Design Supplementary Planning Document Statement of Consultation (November 2019)

Introduction

- 1. The Charnwood Local Plan Core Strategy was adopted in November 2015. It forms the development plan for the Borough alongside the saved policies in the Borough of Charnwood Local Plan (2004).
- 2. A Design Supplementary Planning Document (SPD) is being prepared to provide further information and guidance on the following development plan policies:
 - Policy CS2 High Quality Design
 - Policy CS15 Open Spaces, Sport and Recreation
 - Policy CS16 Sustainable Construction and Energy
 - Policy EV/1 Design (saved Local Plan policy)
- 3. Once adopted, the Design SPD will be a material consideration in the determination of planning applications in the Borough. The Design SPD is intended to replace previously adopted design guidance, which are the Leading in Design SPD from 2005 and the House Extensions SPD from 2003.

Consultation Process

- 4. In accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012, a draft version of Design SPD was consulted on for six weeks between 30th September 2019 and 11th November 2019. The draft Design SPD was informed by a range of meetings with internal Council departments and elected members and a series of design workshops with key stakeholders, including members of the public and developers.
- 5. Prior to the Regulation 12 consultation, workshop meetings were held with Council officers in the Development Management and the Cleansing and Open Spaces Team. This was followed up by an evening meeting with Council Members in July 2019.
- 6. During the Regulation 12 consultation, two workshop sessions were held to support the production of the Design SPD. These workshops were attended by a variety of stakeholders, including members of the public, parish councillors and interest groups. The workshops were held on the following days at the stated locations, between 10:00am and 12:00pm:
 - Thursday 17th October 2019 at Syston Community Centre, Syston
 - Tuesday 29th October 2019 at Charnwood Borough Council Offices (Southfield), Loughborough

7. The feedback from both of the workshop events forms Appendix 2 of this statement.

Consultation Results

8. There were a total of 23 representations made on the draft Design SPD during the consultation period. The full representation made by each stakeholder, as well as the Council's response and proposed actions can be viewed in the table in Appendix 1.

Appendix 1: Table of Received Representations

NAME/ORGANISATION	RESPONSE	OFFICER COMMENTS	PROPOSED ACTION
Dr Amit Bharkada	It is essential that any developments that are put forward, factors in the requirements for health and education. If builds are significant, then consultation needs to occur with local GP practices in order to address the increased population need, especially when the demands on the NHS are increasing. We need to look at how the council and developers can support, in providing safe and effective care which can only really be done with collaborative conversations. The above will ensure the housing developments leaves a positive legacy.	Comments noted. The need for local health practitioners to be engaged early in the development process is acknowledged. The Government's planning practice guidance on design encourages applicants to proactively engage an inclusive, diverse and representative sample of the community so that their views can be taken into account on design. In addition, the Design SPD recognises that achieving high quality design is a collaborative exercise involves a wide variety of built and natural environment professionals as well as members of the local community.	No proposed action.
Cllr Dennis Marchant (for Quorndon Parish Council)	Quorndon Parish Council Planning Committee welcomes the Design Supplementary Planning Document initiative and would like to comment as follows: Introduction 1.3 'Neighbourhood Development Plan' should be included as a document adopted by the council. Reason: 1. Village Design Statements can be and are sometimes included as part of or as an appendix to the Neighbourhood Plan. 2.Design Guidance can be included within the Neighbourhood Plan. Design Principles of Charnwood	Comments noted. It is agreed the status of any made neighbourhood plan in the Borough should be recognised within the Design SPD, as NPs may include policies on design or contain design guidance as an appendix. This is noted and shall be amended in the next iteration of the SPD. The provision of signage for cyclists and pedestrians that is in keeping with the	At paragraph 1.3, add following bullet point: 'Neighbourhood plans (when made)'

3.74 Add: Ensure that Pedestrial destinations are signed by featur the environment. Reason: 1. To encourage visitors use of the Pedestrian and Cycles and increase exercise.	e signs that blend with Local sand residents to make vays to reduce car use how Local on reduce car use which	wever it is the responsibility of the	At Paragraph 3.74, insert new text – 'modal shift from cars, <u>and introduce</u> signage where appropriate'
comments were received regard footpaths and cycle ways and ar 3.144 It is agreed that mitigation noise and indeed reduce the visit essential for development schem highways however, the example of Farley Way, Quorn) is conside example. Reason: Quorndon Parish Councomplaints from this development visual impact as have Charnwood End of Comments.	re Community Actions. The on remeasures that reduce all impact of traffic are set that are close to scheme illustrated (site ared to be a poor cill has received residents at regarding noise and	ne support for the guidance in the SPD mitigating noise impacts is welcomed. regards to the example scheme ctured (Farley Way, Quorn), an ernative scheme shall be considered in a next iteration of the SPD.	Delete Image between paragraph 3.144 and 3.145,.

Design	Midlands
(former	ly OPUN)

Design:Midlands (D:M) www.designmidlands.org (formerly Opun, Architecture East Midlands Ltd) works with local authorities, the commercial sector, developers, communities and design professionals to help create better neighbourhoods, buildings and spaces across the Midlands. It is a charitable company limited by guarantee (Co no. 04456338, charity no. 1143920). D:M specialises in providing targeted and bespoke design support services across the Midlands specifically managing the regional design review panel (DRP).

D:M has been involved, working with Charnwood Borough Council (CBC), in reviewing some major schemes in the Borough. D:M feel that the SPD should make clear reference to the provision of a dedicated design review panel for Charnwood. That would offer transparency and consistency in the design support that could be offered. It is important that the SPD provides clear advice on how that DRP would work, the criteria and objectives that CBC wish to achieve in supporting the Local Plan and SPD ambitions. As the regional provider of DR - we feel D:M has both the local context but regional and national expertise on design, climate change and sustainability best practice that is required to manage a DRP for CBC.

Charnwood design review panel

The context for establishing a design review service is a set out in Charnwood Local Plan Policy *CS2 - High Quality Design*.

To ensure that all applications for major and sensitive developments go through design review, CBC need to provide clear advice in this SPD but also at pre-app. D:M are best placed to support CBC in setting up an independent design review panel that would undertake design reviews of sensitive schemes, ensure meeting of NPPF2 design guidance, as well as the implications of the National Design Guide.

The Design Review Panel is not to duplicate or replace existing in-house design service, or replace

Comments noted. The Design SPD reiterates the requirements of the Charnwood Core Strategy 2015 which states that Design Review is to be carried out for major or sensitive development proposals.

It is acknowledged that Design Midlands is a provider of a design review service within the East Midlands. However, the purpose of the SPD, or any planning document, is not to favour or recommend a particular service over others which may be available. The local planning authority is only able to inform a developer whether a design review is needed to be carried out on their proposal and that it should be undertaken by an independent review panel; it is the developer's choice to decide which service to use.

No proposed action.

Hans Butler	CBCs determination processes. It is an advisory service that will provide independent advice from a multidisciplinary expert panel to support scheme progression and offer support to both the developers and CBC in securing high quality development which meets policy CS2. The Design Review Panel will include a wide range of built environment disciplines to complement and support existing design expertise. These will include: - Urban Design / Building for Life12 - Architecture - Landscape Architecture - Highways - Conservation / Heritage - Sustainability / Energy - Hydrology etc. Design Review charges are generally met by the planning applicant. Costs vary in relation to the size and sensitivity of the scheme. Workshops can also be held to include community representatives and Elected Members. I have skimmed the Design SPD and, as a layman, agree	Comments noted. Support for the SPD is	No proposed action.
	with what is in it and have no other significant comment. I shall not be at either of your two workshops, but will pass on my general support for your process to Councillor Jane Hunt when we next meet.	welcomed.	
Anglian Water Services Limited	Thank you for e-mail relating to Charnwood Draft Design SPD consultation. It would appear that Charnwood District is located outside of our area of responsibility. Therefore we have no comments relating to the content of the Council's Draft Design Guide SPD.	Comments noted.	No proposed action.

Highways England	We welcome the opportunity to comment on the Charnwood Design Supplementary Planning Document (Design SPD). It is noted that this document	Comments noted. Support for the SPD is welcomed.	No proposed action.
	provides guidance on design to support the adopted Charnwood Local Plan Core Strategy 2011 - 2028 in respect of Core Strategy Policy CS2 'High Quality Design', Core Strategy Policy CS15 'Open Space, Sport and Recreation' and Core Strategy Policy CS16		
	'Sustainable Construction and Energy'. Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to the Charnwood Local Plan Core Strategy		
	and supporting Design SPD, our principal interest is safeguarding the operation of the A46 and M1 which route through the borough area. We note that the Charnwood Design SPD is intended to		
	provide general guidance to achieve a consistent high standard of design in Charnwood and to provide greater clarity on how development proposals can meet the policy requirements in the adopted Charnwood Local Plan Core Strategy.		
	We have very limited comments to provide in relation to this consultation although we welcome the clear arrangements set out by the Council to facilitate the delivery of high-quality development including further guidance on highways standards.		
	We have no further comments to provide and trust the above is useful in the progression of the Charnwood Design SPD.		

