

Design Guidance Supplementary Planning Document

Statement of Consultation

June 2015



Wyre Forest District Council

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1. Introduction

- 1.1 This consultation statement sets out details of the consultation undertaken in accordance with Regulation 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The statement sets out who was consulted, when, and how, and summarises the representations received and how they have influenced the 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 sets 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; CP12 Landscape Character; CP13 Providing a Green Infrastructure Network; CP14 Providing Opportunities for Local Biodiversity and Geodiversity; CP15 Regenerating the Waterways
- Site Allocations and Policies Local Plan – SAL.UP3 Providing a Green Infrastructure Network; SAL.UP5 Providing Opportunities for Safeguarding Local Biodiversity and Geodiversity; SAL.UP6 Safeguarding the Historic Environment; 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 has been 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 consultation was targeted towards those organisations and individuals with an interest in design issues. Appendix 1 lists those organisations consulted and this includes statutory consultees set out within Regulation 4 of The Town and Country Planning (Local Planning) (England) Regulations 2012. 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 31st October to 12th December 2014. A draft SPD was prepared and made available on the District Council's web-site and in the Wyre Forest Customer Service Centre, Kidderminster as well as at Kidderminster, Stourport-on-Severn and Bewdley libraries. Notification letters were sent to those parties set out at Appendix A to arrive in time for the start of the consultation. The draft SPD was also made available on the District Council's consultation portal to allow representations to be made electronically. A press release was prepared to mark the start of the consultation.

5. Summary of Responses

- 5.1 A total of 127 representations were received from 11 respondents. Only one response was received from an individual.
- 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.
- 5.3 Summaries of all representations received and the District Council's response to each one can be found in Appendix B.

6. Summary of the Main Issues Raised

- 6.1 The table at Appendix B sets out a summary of the representations received.

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

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

APPENDIX A – LIST OF CONSULTEES

Specific Consultees

Wyre Forest District Parish/Town Councils

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

Other Specific Consultees

Bromsgrove District Council
Central Networks
Directorate of Adult Services and Health (DASH)
Dudley Metropolitan Borough Council
English Heritage
Environment Agency
Greater Birmingham and Solihull Local Enterprise Partnership
Hereford & Worcester Ambulance Service
Hereford & Worcester Fire & Rescue Service
Highways Agency
Homes & Communities Agency
Malvern Hills District Council
Mobile Operators Association
National Grid
Natural England
Network Rail
Office of Rail Regulation
Oil and Pipelines Agency (The)
Severn Trent Water Ltd
Shropshire Council
South Staffordshire District Council
South Staffordshire Water Plc
South Worcestershire Development Plan
Staffordshire County Council
Staffordshire Police Authority
The Coal Authority
Transco West Midlands Local Distribution Zone
West Mercia Constabulary
Western Power Distribution
Worcestershire County Council
Worcestershire Local Enterprise Partnership
Worcestershire Partnership

APPENDIX A – LIST OF CONSULTEES

Worcestershire Regulatory Services
Wychavon District Council
Wyre Forest Clinical Commissioning Group

General Consultees

Organisations registered in the Planning Policy database including:

- agents
- developers
- housing interest groups
- local architects
- local interest groups
- registered providers
- service providers

APPENDIX B - DRAFT DESIGN GUIDANCE SPD (OCTOBER 2014) – SUMMARY OF RESPONSES

Respondent	Response No.	Type of Response	Part of Document	Response Summary	Officer Response
Core11	DDG2	Support	Whole document	Support	Noted
Coal Authority	DDG26	Comment	Whole document	Having reviewed the document, I confirm that we have no specific comments to make at this stage.	Noted
Chaddesley Corbett Parish Council	DDG27	Comment	Whole document	The Parish Council have studied the above draft document and are pleased to say that we agree with most of the policies and have no further comments to make	Noted
WCC-Env.Policy & Strategic Planning	DDG29	Comment	Whole document	We are pleased to see that the document has regard to the important and salient points pertaining to the treatment of public rights of way.	Noted
WCC-Env.Policy & Strategic Planning	DDG39	Comment	Whole document	<p>Minerals and Waste</p> <p>We strongly advise that the proposed SPD should:</p> <p>-refer to the Waste Core Strategy as part of the Development Plan and refer to and take account of policies WCS 11 "Sustainable Design and operation of facilities", WCS 12 "Local characteristics" and WCS 17 "Making</p>	Noted. Section on building stone (para.5.10) together with references to the Waste Core Strategy will be moved to the Character and Identity chapter.

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				<p>provision for waste in all new development,"</p> <p>-recognise that "Local Distinctiveness" will be compromised by lack of local sources of building stone to build new and repair existing vernacular and listed features and buildings which incorporate local stone.</p> <p>The SPD's support for the emerging Minerals' Local Plan proposals to 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. The Waste Core Strategy would encourage any such proposals but existing builders yards and merchants could incorporate this, if they don't already probably as PD/de minimis development. WFDC could nonetheless ascertain if this is their current practice and if it is not encourage such salvage.</p>	
Environment Agency	DDG49	Comment	Whole document	The EA has previously discussed the potential to develop supporting flood risk guidance to build on policy with the adopted plans, e.g. CP02. Given the context within the Design Guidance SPD and link to FRA Guidance within the KCAAP, we would	Comments are noted. Separate flood risk guidance to be progressed in conjunction with Environment Agency.

