

Design Guidance

Supplementary Planning Document

Statement of

Early Engagement

Consultation

2014



Wyre Forest District Council

1. Introduction

- 1.1 This consultation statement has been prepared in accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) 2012. The statement sets out who was consulted, when and how, and summarises the representations received and how they have influenced the Draft Design Guidance Supplementary Planning Document (SPD).

2. Name and Purpose of the SPD

Name

- 2.1 Design Guidance Supplementary Planning Document (SPD)

Purpose

- 2.2 The aim of this SPD is to provide detailed advice on the District Council's expectations for delivery of high quality development. The SPD will clearly set out how the District Council's design policies should be interpreted. This will provide certainty and clarity for those bringing forward development within the District. Wyre Forest District Council's Development Plan is made up of the Adopted Core Strategy (2010), the Site Allocations and Policies Local Plan (2013) and the Kidderminster Central Area Action Plan (2013). The following District Council planning policies relate to design:

- Adopted Core Strategy - CP01 Delivering Sustainable Development Standards; CP03 Promoting Transport Choice and Accessibility; CP11 Quality Design and Local Distinctiveness; CP13 Providing a Green Infrastructure Network; CP14 Providing Opportunities for Local Biodiversity and Geodiversity
- Site Allocations and Policies Local Plan - SAL.UP7 Quality Design and Local Distinctiveness; SAL.UP8 Design of Extensions; SAL.UP9 Landscaping and Boundary Treatment
- Kidderminster Central Area Action Plan – KCA.UP1 Urban Design Key Principles; KCA.UP2 Public Realm

- 2.3 The Design Guidance SPD is being prepared to provide more detailed guidance on the District Council's expectations for the delivery of good development in accordance with adopted policy. It explains how developers should interpret the District's design policies.

3. Who was consulted on the SPD?

- 3.1 The Early Engagement consultation was targeted towards those organisations and individuals with an interest in design issues. The statutory consultees set out within Regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012 were also consulted.

Appendix 1 lists those organisations consulted at the Early Engagement stage. A collaborative approach has been taken to preparing the SPD. Colleagues within a number of Council departments have been directly involved with the preparation of the SPD.

4. How Were People Consulted?

4.1 The consultation period ran from 23rd January to 21st February 2014. A leaflet was prepared which covered the following issues:

- Why is a Revised Design Guidance Supplementary Planning Document Needed?
- Which are the Current Relevant Planning Policies?
- List of proposed Issues to Be Addressed
- Need for high quality design which will complement and enhance local distinctiveness within new developments
- Positive management of the historic environment and heritage assets
- Need to combine active frontages and private spaces
- Creating ownership of an area's sense of place
- Community safety and crime prevention
- Encouraging non-car-based journeys and ensuring any parking is well integrated into development and does not dominate
- Need to ensure that features such as rivers and canals are integrated into design
- Landscaping to be integral to all developments, both hard and soft
- Use of sustainable designs to lower energy consumption eg. orientation of buildings etc. and inclusion of renewable energy schemes
- Requirements for Design and Access Statements
- Should there be minimal dwelling space standards across all tenures and should there be minimum standards for private amenity space?
- Should all new residential development incorporate biodiversity measures?

4.2 The consultation leaflet was sent with a covering letter to those consultees listed within Appendix A in time for the start of the consultation. The leaflet was also posted on the District Council's web-site and consultation portal which allowed electronic responses. Copies of the leaflet were placed in the Worcestershire Hub in Kidderminster and the libraries in Kidderminster, Stourport-on-Severn and Bewdley. A press release was prepared to mark the start of the consultation.

4.3 A stakeholder workshop was held during the consultation period and local planning agents and developers were invited to attend. Appendix B sets

out summary notes from the workshop.

5. Summary of Responses

- 5.1 A total of 40 representations were received from fourteen respondents. Thirteen of these were organisations with only one individual responding.
- 5.2 All of the responses were either in support of the SPD or raised comments in relation to its proposed content. No objections to the SPD were received.
- 5.4 Summaries of all representations received and the District Council's response to each can be found in Appendix C.

6. Summary of the Main Issues Raised

- 6.1 The main issues raised were:
 - Desire to integrate Green Infrastructure into new development with its many benefits and opportunities to enhance local distinctiveness
 - Guiding principles for development adjacent to waterways
 - Opportunities for water re-use within developments
 - Designing out crime / fire prevention
 - SUDs and water management
 - Biodiversity measures
 - Salvage of local stone for reuse within historic development
 - Water efficiency and flood risk guidance
 - Need for SPD promotional leaflets

7. How have those Issues been addressed in the SPD?

- 7.1 The table at Appendix C sets out how each of the comments made has been considered within the Draft SPD.