Alan Johnson	I'm very impressed with the Design Document and you should be congratulated for producing it. I make several suggestions below which may be worth considering.	Comments noted. Support for the SPD is noted and welcomed.	
	It's important that streets, pedestrian paths and cycleways are well maintained. Walking and cycling to local shops, the health centre etc. should be encouraged to improve health and combat obesity. I've noticed that sometimes block paving is patched up with tarmac rather than the original paving being replaced. This is unattractive and gives the impression that the street scene is not cared for and is unimportant.	The Design SPD encourages new developments to support sustainable forms of transportation as much as possible however, in terms of managing the streets and footpaths post-development, this is the responsibility of either the County Council or a private estate management company, and therefore it is beyond the remit of the SPD to provide guidance on this. However, the Design SPD is able to mention that an aspect of good design is the continued management of developments once complete.	No action.
	 I fully support your emphasis on pre-application discussions. 	Noted.	No action
	Have you considered the use of mental maps to help define a locality or a distinctive area with which people identify?	The suggestion for utilising mental maps is useful and should be considered by applicants when they are initially assessing development sites. In addition, the Design SPD encourages new developments to be legible and easy for people to navigate around and more legible development can be easily mentally mapped.	No action
	 You appreciation of the importance of the distinctiveness of areas is excellent IMO. Perhaps you should mention the important of protecting public views such as interesting buildings and landmarks. 	Noted The protection of views towards landmark features can be broadened in the SPD to include those towards key buildings.	No action. At paragraph 3.17, add the following: 'such as differing scales, mass, heights and materials used. Significant views or vistas should be maintained or enhanced in new development proposals.'

- I suggest that more "productive" shrub planting should be encouraged such as rose hips, blackberry and elderberry to encourage foraging and human activity and interaction within residential areas
- Major reservations about developers being encouraged to safeguard mature trees in housing schemes. Large trees in small gardens can shield out sunlight and daylight. Falling branches can pose a danger to children playing in gardens. Also there are issues to do with subsidence. By all means safeguard and incorporate large trees but keep them well away for houses.
- Encourage developers to plant Mulberry trees and Syston plums but ensure that they do not cause safety issues when fruit falls to the ground and poses an accident risk to elderly people slipping on the fruit.
- Crab apple trees can cause problems because
 of the sheer amount of fallen fruit. The one
 planted beside the car park near the Green in
 Syston was a mistake as was the one I was
 encouraged to plant in my garden. The fruit falls
 onto Bath Street, people complain and I have to
 sweep up the apples every few days. Also the
 fallen fruit attracts wasps, so I am told.
- I also suggest that you provide best practice on cycle paths and how they can be incorporated into housing development.

The suggestion of providing more 'productive' planting that people can interact with (e.g. picking berries) can be covered within the Design SPD.

The Design SPD encourages developers to retain mature and healthy trees on the sites they are developing. The SPD provides examples of circumstances where preserving groups of mature trees can be beneficial to the development proposal (e.g. serving as buffers adjoining neighbouring buildings). In general, consideration should be given to the location of mature trees and any proposed buildings on site.

Providing specific guidance on the management of trees after the completion of developments is beyond the remit of the Design SPD. However, landscape management plans are expected to provide detail on how planting schemes are managed after completion of developments. These often accompany planning applications for major developments.

Cycle paths

The Design SPD provides guidance in paragraph 3.74 on how high quality cycle and walking routes can be implemented on site.

Checklist at paragraph 2.7, under 'connections and movement' column, insert 'Use of mental maps'.

At paragraph 3.106, insert following text: 'Trees that bear fruits such as berries or apples can be placed in appropriate areas of a development (e.g. public open space) to encourage a level of interaction and increase availability of healthy food in the built environment.'

The Design SPD is to provide paragraph on maintenance of schemes post-construction.

No action

S Cuff	I would like to see a specific section on good design for house extensions - something very important to residents in parts of Nanpantan Ward, where, as you now we have been blighted by poorly designed & constructed extensions & garage conversions. The attached document can still be found on the CBC web-site. I would recommend that this document is updated and included in the SPD.	Comments noted. The Design SPD provides guidance on design issues that are common to house extension proposals – in particular, the impact upon neighbouring buildings in relation to overlooking and overshadowing. Issues regarding impact upon surrounding context/character is covered under Principle 1 'Respecting and enhancing local character' It is worth noting that under current permitted development rights homeowners are allowed to extend their homes to certain dimensions without the need for planning permission.	Guidance on house extensions to be reviewed and main principles included within the Design SPD.
William Davis Ltd.	I refer to the above consultation document. Please accept this as a formal response to the Supplementary Planning Document consultation (the SPD) on behalf of William Davis Limited (WDL). The representation firstly details a general observation relating to the SPD before focussing upon specific content. General Comment Firstly, WDL would like to question the timing of the SPD and the associated consultation period. Whilst it is appreciated there is a requirement for area specific design in any given Local Authority relating to the existing surroundings and current built form, the basis for any new design guidance derives from Central Government policy. Therefore, with the anticipated "Building Better, Building Beautiful" report due for publication in November 2019, and Government's commitment to produce a National Design Guide/Code it is suggested that the consultation document is poorly timed and could potentially be considered out-of-date by time of adoption. Notwithstanding this, the role of an SPD, as defined by the extant NPPF (February 2019) is to "add further details to policies in the development plan." It is considered that as the Local Plan is currently being reviewed the Polices the SPD is concerned with supplementing may well be subject to alteration during this process. It can therefore	General comments Comments are noted. The production of a Design SPD for Charnwood was an objective set out in the Core Strategy 2015 (paragraph 4.63) and has been timetabled in the current Local Development Scheme (published April 2019). The publication of the National Design Guide and updated guidance on design by the Government is duly noted. It is also acknowledged that the new guidance encourages local authorities to provide their own locally specific design guidance as well, providing it does merely replicate guidance set out in the new Guide. The Design SPD is considered to be in compliance with the the National Design Guide and any future guidance will be taken into account when it is published. The production of the new Local Plan for Charnwood is also duly noted and, in order to ensure compliance with adopted policies, the Design SPD would need to	

be accepted the SPD could be rendered out-of-date once the Local Plan Review process is complete in November 2020.

With the above details in mind WDL is of the opinion the SPD's development should be delayed in order to appreciate the emerging design position at both a Local and National level. This will avoid contrary design requirements and ensure applicants have a clear understanding of what is required from any given proposal.

be reviewed. However, as the Local Plan is currently at an early stage (Regulation 18) and has not been submitted for examination, delaying the Design SPD until after the adoption of the new Local Plan is not deemed practical and may result in incompliance with the NPPF's objectives of achieving high quality design.

No action

Technical Space Standards

Initially, WDL would like to highlight the Council's notion that all new residential developments should consider using the Government Technical Space Standards (as referred to under para 3.96 of the SPD.) In requesting that new homes meet an increased space standard the SPD is initially making assumptions against the viability of projects without clear evidence of need or valid justification. Moreover, Technical Space Standards are not referenced within the Core Strategy. Whilst WDL fully supports the need for high quality design it must be noted that the role of an SPD is to supplement existing Policy and not establish anything new. The NPPF is overtly clear in defining the role of SPDs in stating:

(SPDS) "can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan." (Annex 2.)

The requirement for increased Space Standards is new Policy as it is not part of the extant Local Plan. Therefore, use of these standards must be means tested, consulted upon and independently examined and form part of the Local Plan Review. Reference to these standards within

Technical Space Standards

Concerns relating to the inclusion of the technical space standards within the Design SPD are noted. It is considered appropriate to remove the space standards from the Design SPD prior to adoption.

remove 'Internal Space Standards' box from the Design SPD (below *paragraph* 3.96)

the consultation document is ultra vires to the purpose of an SPD; a precedent established by LJ Gilbart, William Davis and Others vs Charnwood Borough Council (2017) (EWHC 3006.)

It is suggested for the avoidance of doubt reference to Technical Space Standards is removed from the emerging SPD.

50% Frontage Parking Threshold

Within Section 3 parking is discussed. The SPD proposes that, as a rule, "50% of frontages should be for green space and not for parking." William Davis objects to this prescribed standard as, whilst for larger detached properties this can be accommodated within an emerging layout; it cannot be achieved for smaller house types. In allowing for 50% green space to the frontage of, for example, a 2 or 3 bed terraced dwelling whilst also affording the minimum 2 No. 2.4m x 5.5m off street car parking spaces (as dictated within the adopted Leicestershire Highway Design Guide) there would be an intrinsic requirement to allocate rear parking spaces or dedicated parking bays set away from the homes as there is simply not enough space at the frontage of this size of unit to achieve the 50% threshold. This would lead to unattractive and fragmented street scenes with offset parking areas or lead to on street parking; all of which is considered poor design. Moreover, it could ultimately lead to homeowners including hard surfacing to front gardens to gain the required parking.