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				anticipate this being produced as a separate document for Kidderminster. We would welcome discussions with you about how to progress this.	
Natural England	DDG52	Comment	Whole document	Natural England's statutory purpose is to ensure that the natural environment is conserved, enhanced and managed for the benefit of present and future generations, thereby contributing to sustainable development. We welcome this opportunity to comment. Our comments are provided as general advice on the opportunities that design related SPDs offer in relation to our remit, and guidance on further sources of information.	Comments are noted.
WFDC - Dev. Control	DDG59	Comment	Whole document	Document needs restructuring. WFDC - Dev. Control happy to meet with Planning Policy to discuss further.	A revised structure has now been agreed.
WFDC - Dev. Control	DDG58	Comment	Whole document	New images required for front cover - montage of examples	Agreed. Officers to make suggestions for suitable photographs to include.
Environment Agency	DDG51	Comment	Whole document	Water Efficiency: The 'Water Management' section (para. 7.7) highlights water resource but there is limited reference to water efficiency elsewhere. We	Comments are noted. Water efficiency is covered by the new housing standards which will come into effect via updated building regulations.

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				recommend that you include a section on the need for water efficiency standards linked to Policy CP01. Suggest you explore whether more stringent standards would be required for certain parts of District informed by Water Cycle evidence base.	
Environment Agency	DDG50	Comment	Whole document	<p>Sustainability Checklist</p> <p>There is no reference to a local sustainability checklist. At Para. 6.29 of the Site Allocations and Policies Local Plan, reference is made to the West Midlands Sustainability Checklist. However, we recommend that you produce a local sustainability checklist rather than relying on the West Midlands template. This should promote the delivery of high quality low carbon development. The Shropshire checklist covers several issues including sustainable water, energy and waste management requirements for new development.</p>	Comments are noted. A local sustainability checklist is not being progressed at the present time. With changes to standards for water efficiency etc. being brought in via building regulations, any additional requirements could be implemented via new policies contained within the local plan review subject to viability assessment.
MADE	DDG121	Comment	Whole document	Process guidance, good examples, and policy additions.	Comments noted. Officers will research good examples from other authorities and also look at where additional policy may be required.

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MADE	DDG127	Comment	Whole document	Detailing and materials – more information/guidance is required to make it place specific. Images are also important here.	See previous comments on building materials. Additional section to be added to Character and Identity chapter. Local images required.
MADE	DDG128	Comment	Whole document	Discussed images and document design – needs to look good and be innovative. Could use a freelance photographer? Move away from Limehouse/Objective to produce the document. Use graphic designers?	Comments noted. Budget constraints make it unlikely that suggestions will be taken on board. To be done in-house.
MADE	DDG114	Comment	Whole document	Do we actually need it with the National Planning Policy Guidance? Have we checked that it is consistent? NPPG/NPPF, what are the gaps?	It is vital that this SPD signposts users towards the National Planning Policy Guidance and that areas not covered by this but of particular relevance to Wyre Forest are highlighted. The key characteristics of the district include its rivers and canals, flooding issues, the rural landscape and woodlands and heathland/grassland habitats.
MADE	DDG115	Comment	Whole document	How can it reflect the specific characteristics of the District? What do we want the District to look like? A more aspirational document	The overarching design objectives will be expanded to tie in with the locally distinctive vision set out in the Core Strategy.
MADE	DDG116	Comment	Whole document	The document can be rendered down – ask ourselves what value it adds to existing	Agree that there is no purpose in repeating what is already in policy or

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Respondent	Response No.	Type of Response	Part of Document	Response Summary	Officer Response
				guidance. E.g. residential extensions repeats Local Plan Policy?	in existing guidance. The document should simply signpost readers to the WFDC - Dev. Control Practice Notes.
MADE	DDG117	Comment	Whole document	Space standards need to reflect the national position – we can't specify garden standards. Will be too restrictive on innovative high density schemes such as that next to Foregate Street, Worcester.	Remove reference to garden standards as per other comments. Refer to national space standards and latest government announcement.
MADE	DDG118	Comment	Whole document	We need to clearly distinguish between process and policy. Is it in the validation checklist?	Validation checklist will be agreed by development management team and referenced as part of this SPD.
MADE	DDG119	Comment	Whole document	We don't mention Design Review – we need to	Details of the Design Review process will be included in a revised Design Process chapter.
MADE	DDG120	Comment	Whole document	What about Para. 55 and 63 – creativity and innovation. Gets no mention.	A reference to the potential for schemes to be submitted under these clauses will be added to the document.
MADE	DDG122	Comment	Whole document	Streetscene – we need to re-do the pictures and show the streets/demonstrate an edge to the streets	Noted. Diagrams to be revised to be more understandable.
MADE	DDG123	Comment	Whole document	Flow chart a good idea, but needs to be revised. Incorporate design and access statement. Steps diagram – start with the site.	Agree that flow chart can be simplified to show simple steps in process