Appendix A: List of Consultees

National Bodies

Canal & River Trust
English Heritage
Environment Agency
Homes & Communities Agency
Highways Agency
Inland Waterways Association
Natural England
Network Rail
Office of Rail Regulation
The Coal Authority

Neighbouring Authorities

Bromsgrove and Redditch
Dudley Metropolitan Borough Council
Malvern Hills District Council
Shropshire County Council
South Staffordshire District Council
Staffordshire County Council
Wychavon District Council
South Worcestershire Development Plan
Worcestershire County Council

Parish and Town Councils

Bewdley Town Council
Broome Parish Council
Chaddesley Corbett Parish Council
Churchill & Blakedown Parish Council
Kidderminster Foreign Parish Council
Kidderminster Chartered Trustees
Rock Parish Council
Rushock Parish Council
Stone Parish Council
Stourport-on-Severn Town Council
Upper Arley Parish Council
Wolverley & Cookley Parish Council

Regional Bodies

Severn Trent Water
South Staffs Water
Central Networks
Greater Birmingham and Solihull Local Enterprise Partnership
Worcestershire Partnership
Worcestershire Primary Care Trust
Worcestershire Regulatory Services
Worcestershire Local Enterprise Partnership

Local Interest Groups

Bewdley Civic Society
Bewdley Development Trust
CPRE
Core11

Disability Action Wyre Forest
Kidderminster Civic Society
Kidderminster Town Centre Partnership
Stourport-on-Severn Civic Society
Stourport Forward
Stourport-on-Severn Town Centre Forum
Worcestershire Wildlife Trust

Local Developers

Foley Park Estates
Blue Square Kidderminster
Clive Fletcher Developments
Hillberry Homes Ltd
Key Homes (Midlands) Ltd
Kier Partnership Homes Ltd
Lioncourt Homes
Lockett Property Holdings
M & G Builders Ltd
Norgrove Developments
Warren Developments
The Community Housing Group
Jephson HA
Marches HA
Nexus HA
Rooftop HA
Thomas Vale
Vestia Community Trust

Local Agents/Architects

Michael Baynton
Andrew Plank
Haydn Green
Robert Taylor Associates
Central Building Design
Simon Fletcher Architects
Engineering & Building Design
Robert Swan Architects
TJ Preece & Associates
Howl Associates
Julian Barnett
Bernard Eacock
Grace Plant

Appendix B

Notes from Stakeholder Workshop held 13th February 2014

List of attendees:

Andrew Clarke	Taylor Young (design consultant)
Steve Greybanks	Central Building Design
Emma Anning	WFDC (development control)
Mike Preston	Wyre Forest Community Housing
Heather Stone	WFDC (planning policy)
Jess Greybanks	Central Building Design
Steve Braggington	Kidderminster Civic Society
Paul Allen	WFDC (countryside conservation)
Julia Mellor	WFDC (development control)
Rebecca Mayman	WFDC (planning policy)
David Keogh-Smith	Stourport Town Council
Kirsten Huizer	North Worcestershire Water Management
Pete Bassett	WFDC (conservation)
Paul Round	WFDC (development control)

The workshop started with a discussion of what makes good design and people were asked to write down examples of good and bad design locally and also good examples from further afield. Examples of what are considered to be well-designed developments within the District were then shown in a presentation.

Attendees were then split into 4 groups to consider the existing Design Guidance – what works well, what doesn't work well and how could it be improved. The general consensus was that the current document is very comprehensive but too lengthy and not user friendly. The revised document should have a much simpler layout and incorporate key principles, together with pictures and diagrams. It was also suggested that a web-based document which could be split into a series of smaller documents to allow use at site meetings and at appeal hearings would be useful. This format would also allow for easy updating if Government policy changed and for more detailed guidance to be signposted via web-links. The current document has no information on biodiversity issues or water management. Building for Life 12 will also be central to the revised document. It is important that the new document is linked to other documents such as Green Infrastructure Strategy, Conservation Area Character Appraisals, Landscape Character Assessment, Local Transport Plan 3 as well as Secured by Design.