Rear Parking Provision

Notwithstanding this position, the introduction of rear parking areas reduces the level of surveillance and therefore would not be supported by the local constabulary. Furthermore, in achieving the 50% green space to all frontages the density of layouts would be reduced, which would impose an unnecessary burden on developers and could adversely impact upon viability, which is not supported by the extant NPPF.

50% Frontage Parking Threshold

Concerns raised regarding the 50/50 approach to house frontages are noted. The Design SPD sets out guidance which is not required to be followed by developers but is encouraged to be considered when drawing up proposals. In response to some of the concerns raised, however, it is considered appropriate to amend the guidance to encourage this approach for larger dwellings in particular or for larger plots on sites.

Amend language in document to encourage 50% frontage parking threshold for larger dwellings in particular or for larger plots on sites. Below paragraph 4.10, add new paragraph: 'The 50/50 approach may be more appropriate to be applied fronting larger dwellings.'

Rear parking provision

Concerns are noted. The Design SPD encourages a mix of parking solutions to be considered in developments, which includes parking provision to the rear of buildings. In addition, the Design SPD encourages any rear parking provision (e.g. rear parking courts) to be well overlooked by neighbouring buildings, providing them a good level of security

Landscaping strip

In addition to this, the SPD puts forward the notion that tandem properties are to include landscaping strips of 1 metre to separate adjoining hard surfaced parking areas. This is not practical as it would impact upon density and therefore pose viability and deliverability concerns for some projects. Notwithstanding this, these strips would leave unsightly areas as in reality management companies wouldn't undertake their maintenance and ownership concerns between neighbours could lead to either a lack of upkeep or inconsistency between maintenance of strips on the same street; ultimately leading to messy, inconsistent street scenes. All of which is considered poor design.

WDL therefore objects to the 50/50 approach and landscaping strips and requests these are removed from the SPD.

and making them more attractive for people to use.

Landscaping strips

Concerns regarding the upkeep of landscaping strips post-completion are noted. In light of these comments, it is considered appropriate for the SPD to add guidance on how landscaping strips should serve a clear purpose (e.g. be part of a planting scheme or SuDs).

At the end of paragraph 4.11 add following: 'Any landscaping strip should serve a clear purpose such as provide planting or serve as part of a SuDs scheme.'

B Allborough	Having examined the Reception copy, with the same difficulty as previously due to the single staple in a top-left position (solution: 2 staples left side to create book format for easy study), may I comment as follows: 1. Pages 6 & 7: As the 'Planning' department should you have ensured that the headings on page 6 should be on the same page as the table on page 7? – not easy on separate pages!	Pages 6&7 Comments noted. Issues relating to the presentation of the document are acknowledged and shall be addressed for the final published version of the SPD.	Amend document accordingly.
	Item 3.77: seems contrary to CBC current policy of switching off lights on many streets	Item 3.77 Comments noted. The Design SPD encourages good lighting schemes on new development to help improve wayfinding, safety and support vitality within the evening hours. The switching off of street lighting is the responsibility of the County Council and is not a planning or design matter.	No action.
	Item 3.80: should also mention that speed humps are proven to damage small vehicles	Item 3.80 Comments noted. The Design SPD recognises that speed humps can be hazardous to certain road users and states that they should not be relied upon, though their installation in some cases may be necessary on the advice of the Local Highway Authority.	No action.
	Item 3.81-85: Signboards on pedestrian areas (& on major roads) must be clear of the vegetation covering them in many areas	Item 3.81-85 Comments noted. The Design SPD provides good design guidance and advice for new signage above shopfronts. The management of any existing signage (for example, clearing them of vegetation) is the responsibility of shop-owners and the Design SPD is not able to provide guidance on how people should do this, as it is neither a planning or urban design matter.	No action.

Carter Jonas LLP obo	Chapter 2: The Design Process	Comments noted. Our responses to each	No action.
Taylor Wimpey UK Ltd	Taylor Wimpey supports the staged approach identified by the Council to ensure that the context of development sites are fully understood and that final design proposals respond to this. The guidance contained in the SPD confirming that the Design and Access Statement is the appropriate document for this process to be detailed in is also supported.	issue raised are provided below, by individual section:	
	Design review The use of design review, in accordance with the NPPF, is supported by Taylor Wimpey. However, paragraphs 2.22 and 2.23 of the SPD should provide further clarity regarding this process. As currently drafted paragraph 2.23 states: "Applicants will be informed by the Council when independent design review is required for their development proposals". Further information should be provided regarding proposals that are likely to require design review; and the process that the Council will go through to implement this, including likely timescales and costs. This would ensure that the design review process was transparent and could be fully accounted for from the outset of development proposals being brought forward.	Design review The Design SPD reiterates the policy requirement in the Core Strategy for major or sensitive developments. The definition of 'major development' in the context of the policy is the same as the NPPF definition, as follows: 'For housing, development where 10 or more homes will be provided or the site has an area of 0.5 hectares or more. For non-residential development, it means additional floorspace of 1,000m2 or more, or a site of 1 hectare or more, or otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015'. It is considered appropriate for the SPD to provide some clarity on the type of proposals that are likely to require Design Review. Design Review will be required on proposals that the Council identifies as being sensitive.	Add to Paragraph 2.23 'Some examples of recent proposals in the Borough which have been subject to design review have been the sustainable urban extensions (SUEs) and the Loughborough University Science and Enterprise Park. Design review will be required on proposals which the Council identifies as being sensitive.'
	Paragraph 3.6 The recognition in paragraph 3.6 that new developments should take inspiration from existing features but not necessarily replicate these is supported; as is the acknowledgement that successful design often incorporates existing architectural characteristics in more contemporary buildings.	Paragraph 3.6 Comments noted and support welcomed.	No action.

Building height, street width ratio – Paragraphs 3.13, 3.14 The guidance contained regarding building heights is noted. However, a flexible approach should be taken to the application of this in order to ensure that site context fully informs the design of the proposals without being unduly constrained by generic design guidance.	Building height, street width ratio – Paragraphs 3.13, 3.14 Comments noted and support welcomed. The guidance within the Design SPD is intended to be utilised in a flexible manner and dependent upon individual site context.	No action.
<u>Development in the landscape – Paragraphs 3.23</u> Paragraph 3.23's recognition that new developments of the edge of towns and larger villages have the ability to ensure a harmonious relationship between the existing settlement and the surrounding landscape is supported.	<u>Development in the landscape – Paragraph 3.23</u> Comments noted and support welcomed.	No action.
Green Infrastructure – Paragraph 3.54 The recognition that green infrastructure can take many different forms and be managed in different ways is supported. This allows flexibility when development proposals are being brought forward to enable the most appropriate form of green infrastructure to be brought forward on particular sites, dependant on its purpose and context. This also assists in improving the range of open spaces available to residents of the Borough.	<u>Green Infrastructure – Paragraph 3.54</u> Comments noted and support welcomed.	No action.
Public art Further clarity is needed regarding when public art will be required by the Council. This would provide certainty from the outset of development proposals being brought forward meaning that public art could be integrated from the outset.	Public art Public art is not a requirement sought by the Council but it is seen as a significant opportunity to contribute to the distinctive of a place.	No action.
Principle 3: Well connected and legible streets and spaces It is acknowledged that well-designed streets are a crucial factor in allowing developments to function well and providing high quality public space. The guidance contained in the SPD provides a useful reference point for the design of streets throughout developments in order to ensure that these maximise pedestrian and cyclist safety and opportunities for the use of these more sustainable travel modes.	Principle 3: Well connected and legible streets and spaces Comments noted and support welcomed.	No action.
		No action.

Principle 4: Creating multi-functional, safe and inclusive	Principle 4: Creating multi-functional, safe	
<u>places</u>	and inclusive places	
The SPD sets out the opportunities that new	Comments noted and support welcomed.	
developments bring for improving the quality of life of local		
communities and bringing about positive change. The		
principles set out within this guidance are supported and		
the positive outcomes of new development should be		
highlighted through the application process.		
riigriiigriited tiirougri tile application process.		No action.
Deinsials E. Adopting to Climate Change	Drive into E. Adopting to Climate Change	NO action.
Principle 5: Adapting to Climate Change	Principle 5: Adapting to Climate Change	
The guidance contained in this section of the SPD	Comments noted and support welcomed.	
regarding new developments impact on trees,		
biodiversity, sustainable drainage systems and energy		
efficiency is supported. It is recognised that these aspects		
have an important role to play in shaping the design of		
development proposals and ensuring that these result in		
the creation of positive places for people to enjoy; whilst		
ensuring there longevity into the future.		
		No action.
Principle 6: Protecting the amenity of existing and future	Principle 6: Protecting the amenity of	
occupiers	existing and future occupiers	
Ensuring the amenity of existing and future occupiers is	In regards to separation distances, the	
key to Taylor Wimpey when bringing forward	Design SPD states that for every 0.4m	
development proposals. The guidance contained in the	difference in floor height, separation	
SPD provides a useful reference in the design of new	distances should increase by 1m. This	
development.	guidance should be utilised for	
	intermediate heights (e.g. 2.5 storeys) of	
It is noted that separation distances are provided for 2	new dwellings.	
storey dwellings and 3 storey dwellings but not		
2.5 storey dwellings. Clarity on this point would be helpful.		
The flexibility provided by paragraph 3.140, confirming		
that the guidance set out will be applied having regard to		
the wider design issues and site context, is welcomed. It		
is, however, noted that paragraph 3.141 states: "As a		
guide, separation distance should be increased by 1m for		
every 0.4m difference in floor levels between dwellings." It		
will need to be ensured that this guidance is applied on a		
site specific basis as this could be particularly challenging		
on sloping sites.		No office
A 1 100 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		No action.
Additional parking guidance	Additional parking guidance	
	Comments noted and support welcomed.	