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Respondent	Response No.	Type of Response	Part of Document	Response Summary	Officer Response
MADE	DDG124	Comment	Whole document	Overall vision – what we want, should reflect the Local Plan vision. 2 nd section, how we get it, local validation checklist and processes (look at Newcastle Under Lyme's). Examples of good practice (Q. Concern about the GBSLEP approach to a universal checklist, this won't be conducive to locally specific requirements?) Checklist should include reference to the Statement of Community Involvement, Building for Life Standards and Design Review Panel.	Agree that document should be restructured to start with the local plan vision for the district and then look at relevant policies, both national and local. Next section will cover the planning process with reference to SCI, BfL12 and Design Review.
MADE	DDG125	Comment	Whole document	MADE are now undertaking place reviews – looking at places and their context rather than just specific sites. The good, the bad and the ugly. Place Reviews could be undertaken for Lea Castle and Stourport-on-Severn?	Noted. Kidderminster already has the KCAAP adopted. Agree that Stourport would be a good example for a 'Place Review'. Lea Castle will also require a detailed masterplan.
MADE	DDG126	Comment	Whole document	SUDs section – more like a manual than design guidance. This section is too long and disproportionate to the rest of the SPD. It should be more central to design, so for example at the “start with the site stage”	See previous comments. The water management section will be shortened with much of the detail moved into the relevant appendix.
Core11	DDG3	Support	Para. 1.1	Support	Noted
	DDG1	Comment	Para. 1.2	Identify diverse areas and characteristics.	Final document will contain details of different character areas and local distinctiveness

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Core11	DDG4	Comment	Para. 1.2	Please note that open space is recognised as per the NPPF, when dealing with the environment aspect of planning applications.	Noted
Core11	DDG5	Support	Para. 1.3	Support	Noted
Core11	DDG7	Support	Para. 1.3	Support	Noted
Core11	DDG6	Support	Para. 1.4	Support	Noted
Core11	DDG8	Support	Para. 1.4	Support	Noted
Core11	DDG9	Comment	Para. 1.5	Special attention to NPPF should be given / all open space to be treated as green belt	Para.1.5 refers to Strategic Environmental Assessments. The comments are not relevant to this.
Core11	DDG10	Support	Para. 1.6	Support	Noted
Core11	DDG11	Support	Para. 1.7	Support	Noted
Core11	DDG12	Comment	Para. 1.7	Design should underline any roofing parameters and constraint which involve solar panels	Comments noted
Core11	DDG13	Support	Para. 1.8	Support	Noted

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Core11	DDG14	Comment	Para. 1.10	Size of plan must adhere to NPPF / Small or large	Noted. All schemes must be in conformity with NPPF
WFDC - Dev. Control	DDG60	Comment	Para. 1.10	Building for Life 12 - What is this? Requires more explanation. Should it be in an appendix?	Noted. Insert into final sentence 'Building for Life 12 (a government-endorsed industry standard for well-designed homes and neighbourhoods)
Core11	DDG15	Comment	Para. 1.11	A difficult aspect of planning, viewed alongside recent central government guidelines. Small private alterations, extensions, or developing in gardens. Open Plan requirements, Here, neighbours and local authorities must be consulted and agreement given, any possible breaking of existing laws must be addressed. Balancing NPPF with intermediate government indicators invokes the Law- verses Politics special administration needed.	Comments are noted.
Core11	DDG16	Support	Para. 1.12	Support	Noted
Core11	DDG17	Support	Para. 1.13	Support	Noted
Core11	DDG18	Comment	Para. 2.1	Structural design must give way to green infrastructure. To include paths and cycling to help travel to work and leisure.	Comments are noted

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Core11	DDG19	Support	Para. 2.3	Support	Noted
WFDC - Dev. Control	DDG61	Comment	Para. 2.3	Add in Policy SAL.UP9	Agreed. Add 'SAL.UP9 - Landscaping and Boundary Treatment' to end of 2nd bullet point
Core11	DDG25	Support	Para. 2.4	The aspirations are as they should be	Support is welcomed
Core11	DDG20	Support	Para. 2.4	Support	Noted
Core11	DDG21	Support	Para. 2.5	Support	Noted
Core11	DDG22	Support	Para. 2.6	Support	Noted
WFDC - Dev. Control	DDG62	Comment	Para. 2.6	Add in CP13 and SAL.UP9	Agreed. Add to 1st bullet point ' CP13 - Providing a Green Infrastructure Network' Add to 2nd bullet point 'SAL.UP9 - Landscaping and Boundary Treatment'
Core11	DDG23	Support	Para. 2.7	Support	Noted
Core11	DDG24	Support	Para. 2.8	Support	Noted
WFDC - Dev.	DDG63	Comment	Para. 2.9	Add in WCC Landscape Character Appraisal	Agree. Add in 3rd bullet point 'WCC Landscape Character Assessment

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Control					Supplementary Guidance'
WCC- Env.Policy & Strategic Planning	DDG31	Comment	Para. 2.10	Please see suggested revisions in italics: The built, natural <i>and historic</i> environment informs the landscape character and is an important asset...	Suggestion is noted and included
WCC- Env.Policy & Strategic Planning	DDG32	Comment	Para. 2.11	Suggest additional wording: Development responding to landscape character should: enhance and strengthen the setting and character ...	Suggested amendment noted and included
WFDC - Dev. Control	DDG64	Comment	Para. 2.12	Will BfL be used for all development - extensions, minor?	BfL is only applicable to large residential schemes (10+ dwellings)
WCC- Env.Policy & Strategic Planning	DDG33	Comment	Para. 2.13	Under section on 'Creating a place', suggest additional wording for 2nd bullet point. • Working with the site and its context - Does the scheme take advantage of existing topography, landscape features (including water courses), wildlife habitats, existing buildings, <i>heritage assets</i> , site orientation and microclimates?	Suggested wording is noted and included

