

New Residential Design Guide SPD Consultation Summary

Residential Design Guide SPD:

Comment Reference	Respondent	Page/Para Reference	Consultation Response	Officer Summary	Proposed Change to SPD
RDG1	Scrutiny Board	Principle 6: Second Bullet Point	The wording 'Provision of generous Open Space' too vague	This SPD does will not specify outdoor space standards, however, accept cross reference to policy would be beneficial to aid clarity of requirement.	Wording revised to omit 'generous' and add link to CCC Open Space SPD
RDG2	Scrutiny Board	Principle 7	The wording for large mixed-use schemes too vague in definition of what would be appropriate uses	Principle seven seeks to promote larger residential schemes bringing forward supporting uses to aid positive community creation, such as small-scale retail. However, officers advise against the specification of use classes in this principle as such referencing can become outdated.	Wording revisions within principle seven "complimentary mix of uses within a new residential setting"
RDG3	Natural England	General	Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment	Noted and welcomed	No action required

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RDG4.1	Seven Trent	General	<p>“Severn Trent is largely supportive of this document, however we would note that there is not much inclusion of how Sustainable Urban Drainage (SuDS) and blue green infrastructure can be included within New Residential Development design. We would encourage you to include an additional section relating to SuDS design as part of development design.”</p>	<ul style="list-style-type: none"> - Agreed additional reference to SUDS systems to be incorporated, whilst the SPD is design focused, due consideration of technical requirements can also yield positive design outcomes. 	<ul style="list-style-type: none"> - Additional bullet point within principle 15 ‘sustainable design’ added to ensure consideration of SUDS systems.
RDG4.2	Seven Trent	Principle 4	<p><u>Principle 4:</u></p> <p>“Severn Trent is supportive of this principle relating to the appropriate use of trees, vegetation, gardens and open spaces, however we would encourage you to go further by acknowledging the multiple benefits (drainage, biodiversity, amenity) that can be achieved by including good SuDS design within this area. For example good design of trees (if newly planted) could include tree pits which can help to sustainably manage surface water at source.”</p>	<ul style="list-style-type: none"> - Agreed that street design considers the integration of SUDS systems. Biodiversity considerations are outside of the scope of this SPD, however reference to opportunity agreed with. 	<ul style="list-style-type: none"> - Additional bullet point principle inserted at Principle 4 to embed the consideration of SUDS schemes in street design.
RDG4.3	Seven Trent	Principle 32	<p><u>Principle 32:</u></p> <p>Severn Trent is supportive of this principle particularly use of porous hardstanding materials.</p>	<ul style="list-style-type: none"> - Noted and welcomed 	<ul style="list-style-type: none"> - No action required

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RDG5.1	Historic England	General/Paragraph 2.4	<p><u>Paragraph 2.4:</u></p> <p>“Firstly, we welcome the inclusion of the reference to the Council’s conservation area character documents, and that this SPD should be read in conjunction with them (para.2.4).”</p>	<ul style="list-style-type: none"> - Noted and Welcomed 	<ul style="list-style-type: none"> - No action required, however minor rewording at 2.4 to further reinforce link to local plan policy documents of design and heritage matters.
RDG5.2	Historic England	Paragraph 4.2	<p><u>Paragraph 4.2:</u></p> <p>““We note that at para.4.2 the SPD references the NPPF’s advice on planning authorities preparing design codes, consistent with the principles set out in the National Design Guide and National Model Design Code. However, we note that the SPD does not then elaborate on this...” (Comment continues below)</p>	<ul style="list-style-type: none"> - Para 129 (NPPF): “Design guides and codes CAN be prepared...” NPPF does not mandate that design codes are needed, merely provides guidance on how this can be done. 	<ul style="list-style-type: none"> - As below
RDG5.3	Historic England	Table 2: Design Process	<p><u>Table 2: Design Process:</u></p> <p>“...as there is no mention of Design Codes within ‘Table 2: Design Process’, or any commitment within the document to the Council preparing Design Codes to guide residential development schemes. Therefore, we suggest that this section of the SPD is reviewed.”</p> <p>““Notwithstanding the above, Historic England supports the stepped approach advocated in ‘Design Process Expectations in Coventry’ (Table 2, p.10) for larger residential schemes, and particularly the inclusion of tools such as ‘Vision setting’, ‘Concept plans’ and ‘Master planning’.</p>	<ul style="list-style-type: none"> - Para 128 (NPPF): “<i>To provide maximum clarity about design expectations at an early stage, all local planning authorities should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code</i>”. This confirms that the production of a design 	<ul style="list-style-type: none"> - Additional reference to consideration of heritage assets and their setting inserted at 5.5 ‘Vision setting’ within ‘key identifiers of local context’ which require consideration.

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			Where development may impact on the significance of a heritage asset, and/or its setting, we would encourage a heritage led masterplanning approach to ensure that the masterplan is responsive to the local context and heritage of Coventry”	<p>guide is sufficient, and does not therefore necessitate the production of a design code.</p> <ul style="list-style-type: none"> - <i>Para 129 (NPPF): “Design guides and codes CAN be prepared...”</i> NPPF does not mandate that design codes are needed, merely provides guidance on how this can be done. - Works to produce future, specific design codes therefore sit outside of the scope of this SPD - Agree that heritage assets should form key design informative in design outcomes, additional reference to be added in guidance. 	
RDG5.4	Historic England	Principle 16	<p><u>Principle 16 Building Heights:</u></p> <p>“With regard to <i>Principle 16: Building heights</i>, we note that the SPD advises that ‘<i>taller buildings will be more acceptable in city centre locations</i>’. However, we suggest that a caveat should be included here, to require consideration of the impact of building heights</p>	<ul style="list-style-type: none"> - Agree additional reference to heritage impacts would be beneficial, whilst drawing reference to conservation specialism SPD’s 	<ul style="list-style-type: none"> - Additional wording added at 7.11 stating full assessment required when impacting upon heritage assets and linking to LPA’s

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			on the significance of heritage assets and their settings, where relevant.”		supporting policy and SPD base.
RDG5.6	Historic England	Architectural Detailing, Architectural Design, Principle 28 Outdoor Amenity	<p><u>Architectural Detailing/Architectural Design/Principle 28 Outdoor Amenity:</u></p> <p>“We welcome the guidance contained in the sections of the SPD on ‘<i>Architectural Detailing</i>’ and on ‘<i>Architectural Design</i>’ and are pleased to see that conservation and heritage issues are included as a consideration for the provision of balconies within <i>Principle 28: Outdoor Amenity</i>”</p>	- Noted and welcomed	No action necessary
RDG6.1	Sports England	Paragraph 6.5	<p><u>Paragraph 6.5:</u></p> <p>Sport England are supportive of the expectation that new development will connect into and extend the surrounding route and space network in a high quality, safe and legible way.</p> <p>The provision of lit high quality footpaths/cycleways acting as corridor for green would encourage residents to be more physically active in a safe environment which is supported by Sport England’s Active Design Guidance. https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design</p>	- Noted and welcomed	No action necessary

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RDG6.2	Sports England	Principle 3	<p><u>Principle 3: Connectivity:</u></p> <p>Sport England considers that the addition of lit footpaths/cycleways should be incorporated within the principles to align with paragraph 6.5.</p> <p>Sport England are supportive of the promotion of active travel through pedestrian, cyclists and public transport connection being given the highest priority.</p>	<p><u>Principle 3: Connectivity:</u></p> <p>Support introduction of additional principle of lighting and surveillance to cycle and pedestrian routes to promote safe use.</p>	<p>Additional wording at principle 3 added to promote well lit and surveilled cycle and pedestrian routes.</p>
RDG6.3	Sports England	Principle 4	<p><u>Principle 4 Street Design:</u></p> <p>Sport England are supportive of Principle 4:Street Design with it sharing similarities with Sport England’s Active Design Guidance Principles Active Buildings; High Quality Streets and Spaces; Connected Walking and Cycling Routes; Walkable Communities and Appropriate Infrastructure</p>	<p>Noted and welcomed</p>	<p>No action necessary</p>
RDG6.4	Sports England	9.13 Cycle Storage.	<p><u>9.13 Cycle Storage:</u></p> <p>Sport England notes the support for the development of cycling as a sustainable transport mode though there is no corresponding Principle.</p> <p>The Council actively supports the development of cycling as a sustainable transport mode.</p>	<p>Noted and welcomed</p>	<p>No action necessary</p>

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RDG7.1	Rainer Developments	General	<p><u>General:</u></p> <p>The Council will be aware an SPD must supplement a Policy in the Local Plan. If it goes beyond the definition of a SPD, it is a Development Plan Document and the Council can only adopt it by submitting it to the Secretary of State for independent examination and adopting it as such (as set out in the Town and Country Planning (Local Planning) (England) Regulations 2012).</p> <p>Whilst the draft SPD is seeking to provide further guidance in respect of design and specifically Policy DE1, it is apparent that some of the proposed requirements go beyond those of Policy and therefore exceed what is allowed for in the Town and Country Planning (Local Planning) (England) Regulations 2012)</p>	<p><u>General</u></p> <p>Suggestion is made that the document may exceed what is applicable in an SPD and moves to areas where a Development Plan Document may be applicable</p> <p>This SPD only provides guidance and recommendations that the council would encourage to be included in new residential development proposals, it does not however establish new mandatory requirements.</p>	No action required
RDG7.2	Rainer Developments	Principle 16	<p><u>Principle 16: Building Heights:</u></p> <p>As drafted, the principle suggests that building heights should not result in any adverse impacts on residential amenities, however this is inconsistent with national policy in the National Planning Policy Framework which only references significant adverse impacts.</p> <p>There is sometimes an inevitability that development may have an adverse impact on amenity. The question is whether that adverse</p>	<p><u>Principle 16: Building heights:</u></p> <p>Impact to residential amenity is a key identifier of acceptable development proposals, however it is accepted that judgements are made in the context of local situation and precedent and that such impacts are taken in the overall balance of decision making. As such the insertion of 'significant' is accepted as a revision.</p>	Principle 16 insertion of 'significant'