	The information contained within the SPD regarding parking design is helpful. However, a holistic approach should be taken in order to ensure the most appropriate solution for an individual site is delivered. The variety of typologies for car parking that the SPD contains is supported in order to ensure that the most appropriate form of car parking for particular sites can come forward.		
Historic England	Reference to heritage assets and their settings should be included throughout. It may be helpful to include reference to heritage within paragraph 2.5. Reference is welcomed within paragraph 2.7. 2.7 should also include reference to settings and it may be helpful to change the title of the column to 'heritage assets and their settings', to more closely reflect the NPPF, also separating natural designations in relation to wildlife sites into a separate category. Reference to heritage advice would also be helpful, within the Design Process section for example, such as Good Practice Advice 3: The Setting of Heritage Assets https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritageassets/ Within Design Principles, reference to heritage assets and their settings, within the existing text or a as a standalone section would be welcomed.	Comments noted. The Design SPD provides guidance for all types of proposals, including those which could affect heritage assets and their settings. However, it is considered appropriate to identify heritage assets in the table at paragraph 2.7 to give further clarity to developers on examples of key constraints that should be identified early in the site assessment stage. It is also considered appropriate to reference 'Good Practice Advice 3' within the SPD, as further guidance for developers to consider.	Amend paragraph 2.5 to include reference to heritage assets 'to identify key visible features including the topography, key views, nearby footpaths, neighbouring buildings/land uses, heritage-assets and significant landscape features' Reference 'Good Practice Advice 3' in the Design SPD and provide web link.
Gladman	Introduction This letter provides the representations of Gladman made in response to the current consultation on the Charnwood Design SPD (the Design SPD). Gladman acknowledge the key emphasis placed by the Government on securing good design in new developments through national planning policy. The preparation of the Design SPD gives rise to the opportunity to clarify design policies of the Core Strategy which will assist applicants and decision makers alike in the implementation of policy and the delivery of high-quality developments. The Council's decision to renew its current design guidance is therefore welcomed by Gladman.	Comments noted and the general support for the content of the SPD is welcomed. The Design Review is required under Policy CS2 of the Core Strategy for major or sensitive developments. The Design SPD states that applicants will be informed when it is considered appropriate for them to pursue a design review.	No action

Gladman attended one of the workshop events organised by the Council as part of this SPD preparation process. The event was useful and well attended. Gladman is grateful for the Council's invitation to attend the event and opportunity provided to meet and discuss the Design SPD with officers, stakeholders, and members of the community. Gladman's comments on proposals for the Design SPD as drafted are provided below.

SPD Scope and Purpose

As the Council is no doubt aware, the SPD process should not be used as a method to introduce new policy requirements through the backdoor outside of the Local Plan preparation process. The new Local Plan, which is being prepared by the Council separately but in parallel to this SPD, represents the most appropriate process for the Council to pursue a new policy direction in relation to design, open space, climate change and planning obligations where justified and deliverable.

Early on within the Draft Design SPD, the Council clarify that the SPD's purpose is to provide guidance on how a high standard of design can be met in response to Policies CS2 High Quality Design, CS15 Open Spaces, Policy CS16 Sustainable Construction and Energy, and saved policy EV1 Design.

In broad terms, Gladman consider that the Design SPD as drafted achieves this brief and provides for a sufficiently transparent but flexible explanation of the Council's expectations for design in new developments which is responsive to these policies. The Design SPD is therefore considered to achieve the correct balance in providing sufficient guidance to assist applicants in the interpretation of cited policies, whilst ensuring that its content is not too prescriptive in its requirements which could otherwise harm the deliverability of development in the District.

The only exception to the above is in relation to guidance provided for the Design Review as required through Policy CS2 of the Core Strategy. As drafted the Design

Design Review will be sought for major applications (as defined by the NPPF) and sensitive development proposals –

Document amended accordingly

SPD adds little which explains the role/requirements of Design Review which would benefit applicants and decision makers. It is unclear on what basis an independent design review will be required beyond being related to a "major" or "sensitive" development. Key and unanswered questions relating to the Design Review include: The type of application it relates to (for example, how applicable is the design review to outline applications where access is the only detailed matter?);	the Design SPD will be amended to clarify under which conditions a proposal will likely be seen as 'sensitive' by the Council and subject to Design Review. Design Review will assess and provide their views on the design of the scheme as a whole, regardless of what feature (e.g. access) is being sought consent at that stage.	No action
Under what mechanism and how the Design Review will take place?	The exact mechanism of the design review is determined by the provider of the review panel.	No action
Who will undertake the Design Review?	The applicant can decide which provider of design review to employ.	No action
Are there further requirements of the Design Review which go beyond validation requirements or the guidance otherwise set out in the Design SPD?	The purpose of Design Review is to provide recommendations in relation to the design of proposals. The Design SPD (once adopted) will be a consideration in formulating those recommendations.	No action
What weight is attached to the Design SPD when undertaken the Design Review?	The Design SPD will be a very significant consideration when undertaking the Design Review. 'Weight' is a matter to be considered when determining a planning application, which is a separate process.	No action
Over what timescales will the Design Review be undertaken? and	The exact timescales of a Design Review procedure shall be determined on a case by case basis.	No action
Is there an opportunity for an applicant to respond to conclusions made?	Applicants will be able to respond to conclusions made by the Design Review.	No action

To ensure that the SPD meets its defined scope in relation to Policy CS2, Gladman consider that the above should be clarified within the Design SPD before it is adopted.

Alignment with National Planning Policy

It is acknowledged by Gladman that the Design SPD is being produced at a transitional period for national planning policy which creates difficulties in ensuring that the SPD is fully aligned with this evolving context. The Design SPD is responsive to the policy requirements of the Core Strategy which was adopted in 2015. However, since adoption of the Core Strategy, national planning policy has been updated by the Government with the 2019 NPPF now forming the most up-to-date document. In addition, the Government has published updated to Planning Practice Guidance, and has recently issued the National Design Guide

Having reviewed the Council's draft proposals for the Design SPD, Gladman consider that, in most areas, the Design SPD is aligned to the policies of the 2019 NPPF, updates to PPG, and the newly issued National Design Guide.

Density

An evident weakness of the Design SPD as drafted however relates to the national planning policy requirements for the effective use of land and the achievement of appropriate density. The guidance currently provided in the Design SPD only relates to directing higher density at very accessible locations. This does not translate exactly to reflect the policies of the 2019 NPPF which seeks to promote higher density where there is a shortage of available land, and the need to consider market conditions, the need for specific types of housing, and local character. The failure to make effective use of land may now amount to a reason to refuse a development, and so greater guidance as to how the Council would expect developments to make effective use of land is of increased importance for applicants.

The scope of the SPD is being checked against Core Strategy Policy CS2.as part of the responses to consultation responses received and the actions listed.

Noted

Density section

On the matter of density, the Design SPD provides guidance on where higher densities may be most appropriate from the perspective of achieving the requirements. Higher density development being located in very accessible locations is one example of appropriately considering density in good design practice. It does not seek to override the NPPF's objectives of making effective use of land, which ties in with development density. Nevertheless, it would be prudent to clarify the SPD's role by amending the density section of the document.

Amend paragraph 3.20 as follows: 'Town centres and other locations well served by public transport provide an opportunity to increase the density of developments.

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Draft Local Plan 2036

The SPD will need to be reviewed following adoption of the Local Plan. The Government's emerging standards for home building as to be implemented as part of the Future Homes Standards currently being consulted on may also need to be considered.

Conclusions

Gladman welcome the opportunity to commitment on the draft Design SPD and thank the Council for the invitation to attend the related workshop.

In broad terms, Gladman consider that the Design SPD as drafted achieves its purpose and provides sufficient guidance as to how the Council wishes relevant policies of the development plan to be implemented to achieve high standards of design. Importantly the guidance is flexible and avoids the application of prescriptive requirements which go above and beyond existing policy.

Further guidance is however required in order to clarify the role and process of the Design Review as required through Policy CS2 of the Core Strategy.

A clear challenge during the preparation of the Design SPD has been to ensure consistency with both the relevant policies of the Core Strategy and changes to national planning policy and guidance. Gladman largely consider that the Council has achieved this successfully within the Draft Design SPD, though there is a clear disparity in the guidance provided in relation to the effective use of land and density which does not reflect most recent national planning policy. A revision should be made to the Design SPD as drafted to account for this.

The SPD will need to be updated following adoption of the emerging Local Plan, and where required in response to any potential changes made to national planning policy and enhanced building standards.