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WFDC - Dev. Control	DDG65	Comment	Para. 2.16	Amend wording as follows: “The layout of residential streets should mean that high speeds are impossible to achieve and traffic calming should not be needed. lower vehicle speeds without the need for traffic calming.”	Amend 1st sentence to “The layout of residential streets should lower vehicle speeds without the need for traffic calming.”
WFDC - Dev. Control	DDG66	Comment	Page 43 Table .1	Move to appendices	Comment is noted but officers consider that table should remain in the chapter rather than being moved to an appendix. Additional column relating to NPPG to be added.
WFDC - Dev. Control	DDG67	Comment	Assessment of Site & Context	Needs clarification - D&A Statements now only relevant to Major apps	Noted. The chapter relates to large-scale schemes only.
WCC- Env.Policy & Strategic Planning	DDG34	Comment	Para. 3.4	Suggested amendments as follows: Heritage Assets – Buildings, structures and archaeology all give clues to how a place has evolved. These may be statutory listed assets or assets of local value. It is important that these are considered as part of any development, or the impacts of development <i>to the setting of heritage assets</i> are taken into account if these assets adjoin the development site. <i>Worcestershire Historic Environment Record, historic maps and plans provide essential data sets that inform</i>	Suggested amendments noted but it is considered too detailed for this guidance. Reference to Worcestershire Historic Environment Record added at end of bullet point.

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				<i>appropriate and proportionate site investigations that in turn aid the interpretation of the places and establish significance of heritage assets and their setting and highlight issues and options that should inform design.</i>	
WCC- Env.Policy & Strategic Planning	DDG35	Comment	Para. 3.5	Suggested amendments to para.3.5: Landscape setting – The quality and character of the landscape setting including trees, hedgerows, green spaces, natural, <i>prehistoric or historic features</i> , which could influence the <i>development of habitat to support enhancements for biodiversity</i> , the <i>setting of heritage assets</i> or layout of the scheme.	Suggested additional wording is noted and included
WFDC - Dev. Control	DDG69	Comment	Para. 3.5	Need to clarify where landscape analysis plan has come from – Is there an example for Wyre Forest?	If possible, an example from a Wyre Forest planning application will be used.
WFDC - Dev. Control	DDG68	Comment	Para. 3.5	Bullet point 1 - needs reference to Worcestershire County Landscape Character Assessment	Agreed. Add in 'Please refer to Worcestershire Landscape Character Assessment http://www.worcestershire.gov.uk/downloads/file/4788/landscape_character_assessment_supplementary_guidance

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WFDC - Dev. Control	DDG70	Comment	Para. 3.9	Improve layout of diagrams and labelling/context explanation	Agree. Layout and labelling will be improved in liaison with officers from WFDC - Dev. Control.
WFDC - Dev. Control	DDG71	Comment	Para. 3.10	These diagrams need introductory paragraphs. Refer to Highways Design Guide (WCC) pages 12 -15 and use clear labelling	Noted. The current guidance from WCC on highway design can be found in the LTP3 Highways Design Guide. However, this guidance is in the process of being reviewed.
WFDC - Dev. Control	DDG72	Comment	Para. 3.11	Remove wording “may be ineffective and not consider the opportunities for the site fully.” Insert “still has its place within <u>some</u> developments”	Amend sentence to read as '...a single parking solution may be ineffective. A variety of solutions is often the most successful approach. As the design agenda has evolved there has been a move away from courtyard parking: however, this still has its place within some developments.'
WFDC - Dev. Control	DDG73	Comment	Para. 3.12	Amend wording at end of Para.: “WFDC - Dev. Control Practice Note <u>§ 15</u> “Approach for Major Applications” at www.wyreforestdc.gov.uk/planning-and-buildings/planning-practice-notes-and-advice-leaflets.aspx ”	Final sentence - only refer to WFDC - Dev. Control Practice Notes - remove specific reference.
WFDC - Dev. Control	DDG74	Comment	Para. 3.13	Amend wording “A checklist of what documentation needs to be submitted with a planning application is contained within <u>the</u> Appendix 1 of WFDC - Dev. Control Practice	Amend final sentence to read: 'A checklist of what documentation needs to be submitted with a planning application is contained

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				Notes 17— Guidance for Developers Submitting Major Planning Applications and is available to download from the website as set out at 3.12.”	within the WFDC - Dev. Control Practice Notes.'
WFDC - Dev. Control	DDG75	Comment	Para. 3.14	Include requirement for Heritage Statement	Amend final sentence to read ' All Listed Building applications also require one together with a Heritage Statement.'
WFDC - Dev. Control	DDG76	Comment	Para. 3.16	Delete last 2 sentences – not enforceable “Wyre Forest DC would encourage applicants and developers to exceed the current building regulations at time of application / development and to meet with best practice approaches wherever possible. Further information regarding sustainable design and construction can be found online at the BREEAM website: www.breeam.org/filelibrary/BREEAM%20and%20Planning/Good_Practice_Guidance_-_Sustainable_Design_and_Construction.pdf ”	Delete final 2 sentences of Para. 3.16 from 'Wyre Forest DC would encourage ...'
WFDC - Dev. Control	DDG77	Comment	Para. 3.17	Amend at Kingswinford, Dudley to <u>neighbouring authority</u> .	Amend opening sentence 'The new vicarage at a neighbouring authority ...'
WFDC - Dev.	DDG78	Comment	Para. 3.18	Where in Kidderminster? Remove “This has yet to be implemented” as planning	Amend to read ' Planning permission was also granted for a similar