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			<p>impact is significant or not. As such, Representations to the draft Design Guidance for New Residential Development Supplementary Planning Document it is recommended that the word “significant” in added to Principle 16 so the second bullet point reads:</p> <p>“Building heights should not result in significant adverse impacts on residential amenities and will be expected to enable a building to integrate well into its surrounding context.”</p>		
RDG7.3	Rainer Developments	Principle 19	<p><u>Principle 19: Space Standards:</u></p> <p>The National Planning Policy Framework is clear at Paragraph 131 f) that “planning policies and decisions should ensure that [...] developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users”, with Footnote 49 adding that “planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, <u>where the need for an internal space standard can be justified</u>” (underlining added for emphasis).</p> <p>Insufficient justification is provided for the need</p>	<p><u>Principle 19: Space Standards:</u></p> <p>The local authority wish to promote the best standards of residential development in the city and as such promote the use of NDSS space standards as a minimum expectation in forthcoming residential development. Whilst accepting that these standards being introduced as a formal requirement would need to be contained within local plan review, the inclusion of the expectation of best practice is seen as appropriate to remain in the SPD and indeed accord to established expectations in affordable housing SPD.</p>	No revision

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			<p>to impose the optional nationally described space standard, and in any case this requirement would need to be established in a Development Plan Document such as the Local Plan rather than through a SPD, particularly where there is no Policy support.</p> <p>As such, it is recommended that Principle 19 is removed, or at the very least amended to provide support for residential development proposals which adhere to the nationally described space standard, but recognise that such a standard is not necessary in all residential schemes.</p>		
RDG7.4	Rainer Developments	Principle 28	<p><u>Principle 28: Outdoor Amenity:</u></p> <p>Principle 28 adds that predominantly north facing balconies or balconies in close proximity to main roads which will be materially affected by noise and air pollution will not be considered favourably. In effect, if applied rigidly, the Principle would remove the ability to develop above ground floor level in large parts of the City. This is not consistent with National and Local Policy that requires development to make efficient use of land.</p> <p>Residential amenity is covered in the Local Plan by Policy H3: Provision of New Housing as opposed to Policy DE1, with criterion 3 of Policy H3 stating that “a suitable residential environment will include safe and appropriate</p>	<p><u>Principle 28: Outdoor Amenity:</u></p> <p>The introduction of an expectation of the delivery of private external amenity space to flatted developments in the city is promoted as a positive development of guidance post the experience of the Covid Pandemic and the highlighting o the importance of private external amenity space in mental wellbeing of residents which is often not able to be met through the delivery of communal spaces.</p> <p>Officers accept however that there will be occasion that the use of balconies may not be</p>	<p>Exclusions from expectation of private external space of amenity and design added considerations into principle 28.</p> <p>Further to inclusion of amenity consideration in exceptions, wording removed in respect of roadside and north facing situations to allow individual assessment.</p>

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			<p>access, <u>have adequate amenity space and parking provision</u>, and be safe from environmental pollutants such as land contamination, excessive noise and air quality issues” (underlining added for emphasis).</p> <p>Whilst the provision of balconies may be appropriate for some flatted developments as a way of ensuring adequate amenity space, it is not the only solution. In many instances, alternative provision such as designated communal indoor and outdoor amenity space may be more suitable in making more efficient use of the land and providing a better design solution as opposed to designing private space with 2m screen walls to the rear of ground floor flats. It may also be a better design solution for the appearance of the building not to have balconies.</p> <p>In any case, imposing such a specific and onerous requirement in this SPD goes beyond the requirement of the Policy.</p> <p>If the Council are to retain a specific requirement for balconies, it is recommended that Principle 28 of the draft SPD is revised to provide greater flexibility for circumstances where it is not appropriate. Conservation, privacy, or heritage reasons are already listed as an exception to the standard, but this list would benefit from expanding to include design, viability, and density.</p>	<p>appropriate to local context and as such have inserted ‘design and amenity’ as further potential exceptions to the expectation where cases for such exceptions can be individually assessed in forthcoming proposals. Considerations of viability are seen to sit outside of the scope of a design guidance SPD.</p>	
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RDG 8.1	Coventry Green Party		<p>We welcome this new guidance for housing developers. In particular, we applaud its advocacy of both active and passive solar designs as they go well beyond the minimum requirements set out in the current uplift to the Building Regulations. We are also pleased to note that the SPD encourages designers to protect and enhance the green character of our streets.</p> <p>However, we believe the guidance could both provide more clarity on those design systems and contain a much stronger statement on the vital role of the green infrastructure in making our urban environment more resilient in the face of the climate damage we are witnessing now.</p>	<p>Noted and welcomed</p> <p>Whilst the SPD advocates the inclusion of renewable energy systems, technical guidance on such systems cannot be given within the design led SPD and would therefore defer to the evolving building regulation system.</p> <p>Green infrastructure considerations are embedded in policy DE1 of the local plan stating 'green infrastructure should be considered in the earliest stages of the design process, and further referenced in the SPD to reinforce this at points 6.5, 6.7, 6.12 and within principle 6.</p>	No action necessary
RDG 8.2	Coventry Green Party	Principle 15	<p><u>Principle 15</u></p> <p>We recognise that active and passive solar designs offer a viable alternative to the, perhaps, more well established passivhaus standard. So, we welcome the statement in Principle 15 that the Council will “resist” any proposals that fail to incorporate passive solar design unless there is a “strong justification” for doing so and that it is “supportive of active solar micro renewable technologies”</p>	Noted and welcomed	No action necessary

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RDG 8.3	Coventry Green Party	Paragraph 7.4 & 7.5	<p><u>Paragraph 7.4 & 7.5 and Figures 14 & 15</u></p> <p>However, we think that both the written guidance (in paragraphs 7.4 and 7.5) and the illustrations (in figures 14 and 15) understate quite how rigorous these designs really are in terms of the technical specifications for insulation, ventilation and air tightness. For that reason, we suggest that those requirements are spelled out in an appendix to the planning document.</p>	<p>As above the SPD does not aim to articulate technical system detail of the delivery of renewable systems, rather embed the expectation that such systems should be fully considered for implementation in forthcoming proposals. In regard to technical guidance on requirements of such systems the SPD defers to the evolving building regulations framework.</p>	<p>Additional wording at 7.7 to draw reference to established and emerging building regulations standards in respect of embedded energy and energy efficiency in new residential construction</p>
RDG 8.4	Coventry Green Party	Paragraph 6.7	<p><u>Paragraph 6.7</u></p> <p>We welcome the statement in paragraph 6.7 that “the Council wishes to perpetuate and enhance ... (the) soft green character in its streets”. And that it encourages designers to “help maintain the ever-expanding green character of the city”. However, in our view, the current draft does sufficiently acknowledge the gravity of the situation we are facing as the climate continues to heat up. For that reason, we propose that, instead of the current wording which asks designers to “consider green infrastructure at the earliest stage in the design process” (see key principle “m” in Policy DE1) we would ask that this wording of this principle is more explicit in stressing the increasing importance of trees and other vegetation in cleaning and cooling the environment surrounding our homes.</p>	<p>The SPD cannot revise established wording within local plan policy DE1, however the role of landscape, planting and green infrastructure is nevertheless highlighted within the SPD.</p> <p>Officer accept that further strengthening of the importance of these elements and therefore propose additional wording included.</p>	<p>Additional wording at para 6.7 to recognise soft landscape role in cleaning and cooling the environment.</p>

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RDG 8.5	Coventry Green Party	General	<p><u>General</u></p> <p>In broad terms, we welcome this new guidance for developers and designers on residential new build. It is innovative in its advocacy of passive solar design and positive in its reference to the green infrastructure. We hope that the Council will accept our comments intend to strengthen that guidance. As the members of the Coventry Green Party, we would welcome any opportunity to discuss further with the Council our ideas on this vital matter.</p>	Noted and welcomed	Actions as noted above.
RDG 9.1	Guide Dogs	Principle 4	<p><u>Principle 4: Street Design</u></p> <p>Guide Dogs welcomes the inclusion within the Design Guidance for New Residential Developments of Principle 4: Street Design, and that residential developments should:</p> <p>“Ensure streets are safe places by considering the needs of vulnerable users and providing active frontages, good lighting, clear, obstacle free routes for pedestrians and designing in traffic calming measures to restrict vehicle speeds.”</p>	Noted and welcomed	No action necessary

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RDG 9.2	Guide Dogs	6.9	<p><u>Paragraph 6.9 & 6.10</u></p> <p>However, the Supplementary Planning Document goes on to state:</p> <p>6.9 Shared spaces are streets and areas of public realm in which all uses have equal status. They involve the introduction of features which influence driver behaviour to reduce vehicle speeds and create places that encourage a high level of social interaction between residents. They work best in short residential streets such as mews, cul de sacs and rural lanes.</p>	Noted	No action required
RDG 9.3	Guide Dogs	6.10	<p>Shared streets are increasingly being promoted in Coventry. Although the Council welcomes this approach, it is important the design is carefully considered to ensure that the needs of all road users (including vulnerable groups such as children, elderly and disabled) are catered for.</p>	Noted	No action required
RDG 9.4	Guide Dogs	Shared Spaces	<p><u>Shared Spaces</u></p> <p>People with sight loss feel unsafe when forced to navigate wide open spaces and walk amongst moving vehicles.</p> <p>Guide Dogs recommends that a 60mm kerb be in place to separate footways and carriageways to help avoid collisions and assist people with a vision impairment navigate. Having the right balance between attractiveness and</p>	<p>Officers note representation from user group which promotes inclusivity through the design of the built environment. Officer agree that such considerations of inclusivity should be included within the SPD and therefore include additional wording at principle 6 – Street Design.</p>	<p>Additional principle wording at 5 – Street design stating – street design should ensure inclusivity for all, notably careful considerations of gradients and demarcations to assist the visually impaired should be embedded into design proposals.</p>

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			<p>inclusiveness is crucial in determining if the overall objective is a success. These two things are not mutually exclusive, and both need to be considered.</p> <p>If a shared space is going to be included, with no kerb, then present corduroy tactile paving should be installed along the length of the carriageway on both sides. Corduroy hazard warning surfaces warn people of the presence of hazards e.g. steps and level crossings. Further, in line with the guidance on corduroy tactile paving, the paving should be 800mm deep to give enough warning of the hazard ahead. The paving should also be of one consistent colour, which should contrast against its surroundings.</p>		
RDG 9.5	Guide Dogs	Continuous Pavements	<p><u>Continuous Pavements</u></p> <p>These junctions are dangerous for people with sight loss, as people with a vision impairment may not be aware that they are entering onto a crossing area.</p> <p>Continuous footways should be avoided. However, where they are used, a tactile surface (with appropriate contrast) should be placed along the width of the crossing points where the traditional kerb has been removed. The tactile should be 800mm deep at all points and should not extend around the corner of the junction, as this would cause confusion to a</p>	Officers agree with the importance that street design should consider all user groups and their requirements, as such additional wording introduced in principle 5	Additional principle wording at 5 – Street design stating – street design should ensure inclusivity for all, notably careful considerations of gradients and demarcations to assist the visually impaired should be embedded into design proposals.