Appendix C

Design Guidance Supplementary Planning Document Early Engagement

Respondent	ID	Response type	Summary - Please summarise your response here	Officer Response
The Coal Authority	DGEE1	Comment	No specific comments to make at this stage.	Noted
Natural England	DGEE2	Comment	Natural England welcomes the opportunity to comment and provide general advice on opportunities that design related SPDs offer in relation to the natural environment.	Noted
Natural England	DGEE3	Comment	<p>SPD should, where possible, provide clear focus in relation to Green Infrastructure provision. If possible, GI should be incorporated into new development. Urban green space allows species to move around and between towns and rural areas. GI is also effective tool for managing challenges of climate change such as flooding and higher temperatures. Greener neighbourhoods and access to nature can improve health and quality of life. Urban greenspace can also contribute to resilient ecological networks. GI has multi-functional benefits. (see TCPA Good Practice Guidance for Green Infrastructure and Biodiversity) See also http://www.naturalengland.org.uk/Images/GI-signposting_tcm6-11961.pdf</p> <p>Also opportunities to retrofit green infrastructure - green roofs and roof gardens, green walls to provide insulation or shading/cooling, new tree planting or managing highway verges to enhance biodiversity.</p> <p>Air quality, ground/surface water and soil protection needs consideration in all urban design plans.</p>	Agree that green infrastructure should, if possible, be incorporated into new development. Include reference to Natural England's signposting document in SPD. Multi-functional benefits of GI will be outlined in SPD together with potential retrofitting of GI into urban environments.
Natural England	DGEE4	Comment	SPD should encourage opportunities to incorporate features which are beneficial to wildlife into development proposals eg. bat/bird boxes. (NPPF para.118 and NERC Section 40).	Suggestions are noted.

Respondent	ID	Response type	Summary - Please summarise your response here	Officer Response
Natural England	DGEE5	Comment	SPD may provide opportunities to enhance character and local distinctiveness of surrounding natural and built environment. Landscape characterisation and townscape assessments provide tools to consider new development and ensure it makes positive contribution to landscape character. eg. trees species chosen to exceed building height and managed to do so, and where mature trees retained, need succession planting in place.	Suggestions for how SPD can help enhance character and local distinctiveness are noted.
Natural England	DGEE6	Comment	Impact of lighting on landscape and biodiversity (NPPF para.125) should be covered in SPD.	Agree that lighting impacts should be covered by SPD
Natural England	DGEE7	Comment	SPDs do not usually need to be subjected to Strategic Environmental Assessment or Habitat Regulations Assessment as they normally do not introduce new policies or proposals.	Noted.
Homes & Communities Agency	DGEE8	Comment	No comments at this stage.	Noted.
Canal & River Trust	DGEE9	Comment	<p>We note reference in consultation leaflet to need to ensure canals and rivers are integrated into design. Canal & River Trust has following guiding principles for design of developments adjacent to waterways:</p> <ul style="list-style-type: none"> • individual waterways and water spaces should be viewed as part of wider network • water is a space and leisure/commercial resource in its own right. • need to consider development views both towards the water and also from the water • tow path should be integral part of public realm • siting, configuration and orientation of buildings must optimise views of water with natural surveillance and encourage and improve access to/from and along water • waterside development needs to be considered holistically with opportunities for water-based development, use and enhancement 	Guiding principles for design of developments near canals and rivers are noted and will be integrated into SPD. Comments re biodiversity measures and potential for renewable energy are noted.

Respondent	ID	Response type	Summary - Please summarise your response here	Officer Response
			<ul style="list-style-type: none"> improve site appearance from both tow path and from water itself and enhance environmental quality of waterway corridor appropriate boundary treatment and access issues may be different for tow path side and offside of waterway <p>Examples of biodiversity measures which developments along waterways could contribute to include bioengineering (where none in place), hedge planting and linear orchards, provision of bird nesting/bat boxes, sowing of wildflower seeds to improve towpath flora and tackling pollutant discharges.</p> <p>Canals are also potential energy resource - use of water for heating/cooling of buildings - potential for CHP - can be viable in large single managed residential schemes.</p>	
Severn Trent Water Ltd	DGEE10	Comment	Mitigation of flooding risk - greater emphasis needs to be paid to consequences of extreme rainfall. Surface water needs to be managed responsibly to avoid property damage.	Comments are noted.
Severn Trent Water Ltd	DGEE11	Comment	Developers need to contact Severn Trent Water direct to ensure there is available capacity in sewerage and water supply network.	Developers will be alerted to this in SPD
Severn Trent Water Ltd	DGEE12	Comment	STW supports opportunities for water retention and reuse by encouraging installation of grey water systems and water butts.	Noted. SPD can encourage this.
Severn Trent Water Ltd	DGEE13	Comment	STW would like the opportunity to work closely with WFDC to ensure that water infrastructure can be planned in line with the Local Development Plan or to discuss matters of concern relating to water issues	Noted.
Herefordshire & Worcestershire Earth Heritage Trust	DGEE14	Comment	If possible, schemes should promote biodiversity and at some locations there may be opportunities for the conservation of geodiversity. HWEHT can advise on this.	Suggestions are noted.
Herefordshire & Worcestershire	DGEE15	Comment	H&WEHT are running HLF project looking at building stones across area, detailing their properties and uses in buildings and structures.	SPD will include reference to local building stone and potential sources.