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Control				permission has expired.	scheme for a replacement rectory for St. Georges Kidderminster as shown below.'
WFDC - Dev. Control	DDG79	Comment	Para. 4.1	Remove wording referencing extensions – they are dealt with in the next chapter “areas where infilling takes place and where extensions to existing dwellings are proposed. ”	Amend opening sentence to read 'The District Council has an important role to play in influencing essential elements of housing design in new residential areas and in older residential areas where infilling takes place.'
WFDC - Dev. Control	DDG80	Comment	Para. 4.4	Photos - Include a panorama of streetscene instead	Change photograph to a panorama of a streetscene in liaison with officers from WFDC - Dev. Control.
WFDC - Dev. Control	DDG81	Comment	Para.4.6	Small scale developments define as 1-9 homes.	Amend opening sentence to read as 'Small scale developments (1 - 9 homes) ...'
WFDC - Dev. Control	DDG83	Comment	Para.4.8	Amend: Repair / Completion – New development sometimes works to repair <u>improves or repairs</u> the townscape	Repair / Completion -New development sometimes improves or repairs the townscape...'
WFDC - Dev. Control	DDG82	Comment	Para.4.8	Use examples of local development. Also first diagram is not example of good design.	Sketch drawings will be replaced with local examples if possible.
WFDC - Dev. Control	DDG84	Comment	Para.4.10	How does this layer plan fit in? No context and not referenced anywhere else	Agree with comment. Diagram will be removed as it does not add to understanding.

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WFDC - Dev. Control	DDG85	Comment	Para.4.16	Move para 4.16 to after para 2.17 makes more sense there	Agree. Move paragraphs 4.16-4.18 to end of chapter 2.
WFDC - Dev. Control	DDG86	Comment	Para.4.16	Bullet point Red - Does the applicant grade their own scheme?	Yes, the applicant grades the scheme before officers then assesses their submission to see if they agree with the grading in answer to the 12 key questions.
WFDC - Dev. Control	DDG87	Comment	Para.5.3	1st bullet point - Refer to 45 degree advice note	Bullet point i - add in reference to advice note on website
WFDC - Dev. Control	DDG129	Comment	Para.5.4	Bullet Point 8 - suggest re-wording: "The use of flat roofs has the potential to have a significant impact on the aesthetics of a development. As such proposals incorporating flat roofs will be assessed by their merits"	Noted and included
WFDC - Dev. Control	DDG88	Comment	Para.5.5	Remove link to website? "Additional good practice guidance is available on the District Council's website at http://www.wyreforestdc.gov.uk/planning-and-buildings/planning-practice-notes-and-advice-leaflets.aspx "	Remove specific link to website as guidance notes are to be updated.
WFDC - Dev.	DDG89	Comment	Para.5.7	Use different photo - completed development and make reference to good	Use photo of good local example referencing setback and matching

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Control				set back	materials.
WFDC - Dev. Control	DDG90	Comment	Para.5.9	Extending Listed Buildings remove section from Design SPD and leave to advice leaflet.	Remove section as duplicates advice leaflet.
WFDC - Dev. Control	DDG91	Comment	Character & Identity	Is this chapter necessary? CP11 and SAL.UP7. If so does it relate to 10+ houses or 1-9? Para 6.1 “a proposal must <u>should</u> improve...” Para 6.4 refers to Appendix 3 – no maps. Photos at 6.6 - Use residential examples for Wyre Forest if possible and show layout	<p>Disagree that this chapter is not required. The Quality Design and Local Distinctiveness Policies provide the basics. The SPD adds in more detail reflecting the local area. This chapter is applicable to all types of development.</p> <p>At Para. 6.1 5th sentence, amend to read ' Where the context is weak, a proposal should improve the quality of an area.'</p> <p>Para. 6.4 - Maps will be added at Appendix 3.</p> <p>Para. 6.6 - if possible, local examples will be used.</p> <p>Add in paragraph referring to local building stone as per comments from Worcestershire County Council.</p>

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Respondent	Response No.	Type of Response	Part of Document	Response Summary	Officer Response
WFDC - Dev. Control	DDG92	Comment	Landscape Design	Is this section necessary? Separate SPD/ Appendix – Divided into Minor, Major, Other?	Comments are noted. This chapter will be slimmed down and moved to earlier in the document as it refers to all types of major developments.
Wyre Forest District Council	DDG54	Comment	Para.7.3	Suggest use of a different photograph.	Noted and agreed.
WFDC - Dev. Control	DDG93	Comment	Para.7.3	Does this apply to all schemes or where appropriate?	Para. 7.3 will apply to large residential schemes where appropriate.
WFDC - Dev. Control	DDG94	Comment	Design of Space for Play	Refer to S106 requirements for LEAPS/Neaps/ off site etc	Add in reference to planning obligations SPD before bullet points.
WCC- Env.Policy & Strategic Planning	DDG30	Comment	Water Management	<p>We welcome and support the references throughout the document to the role of the water environment in informing and creating a sense of place.</p> <p>With regard to SuDS policy and legislation we would advise the LPA to be mindful of the draft National SuDS Standards and accompanying guidance which are likely to form part of the NPPF technical guidance.</p> <p>We welcome the references to the role of</p>	Comments are noted

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Respondent	Response No.	Type of Response	Part of Document	Response Summary	Officer Response
				Water Sensitive Urban Design and SuDs as part of a multifunctional and holistic approach to surface water management.	
WFDC - Dev. Control	DDG95	Comment	Water Management	Water Management – consider slimming down to bits which most relevant. Use SUDs examples from our District.	Agree that section needs to be slimmed down. If possible a local example of a SUDs scheme will be used.
Environment Agency	DDG41	Comment	Para.7.7	Groundwater should also be identified in considering and managing all parts of the water cycle. Most of the eastern half of the district is underlain by Permo-Triassic sandstones which are classed as Principal Aquifers as large volumes of water can easily be drawn from them via boreholes or wells. They are regionally important for public water supply but are highly vulnerable to surface contamination. Source Protection Zones have been modelled to protect specific sensitive locations such as the public water supply boreholes.	Comments are noted. Further reference will be made to importance of groundwater to public water supply in eastern part of district
Environment Agency	DDG42	Comment	Para.7.10	We note that the North Worcestershire Water Management Team has been referred to in identifying roles and responsibilities in relation to flood risk. Watercourses classed as 'Main Rivers' fall under the remit of the Environment Agency and this could be detailed within this Para.	Add in additional text. 'Please note that main rivers fall under the remit of the Environment Agency.'