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			visually impaired person and create a risk that they would cross at this point and not proceed directly across to the opposite side. Tactile paving should also be provided at the other side to indicate the end of the crossing. Additionally, there should be clear signage for pedestrians when approaching the junction that identifies the continuous footway across a side road to assist those with some residual vision.		
RDG 9.6	Guide Dogs	General	<p><u>General</u></p> <p>We have recently published comprehensive guidance to assist designers, architects, and local authorities in creating places that are both inclusive of people with sight loss, and ready to address the challenges towns and cities face in the future. The “Making the built environment inclusive” guidance can be viewed by clicking on the following link:</p> <p>www.guidedogs.org.uk/inclusive-regeneration/</p>	Officers welcome reference to additional guidance in respect of this user group, however this reference does not impact upon the content of the SPD. As above further reference has been made within principle 5 for the consideration of all user groups, with specific reference to considerations for the visually impaired.	Additional principle wording at 5 – Street design stating – street design should ensure inclusivity for all, notably careful considerations of gradients and demarcations to assist the visually impaired should be embedded into design proposals.
RDG 10.1	Coventry Society	General	<p><u>General</u></p> <p>This consultation document is well-considered, contains some good ideas and makes a lot of sense. It is about Principles, and they need to be stated. However, while they have a use one must question whether they will really inspire good design. They set benchmarks, which may be helpful to planners working through</p>	<p>The SPD sits alongside design policy within the local plan and seeks to further articulate design expectations in the city and the process upon which ‘good design’ may be established.</p> <p>The SPD does not seek to define in a binary sense what may be</p>	<p>No revision necessary</p> <p>Table 2 is table one needs fixing</p> <p>Check where size definitions came from</p>

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			<p>checklists to help form their judgements but may lead to applications which demonstrate compliance yet do little to help create a good sense of place. Overall, the document falls short in explaining what is good design.</p> <p>We can see that the guide is intended for developers and their architects/designers but we question its appeal to smaller developers and their clients who just want and need good practical illustrations and less text. Ideally, there should be a supplement, written by an architect or planner who is knowledgeable about the subject and the difficulties of raising standards.</p> <p>A key element of the document is the series of blue 'Principle' boxes. These are clear in concept and generally clear in definition.</p>	<p>considered 'good design' as such definitions are grounded in responsive outcomes to individual site situations. Rather the SPD establishes key points of consideration which designers will be expected to evidence in yielding design outputs and therefore positive promoting contextual responsiveness.</p>	<p>Architectural detailing already present as principle</p> <p>Public art as principle – noted</p> <p>Make note should be read in other documents such secure by design</p>
RDG 10.2	Coventry Society	Front Cover & Imagery	<p><u>Front Cover & Imagery</u></p> <p>As with many documents now produced by the City Council it does have the feel of being produced by consultants - as exemplified by the awful, uninspiring 'anyplace' cover, references to 'the borough' and to 'villages'. Coventry photographs, where used, add to authenticity though some display poor access for disabled wheelchairs and children's pushchairs, some are poor quality, and a few include features which could be used against the Council on appeal. A review is needed of the relevance and appropriateness of all photographs.</p>	<p>References to massing precedents inclusive of town and village wording are accepted to be omitted to be specific in nature to Coventry.</p> <p>Officers note the use of imagery not from Coventry however also seek to illustrate good practice and innovative design solutions, accept use of caveat to imagery may be beneficial.</p>	<p>Deletion of wording at 7.9 and 8.4.</p> <p>Imagery role in the SPD clarified at 3.6</p>

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RDG 10.3	Coventry Society	3.5	<p><u>Paragraph 3.5</u></p> <p>The document quickly confuses the reader with a reference in 3.5 to a Table 1. However, there is no such table which is supposed to be in Chapter 5. How significant is the omission?</p>	Officers note the need for revision to wording in respect of this point to ensure clarity for the reader.	Wording at 3.5 revised to ensure clarity.
RDG 10.4	Coventry Society	5.1	<p><u>Paragraph 5.1</u></p> <p>In that Chapter in 5.1 referring to the 'iterative design process' there is the expectation that 'Larger schemes (50+ net new units)' will be expected to follow the steps identified in Table 2. However, there is no justification as to why larger schemes are considered to be of that size or above.</p>	The threshold was established to read in parallel to the LPA's established pre application structure which defined development of 50-199 dwellings/units to constitute 'Medium Scale Major Development'. The SPD therefore establishes an expectation that development of this level and above should engage with the Pre-application system in order to promote best design outcomes.	- No action necessary
RDG 10.5	Coventry Society	Principle 1 & 2	<p><u>Principles 1 & 2</u></p> <p>In the first two 'Principles' there is a reference to 'developments of 10 or more dwellings' without any justification of why this size of development has been chosen.</p>	It is the officer's assessment that the principles established in 1 and 2 in reference to concept plans are proportionate requirements for proposals, where opportunity of development of this quantum is able to establish a site-wide design approach which may be articulated with the supply of a concept plan. Similarly, this threshold also accords to the LPA's definition of small scale	- No action necessary

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				major development articulated in the pre-application structure.	
RDG 10.6	Coventry Society	Principle 4 & 5	<p><u>Principle 4 & 5</u></p> <p>In Principle 5 there is a reference to 'Developments of over 80 dwellings...' without any further justification. Without such justifications - and thus clarity - the document will be open to dispute by the developers that are required to follow its principles.</p> <p>Principles 4 and 5 are, confusingly, both titled 'Street Design'. P5 should be retitled 'Design of shared spaces'.</p>	<p>Officers agree clarity on principle in title wording re shared space and revise accordingly.</p> <p>80 Unit threshold previously to see correlation with council highways design guidance, however officers accept that with this guidance in place whilst other thresholds of development size within the SPD being 200+, a revision is accepted in order to accord principles within the SPD.</p>	<p>Principle 5 – Suffix in title of 'shared space'</p> <p>Principle 5 – threshold revision to 200</p>
RDG 10.7	Coventry Society	Section 7	<p><u>Section 7 & the adoption of 2 new principles</u></p> <p>Section 7 'Built Form' in the last part 'Architectural detailing' there is the opportunity to add in two new Principles</p> <p>Making 7.24 a Principle (The Council will expect development to exhibit high quality architecture which reinforces the design vision for the scheme....)</p>	<p>Officers are content that the aspirations of suggested principle at 7.24 is similarly articulated within principle 21 in respect of architectural detailing whilst also drawing reference to DE1 in the local plan which further reinforces this principle.</p> <p>In respect of public art, this is articulated at 7.27 within the SPD, and is seen to address this</p>	No Action necessary

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			A Principle relating to public art based on 7.27 (Public art will be encouraged to be incorporated into new developments particularly where they have significance to local communities and reflect the history and character of an area').	point sufficiently, given not all developments can be anticipated to be suitable for artwork integration, the application into an over-arching principle in the SPD is not seen as appropriate.	
RDG 10.8	Coventry Society	Secure by Design	<p><u>Secure by Design</u></p> <p>There ought to be a section that mentions 'secure by design' and references to parking courts should mention the importance of ensuring security.</p>	SBD is not a mandatory requirement however officer accept that early liaison in this respect is positive, therefore additional wording added to reinforce this.	<p>Reference to well lit and surveyed routes made in principle 3 - connectivity</p> <p>Principle 11 – parking courtyards – ‘secure by design standards should be fully considered’</p> <p>9.23 – boundary treatments – additional wording “secure by design standards should be referenced in design development and the authority recommend early liaison with SBD officers</p>
RDG 10.9	Coventry Society	Cross referencing to other council guidance	<p><u>Cross referencing to other council guidance</u></p> <p>There should be the opportunity to cross-reference to other city council guidance such as energy conservation, both for ventilation, heating and cooling.</p>	Reference to SPD being read in conjunction with other council guidance contained at 2.2 and 2.4	No action necessary

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RDG 10.10	Coventry Society	Other	<p><u>Other</u></p> <p>We are concerned that whilst the Council can control the design of new dwellings, once constructed Permitted Development rights could allow unfortunate changes which undermine the quality of the development, e.g., with the construction of additional storeys.</p>	Discussion of restriction of permitted development rights of homeowners is significantly beyond the scope of this SPD and what may be included in content.	No action necessary
RDG 11	West Midlands Police	New Principle	<p><u>Proposed new Principle – Design out Crime</u></p> <p>To fully meet the requirements of national planning policy, the CCWMP formally requests that an additional core design ‘Principle’ is included within the SPD to highlight the need for residential development designs to fully address safety and security matters. This would include consideration of management plans, lighting, planting, reducing crime, anti-social behaviour and the fear of crime.</p> <p>The proposed wording for the new Principle is as follows:</p> <p>“Principle – Design out Crime:</p> <p>All designs will be required to meet Secured By Design standards and consider safety and security and the need to reduce anti-social behaviour and the fear of crime. Designs should seek to prevent crime and be developed in consultation with the Force</p>	The SPD cannot incorporate a requirement for secure by design standards, nor introduce third parties to a confidential Pre-application process. However, officers agree that reference should be made to secure by design consideration and promote that applicants should engage with these standards to inform design outputs, as such additional wording introduced into SPD accordingly.	<p>Reference to well lit and surveyed routes made in principle 3 - connectivity</p> <p>Principle 11 – parking courtyards – ‘secure by design standards should be fully considered’</p> <p>9.23 – boundary treatments – additional wording “secure by design standards should be referenced in design development and the authority recommend early liaison with SBD officers</p>