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Earth Heritage Trust			Project will also look at quarries from where these stones were sourced and possibility for obtaining stones for building repairs and extensions. Online database of quarries will be available from 2015 - need to encourage its use in SPD.	
West Mercia Police	DGEE16	Support	<p>These representations should be considered as joint submission by Warwickshire Police, West Mercia Police and Hereford and Worcester Fire and Rescue Service.</p> <p>We support identification of following important issues:</p> <ul style="list-style-type: none"> • community safety and crime prevention • need to combine active frontages and private spaces • creating ownership of an area's sense of place • requirements for Design and Access Statements <p>Above are all integral part of crime reduction and if combined with detailed security standards via SPD they will help to drive down crime rates. This is encouraged by paragraph 58 of NPPF.</p>	Noted. Issues which can together help to reduce crime will be encouraged in SPD.
West Mercia Police	DGEE17	Support	<p>Secured By Design principles and standards will need to be included in new developments. SPD should specify this.</p> <ol style="list-style-type: none"> 1. Secured By Design objective is the designing out of crime and anti-social behaviour during the planning process. 2. Implementation of Secured By Design has led to significant and sustainable reductions in crime. Through better planning, the well-being of residents, occupiers and visitors to development is improved. This will help to ensure that building stock is fit for purpose for the future. Future Homes Commission report (Oct.2012) - 43% view security as most important aspect. <p>If security is not fully considered in design process, then extra police resources are likely to be required after development to tackle crime</p>	Secured By Design standards will be specified in SPD.

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			and anti-social behaviour.	
West Mercia Police	DGEE18	Comment	We would also like to see fire safety measures and prevention (Buildings Regulations (Approved Document B - Fire Safety) included in the SPD. This would help to reduce deaths, injuries and property damage as a result of fire. Following would need to be covered - fire alarm provision, means of escape, restriction of fire spread within and between buildings, building stability in event of fire, and access for fire appliances to buildings.	Noted. Fire safety and prevention will be covered in SPD.
West Mercia Police	DGEE19	Comment	Design and Access Statements should be used to show how new development will achieve Secured By Design principles and fire safety design measures. This is referenced in CP11 (developers will be required to demonstrate how proposals address community safety and crime prevention), SAL.UP7 vii (maximise natural surveillance and incorporate principles of Secured By Design and consider incorporating fire safety measures), SAL.UP9 ii (use of thorny plants to help prevent crime and vandalism), KCA.UP1b (create positive built frontages that provide enclosure and natural surveillance), KCA.UP1j (create safe and secure environment that minimises opportunities for crime and anti-social behaviour) and Churchfields Masterplan SPD - Design Principle 7 (5th point - incorporate Secure By Design principles to reduce opportunities for crime and anti-social behaviour.	SPD will outline what Design and Access Statements need to include.
West Mercia Police	DGEE20	Comment	Given support already shown by the Council for Secured By Design and fire safety measures, it is imperative that the SPD signposts people to research current best practice.	Noted. SPD will signpost current best practice.
West Mercia Police	DGEE21	Comment	We suggest that the SPD recommends that developers consult with WMP/HWFRS at the earliest opportunity as it is much easier to incorporate Secured By Design and fire safety measures early on in the design process. Promoting good design is central to the NPPF's principles of sustainable development. This will ensure the viability of the development for the future. Poorly designed development will require future refurbishment or even demolition.	Noted. SPD will encourage developers to contact WMP/HWFRS early on in the design process.
Worcestershire	DGEE22	Comment	Agree that site design should integrate rivers and canals (but would add	Comments noted.