Draft Local Plan 2036

The need for the Design SPD to be reviewed following adoption of the Charnwood Local Plan 2036 is noted.

Noted No action

Thank you for the opportunity to comment on your consultation. Severin Trent are generally supportive of the principles outlined within the Charmwood Borough Council Draft Design Supplementary Planning Document, there are however a few elements of the document that we feel could be enhanced to ensure the delivery of the objectives indicated by the design SPD related to the functions of a Water and Sewerage Provider. Water Efficiency Water is a valuable resource, to ensure that sufficient potable water is available to accommodate future growth within and beyond the local plan period without causing any adverse impact on the environment. Severin Trent are looking for new reliable sources of water that can be used o limate change are likely to have an impact on the availability of water, meaning that we need to start being more responsible in how we use water. Severin Trent would therefore strongly encourage the inclusion of a section of Design SPD to address this water efficiency. Part G of Building Regulations highlights a maximum water consumption rate of 110 Litres of water peer person per day, but it also identifies that an optional rate of 110 Litres of water peer person per day can be utilised, paragraph 2.8 of Building Regulations part G states: 'The optional requirement only applies where a condition that the dwelling should meet the optional requirement is imposed as part of the process of granting planning permission. Where it applies, the estimated consumption of wholesome water calculated in accordance with the methodology in the water efficiency; should not		Should the Council wish to discuss the content of these representations any further then please do not hesitate to get in touch.		
Water is a valuable resource, to ensure that sufficient potable water is available to accommodate future growth within and beyond the local plan period without causing any adverse impact on the environment, Severn Trent are looking for new reliable sources of water that can be used to augment our current supply, however Growth and climate change are likely to have an impact on the availability of water, meaning that we need to start being more responsible in how we use water. Severn Trent would therefore strongly encourage the inclusion of a section of Design SPD to address this water efficiency. Part G of Building Regulations highlights a maximum water consumption rate of 125 litres of water per person per day, but it also identifies that an optional rate of 110 Litres of water per person per day can be utilised, paragraph 2.8 of Building Regulations part G states: "The optional requirement only applies where a condition that the dwelling should meet the optional requirement is imposed as part of the process of granting planning permission. Where it applies, the estimated consumption of wholesome water calculated in accordance with the methodology in the water efficiency calculator, should not	Severn Trent	consultation. Severn Trent are generally supportive of the principles outlined within the Charnwood Borough Council Draft Design Supplementary Planning Document, there are however a few elements of the document that we feel could be enhanced to ensure the delivery of the objectives indicated by the design SPD related to the		No action.
It is therefore advised that this recommendation is		Water is a valuable resource, to ensure that sufficient potable water is available to accommodate future growth within and beyond the local plan period without causing any adverse impact on the environment, Severn Trent are looking for new reliable sources of water that can be used to augment our current supply, however Growth and climate change are likely to have an impact on the availability of water, meaning that we need to start being more responsible in how we use water. Severn Trent would therefore strongly encourage the inclusion of a section of Design SPD to address this water efficiency. Part G of Building Regulations highlights a maximum water consumption rate of 125 litres of water per person per day, but it also identifies that an optional rate of 110 Litres of water per person per day can be utilised, paragraph 2.8 of Building Regulations part G states: "The optional requirement only applies where a condition that the dwelling should meet the optional requirement is imposed as part of the process of granting planning permission. Where it applies, the estimated consumption of wholesome water calculated in accordance with the methodology in the water efficiency calculator, should not exceed 110 litres/person/day"	guidance to help interpret requirements for Policy CS16 'Sustainable Construction and Energy'. A key criteria of this policy is: • Encouraging residential development to meet the equivalent of Code for Sustainable Homes Level 5 for water efficiency (80 litres/person/day) As water efficiency is encouraged through adopted planning policy in the Borough, it is considered that it is not necessary to repeat this within the	No action.

to be design in accordance with this standard and ensure that developers are aware of this at an early stage. By implementing the optional rate we are able to mitigate the some of the impacts new development will have on the water cycle and the natural environment through increase water supply needs.		
Further information regarding this aspect is covered in our standard guidance below for water efficiency.		
Paragraph 2.7 The checklist identify the starting point for design, Surface water management has become an increasingly important characteristic of site design in recent years, whilst the LLFA will provide support to Local Planning authorities regarding the design of the surface water systems, these features can have a significant impact on the performance of new and existing sewers, we would therefore recommend that flood flow routes are identified within the Physical and Natural features column.	Noted	No action
We are also supportive of these needing to be assessed, it is important that watercourses are retained, as open features within development associated with open space to enable access to be obtained for maintenance and flood risk prevention. These features are an important part of the water system and provide sustainable outfalls for current and future development.		
Severn Trent would also recommend that the built and human features column includes a reference to existing services and utilities and any associated easements as these could have significant impact on the potential layout for development, in some cases it may be feasible to divert these features, but in some cases this is impractical and early consideration / discussion on these points could mitigate the need for expensive re-design at later stages of planning at design	Noted.	Also in same Checklist, add 'utilities and infrastructure' under the 'Built and human features' column.
Paragraph 2.20 Pre – application discussions, we would note that preapplication discussion should also be held with key stakeholder such as service providers like Severn Trent,	The Design SPD states that pre- application discussions can be used to identify specialist bodies and organisations who may need to be	No action.

this can help to identify any constraints or risk to the development schedules early.

engaged/consulted by developers as they progress their schemes. If specific constraints have been identified as part of a pre-application submission (developers are encouraged to have undertaken site analysis prior to meeting the local planning authority) then the planning team can inform developers of which organisations to contact and at what point in the process will mitigation measures likely need to be implemented.

No action.

<u>Principle 1: Respecting and enhancing the Local</u> Character

Severn Trent recognise the importance of protecting the natural character or settlements and the local area. We also note that some features that play an important part in both place setting and natural processes, key features from a sewerage perspective is the performance of surface water assets such as watercourses, ditches and land drains, whilst these features should not connect into the sewerage system the removal of these assets can result in a detrimental impact on sewer performance. As flows are re-directed into the sewerage system. We would therefore recommend that these features are recognised within this section as this ensure that they are protected as open features. Where they are considered as part of the design they can be utilised alongside SuDS features within areas of open space, enhancing both biodiversity and amenity for new developments and result in blue – green corridors through development for wildlife.

Concerns are noted however this section deals with explaining how proposals can respect and enhance the built environment through their design and how they can limit their impacts upon the natural environment (for example, when development is proposed to the edge of settlements bordering open countryside). Any potential impacts upon utility systems and other existing infrastructure should be identified as constraints during site assessment phase and are best reiterated in the Design Process section.

No action.

Public Open Space

Paragraph 3.37 highlights that "streets can be made more attractive and multi-functional by introducing planting and landscaping as well as street furniture." We are supportive of the principle of planting green features that create multifunctional space, in particular where surface water management is considered part of the multi-function incorporated. There are a number of Source control SuDS techniques that could be used to assist with this such as Tree-pits, Bio-retention areas and rain gardens. It is

Comments noted. The Design SPD encourages the implementation of SuDs within open amenity spaces provided on

new developments.

th oo the second	strongly recommended that this is acknowledged within the design SPD. Paragraph 3.40 talks about individual open spaces that are part of an interconnected network this approach should be aligned with SuDS principles in such that the site is design utilising a sub catchment or		No action.
S C o o	Principle 5: Adapting to Climate Change Severn Trent is supportive of the inclusion of principle 5. Climate change is anticipate to have a significant impact on rainfall and surface water flows, this will in turn impact on sewerage performance and design, as such new development should be designed with these impacts in mind.	Comments noted.	
b n s lo p n u a	Paragraph 3.105 Trees Severn Trent are supportive of planting trees to enhance biodiversity and these can be utilised to assist with the reduction in surface water flows getting to the sewerage system. It is important however that were trees are ocated within the urban environment the opportunity to provide multiple benefits including surface water management through the inclusion of tree-pits is also undertaken. The use of tree-pits can assist with the appropriate development of the trees as well as surface water management, providing wider benefits to the development.	Comments noted.	No action.
<u>d</u>	Paragraph 3.116 Maximising biodiversity creation on new development Severn Trent is supportive of the principle to maximise Biodiversity within new development as it can assist with	Comments noted. The Design SPD encourages developers providing SuDs to refer to the CIRIA SuDs Manual for more comprehensive guidance on	No action.

the mitigation of climate change and management of surface water flows. We would note that where SuDS are designed in accordance with The SuDS Manual (CIRIA) they can result in increased bio-diversity elements. We would also recommend the consideration of Blue –Green corridors where that can enable wild life to pass through new development preventing the segregation natural habitats through the development. These corridors will also enable watercourses and SuDS to be located in open spaces, resulting in multi-functional space that can minimise the land take needs for surface water management and open space requirements.	various design approaches to SuDs implementation.	No action
		No action.
Sustainable drainage systems Severn Trent is supportive of the inclusion of SuDS within new development therefore we are supportive of paragraphs 3.119 - 3.121 for the reasons outline earlier in our response. Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice. For your information we have set out some general guidelines that may be useful to you.	Comments noted.	
to you.		No action.
Position Statement As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.	Noted.	
		No action.
Sewage Strategy	Noted.	

Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works. No action. **Surface Water and Sewer Flooding** Comments noted. It is beyond the remit We expect surface water to be managed in line with the of the Design SPD to provide guidance Government's Water Strategy, Future Water. The strategy on the design and specifications of sewer sets out a vision for more effective management of systems. surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer. We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers. To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More

Water Quality

details can be found on our website

Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency's Source Noted.

Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.

Water Supply

When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts.

We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.

Water Efficiency

Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations. We recommend that in all cases you consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.
- Hand wash basin taps with low flow rates of 4 litres or less.
- Water butts for external use in properties with gardens.

To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean

Noted.

No action.

Comments noted. The Design SPD cannot provide standards on the installation of efficient bathroom fittings such as toilets and showers, as this is not a planning matter. The Design SPD also can impose any expectations upon developers, as this would constitute as additional policy requirements which SPDs are not able to seek. However, in regards to water efficiency, Policy CS16 does require developers to consider water efficiency in their development proposals through the following criteria:

 Encouraging residential development to meet the equivalent of Code for Sustainable Homes Level 5 for water efficiency (80 litres/person/day)

	water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website We would encourage you to impose the expectation on		
	developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.		
	We hope this information has been useful to you and we look forward in hearing from you in the near future.		
Environment Agency	Thank you for giving the Environment Agency the opportunity to comment on your Design Supplementary Planning document.	Noted.	No proposed action.
	We do not have any bespoke comments to make on this submission.		
Leicestershire County Council Highways	This response is being made on behalf of Leicestershire County Council as the Local Highway Authority (LHA).	Noted.	No action.
	The LHA welcomes the opportunity to comment on the Borough Council's draft Design Supplementary Planning Document (DSPD). It is committed to continuing to work with Local Planning Authorities and other bodies to support the delivery of houses (and jobs) to meet the future needs of Leicester and Leicestershire's growing population. It also recognises intentions to create attractive, safe and distinct places for people to live in.		
	However, like many other LHAs the County Council faces significant financial challenges in seeking to maintain even its existing highway assets (including roads, footways, cycleways, signs, lines, structures, street lighting, etc.). Increasing lengths and numbers of assets will only add to these pressures, especially where there are desires to create housing developments that move away from using standard pallets of highway materials and that incorporate, public spaces, extensive street furniture, trees or planting in the public highway ('non-standard design elements').	Noted.	No action.

The LHA would therefore wish to see the final version of the Borough Council's DSPD placing a strong emphasis on the importance of maintaining the quality of a development throughout its lifetime. It would also want the final DSPD to highlight the need for appropriate maintenance strategies to be put in place where the use of 'non-standard design elements' are proposed, including the need for payment of commuted sums to the LHA. Such matters are best addressed at the earliest stages in the development of a site's design and layout; the promotion of early joint discussions between the site promoters, Local Planning Authority and LHA should be referenced in the final version of the DSPD.

Comments noted. We note the importance of management strategies for streets and public spaces after development schemes are completed in order to retain their quality and use. The Design SPD shall contain guidance on where this would be appropriate for developers to pursue.

Amend paragraph within Providing attractive and well managed public and private spaces

"For new public spaces it is important that long term maintenance strategies are considered at an early stage in the design process, and this should involve discussions with key stakeholders such as the Local Highway Authority".

The LHA is also committed to promoting means of travel alternate to the private car, recognising the environmental and public health benefits that this can bring. It acknowledges the importance that well-located, well-designed and well-connected developments can help to play in achieving this. In this respect, it would like to see the final version of the DSPD strengthened to ensure that transport connectivity is considered early in the process of a site's planning, including (as appropriate) through master-planning and the transport assessment process. This will enable the LHA to be best placed to provide advice on how it might be appropriate to provide for means of travel other than by private car in the light of any existing provision(s) in the area of a site and of any of its own policies, strategies, plans and initiatives.

Comments noted. The Design SPD encourages that developers undertake thorough site assessments prior to determining proposal layouts and design priorities etc. The Design SPD provides a checklist (under paragraph 2.7) to provide a starting point for developers to carry out site assessments. The matter of transport connectivity e.g. proximity of site to public transport connections is covered under the 'connections and movement' column.

No action.

In the light of Leicestershire County Council's formal declaration of a Climate Change Emergency, it is supportive of seeing greater numbers of electric vehicles on our roads, to replace fossil-fuelled cars. Provision of charging points across the Country remains a challenge to greater electric vehicle ownership and usage (and the LHA, like many other bodies, continues to press Government for a common, national strategy for / approach to the development and delivery of charging infrastructure). In this respect, the LHA considers that the final DSPD could be stronger in its reference to the provision of charging points, especially in the design of new houses.

Comments noted. The Design SPD cannot require electric car charging points to be implemented in new residential developments, as this is a matter for local planning policies to address. The Design SPD provides guidance on how electric car charging points should be designed in order to appear congruous with surrounding street character. This is supplied within 'Additional principles for well designed parking' in Appendix 1: Additional parking guidance.

I hope that this response will be of assistance in shaping the final version of the Borough Council's DSPD. The LHA would be happy to discuss its comments further with the Borough Council as necessary.

Clarification comments received from Leicestershire County Highways

- 1.The LHA would therefore wish to see the final version of the Borough Council's DSPD placing a strong emphasis on the importance of maintaining the quality of a development throughout its lifetime': Where there is deterioration of appearance and attractiveness overtime, this can detract from a development's original quality. Thus, the LHA would wish to see text included in the final version of the Design DPD that highlights the importance of seeking to ensure that the quality of a development can be maintained and is lasting throughout its lifetime, and is not just about its appearance at time of completion.
- 'It would also want the final DSPD to highlight the need for appropriate maintenance strategies to be put in place where the use of 'non-standard design elements' are proposed, including the need for payment of commuted sums to the LHA': This comment is linked to the first. Despite having some of the best maintained roads in the country, the LHA no longer has sufficient funds to seek to maintain in a constant state of condition even its existing highway assets, let alone to deal with the additional liabilities of new assets created as part of new developments. (The LHA no longer receives increases in its maintenance block grant from Government to make allowance for additional assets.) Thus, in the interests of seeking to maintain the long-term quality of developments where 'non-standard design elements' (examples of which were given in the LHA's original response) are intended to be incorporated, it is important that appropriate long-term maintenance strategies are put in place, including the possible use of commuted sums. The LHA would wish to see the final version of the Design DPD include a section on long-term maintenance strategies.
- 3. 'Such matters are best addressed at the earliest stages in the development of a site's design and layout;

Comments noted. It agreed that the importance of maintaining the quality of development through its lifetime should be referred to within the Design SPD.

Amend Materials and Detailing section:

"The choice of materials which do not deteriorate in their attractiveness over time is important in maintaining the quality of a development throughout its lifetime".

Agreed.

See proposed amendment within attractive and well managed public and private spaces.

	T		
	the promotion of early joint discussions between the site promoters, Local Planning Authority [LPA] and LHA should be referenced in the final version of the DSPD': The LHA is conscious of issues of site (financial) viability. In this respect, it considers that it is important for site promoters / developers (and indeed the LPA) to be aware of a site's potential highways and transportation related costs, including in respect of possible costs relating to long-term future maintenance of 'non-standard design elements', at the earliest opportunity in order to feed into site costs / viability considerations. This should help to avoid issues arising at later stages in the planning, design and delivery of a development. The LHA would therefore wish to see included in the final version of the Design DPD text that stresses the need for early joint discussions between the site promoters, LPA and LHA so that design issues can be discussed; the potential for incorporation of 'non-standard design elements' can be identified; and in principle agreement reached about the proposed long-term maintenance strategy.	Noted. Charnwood Borough Council welcomes early joint working with the Local Highway Authority.	No change
Cllr M Draycott	Chapter 1 Introduction First yes housing is needed but not the bog standard designs going up which where ever you go all look the same. It is social housing that is needed and good quality does not mean expensive. In this document I do not agree of more of the same. Adding even more properties to existing settlements who are struggling now to cope with the 1000s of new homes, with no improvements to the infrastructure, is not acceptable. It is destroying local identities such as Shepshed and within a decade it will be joined to Loughborough and no longer recognisable as its former self; Shepshed Town. Rather with so many more properties being proposed in Loughborough & Shepshed mainly, there is enough to build them as one settlement or a new SUE. To the East of Loughborough there is plenty of land to do this and could butt up against the boundary of Loughborough ie. Cotes for example, which developers are already interested in. Plus the Planners argument about	Comments noted. Concerns raised about development at Loughborough and Shepshed and the pressure upon infrastructure are noted however, this is a matter for the Local Plan to address. The Design SPD is primarily focused upon explaining how development can be better designed to reflect the requirements of Policy CS2 of the Core Strategy and the NPPF's objectives for achieving high quality design in new developments.	No action.