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			<p>Design Out Crime & Crime Reduction Officers at the pre-application stage.</p> <p>Any relevant counter terrorism standards applicable at the time should be taken into consideration.</p> <p>Details of Secured By Design compliance should be included in Design and Access Statements at the planning application stage. All design proposals should consider the legacy of the development and whether a maintenance plan would be appropriate, particularly in communal areas, to reduce the risk of crime in the short, medium and longer-term.”</p>		
RDG 12.1	Warwickshire Flood Risk Management	General	<p>During the design process FRM would encourage consideration of blue infrastructure as early on as possible. A mention of this during the concept planning stage could help ensure sufficient space and provision is made for sustainable water management in future developments.</p> <p>FRM have identified opportunities to incorporate Sustainable Drainage Systems (SuDS) that provide multiple benefits in addition to water management within confined spaces. SuDS could help deliver on many of the objectives discussed in the SPD such as amenity and green space.</p> <p>For instance: [The following comments follow on from this more general comment]</p>	Greater emphasis and referencing to SUDS systems now contained within document accordingly,	<p>Principle 4 – updated wording to include consideration of SUDS systems</p> <p>Principle 15 – Consideration of SUDS systems should always be considered</p>

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RDG 12.2	Warwickshire Flood Risk Management	Section 6.7	<p><u>Section 6.7</u></p> <p>Section 6.7 discusses the ‘green character’ of Coventry’s street design and encourages the use of green infrastructure. FRM would like to highlight this opportunity to also mention sustainable drainage systems such as tree pits, rain gardens and swales; all of which would contribute to the amenity value and green street scene, but also provide sustainable highway drainage that helps manage flood risk.</p>	Officers agree the referencing of SUDS systems alongside principles of street design should be considered, wording revision therefore added.	Additional principle in4- street design included to reference SUDS in street design
RDG 12.3	Warwickshire Flood Risk Management	6.12	<p><u>Section 6.12</u></p> <p>There are also opportunities to consider blue/green infrastructure and micro SuDS when discussing appropriate design and density in section 6.12.</p>	Officers note this point, however content of the SPD at 6.12 discusses density in respect of prevailing urban grain and contextual responsiveness, as such do not believe it appropriate to include reference to SUDS systems at this point.	No action necessary
RDG 12.4	Warwickshire Flood Risk Management	8.17-8.22	<p><u>Sections 8.17 – 8.22</u></p> <p>Sections 8.17-8.22 discuss the importance of amenity space whilst facing the challenges of confined urban spaces. Opportunities for dual purpose facilities could be mentioned here. With imaginative design, SuDS can provide both high quality green amenity spaces for most of the year but also provide vital flood protection during heavy rainfall events.</p>	Whilst noting the visual amenity value of SUDS systems, officers advise that referencing in this location of the SPD may confuse the reader in respect of the aims of delivery of useable outdoor amenity spaces and therefore advise against wording changes in this regard.	No action necessary

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RDG 12.5	Warwickshire Flood Risk Management	9.20	<p><u>Section 9.20</u></p> <p>FRM supports Coventry City Council’s stance on minimising the adverse impacts of hardstanding, including flooding, in section 9.20.</p>	Noted and welcomed	No action necessary
RDG 12.6	Warwickshire Flood Risk Management	6.33	<p><u>Section 6.33</u></p> <p>FRM supports the conservation and enhancement of waterways as eluded to in section 6.33. This section of the SPD could be expanded upon to reference the Coventry Local Plan policy EM4 where river restoration and de-culverting is encouraged.</p>	Officers agree that reference to local plan policy here may aid the reader and as such revise wording to provide link.	6.33 - “due consideration of relevant local plan policies should be embedded in design proposals”
RDG 13.1	Savills (On behalf of unnamed housebuilder client)	General	<p><u>General</u></p> <p>Overall, it is considered that in certain parts of the SPD the proposed requirements are quite onerous and we consider that the overall wording of the guidance should be more flexible to allow for the design of residential schemes to be considered and agreed on a site by site basis. Words such as ‘where possible’ and ‘encouraged’ should be utilised throughout the SPD unless there is sufficient justification as to why the specific requirement is necessary. This will ensure that the SPD is “flexible enough to accommodate needs not anticipated in the plan” (NPPF paragraph 82) and ensure that developments are making the best use of land.</p>	The SPD articulates design expectations in the city in order to promote high quality outcomes, however the SPD does not introduce additional mandatory requirements, in this context current wording is seen to be appropriate.	Revisions as follows per point below :

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RDG 13.2	Savills (On behalf of unnamed housebuilder client)	Principle 1	<p><u>Principle 1</u></p> <p>Principle 1 does not differentiate between outline, full or reserved matters applications; however, paragraph 5.6 states that the concept plan should include an ‘indicative layout’. We would only normally expect an outline planning application to be supported by a Concept Plan as plans are indicative at this stage. However, full or reserved matters applications should include more detailed plans.</p> <p>It is currently unclear what purpose a Concept Plan would serve for a full or reserved matters application. We consider that Principle 1 should be reworded to state that “Outline applications for 10 or more dwellings should also provide a concept plan in the Design & Access Statement”. For outline applications, Concept Plans should then only be illustrative to demonstrate how the illustrative masterplans could potentially be delivered.</p>	<p>Whilst concept plans often articulate proposals at outline submission stage, these concepts also aid later design development stages by illustrating the design process from conception to the later detailed layout stages. As such principle one sets the expectation for concept plans to be submitted across application types, in order that proposals at any stage are supported by a cohesive design narrative.</p>	No Action necessary
RDG 13.3	Savills (On behalf of unnamed housebuilder client)	Principle 2	<p><u>Principle 2</u></p> <p>‘Plot Plans’ are not a readily understood requirement. Little detail or guidance is included within the SPD on what plot plans entail and how they differ from a Layout Plan. Further clarity is sought on this requirement.</p>	Accepted and re-wording enacted for clarity of requirement	<p>Principle 2 rewording of ‘plot plans’ to ‘layout plans which identify dwelling plots</p> <p>Title and 5.8 rewording, ‘plot layouts plans’</p> <p>Table 2 update – ‘plot layout plans’</p>

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<p>RDG 13.4</p>	<p>Savills (On behalf of unnamed housebuilder client)</p>	<p>Para 6.5 and Principle 4</p>	<p><u>Paragraph 6.5 & Principle 4: Cul-de-sacs</u></p> <p>We consider that the wording of this paragraph and its principle are not positively prepared in accordance with the requirements of the NPPF (paragraph 16).</p> <p>Cul de sac as part of proposed layouts can help to define character areas, create safer streets through removing ‘through-traffic’ and are often sought after by house purchasers. The provision of some culs de sac as part of a development does not necessarily mean it is not well-connected.</p> <p>Regard should also be given to the support in ‘Secured by Design Homes’ (V2 March 2019) to the safe environments that culs-de-sac can create and to avoid permeability between culs-de-sac. We also request clarification on whether single roads that lead to private drives would also fall within this category?</p> <p>From a design perspective, culs-de-sac should be considered acceptable providing that the distances to main roads/loops are maintained for emergency/fire service vehicles.</p> <p>We consider that paragraph 6.5 should be reworded to state that:</p> <p>“cul de sac layouts will be supported where the wider scheme can demonstrate connectivity to</p>	<p>Para 80 of the national design code state that <i>“Mews, courtyards and cul-de-sac will generally only be appropriate at the most local level where there is little vehicular movement.”</i> And whilst the authority do not rule out the use of cul-de-sac arrangement, the need for connectivity and thus promoting their restrained use has informed the SPD.</p> <p>Officers note the suggestion for re-wording at 6.5 to reinforce the role and importance of connectivity in cul-de-sac arrangements, however the text of the SPD reaches similar conclusion in this regard.</p> <p>In respect of principle 4 – officers retain the position that excessive use of cul-de-sac arrangements may yield lower quality design outcomes and therefore retain wording in the interests of delivery of positive street hierarchy.</p>	<p>No action necessary</p>
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			<p>surrounding areas via open space or footpath/cycle links”.</p> <p>We consider that the last sentence of Principle 4, bullet 2 should be deleted as it is not positively prepared in accordance with the NPPF (paragraph 16).</p>		
RDG 13.5	Savills (On behalf of unnamed housebuilder client)	Principle 5 & Paragraph 6.9: Shared Spaces	<p><u>Principle 5 & Paragraph 6.9: Shared Spaces</u></p> <p>We consider that the delivery of shared spaces should be determined on a site by site basis and key considerations such as site context should be taken into consideration. This principle should be reworded to ‘encourage’ the provision of shared spaces.</p>	<p>The SPD does not set a mandatory principle in this regard, and the LPA accepts that assessment will be made on a site-specific basis on such proposals. The SPD wording currently promotes shared space use by stating ‘developments <i>should</i> contain a mixture of shared space’ and as such the suggested re-wording is not seen to alter outcomes.</p>	No action necessary
RDG 13.6	Savills (On behalf of unnamed housebuilder client)	Principle 6	<p><u>Principle 6</u></p> <p>We assume that by referring to high ‘intensity’ the Council is referring to high density areas, although this should be clarified in the SPD.</p> <p>The SPD does not define what the Council considers is ‘generous’. The adopted Local Plan already requires development to provide a percentage of land which is undeveloped dependant on its size and location (supporting text of Policy H9).</p>	<p>Clarification upon open space requirements provided by revision to allow cross reference to open space SPD.</p>	Bullet point 3 principle 6 – reference to open space SPD