Respondent	ID	Response type	Summary - Please summarise your response here	Officer Response
Wildlife Trust			that all habitats should be considered as relevant), that landscaping should be integral to all applications and that all development should incorporate biodiversity enhancement measures.	
Worcestershire Wildlife Trust	DGEE23	Comment	Recommend that SPD refers to Sub-Regional GI Strategy and Wyre Forest GI Strategy and provides guidance on how new development can contribute to GI networks and be resilient to effects of climate change and extreme weather events. Poorly designed sites can disrupt existing green corridors with knock on effects for wildlife, drainage and pollution.	Comments noted. SPD will include references to GI Strategies.
Worcestershire County Council - Environmental Policy & Strategic Planning	DGEE24	Comment	Concerned there is no specific reference to consideration of multifunctional and holistic approach to water management.	Comments noted. SPD will include section on water management.
Worcestershire County Council - Environmental Policy & Strategic Planning	DGEE25	Comment	Support objective that SPD should include 'Positive management of the historic environment and heritage assets.' Also suggest that all new residential developments which are able to should incorporate biodiversity measures. SPD is opportunity to provide further guidance re densities and specifications considered to be appropriate. Also refer to comments re SUDS and water management.	Support is noted. Suggestion re biodiversity measures and SUDS will also be incorporated into SPD.
Worcestershire County Council - Environmental Policy & Strategic Planning	DGEE26	Comment	Advises that SPD should take account of Waste Core Strategy, in particular policies WCS11 "Sustainable Design and operation of facilities", WCS 12 "Local characteristics" and WCS 17 "Making provision for waste in all new development."	Waste Core Strategy will be referenced in SPD
Worcestershire County Council - Environmental Policy & Strategic Planning	DGEE27	Comment	We recognise that "Local Distinctiveness" in WFD will be compromised by the lack of local sources of building stone to build new and repair existing vernacular and listed features and buildings which incorporate local stone.	Comments are noted. See response from HWEHT DGEE15
Worcestershire	DGEE28	Comment	The SPD`s support for the emerging Minerals` Local Plan proposals to	Comments re reuse of local stone

Respondent	ID	Response type	Summary - Please summarise your response here	Officer Response
County Council - Environmental Policy & Strategic Planning			encourage local sources of building stone would be appreciated. More practically WFDC could encourage the salvage, collection storage and re-sale of local stone produced during redevelopment and rebuilding to enable their re use locally (as encouraged by Waste Core Strategy).	salvaged from redevelopment will be referenced in SPD.
Environment Agency	DGEE29	Comment	Water Efficiency - linked to policy CP01. Recommend include section on need for water efficiency standards - perhaps use best practice examples. Also check Water Cycle Study as to whether different parts of district need more stringent targets imposed.	Comments noted. Consider use of best practice examples on water efficiency.
Environment Agency	DGEE30	Comment	Flood Risk - Have previously discussed potential to develop supporting flood risk guidance to build on existing policy. KCAAP refers to proposals to produce developer guidance note. This will include information on flood risk (mostly taken from Level 2 Strategic Flood Risk Assessment) and a pro-forma to assist developers in producing FRAs that meet policy requirements. We would welcome discussions with you on this to assist developers and decision makers with sequential test.	Comments re flood risk guidance noted. Will look to discuss further with EA.
Environment Agency	DGEE31	Comment	<p>Water Management/Quality</p> <p>We would welcome a reference to SUDS design standards and options to reduce flood risk, improve water quality and improve ecology. Suggest you discuss this with North Worcestershire Water Management Team.</p> <p>We support suggestion that SPD will '<i>ensure that features such as rivers and canals are integrated into design</i>'. This could also link to opening up of culverts and re-engineering of channels, inclusion of blue infrastructure, promotion of improved biodiversity and water quality, landscape enhancement and improved public amenities.</p>	<p>Note comments and will discuss with North Worcestershire Water Management Team.</p> <p>Note comments re rivers and canals and will look to explore this further in SPD.</p>
Environment Agency	DGEE32	Comment	<p>Delivering Sustainable Development Standards</p> <p>Para.6.29 of Site Allocations and Policies Local Plan refers to West Midlands Sustainability Checklist. However, we recommend WFDC produces a local 'sustainability checklist' to provide clear consistent</p>	Suggestion to produce local sustainability checklist is noted.