"infrastructure would be to costly" would not apply in this case to this site. Loughborough, villages and towns already made larger need a respite and it does not seem right that large areas to the East of the Borough are not sharing the pain.

Finally I welcome the inclusion of sites for Gypsies, Travellers and Travelling Show people but the figures seem very small and will take decades to deliver. Again with such a large borough surely more sites could be made available and in decent places.

Industrial Heritage. I welcome the inclusion of Nottingham Road, Loughborough becoming a Gateway in and out of the town centre. Thousands of people from the railway station use this road and it is in great need of some TLC in order for it to be of the same standard as say Epinal Way, flower baskets and all plus more litter bins.

Principle 1 Respecting and enhancing the local character To have all new housing in neat and orderly rows has resulted in estates all looking the same and soulless. Its stated Respecting and enhancing local character that means building properties that represent the area and being different is not bad practise.

Principle 5 Adapting to Climate Change

Houses being built are not fit for the future. They need to be better insulated, zero carbon standard etc instead of the bog standards being applied now. Social housing should be being build as the greatest need and can be of good quality as Norwich City Council's recent eco efficient Goldsmith street Council housing project confirms.

The Design SPD encourages all new development to consider ways in which it can be made distinctive, balancing innovative and different designs while at the same time respecting local identity and character. It does not seek to advocate any particular approach to the layout of new dwellings, as this is something which should be informed as a result of assessing the site context and its surroundings.

We understand concerns relating to the energy efficiency of new homes however this is a matter for the Building Regulations to address and is therefore beyond the scope of the Design SPD. The Design SPD does however encourage developers to think about how development can be made more adaptable to climate change in general ,some examples provided in the SPD include increasing biodiversity, the provision of SuDs systems and facilitating

No action.

	Flooding. Its increasingly clear that with so much concrete covering our earth now water has no where to go. Any more development needs to state gardens are not covered by concrete but by materials that allow water to drain away. In the meantime housing needs to be prepared for flooding. For example ground floor electric plugs not low down, wall surfaces that can cope with flooding etc. Honesty is needed with housing development. Yes planting of new trees etc included but as we all know its at a cost. For example the current highway improvements on the A512/Jc23 M1 to enable the new Garendon Houses has seen hundreds of bushes, plants and trees cut down for the work to start. Its has been a shock to all those seeing every day it happen. More honesty please.	more natural forms of heating and ventilation. In regards to flooding, the SPD encourages developers to install permeable ground features in their development (for instance permeable surfacing in car parking courts/driveways for houses). Furthermore, the general requirements for new large scale development to provide a proportion of open green spaces is a means of increasing permeability Certain permitted development rights can be removed from new homes in order to address homeowners paving over front gardens. Noted.	No action.
Joseph Hall	The planning system has a responsibility for planning for health. It would be good to see health and physical activity referenced more strongly from the outset to demonstrate the importance and impact of design on health. This directly connects to providing attractive public and private spaces; well-connected and legible streets and spaces; creating multi-functional, safe and inclusive places and adapting to climate change. Principle 2 Providing attractive and well managed public and private spaces 3.36-3.40: Inclusion of planting, landscaping, street furniture and styling is welcomed to maximise the use of public open space. In addition to this, it is essential these spaces are well-lit and have good natural surveillance in order for the benefits to physical activity and social interaction to be fully realised.	Comments noted. The ways in which planning can influence the health of local communities is extensive and design is one part of a multi-faceted and multi-stakeholder approach. The Design SPD encourages many interventions on developments which can help support the health and wellbeing of communities. Comments noted.	No action. No action.

Principle 3 Well connected and legible streets and spaces Reference to Manual for Streets is welcome, as are the references to pedestrian and cycle connectivity. It should be strongly highlighted that the MfS recommends prioritising active travel over the private vehicle. All active travel connections should have strong natural surveillance, provide the most direct route and have high-quality waymarking in place. It would be good to see inclusion of best practice incorporation of cycle routes along primary routes (for example "Do" for protected cycle lanes and "Don't" for cycle lanes painted alongside streets or on pavements (which are recognised as failing to encourage greater levels of cycling).

<u>Principle 4 Creating multi-functional, safe and inclusive places</u>

Inclusion of Sport England's Active Design principles is positive. It would be useful to clarify how this will be considered/ assessed during the planning process to encourage proactive use of these principles to develop more physically active places.

Additional parking guidance

It is critical that parking pro-actively considers not only the private vehicle, but also parking for cycles. If we wish to deliver mode shift we need to ensure we're creating places that allow for cycling to be a feasible option (to reduce congestion, reduce emissions and provide more physically active communities). Requirements for cycle parking - at homes, workplaces, in towns, villages and at other public amenities - should be specified to promote active travel.

The inclusion of best practice examples shall be considered for the next iteration of the SPD. The Design SPD encourages the provision of cycle routes that are separate from the highway and be well connected to important destinations such as schools and community facilities, to make them more attractive for cyclists to use than the highway.

At paragraph 3.74 (Cycle and walking routes), provide best practice examples of cycle routes.

The Active Design guidance document from Sport England is a material consideration for planning applications and reference to it within the Design SPD provides clarity on its relevance towards design decisions in Charnwood.

The Design SPD provides guidance on how cycle parking should be implemented on new developments (in 'Appendix 1: Additional parking standards') however it is unable to provide specific requirements for cycle parking; the role of the SPD is provide additional information in support of adopted planning policies and expecting developers to meet specific requirements to provide cycle spaces would go beyond this role.

No action.

Steve Beard (Sport	t
England)	

Thank you for consulting sport England on the above, please note that we are Sport England not Sports

Sport England is pleased to see the section on and the inclusion of Active Design

However, We would support upfront/earlier references to the establishment of Active Environments to create an environment for residents/communities to be healthy. This is in part picked up in para 3.87 but we feel this is this too late in the SPD. Particularly given the headline references to health and wellbeing in the Strategic Growth Plan

It is not just about getting people active in public open spaces or in sports facilities it is about creating an environment where people find it easier/safer to walk or cycle rather than using the private car and therefore active.

The question we have is - How does the SPD deliver housing sites (designs) that positively influence levels of physical activity and are good for people's health?

An introductory paragraph which sets up the objective to create healthy communities would be supported, eg

The linkages between health and the built and natural environment have long been established and the role of the environment in shaping the social, economic and environmental circumstances that determine health is increasingly recognised and understood.

An ever-increasing body of research indicates that the environment in which we live is inextricably linked to our health across the life course. For example, the design of our neighbourhoods can influence physical activity levels, travel patterns, social connectivity, mental and physical

Source Public Health England - Spatial Planning for Health An evidence resource for planning and designing healthier places 2017

health and wellbeing outcomes.

Comments noted. The Design SPD provides guidance which encourages new development to help facilitate more active lifestyles for residents. However, it is acknowledged that effective implementation of such a goal requires a multi-faceted approach, implementation of many of the design solutions covered/promoted in the SPD would provide certain 'spin-off' benefits like encouraging healthier options of travel and improving accessibility to open space and sports provision.

The paragraph provided in the representation (in regards to Active Design) is considered appropriate to be added to the SPD at paragraph 3.92.

In 'Active Design by Sport England' box add following paragraph: 'Active Design is about designing and adapting where we live to encourage activity in our everyday lives and helps to implement the objective raised above; It's a combination of 10 principles that promote activity, health and stronger communities through the way we design and build our towns and cities.

Reword following line: 'Sport England's Active Design guidance was published in 2015 and is based around 10 Active Design principles The 10 principles of active design are:'

	Tai		
	Also, We would suggest intro para to active design. E.g; Active Design is about designing and adapting where we live to encourage activity in our everyday lives and helps to implement the objective raised above; It's a combination of 10 principles that promote activity, health and stronger communities through the way we design and build our towns and cities.		
Paul Metcalfe (National Forest Company)	It is disappointing that the National Forest is not mentioned within the document. In order to make the design of new development locally relevant it is considered that the reflecting and enhancing the character of the National Forest and Charnwood Forest should be promoted as a design principle.	Comments noted. It is considered appropriate for the Design SPD to provide references to the National Forest within its guidance.	Make reference to the National Forest in Design SPD.
	The document suggests that new development should contribute to local distinctiveness, but does not set out what this might be. The NFC considers that where local distinctiveness is lacking a National Forest-inspired identity should be adopted. This would involve incorporating features such as tree planting, creation of green space, natural play and sustainable design. I have attached a copy of the NFC's Design Charter which sets out how a National Forest character can be adopted.	The Design SPD identified how distinctive design can be achieved and that each site should be considered on its own merits, rather than focusing on prescription.	No action.
	The use of trees to create character is referenced in various places within the document. In order to settle new development into the landscape, as discussed from paragraph 3.21 onwards, reference should be made to the use of larger grown tree species which have a mature height above the ridgeline of the properties. This will ensure that views of the development are softened by trees within the development in addition to trees in open spaces on the edge of development.		
	Paragraph 3.54 onwards on green infrastructure would be a logical place to refer to the National Forest and the need to include woodland planting and landscaping to accord with the planting guidelines as set out in Local Plan policy		

CS12. This policy expects planting to be incorporated in new developments within the National Forest and within Charnwood Forest of between 20-30% of the site area as explained in the NFC's planting guidelines which is referenced in the policy.