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			Therefore, we consider that the undeveloped land requirement and public open space provision (in accordance with adopted standards) should be the only green infrastructure required.		
RDG 13.7	Savills (On behalf of unnamed housebuilder client)	Principle 7	<p><u>Principle 7</u></p> <p>We consider that the SPD should provide more clarity on what the Council considers is a 'large' development and if this requirement remains then "where possible" and "where appropriate" should be added to the end of the sentence as a mix of uses may not be suitable or required for every site.</p>	<p>Officers accept role of greater clarity at points 5.1 and 5.2</p> <p>The introduction of an expectation of a mix of uses is seen to promote the creation of new communities in larger schemes, whilst the SPD does not introduce a mandatory requirement, rather an expectation in the aims of positive place making by the incorporation of uses complimentary to a new residential setting.</p>	<p>Rewording of 5.1 to aid clarity now stating expectation of schemes of 50 units and over, which accords to the pre-applications process definition of 'medium scale, major development'.</p> <p>5.2 rewording to recommend the Pre-application process for schemes of more than 10 units</p>
RDG 13.8	Savills (On behalf of unnamed housebuilder client)	Paragraph 6.21, Principle 32, Principle 9, Principle 10 & Principle 12: Car Parking	<p><u>Paragraph 6.21, Principle 32, Principle 9, Principle 10 & Principle 12: Car Parking</u></p> <p>Paragraph 6.21 states that porous surfacing should be used for parking areas. Principle 32 also requires new hardstanding areas to be constructed from porous materials. We consider that this sentence should be reworded to 'encourage' the use of porous surfacing in accordance with the wider sustainable surface water drainage strategy which is required by</p>	<p>The SPD does not set out new requirements in this respect, however, seeks to promote an expectation of the use of porous materials to aid the management of surface water where new areas of hardstanding are proposed</p>	<p>No Action necessary</p>

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			the NPPF (paragraph 167) and the Local Plan (Policy EM5).		
RDG 13.9	Savills (On behalf of unnamed housebuilder client)	Principle 9	Bullet 1 of Principle 9 states that no design should group more than 3 parking spaces without intervening landscaping (on-plot and on-street). It is unclear whether this is referring to three linear spaces on a streetscene or if side parking for two dwellings resulting in four spaces would also be unacceptable? If landscaping were proposed, once the dwelling is sold, there is no guarantee that it will be retained by the purchaser. We consider parking should be agreed on a site by site basis and this requirement should be removed.	Officers accept additional need for clarity in respect of parking space grouping in principle 9 and wording amended accordingly. Design outcome sought to prevent excessive linear run of parking spaces without relief to manage potential of car dominance in street scene.	Principle 9 'no more than 3 linear parking spaces together'
RDG 13.10	Savills (On behalf of unnamed housebuilder client)		Principle 10 states that on-plot parking should generally be to the side or rear of properties to reduce visual impact. We do not support this onerous requirement. Our experience is that rear parking can raise concerns in relation to safety / visibility / accessibility. As a general rule, Secured by Design Homes (March 2019) discourages use of rear parking courts. Parking locations should be determined on a site by site basis.	Principle 10 does not mandate parking arrangements in any specific form, however, seeks to promote arrangements which may mitigate the risks of car dominated street scenes y excessive use of frontage parking arrangement, therefore promoting accommodation of vehicles to the side or rear. Re-wording accepted to clarify at principle 10.	Principle 10 – On plot parking “on plot parking should not be dominated by excessive frontage parking arrangements”

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<p>RDG 13.11</p>	<p>Savills (On behalf of unnamed housebuilder client)</p>		<p>Principle 12 states that where parking bays are provided on-street, they should be in clusters of no more than 3 spaces. It is unclear what the justification for this requirement is and we consider it should be removed.</p>	<p>As noted above, the SPD seeks to promote design approaches which mitigate the potential for excessive car dominance in the streetscene in order to create the most positive new residential environments.</p> <p>Officers accept rewording to this point to aid clarity of expectation</p>	<p>Principle 12 – “where bays are provided, they should not generally not exceed a cluster of 3 spaces without landscape relief,</p>
<p>RDG 13.12</p>	<p>Savills (On behalf of unnamed housebuilder client)</p>		<p><u>Principle 15</u></p> <p>We consider that the layout should be determined on a site by site basis. Therefore, this requirement should be reworded to state that “the Council will <u>encourage</u> new residential developments to make optimal use of natural light and warmth so as to minimise the use of energy for lighting and heating, <u>where possible</u>”.</p>	<p>Officers accept that site context and constraints may impact upon the deliverability of these positive principles. Therefore, the principle is proposed to retain with minor rewording or ‘where possible’.</p>	<p>Principle 15, bullet point one – where possible.</p>
<p>RDG 13.13</p>	<p>Savills (On behalf of unnamed housebuilder client)</p>		<p><u>Paragraph 7.5</u></p> <p>We consider that building heights should be determined on a site by site basis allowing for consideration of existing streetscape and the scale of existing development.</p>	<p>Understood to be in reference to para 7.9 – the SPD referencing site specific design informative, notably at Principle 17.</p>	<p>No action necessary</p>

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<p>RDG 13.14</p>	<p>Savills (On behalf of unnamed housebuilder client)</p>	<p>Principle 19</p>	<p><u>Principle 19: NDSS</u></p> <p>There is no requirement in the adopted Local Plan for developments to comply with NDSS. Footnote 49 of the NPPF states that “policies may also make use of the nationally described space standard, where the need for an internal space standard can be <u>justified</u>” [Savills emphasis].</p> <p>The PPG adds further guidance which states that in order to justify a need for internal space policies, Councils should take account of evidence of need, the impact of development viability and timing of the transitional period for the adoption of space standards (Reference ID: 56-020-20150327).</p> <p>No demonstration of need or viability evidence has been prepared to support the SPD. The introduction of a NDSS policy should be tested and justified through the Local Plan process. This SPD cannot introduce a requirement for dwellings to meet NDSS and therefore Principle 19 should therefore be deleted</p>	<p>The SPD does not introduce a mandatory requirement to meet NDSS standards, however, sets an expectation that new development should meet these standards in delivery of quality residential development in the city, similarly this expectation aligns to those set for delivery of affordable housing in the city which states</p> <p><i>The City Council will actively seek the delivery of affordable housing that meets high of living standards. As such, the Council promotes the use, and reference of, the Nationally Described Space Standards as an initial framework in achieving affordable homes with satisfactory internal living space.</i></p> <p>The setting of this expectation establishes a transition period ahead of any local plan revision in this regard. Tests of viability therefore remain applicable.</p>	<p>-</p>
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RDG 13.15	Savills (On behalf of unnamed housebuilder client)	Principle 20	<p><u>Principle 20: Adaptable Homes</u></p> <p>We request that ‘where possible’ should be added to Principle 20 seeking for buildings to be adapted to meet future needs</p>	<p>In the context of Principle 20 not introducing a new mandatory requirement, this suggested revision is not seen to be necessary. The principle seeks to promote to incorporation of designing in adaptability into new housing developments.</p>	No action necessary
RDG 13.16	Savills (On behalf of unnamed housebuilder client)	Paragraphs 7.23, 7.24 & Figure 19	<p><u>Paragraphs 7.23, 7.24 & Figure 19</u></p> <p>Paragraphs 7.23 and 7.24, as well as Figure 19 of the SPD are not considered to be typical architectural details for the majority of existing housing found in Coventry. We consider that the design of schemes should comply with national design guidance and should most importantly be determined on a site by site basis, informed by the site context or the agreed vision between the Council and applicant for the site.</p>	<p>Elements of architectural interest which may add to the visual richness of schemes are shown. Whilst these are not in any way prescriptive and architectural design should be contextually responsive and assessed in this regard, the SPD seeks to promote architectural innovation in the city across a wide variety of contexts, as such the statements seek to promote innovation and consideration of a wide range of architectural treatments.</p>	No action necessary
RDG 13.17	Savills (On behalf of unnamed housebuilder client)	Paragraph 8.4	<p><u>Paragraph 8.4</u></p> <p>We consider that separation distances should be determined on a site by site basis and the SPD should clearly state that these should be achieved ‘where possible’ and in the context of the site, as opposed to a blanket requirement across the whole city.</p>	<p>Guidance upon separation distances is given within the SPD, whilst accepting that some consideration of context will be given in this regard – wording changes are not therefore seen as necessary.</p>	No action needed

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<p>RDG 13.18</p>	<p>Savills (On behalf of unnamed housebuilder client)</p>	<p>Table 3</p>	<p><u>Table 3: Outdoor Space Standards</u></p> <p>These requirements should be used as a guideline for development and applied flexibly. The final areas should be agreed on a site by site basis. We consider that ‘where possible’ should be added to the wording to provide this flexibility.</p> <p>The above separation distances and outdoor space standards proposed within the SPD are not supported by evidence which considers the impact of the proposed separation distances on site coverage and density that can be achieved and on development viability</p>	<p>The SPD accepts at 8.20 that sizes may also vary on the context of the property.</p>	<p>Table 3 revised titled ‘guidance’ accepting point of 8.20 site specific contexts</p>
<p>RDG 13.19</p>	<p>Savills (On behalf of unnamed housebuilder client)</p>	<p>Principle 26-29</p>	<p><u>Principle 26-29</u></p> <p>On a more minor note, Principles 26 – 29 should all have different names to avoid confusion on what they each relate to.</p>	<p>Each principle is stated below the relevant topic area, however to aid clarity for the reader officers accept additional wording to the titles may be useful – as such revised wording proposed</p>	<p>Principle 26 – Private Garden Space</p> <p>Principle 27 – External Communal Space</p> <p>Principle 28 – Outdoor Amenity – Apartment Schemes</p> <p>Principle 29 – Outdoor Amenity – Residential Care Homes</p>