Respondent	ID	Response type	Summary - Please summarise your response here	Officer Response
			<p>approach for developers and promote delivery of high quality low carbon development. We would also encourage more ambitious responses to climate change. See Shropshire Design Guide SPD for suggested checklist.</p>	
South Worcestershire Development Plan	DGEE33	Comment	<p>Suggest following additional issues for inclusion in SPD:</p> <ul style="list-style-type: none"> • Integration of sustainable transport opportunities within design schemes • New buildings should be fit for purpose • Well planned streets and spaces with appropriate scale, mass, proportions and materials • Provide a clear and simple basis for appraising design quality of planning applications, e.g. Building for Life and BREEAM? • Incorporation of specific case studies and 'success stories' that justify the guidance? • Inclusion of specific guidance on water management, pollution and waste management • Identify the potential for adaptation in new builds • There needs to be a caveat with respect to achieving deliverable sustainable design and minimal dwelling space standards as this is dependent on outcome of government consultation. • Question whether existing policy framework would allow for minimal space standards to be developed via SPD. Would however support their inclusion as aspirational guidance. • Agree that new residential development should incorporate biodiversity measures. 	<p>Suggestions for topics to include in SPD are noted. Outcome of Housing Standards Review published March 2014 - standards to form part of Building Regulations.</p>
English Heritage	DGEE34	Comment	<p>English Heritage considers that positive design principles can have positive effect on historic environment. Note and welcome following proposed issues:</p> <ul style="list-style-type: none"> • Need for high quality design which will complement and 	<p>Welcome support for issues to be addressed.</p>

Respondent	ID	Response type	Summary - Please summarise your response here	Officer Response
			<p>enhance local distinctiveness within new developments</p> <ul style="list-style-type: none"> • Positive management of the historic environment and heritage assets • Creating ownership of an area's sense of place 	
English Heritage	DGEE35	Comment	<p>EH would promote inclusion of following themes:</p> <ul style="list-style-type: none"> • robust set of design principles, including one specific to historic environment • recognition of design principles in different contexts - landscape, townscape, settlements, conservation areas, buildings, plots, setting of heritage assets • consideration of design in varying land uses - residential, commercial, landscape, infrastructure (including highways and street design), retail (including shop fronts and signage) • importance of understanding a place (existing and new) • role of traditional building materials and methods • assess how design can have positive strategy for historic environment and conserve/enhance heritage assets, buildings and landscape • recognition of both designated and undesignated heritage assets including archaeology • use diagrams/photos of good practice • use appendix with links to relevant guidance documents and information on traditional building materials for district <p>Welcome continued involvement in SPD preparation and SEA Screening Report.</p>	Suggestions are welcomed and noted.
Shuttes J	DGEE36	Comment	<p>SPD is opportunity to establish clearer guidelines, especially for domestic buildings. Guidance on good design has existed for long time but do not feel it is considered when granting permission. Are however several worthy commercial schemes such as new crematorium, piano building and Church House. Housing design is mostly very poor in</p>	Comments re design in district are noted. SPD will be used to encourage better design, especially of new housing.

Respondent	ID	Response type	Summary - Please summarise your response here	Officer Response
			district - very little distinctive detailing on recent/current developments. Feel that quality of design should be set out clearly and not just alluded to via photographs.	
Kidderminster Civic Society	DGEE37	Comment	SPD needs to be updated to reflect new local plan documents. Index needs improving. Should include Building For Life 12. Still retain a hard copy version in A4 portrait but produce leaflet to promote SPD as many unaware of its existence.	Comments are noted, especially re production of leaflet to promote SPD to wider audience.
Kidderminster Civic Society	DGEE38	Comment	Should aim to add quality to both local housing stock and local amenities - would support BfL12. New SPD should include examples of good design, both local and national to encourage quality design and promote district as good place to move to.	Agree with comments.
Kidderminster Civic Society	DGEE39	Comment	Demolition of historic and landmark buildings should be a last resort. Their retention and integration into new schemes retains connection with the past and stops a place becoming 'anytown'. Suggest a new landmark building is promoted to bring a unique feature to the district.	Comments on historic buildings and suggestion of promoting a new landmark building are noted.
Kidderminster Civic Society	DGEE40	Comment	A well designed town in which to live and work will encourage people to move into the area. Kidderminster should take advantage of the river and canal and incorporate them into designs. The district should make the most of its countryside assets and rail and road links.	Agree that good design will encourage people to both live and work in district.