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Environment Agency	DDG43	Comment	Para.7.11	<p>The district contains a significant rural area. In addition to managing flood risk, the use of SuDS can help to meet objectives of the Water Framework Directive (WFD) i.e. help to deliver the aim of waterbody 'good status' by 2027.</p> <p>Advice on rural SuDS can be found at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/291508/scho0612buwh-e-e.pdf</p>	Noted. A cross reference to advice on rural SuDS will be added to the final SPD.
WFDC - Dev. Control	DDG96	Comment	Para.7.14	Third bullet point – do we want to dissuade from open plan estates?	Comment noted.
WFDC - Dev. Control	DDG97	Comment	Microclimate	Is the section on microclimate necessary?	Officers consider that it is vital to consider microclimatic conditions when designing a development as building orientation can effect energy consumption and future use of external spaces.
Wyre Forest District Council	DDG55	Comment	Para.7.15	Pleased to see mention of heat island effect.	Noted
Wyre Forest District Council	DDG56	Comment	Incorporating Biodiversity into	Pleased to see mention of green roofs and walls	Noted.

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Respondent	Response No.	Type of Response	Part of Document	Response Summary	Officer Response
			Developments		
WCC- Env.Policy & Strategic Planning	DDG36	Comment	Para.7.25	<p>Suggested additional text as follows:</p> <p>Wyre Forest District is dominated by three main watercourses: the River Severn, the River Stour and the Staffordshire and Worcestershire Canal which follows the valley of the Stour. There is also a very large network of streams and pools. <i>Many of these features are heritage assets, being built or modified to perform particular functions.</i> The Hoo Brook, Blakedown Brook and Dowles Brook all have national significance for biodiversity. Many of the key regeneration sites are situated alongside these waterways and it is important that developments are designed with the 'blue' infrastructure at the heart of any proposals.</p>	Suggested amendments are noted
WFDC - Dev. Control	DDG98	Comment	Para.7.25	<p>Special Consideration Around Canals and Rivers – Can't we just rely on Local Plan policies?</p>	<p>This section builds upon policy CP15: Regenerating the Waterways. The canal, rivers, streams and pools are key to the district's local distinctiveness and officers consider that specific design principles should be set out in the SPD.</p>

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Respondent	Response No.	Type of Response	Part of Document	Response Summary	Officer Response
Canal & River Trust	DDG28	Comment	Para.7.26	We welcome the inclusion of our previously suggested design principles which provide a good starting point and raise a number of questions when reviewing development proposals. It is important to consider views both from the towpath and the water at boat level. When considering new buildings, we are supportive of buildings which enhance the historic environment. Also need to consider siting, orientation, massing, scale, materials and setback. Boundary treatments should be given careful consideration. Highways and parking are often sited adjacent to waterways but need appropriate screening. Access from developments to the canal should be convenient, comfortable, attractive and safe. Bridges should integrate well into surroundings and minimise impact on canal corridor.	Comments are noted. Further detail will be included in final SPD.
WCC- Env.Policy & Strategic Planning	DDG37	Comment	Para.7.26	Suggest additional design principal relating to canals: • <i>consideration of associated heritage assets</i>	Suggestion is noted.
WFDC - Dev. Control	DDG99	Comment	Para.7.27	Suggests use of a different photograph of planting.	Noted and agreed.

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Respondent	Response No.	Type of Response	Part of Document	Response Summary	Officer Response
Environment Agency	DDG44	Comment	Para.7.28	<p>Development alongside rivers and streams': should open up culverted watercourses, where practicable. In terms of the species mentioned, a reference should be made to providing habitat for water vole.</p> <p>For the last bullet point, including undeveloped buffers helps to reduce disturbance to watercourse corridors in protecting habitat/ecology and the species referred to. Buffers also provide a suitable easement for access to undertake flood risk maintenance and / or improvement works, when required. With this in mind, an additional point should be added to this section to highlight that development should provide ongoing access and maintenance to any watercourses within or adjacent to the site.</p> <p>Developers could refer to The River Restoration Centre 'Manual of River Restoration Techniques' which provides further advice and a number of case studies on river restoration projects, available via: http://www.therrc.co.uk/rrc_manual.php</p>	<p>Comments are noted. Add in additional reference to water vole in 3rd bullet point. Insert additional bullet point at start - 'Should open up culverted watercourses, where practicable'. Final bullet point - add in -' ... wetland species and help to reduce disturbance to watercourse corridors in protecting habitats/ecology. Buffers also provide a suitable easement for access to undertake flood risk maintenance and / or improvement works, when required.'</p> <p>Add in bullet point: 'provide ongoing access and maintenance to any watercourses within or adjacent to the site.'</p> <p>Additional sentence: Developers could refer to The River Restoration Centre 'Manual of River Restoration Techniques' which provides further advice and a number of case studies on river restoration projects, available via: http://www.therrc.co.uk/rrc_manual.p hp</p>