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<p>RDG 13.20</p>	<p>Savills (On behalf of unnamed housebuilder client)</p>	<p>Principle 24, 25 & Paragraph 8.10</p>	<p><u>Principle 24, 25 & Paragraph 8.10: Internal Lighting of Habitable rooms</u></p> <p>Principles 24 and 25 as well as paragraph 8.10 contain very specific requirements for internal lighting in habitable rooms. We consider that more flexible wording should be adopted as these requirements should be determined on a site by site basis. Therefore ‘where possible’ should be added to these sections of the SPD</p>	<p>Principle 24, 25 & Paragraph 8.10 do not seek to introduce new mandatory requirements. Instead they seek to provide guidance on best practice.</p>	<p>No action necessary</p>
<p>RDG 13.21</p>	<p>Savills (On behalf of unnamed housebuilder client)</p>	<p>Principle 30</p>	<p><u>Principle 30: Front boundary treatments</u></p> <p>We do not support Principle 30 and the proposal that front garden boundary treatments in excess of 1.2m will be discouraged. This statement is not positively worded (NPPF paragraph 16) and front gardens can help create a street scheme. Boundary treatments can be framed by hedgerows and railings as well as walls and fences. We therefore consider that it should be deleted.</p>	<p>Boundary treatments to front gardens are promoted in the SPD however those in excess of 1.2m are discouraged in respect of the creation of overly defensive environments.</p> <p>The policy does not mandate this principle, however, dissuades such approaches, and in this context officers do not believe this requires deletion.</p>	<p>No action necessary</p>
<p>RDG 13.22</p>	<p>Savills (On behalf of unnamed housebuilder client)</p>		<p><u>Paragraph 9.12: Bin Storage</u></p> <p>There may be some instances where the distance is greater than 25m and is justified. We consider that this sentence should be amended to state that “where possible, the distance between the collection point and storage points should be less than 25m”.</p>	<p>Paragraph 9.12 does not seek to introduce a mandatory requirement; it instead seeks to guide new residential development to avoid providing bin storage further 25m away from collection points. Given that 9.12 does not introduce a mandatory requirement and rather promotes early</p>	<p>No action necessary</p>

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				engagement with the LPA, stating a base expectation, the statement is implicit in its acceptance of assessment of individual sites.	
RDG 14.1	Claremont on behalf of Persimmon Homes (Central)	Glossary	<p><u>Glossary</u></p> <p>Section 1 of the SPD presents a glossary to define key terms to be used throughout the SPD which is supported.</p> <p>However, the glossary as currently proposed includes some definitions which are inappropriate or unjustified, and not in accordance with existing policy, legislation and/or guidance:</p> <p>Daylight The definition for 'daylight' as proposed within the SPD is considered ambiguous in its current form. The use of the term 'volume' to describe levels of natural light received by dwellings alludes to the imposition of technical or numerical standards with respect to daylight which is not supported.</p> <p>In addition, the current definition refers to the illumination of internal accommodation, which infers that daylight standards will be applied to</p>	<p>Access to positive levels of daylight is seen as crucial in delivering quality accommodation in the city. The contents of the glossary however simply seek to articulate terms to aid understanding to the reader rather than extend beyond into applications. Clarifications of the expectations of design approach to the subject of daylight is outlined in section 8.8, 8.9, 8.10 and within Principle 24 and 25. It is accepted however that 'volume' within the definition could be interpreted as overly technical and as such minor wording revision enacted.</p> <p>Similarly in respect of Density the glossary does not seek to articulate application of terms, rather a brief explanation of them to aid the reader. Considerations of density are then primarily</p>	<p>'Daylight' Accepted 'volume' deletion in daylight definition replaced with 'the level of'</p> <p>'Density' No action necessary</p> <p>'Habitable Rooms and areas' Omission of initial wording to aid clarity, and removal of outlook from kitchen areas whilst retaining 'a positive level of natural light'.</p>

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			<p>all internal accommodation rather than habitable and non-habitable rooms.</p> <p>This approach is not supported and it is recommended that the proposed definition is revised such that it accords with recent government guidance and legislation.</p> <p><u>Density</u></p> <p>In addition, it is not considered that the definition of 'density' as presented within the draft SPD is acceptable in its current form. Whilst the current definition acknowledges that density relates to more than just the number of residential units per hectare, no further clarification of how else density is considered by the Council is provided. Further clarification of this is therefore necessary, particularly in respect of how the Council assesses density in respect of mixed use developments.</p> <p><u>Habitable Rooms & Areas</u></p> <p>The definition of 'habitable rooms and areas' presented within the glossary is also not supported in its present form. It is not considered that this definition accords with the accepted terminology used throughout national policy and guidance.</p> <p>Crucially, references to sitting, lying down, and quiet environments to concentrate or rest</p>	<p>contained in the SPD at 6.11, 6.12 and Principle 6, whilst also making reference to higher and lower density character areas in seeking contextually responsive design solutions.</p> <p>In respect of habitable rooms and areas, the explanation provided in the glossary is not seen to be at odds with other accepted definitions, however, accept that wording may introduce some ambiguity to the reader. Therefore, initial wording removed whilst 'outlook' removed from cooking space but retaining positive level of natural light</p>	
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			<p>should therefore be removed as these are misleading and not relevant considerations.</p> <p>Moreover, the current definition seeks to apply requirements for natural light and outlook to kitchens which are used solely for food preparation only. It is requested that this reference is removed as requiring outlook and natural light for non-habitable rooms conflicts with national policy and guidance</p>		
RDG 14.2	Claremont on behalf of Persimmon Homes (Central)	<u>Design Process Expectations in Coventry: Pre-App</u>	<p><u>Design Process Expectations in Coventry: Pre-App</u></p> <p>This approach is not supported, and instead this text should be revised to identify pre-application engagement on all larger schemes as an aspiration rather than a requirement.</p> <p>Identifying pre-application engagement as an aspiration comprises an approach which complements the provisions of Paragraph 40 of the National Planning Policy Framework (NPPF) which advises that whilst LPA's have a key role in encouraging other parties to take maximum advantage of the preapplication stage, they cannot require that a developer engages with them prior to the submission of a planning application.</p>	Officers accept re wording of requirement at 5.2	5.2 – Wording revised to encourage schemes of 10 units or more to engage with the pre-application process

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RDG 14.3	Claremont on behalf of Persimmon Homes (Central)	Design Process Expectations: Vision Setting	<p><u>Design Process Expectations: Vision Setting</u></p> <p>Whilst the imperative for developments to be led by a coherent design vision is appreciated, it is not considered appropriate to place substantial emphasis on agreeing strict design visions for development at the pre-application stage.</p> <p>Indeed, the Council’s website expressly identifies that pre-application advice does not constitute a formal response from the Council. Instead, it is advised that this text is revised to identify the Council’s aspiration for design visions guiding development to be established at the earliest opportunity.</p>	This SPD does not seek to introduce new mandatory requirements, it seeks to advocate and encourage developers/agents to engage with the council on matters of design in the council’s preferred manner.	No action necessary
RDG 14.4	Claremont on behalf of Persimmon Homes (Central)	Principle 2	<p><u>Principle 2: Concept Plan</u></p> <p>It is requested that an alternative name for Principle 2 is identified, such as ‘Plot Plans’, in order to clearly distinguish between the requirements of this Principle and Principle 1 which also refers to concept plans. In addition, it should also be clarified that the submission of plot plans should only be required at detailed design application stage, as this information will not be available, or indeed necessary to define, at outline stage</p>	Principle 2 to be renamed “Plot Layout plans” and this is shown in table 2 as only necessary in detailed design stage	<p>Amended Principle 2 title ‘plot layout plan’</p> <p>Note re Table 2 – ‘design process’ revised to state exceptions in outline application expectations.</p>

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RDG 14.5	Claremont on behalf of Persimmon Homes (Central)	Principle 3	<p><u>Principle 3</u></p> <p>In respect of connectivity, Principle 3 expects developments to connect into and complement the existing local network of routes and public open spaces and which prioritise modes of active transport. This is supported.</p> <p>However, Principle 3 also expects developments to look for opportunities to create connections into/through neighbouring land such to facilitate a well connected network in the event of future land release and development. This requirement requires further clarification from the Council, and it is advised that this should instead be identified as an aspiration to be applied only where justified and feasible. Appropriate circumstances in which this aspiration could be applied include where adjacent land is allocated for development, subject to an extant consent or the subject of an application for development.</p>	Principle 3 seeks to encourage developers to explore opportunities to create better connections, it does not seek to introduce new mandatory requirements.	No action necessary
RDG 14.6	Claremont on behalf of Persimmon Homes (Central)	Principle 4	<p><u>Principle 4</u></p> <p>Principle 4 however continues on to advise that street design should facilitate social interaction through incorporating pause points, small amenity spaces, seating and squares. It is not considered that incorporating these features into street design is necessary, where it is considered that sufficient opportunities for</p>	Principle 4 is not seeking to introduce new mandatory requirements. It seeks to illuminate the council's vision for new residential developments through outlining expectations not requirements.	No action necessary

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			social interaction would be provided for through any public open space provision on site.		
RDG 14.7	Claremont on behalf of Persimmon Homes (Central)	Principle 5	<p><u>Principle 5: Shared Spaces</u></p> <p>Although the provision of shared spaces is supported, it is considered that the identified threshold of 80 units is not appropriate where it may be challenging to incorporate a variety of shared spaces and traditional vehicular streets in schemes of this size.</p> <p>Instead, it is advised that a pragmatic approach to the delivery of shared spaces would be to remove the 80 dwellings or more threshold and instead advocate for their incorporation into scheme design where feasible and deliverable</p>	We acknowledge that this is not universally applicable and that there may be especially constrained sites that cannot accommodate this, as such the threshold has been revised to align to the council's definition of Large Scale development of 200+ units.	Revision in principle 5 to 200+ unit threshold to accord to council definition of Large Scale Development
RDG 14.8	Claremont on behalf of Persimmon Homes (Central)	Principle 6	<p><u>Principle 6: Density of new development</u></p> <p>This approach is supported and considered compliant with Paragraph 119 of the NPPF.</p> <p>Of concern however is the expectation within Principle 6 that residential developments in higher intensity locations will be supported by generous green infrastructure provision and the appropriate level of amenity space provision.</p> <p>It is considered that this expectation fails to recognise that higher density developments are frequently located within the established urban</p>	The appropriate levels of open amenity space is laid out in the Open Spaces SPD and as per a previous comment we will highlight that in this section. We disagree that the provision of high density residential development precludes the provision of green and open space and will expect applicants to be mindful of the provision of such space for the benefit of future occupiers.	Link to Open Space SPD now included in SPD within principle 6