Principle 5 on adapting to climate change should also make reference to mitigating the impacts of climate change. Tree planting, sustainable drainage, biodiversity enhancements and incorporating sustainable design principles would also assist with mitigating climate change along with adapting to it.

Section 3.105 concerning trees should also make reference to the importance of planting trees within the National Forest to create a National Forest character and contribute towards the creation of the Forest. The energy efficiency section should also make reference to the use of locally grown wood fuel as a low carbon heating option which would also reinforce local distinctiveness.

I would be grateful if you could take these comments into account in your next draft of the document and we would welcome the opportunity to comment further on this in due course. Please let me know if you would like to discuss these comments further.

J Potter	It would be helpful to include some specific balance in the document: 1) To avoid unnecessarily urbanizing and/or obtrusive external lighting for example at settlement edges and with regard to countryside aesthetics, nature conservation, night skies;	Comments noted. The Design SPD provides guidance on how lighting schemes on new developments should be approached, in <i>paragraph</i> 3.77. In addition, development to the edges of settlements in provided specific design guidance at <i>paragraph</i> 3.23.	No action.
	Excessive hard surfacing is also connected to detrimental minerals-extraction.	Comments noted. The Design SPD encourages the use of more sustainable construction methods in new developments.	No action.
	Footnote comment: at Fairfield it was a positive that a view from Leicester Road re the old, white painted, school building was to some degree opened up - not so well designed though [front lawn gone] now an expanse of tarmac; playing field views from the A6 towards the L.G.S. buildings ought not to be lost.	The importance of maintaining views towards landmark features of buildings/ key views shall be covered in the next iteration of the Design SPD.	At paragraph 3.17, add the following: 'such as differing scales, mass, heights and materials used. Significant views or vistas should be maintained or enhanced in new development proposals.'
D Brass	Having spent years teaching of environmental priorities, and thousands of pounds on panels etc. to generate and store electricity, and knowing how other nations continue to be in terms of use of fossil fuels, I feel your number five must be number one! Not only must we do our best to conserve the planet, we must set an example. Certain priorities I believe, spring directly from this:	Comments noted. The order in which each of the design principles is arranged in the document does not prioritise one principle over another and the Design SPD is to be read as a whole.	No action.
	a) Wherever possible development should be within a green framework (i.e. there should be no blurring of boundaries between centres of population) – this to include woodland, fields, hedges etc. that link wildlife to people. Ancient woodland should be sacred (no HS2) Specialist knowledge of trees and plants that promote reduction of CO ² release into the atmosphere must be utilised	Matters regarding development between settlements are the attention of the Local Plan and not the Design SPD, however the SPD does provide guidance on how developers can approach proposals to the edge of existing settlements, bordering upon open countryside, in a sensitive and appropriate manner and one example of doing this includes retaining planting and greenery at the site boundaries.	No action.

	 b) Water courses within any local area must be managed to achieve priorities decided on a national as well as a regional and local basis e.g. Wetlands, marshes etc. in defined areas, efficient capture of, and direction of water to prevent flooding. This priority suggests types of technological development but primarily tree planting (11.11.19 floods) 	The management of water courses is a strategic planning matter and is beyond the remit of the Design SPD. The Design SPD does encourage developers to consider planting trees in appropriate locations however.	No action.
	c) The character of an area (e.g. Rutland) or a town (Bath) has generally been created over time and the availability of materials, stone and wood replaced by brick on a large scale in the nineteenth century. The recent use of concrete on a large scale it could be argued, has transformed 'character' as well as largely increasing CO ² emissions. There is no doubt the past half-century has seen town and city individuality lost to road and transport needs and development carried out by those without knowledge of or commitment to a place.	Noted.	No action.
d with the second secon	Existing topography i.e. the constraints imposed by earlier development – of rail, road, town/village centre, should, I would argue, be respected e.g. if 'old' railway lines had not been ignored, they would be reused. These lines like our own Great Central can be developed or getting from A to B, but as they can (also) run steam occomotives which at a first class tourist attraction Had to sit in the Ladies Waiting Room as I did last week, is to be transported back in time - a happy journey for senior citizens like myself but also informative for the young.) By and large human habitation has grown consistently with natural communication links – river to sea, confluences etc. and it has proved wisest to develop on flood plains. Industry in the past became mechanised when power sources allowed (water/coal) today the use of solar power should intimately geared to design and development wherever possible on brownfield sites.	The reuse of old railway lines or former transportation corridor would be supported should a development site present such an opportunity. Developers are encouraged to acknowledge such opportunities in their site assessments, which the Design SPD encourages to be carried out.	No action.
	Population growth; in the past was not seen as a difficulty n terms of design, the upper echelons of society owning	Issues relating to the concentration of new development along transportation	No action.

country estates or gravitating to the leading edge of cities which were closer when the working classes of people occupied areas of high density and minimal design. Today by contrast increase in population is threatening the character of every town and city and many villages too, when to other centres. Analysis of population statistics is therefore vital in the design and development of any area, respect being shown to its 'nature' inhabitants as well as incomes (It may be argued that property development in Loughborough has for years now favoured university students to the detriment of young Loughburians unmarried or married with young children).

corridors and brownfield development are matters for the local plan to address, not the Design SPD. In regards to solar power, the Design SPD does provide a level of guidance on where solar panels are best located in order to maximise their efficiency.

Property in the age of climate change and new materials. Visiting older properties that for reasons of supply and demand have been re-jigged to house 'singletons', couples, families etc. leaves one in no doubt that constructing the same type of terraced or semi-detached houses shows a real want of imagination. New build should also take account of new technologies with respect to water use and solar energy. As those who earn less spend more proportionately on rent, mortgage and utilities than the better paid, priority it seems to me should be given to quality of design for those who now generally require two incomes to fund home and family.

The analysis of population statistics is useful for development design purposes, in so far as providing an insight into the demographics of areas and identifying changing lifestyle patterns. This is an important consideration in design and interventions are identified within the 'Adaptability' section of the SPD which encourages developers to consider providing homes that are easily adaptable to changing needs (such as the needs of the elderly or single people).

No action.

Appendix 2: Charnwood Design Workshops

- i. During the consultation on the draft Design SPD, two workshop sessions were held at the Syston Community Centre and at the Charnwood Borough Council offices in Loughborough.
- ii. The aim of the workshops was to engage with local people on design issues and allow them the opportunity to influence the content of the Design SPD. The workshop exercise was based around asking the following three questions:
 - 1. What does the phrase 'high quality design' mean to you?
 - 2. What do you perceive to be the main barriers in achieving high quality design?

- 3. How can some of these barriers be overcome efficiently and effectively?
- iii. In response to **question 1 'What does the phrase 'high quality design' mean to you?'**, the following comments were raised:
 - Long lasting
 - Use of sustainable materials
 - 'Quality for money' rather than 'value for money'
 - Facilitates social interaction
 - Secure (natural surveillance)
 - Good integration of utilities
 - Contextually appropriate materials, massing and detailing
 - Uses new technologies
 - Achieves carbon neutrality
 - Adaptability of spaces and buildings
 - Preserving green spaces, hedgerows and trees
 - Is able to be enforced
 - Harmonious
 - Accessible by public transport
 - Adds variety
- iv. In response to question 2 'What do you perceive to be the main barriers to achieving high quality design?', the following comments were raised:
 - Challenge of designing individual buildings
 - What is appropriate in areas of weak character?
 - Lack of integration between authorities
 - Constraints of national planning legislation
 - Timescales for projects
 - Use of standard house types
 - Lack of understanding on design issues

- Section 106 agreements and negotiations
- Building regulations on energy efficiency
- Viability of development proposals
- Lack of certainty no 'rules'
- Skills shortages in construction industry
- Maximising densities on site
- Lack of consequences for 'bad design'
- Councils not leading on development projects
- Brownfield sites not being maximised
- Sites are cleared before starting design process
- Schools not teaching design
- v. In response to **question 3 'How can some of these barriers be overcome efficiently and effectively?'**, the following comments were raised:
 - Redistribution of costs (land ownership costs/ overheads)
 - Mutual agreement between land owners
 - Aesthetically pleasing mitigation measures
 - Prioritising small, low cost interventions for good design
 - Early engagement with infrastructure providers
 - Functionality of development balanced with design
 - Providing infrastructure first roads, schools
 - Prioritising community facilities and ensure they are affordable to use/run
 - Getting parking off the streets and in front of houses
 - Garages made fit for purpose (to remove cars from forecourts/streets)
 - Early engagement with infrastructure providers
 - Society and community cohesion facilitating interaction
 - Liaison with researchers
 - Role of SPD in providing clarity on issues e.g. 'weak character'

- Preserve historic character of villages
- Authorities being proactive when working together
- Homes adaptable to changing lives
- Different timescales for larger development proposals (i.e. longer determination times)
- Advocating 'exemplar' local schemes in SPD