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WFDC - Dev. Control	DDG100	Comment	Design for Privacy	Design for privacy consider re-wording. WFDC - Dev. Control happy to discuss in further detail. Para 8.2 bullet point 1 – 31m should be 25m?	Noted. Officers to discuss how to take this section forward.
WFDC - Dev. Control	DDG101	Comment	Safety & Security	Safety and Security – duplication? Para 8.4 – Design and Access Statements for Major Applications only	Comments are noted. The types of applications requiring Design and Access Statements are mentioned at para.3.14. Although Appendix 2 lists the attributes for Secured By Design, it is worth setting them out in more detail
WFDC - Dev. Control	DDG102	Comment	Para.8.9	4 th bullet point - would we refuse on this basis?	Noted. Officers to discuss this.
WFDC - Dev. Control	DDG103	Comment	Para.8.10	Internal layouts – can we require this? Remove	Agree. This section will be rewritten. Reference will need to be made to the nationally described space standard issued by DCLG in March 2015. This will be implemented through the planning system. It can only be applied where there is a local plan policy based on evidenced local need and where the viability of the development is not compromised.

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WFDC - Dev. Control	DDG104	Comment	Private Garden Space	Private garden space – too prescriptive.	Noted. Remove this section.
WFDC - Dev. Control	DDG105	Comment	External Storage, Refuse & Recycling	Sections on External Storage and Access for All - Remove	Comments are noted. Remove sections.
WFDC - Dev. Control	DDG106	Comment	Shop Front Design Guidance	Does this apply to historic areas only? Does it replace Shop Front Design SPG?	Comments are noted. This guidance applies to all areas and does not replace the existing Shop Front Design SPG
WFDC - Dev. Control	DDG107	Comment	Para.9.8	Is there a % perforated?	Details of suggested shutter perforation will be discussed with officers
WCC- Env.Policy & Strategic Planning	DDG38	Support	Rural Development	We commend Wyre Forest District Council for referencing and empowering use of the guidance!	Support is noted.
WFDC - Dev. Control	DDG108	Comment	Rural Development	Rural Development - need to reference WCC Landscape Character Assessment Image of barn conversion needs updating	Noted. Paragraph on Worcestershire Landscape Character Assessment will be added.

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					<p>'Landscape character is an important factor that is considered in the assessment of a planning application. At a national level English Nature have divided up the landscape into National Character Areas. In Worcestershire, these are further divided up into smaller Regional Character Areas and then into Landscape Descriptive Units which are determined by analysing maps of geology, topography, soils, tree cover, land use and settlement patterns. Landscape Types are generic and can be found anywhere in the country where the same combinations of physical and cultural landscapes occur. An application for residential development should show that the key characteristics of the Landscape Type have been considered in the siting, design, scale and layout of any proposed change. Further details of the Worcestershire Landscape Character Assessment can be found at http://www.worcestershire.gov.uk/info/20014/planning/1006/landscape_character_assessment/5</p>

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WFDC - Dev. Control	DDG109	Comment	Examples of High Quality Employment Development	Use photos of employment development examples in Wyre Forest	Agreed. Photographs of Amada and Beakbane will be used in the final SPD.
WFDC - Dev. Control	DDG110	Comment	Appendix 1	BFL 12 Matrix needs amendments - further discussion with WFDC - Dev. Control Notes - quantify large scale housing (i.e. 10+ housing)	Officers will discuss with Development Management colleagues how the proforma should be used to assess large scale housing schemes. Amend title to BfL12. Quantify 'large-scale housing' (10+ dwellings). Update link to latest edition of BfL12 (January 2015) http://www.designcouncil.org.uk/knowledge-resources/guide/building-life-12-third-edition Amend final table for Wyre Forest Response by deleting scores and just referring to the traffic light system.
Wyre Forest District Council	DDG53	Comment	Appendix 2	Requirement for an Arboricultural Impact Assessment in accordance with BS5837:2012 needs highlighting under the section on Design and Access Statements.	This requirement for an Arboricultural Impact Assessment will be included within the planning application validation checklist to be set out as part of the final document.
Wyre Forest	DDG57	Comment	Appendix 2	With reference to the need for a maintenance plan for soft landscaping, there	BS8545 will be highlighted under the Design and Access Statements

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District Council				needs to be a designated time for the establishment of trees as per BS8545 Trees: from nursery to independence in the landscape.	specification.
WFDC - Dev. Control	DDG111	Comment	Appendix 2	D&A Statements for major applications only	This is stated in the text at Para. 3.14 but will also be added in at the appendix for clarification.
WFDC - Dev. Control	DDG112	Comment	Appendix 3	Character studies - include maps and layouts with wording to provide context	Agree that this would be helpful. Extract street maps to illustrate the different character types will be included together with photographs from the district.
Environment Agency	DDG45	Comment	Appendix 4	We welcome the reference to contaminated land in considering the suitability of infiltration SuDS and to the requirement for the number of treatment stages to be informed by the uses proposed on site e.g. road/car parks may need more treatment. The developer would need to demonstrate that, where infiltration SuDS are intended to be used the risk to controlled waters (ground and surface waters) has been adequately assessed. In addition, the use of infiltration SuDS would need to be considered carefully for sites located within SPZ1 of public water supplies.	Comments noted. Further details will be added to the appendix.