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			<p>area and on brownfield sites which are therefore constrained by site area, proximity to adjacent development and site conditions.</p> <p>It is advised that the Council revise Principle 6 in order to recognise the constraints to developments in higher intensity locations, and instead promote the adoption of creative strategies to deliver green infrastructure and amenity space provision where appropriate.</p> <p>This ensures that the delivery of higher density urban schemes and brownfield regeneration throughout the City is not compromised by overly restrictive standards.</p>		
RDG 14.9	Claremont on behalf of Persimmon Homes (Central)	Principle 7	<p><u>Principle 7</u></p> <p>Although Principle 7 is also referred to as ‘Density’ within the draft document, it is recommended that this be revised to refer to ‘Mix of Uses’ as this more closely reflects the content of the Principle. Accordingly, Principle 7 seeks to ensure that all residential development contributes to balanced communities through delivering a mix of residential densities and a varied housing mix. Whilst this is supported, this Principle would benefit from some further clarification to identify that a mix of residential densities will be supported in accordance with local</p>	<p>Title an error and will be amended to “Mix of Uses”</p> <p>The SHMA is already referenced in the preliminary text, and references to Local Plan policies within every Principle would render the document less usable.</p> <p>As an urban authority the expectation for large residential sites to have a mix of uses is appropriate. In the unlikely event of this not being appropriate this will be dealt with on a case-by-case basis.</p>	Amended Principle title to “Mix of uses”

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			<p>character to ensure the SPD's compliance with Policy H9 of the Local Plan.</p> <p>Furthermore, it would also be beneficial for this Principle to direct developers to the Council's latest SHMA when considering housing mix and to recognise that there are circumstances where delivering a SHMA compliant housing mix, as confirmed through Local Plan Policy H4.</p> <p>Principle 7 also asserts that 'larger residential development sites' will be expected to deliver a mix of uses. This expectation is not considered appropriate, where it fails to recognise that delivering a mix of uses within developments is not always feasible or appropriate. This is confirmed within Paragraph 113 of the National Design Guide which similarly advises that mixed-use schemes are typically appropriate in urban locations and the centre of larger scale developments</p> <p>Requiring a mix of uses on all larger schemes will necessitate a reduction in the capacity of these sites and their resultant contribution to the City's housing land supply which is contrary to the NPPF and its aspiration to secure an effective use of sustainably located sites.</p>	-	
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<p>RDG 14.10</p>	<p>Claremont on behalf of Persimmon Homes (Central)</p>	<p>Principle 9 and Paragraph 6.23</p>	<p><u>Principle 9 & Paragraph 6.23: Parking Layouts & Inclusive Access</u></p> <p>The inclusion of this expectation demonstrably conflicts with the flexible approach to parking provision identified in the supporting text which expressly identifies at Paragraph 6.23 that the Council accepts that developments may require a mix of parking solutions.</p> <p>The current requirement does not provide for this where compliance with this requirement cannot be achieved for terraced house types whilst also necessitating a uniform approach to parking provision which is not considered to represent good design.</p> <p>Principle 9 also continues on to advise that no design should group more than three car parking spaces together without intervening landscaping. This requirement is overly prescriptive and should be revised to require developments to make use of green infrastructure where possible in order to ensure that parking does not dominate the development or street scene, in accordance with Paragraph 86 of the National Design Guide</p>	<p>Principle 9 merely outlines the councils desires with regards to Parking in new residential developments, it does not introduce new mandatory requirements.</p>	<p>No action necessary</p>
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<p>RDG 14.11</p>	<p>Claremont on behalf of Persimmon Homes (Central)</p>	<p>Principle 10, 11 & 12</p>	<p><u>Principle 10,11 & 12</u></p> <p>The Council’s approaches to on-plot parking and parking courts as set out within Principles 10 and 11 respectively are considered to be pragmatic and are therefore supported.</p> <p>The Council’s approach to on-street car parking established within Principle 12 however requires further clarification where this Principle identifies that where parking bays are provided these should accommodate a cluster of no more than three cars. This approach is overly prescriptive and fails to acknowledge that some site layouts could sensitively accommodate clusters of more than three bays without having a dominating impact on the street scene.</p> <p>The general guidance contained within the Principle is considered to be sufficient to ensure that on-street car parking is sensitively integrated without the introduction of numerical standards.</p>	<p>Principle 3 does not introduce new mandatory requirements. It outlines the councils expectations for off-street parking, however clarity of wording revision enacted at principle 12.</p>	<p>Wording revision in principle 12.</p>
<p>RDG 14.12</p>	<p>Claremont on behalf of Persimmon Homes (Central)</p>	<p>Principle 13</p>	<p><u>Principle 13: Boundary Treatments</u></p> <p>Boundary treatments are considered at Principle 13 of the draft SPD. Whilst the National Design Guide promotes developments which clearly distinguish between public and private spaces, this can be achieved through the use of soft landscaping and low level</p>	<p>Principle 13 does not seek to establish a mandatory minimum height for boundary treatments, it seeks to promote a minimum height for boundary treatments to be adhered to ‘where appropriate’.</p>	<p>No action necessary</p>

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			boundary treatments. As such, it is not considered necessary or justified for Principle 13 to establish a 1m minimum height for boundary treatments in residential environments.		
RDG 14.13	Claremont on behalf of Persimmon Homes (Central)	Built Form General Comment	<p><u>Built Form General Comment</u></p> <p>Persimmon Homes (Central) are predominately supportive of the Council’s guidance in respect of built form as set out within Principles 14 – 22.</p>	Noted.	No action necessary
RDG 14.14	Claremont on behalf of Persimmon Homes (Central)	Principle 15	<p><u>Principle 15</u></p> <p>In respect of Principle 15: Sustainable Design however it is considered that the requirement for developments to incorporate passive solar design is poorly substantiated. Instead, this should be identified as an aspiration for developments where feasible alongside the implementation of other passive design strategies, as promoted by Paragraph 150 of the National Design Guide.</p>	We feel the need for improved passive solar design is widely established and should be welcomed by developers in order to provide sustainable development. Building Regs Part O and M already have such similar expectations regarding minimising solar gain.	No action necessary
RDG 14.15	Claremont on behalf of Persimmon Homes (Central)	Principle 19	<p><u>Principle 19: NDSS</u></p> <p>Principle 19 of the SPD expects new housing development to comply with the national internal space standards. Whilst this is supported, the Council should recognise that compliance with these standards may not always be feasible or deliverable. Indeed, there</p>	Support noted and welcomed. The principle states an expectation and not a requirement to meet such standards.	No action required

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			is no Local Plan policy which requires that schemes comply with these standards, and footnote 49 of the NPPF advises only that LPA policies can make use of the nationally described space standards, only where the need for an internal space standard can be justified.		
RDG 14.16	Claremont on behalf of Persimmon Homes (Central)	Principle 21	<p><u>Principle 21: Architectural Detailing</u></p> <p>The use of architectural detailing which creates attractive buildings is established by Principle 21 of the draft SPD and is supported. However, this Principle requires further clarification where it identifies that buildings which employ architectural detailing that is not honest will be resisted.</p> <p>The use of the phrase 'honest' is both ambiguous and subjective. It is advised that this clause could alternatively be phrased to refer to concepts such as pastiche designs in order to provide clarity in the application of this Principle</p>	The definition of honesty in this context is discussed in the preceding paragraph 7.26. However, insertion of a link to this paragraph within principle box is accepted could aid clarity for the reader.	Amend principle to include call back to para 7.26
RDG 14.17	Claremont on behalf of Persimmon Homes (Central)	Principle 22	<p><u>Principle 22: Architectural Design</u></p> <p>The provisions of Principle 22: Architectural Design are supported, however it is suggested that this Principle could be improved through the introduction of amended wording to support the role of windows in establishing active frontages.</p>	<p>The wording of principle 22 establishes the positive role of fenestration in architectural design, from which active frontage may be delivered.</p> <p>The role of active frontages is elsewhere articulated within</p>	No action required

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			Further clarification of this principle could also be achieved through the further introduction of wording to identify that the design and detailing of fenestration should seek to positively respond to and enhance local character. This would further ensure that the SPD supports the provisions of the National Design Guide with respect to detailing and active frontages.	section 7.18, Principle 4 and Principle 11. Where principle 22 seeks to establish positive architectural design principles around fenestration arrangements and officers believe there is value in addressing this point in principle singularly.	
RDG 14.18	Claremont on behalf of Persimmon Homes (Central)	Paragraph 8.2	<p><u>Paragraph 8.2</u></p> <p>In principle, this is supported, however it is recommended that the wording is revised to relate specifically to residential amenity.</p> <p>It is considered that the existing wording alludes to a requirement for services and facilities to be provided within a development, which may not be feasible or necessary, particularly for sustainably located sites within the urban area</p>	The preceding paragraph – 8.1 – gives detail regarding the amenity being discussed and so change is considered necessary.	No action required
RDG 14.19	Claremont on behalf of Persimmon Homes (Central)	Paragraph 8.3	<p><u>Paragraph 8.3</u></p> <p>The reference to being overheard should be removed, as this is subjective and is not a material planning consideration in respect of privacy and residential amenity.</p> <p>The Council’s approach to separation distances in this Section, including the minimum distance</p>	This paragraph talks about the benefit of privacy including the perceptions thereof. This paragraph does not attempt to set policy nor to apply material weight to a perception, and therefore no change is necessary.	No action necessary.