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				Moving from SPZ 3 the outermost, to SPZ1 (closet to the borehole) we impose greater restrictions on activities and discharges (such as surface water and foul water drainage) to protect the abstraction.	
Environment Agency	DDG46	Comment	Appendix 4	<p>The flood risk Sequential Approach in the layout and design of the proposed development should only be used after the Sequential Test has been passed. We normally advise that finished floor levels are set at least 600mm above the relevant 1% (1 in 100 years) plus climate change flood level. In demonstrating that there is no increase in flood risk, there should be no impact on flood flow routes and floodplain storage. Any flood storage compensation would need to be provided on a 'level for level, volume for volume' basis. Developers should seek opportunities to reduce the overall level of flood risk in the area (flood risk betterment).</p> <p>In designing for safe development, we would recommend adding an additional Para. within this section to cover safe access and egress for occupiers (especially important where 'more vulnerable' users or overnight accommodation is proposed). For 'more vulnerable' and 'highly vulnerable'</p>	<p>At end of 1st Para. add 'The flood risk Sequential Approach should only be used after the Sequential Test has been passed.'</p> <p>At 2nd Para. after 1st sentence add in 'The Environment Agency normally advise that finished floor levels are set at least 600mm above the relevant 1% (1 in 100 year) plus climate change flood level.'</p> <p>At end of 2nd Para. add: ' In demonstrating that there is no increase in flood risk, there should be no impact on flood flow routes and floodplain storage. Any flood storage compensation would need to be provided on a 'level for level, volume for volume' basis. Developers should seek opportunities to reduce the overall level of flood risk in the area</p>

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				<p>development (as classified in Table 2 of the flood risk section of the National Planning Practice Guidance), the developer should demonstrate (within a Flood Risk Assessment (FRA)) that the development has safe pedestrian access above the 1% river flood level plus climate change. Pedestrian access should preferably remain flood free in a 1% river flood event plus climate change. However, in cases where this may not be achievable, the FRA may demonstrate that pedestrian access is acceptable based on an appropriate assessment of 'hazard risk' including water depth, velocity and distance to higher ground (above the 1% river flood level plus climate change). See http://www.hydres.co.uk/tools/FD2320%20TR2%20Final%20Jan%2006.pdf).</p> <p>For 'less vulnerable' development e.g. office, retail, the FRA should consider safe access above the 1% river flood level plus climate change. Consideration of an appropriate flood evacuation management plan (see below) in consultation with Emergency</p>	<p>(flood risk betterment).'</p> <p>Add new Para. : 'For 'more vulnerable' and 'highly vulnerable' development (as classified in Table 2 of the flood risk section of the National Planning Practice Guidance), the developer should demonstrate (within a Flood Risk Assessment (FRA)) that the development has safe pedestrian access above the 1% river flood level plus climate change. Pedestrian access should preferably remain flood free in a 1% river flood event plus climate change. However, in cases where this may not be achievable, the FRA may demonstrate that pedestrian access is acceptable based on an appropriate assessment of 'hazard risk' including water depth, velocity and distance to higher ground (above the 1% river flood level plus climate change). See http://www.hydres.co.uk/tools/FD2320%20TR2%20Final%20Jan%2006.pdf).</p> <p>For 'less vulnerable' development</p>

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				<p>Planners would be required.</p> <p>Flood level data(where available) to assist the Flood Risk Assessment and Flood Management Plan, including modelled levels for the: 5% event (functional floodplain), 1% event, 1% event with climate change, 0.1 % event, may be obtained from the Environment Agency's Customer Services team on telephone 03708 506506; shwgenquiries@environment-agency.gov.uk</p>	e.g. office, retail, the FRA should consider safe access above the 1% river flood level plus climate change.
Environment Agency	DDG47	Comment	Appendix 4	<p>Measures to manage residual risk - a. contributions should be for both new and existing publically funded Flood Alleviation Schemes (FAS). Also recommend developer contributions (£1000 per dwelling) are made towards flood warning systems where a development depends on this service.</p> <p>c. & d. Part 3 (Guidance) of the CLG document titled 'Improving the Flood Performance of New Buildings: Flood Resilient Construction' provides further guidance on flood resilient design and construction, available via: https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings</p>	<p>a. add in '(both new and existing)'</p> <p>d. add in 'Part 3 (Guidance) of the CLG document titled 'Improving the Flood Performance of New Buildings: Flood Resilient Construction' provides further guidance on flood resilient design and construction, available via: https://www.gov.uk/government/publications/flood-resilient-construction-of-new-buildings</p> <p>e. add in 'where a development benefits from a FAS, evacuation plans must consider residual risk from a breach or overtopping. The</p>

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				The Level 2 Strategic Flood Risk Assessment contains hazard ratings for breach and overtopping scenarios for the Kidderminster FAS and Bewdley FAS.	Level 2 Strategic Flood Risk Assessment contains hazard ratings for breach and overtopping scenarios for the Kidderminster FAS and Bewdley FAS.'
Environment Agency	DDG48	Comment	Appendix 4	Recommend additional point to cover responsibilities of 'riparian landowners', those who own land / property adjacent to river, stream or ditch including maintenance of watercourse and banks. See guidance document 'Living on the Edge' https://www.gov.uk/government/publications/riverside-ownership-rights-and-responsibilities	Add additional point h. 'Those owning land or property adjacent to a river, stream or ditch may also have additional responsibilities for maintenance of the watercourse or banks. See guidance document 'Living on the Edge' https://www.gov.uk/government/publications/riverside-ownership-rights-and-responsibilities '
WFDC - Dev. Control	DDG113	Comment	Appendix 5	Remove – can't require this.	Appendix will be removed.