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			of 20m between the rear of two storey buildings directly facing each other, is supported and is in accordance with standards required by other Local Planning Authorities.		
RDG 14.20	Claremont on behalf of Persimmon Homes (Central)	Principle 23	<p><u>Principle 23</u></p> <p>Principle 23, which relates to habitable rooms is supported where this Principle is considered to be pragmatic and in accordance with national guidance and legislation.</p>	Noted	No action required
RDG 14.21	Claremont on behalf of Persimmon Homes (Central)	Principle 24	<p><u>Principle 24</u></p> <p>This is not challenged, however the supporting text to this Principle contained at Paragraph 8.13 identifies that “neighbours will often be particularly distressed if a new development threatens their existing private sunny space”.</p> <p>Although this is identified as supporting text, this is colloquially phrased which is not appropriate for use within this policy document. It is recommended that this reference is therefore removed, particularly given that access to ‘sunny spaces’ is not a material planning.</p>	<p>As noted, this is supporting text in a SPD and is not adding material weight to new concepts.</p> <p>Wording revision at 8.13 to aid clarity</p>	Removal of text from 8.13
RDG 14.22	Claremont on behalf of Persimmon Homes (Central)	Paragraph 8.14	<p><u>Paragraph 8.14</u></p> <p>...In this respect, reference made in Paragraph 8.14 to the need to retain sunlight for outdoor spaces should also be removed</p>	Officer agree with need for greater clarity in wording	Removal of reference to habitable external in 8.14

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<p>RDG 14.23</p>	<p>Claremont on behalf of Persimmon Homes (Central)</p>	<p>Principle 25</p>	<p><u>Principle 25</u></p> <p>The aspirations identified by the Council in Principle 25 are supported, however it is advised that an alternative name for Principle 25 be sought, where presently Principle 24 is also referred to as Daylight and Sunlight. This will ensure clarity in how each of these Principles are applied.</p> <p>In addition, Principle 25 also makes reference to the imperative for ‘good quality’ daylight and sunlight access to be secured for habitable rooms and external spaces. As identified, reference to external spaces in the wording of this Principle should be removed as natural light provision in external spaces is not a material planning consideration.</p> <p>In addition, it is also recommended that the phrasing of this Principle should be revised to refer to ‘adequate’ or ‘sufficient levels’ of natural light. This revision would ensure that the terminology used by the Council accords with that used in reference to daylight throughout the National Design Guide as well as the General Permitted Development Order’s requirement for all habitable rooms to benefit from ‘adequate’ natural light.</p> <p>For clarity, it is also recommended that, if references to sun access are to be retained, then this term requires definition in the</p>	<p>Heading retained, however that of principle 24 revised to differentiate</p>	<p>Principle 24 re-named ‘outlook’ to differentiate</p>
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			Glossary of terms presented at the start of the SPD. Without definition, it is considered that this term is ambiguous		
RDG 14.24	Claremont on behalf of Persimmon Homes (Central)	Paragraph 8.19	<p><u>Paragraph 8.19</u></p> <p>This approach is considered to be pragmatic where it recognises that urban sites in particular are often constrained by the available site area.</p>	Noted.	No change required
RDG 14.25	Claremont on behalf of Persimmon Homes (Central)	Paragraph 8.20 & Table 3	<p><u>Paragraph 8.20 & Table 3</u></p> <p>Paragraph 8.20 and Table 3 of the draft SPD continues on to establish minimum outdoor private amenity spaces for houses. Crucially, the proposed standards seek to differentiate between outdoor amenity spaces which are predominantly North facing and those with face predominantly South, advising that properties with northern facing outdoor amenity spaces will require provision of a larger amenity space. It is considered that this requirement is onerous, and unjustified.</p> <p>Whilst access to high quality amenity space is important for residential amenity, the level of direct sunlight these receive is not a material planning consideration. Indeed, it is considered that this approach fails to recognise the value of outdoor amenity space for both passive and active recreational activity as well as meeting the other outdoor requirements of residents.</p>	Paragraph 8.2 is not introducing a new mandatory requirement, it merely sets out the councils expectations, in order to further clarify this the stated minimums are given as guidance, whilst 8.20 also states that private outdoor amenity space will be considered on a case by case basis.	Insertion of 'guidance' to table 3 rep RDG13 in order to ensure role of expectation articulated clearly

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			<p>It is maintained that there is no reference to any requirement for outdoor amenity spaces to benefit from adequate natural light throughout the National Design Guide. In fact, Paragraph 132 of the National Design Guide identifies that private amenity spaces such as gardens can enhance both visual and outdoor amenity, whilst also providing a degree of privacy and separation for living areas from adjoining public spaces. In this respect, it cannot be considered that the Council’s approach to outdoor amenity space provision for houses is justified and references to differentiated requirements for North and South facing garden areas are removed.</p>		
RDG 14.26	Claremont on behalf of Persimmon Homes (Central)	Principle 26	<p><u>Principle 26</u></p> <p>This requirement is not a national policy requirement and is not identified as a requirement within the Council’s adopted Local Plan. This requirement is therefore not considered to be in accordance with adopted national and local planning policy and is therefore unjustified.</p> <p>Principle 26 also seeks to require private outdoor garden spaces to be inclusive of access not dependant upon routes through internal spaces and have level access from the home. Although these are identified as aspirations to be delivered where possible and feasible, it</p>	<p>This principle makes clear that it is not a requirement but should be in place where possible and articulates good design. Clearly, as noted in the SPD there will be occasions where this is not feasible, such as outlined in the representation.</p>	<p>No action required.</p>

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			<p>considered that these aspirations are onerous and should therefore be removed. For example, providing inclusive access without using routes through internal spaces is likely to be achievable only for detached and semi-detached dwellings. For terraced houses, satisfying this would be reliant upon provision of side gates which deliver access to several gardens, the principle of which is not generally supported due to security risk.</p> <p>This is confirmed by Paragraph 10.4 of Secured by Design which requires access gates to rear gardens to be located on or as near to the front of the building line as possible. Moreover, providing level access to all outdoor amenity spaces is not considered to be pragmatic or necessary. It is recommended that this aspiration is clarified such that it is applied only to dwellings which are built to wheelchair accessible standards in accordance with building regulations.</p>		
RDG 14.27	Claremont on behalf of Persimmon Homes (Central)	Principle 27	<p><u>Principle 27</u></p> <p>Principle 27 is currently referred to as 'Outdoor Amenity'. It is recommended that this Principle is renamed 'Communal Outdoor Amenity Space' for clarity as Principle 26 is presently also referred to as 'Outdoor Amenity'.</p> <p>Principle 27 reiterates the Council's aspiration for amenity spaces to benefit from direct sunlight, expecting external communal outdoor</p>	<p>Heading is an error and will be amended.</p> <p>The wording is clear that it is not a requirement and therefore does not set new policy. The aspiration for communal amenity space for have sunlight is entirely reasonable.</p>	Amend heading of Principle 27 to "Outdoor Amenity - External Community Space"

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			<p>amenity space to be located such that it receives sunlight for a substantial part of the day. As demonstrated throughout these representations, this requirement is considered to be unsubstantiated by national and local planning policy and should therefore be removed where access to sunlight is not a material planning consideration with respect to outdoor amenity spaces</p>		
RDG 14.28	Claremont on behalf of Persimmon Homes (Central)	Paragraphs 8.24 - 8.26	<p><u>Paragraphs 8.24 - 8.26</u></p> <p>The Council’s pragmatism in considering conversion schemes on a case-by-case basis is supported.</p> <p>However, the expectation for schemes to deliver alternate outdoor amenity space provision where private amenity space cannot be delivered is not supported. It should be recognised that conversion schemes are often constrained by the available site area, such that alternate outdoor space may not be deliverable. Indeed, it should be appreciated that proximity to local services and facilities, access to local green spaces, and the size of internal accommodation, are factors which reduce residents’ reliance upon on-site amenity space provision such that a failure to provide private amenity space on site may not translate into a material loss of amenity for future residents, especially for sustainably located sites within the urban area</p>	<p>Whilst we note that there may be occasions that such constraints render the reasonable expectation of provision of suitable amenity space, we disagree that this expectation should be disregarded for all applicable sites.</p>	No change required.

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<p>RDG 14.29</p>	<p>Claremont on behalf of Persimmon Homes (Central)</p>		<p><u>Principle 28</u></p> <p>This Principle should be renamed where it is presently referred to as ‘Outdoor Amenity’ which is ambiguous.</p> <p>This Principle requires all ground floor flats to have access to a well-defined private area of amenity space which directly adjoins and is accessible from the flat, whilst all flats above ground floor are expected to be provided by balconies unless conservation, privacy, or heritage issues negate against their use. The requirements of this Principle is strongly opposed, where these requirements are considered to be onerous and a limitation on development.</p> <p>This is over and above the design principles set out within the National Design Guide which recognises at Paragraph 132 the balconies and private gardens can enhance visual and outdoor amenity. In addition, this Principle also contradicts guidance contained within the draft SPD and within the National Design Guide which seek to establish built form and appearance that adds new character and difference to places, where this Principle will allow for limited variation in the architectural style of flatted developments.</p> <p>Principle 28 also identifies that predominantly</p>	<p>Wording omitted in respect of north facing balcony and meeting standards, accepting that north facing elements can play a positive role, however ‘amenity’ inserted within principle 28 to enable assessment of amenity value of proposed balconies. Officers accept that there will be instances where these positive principles may be difficult to achieve, therefore ‘wherever possible’ wording inserted in respect of ground floor private amenity.</p> <p>Throughout principles, new mandatory requirements are not established, rather design expectations set.</p>	<p>Principle 28 heading amended to include “Apartment Schemes”.</p> <p>‘Wherever possible’ inserted in ground floor amenity principles</p> <p>Omission of north facing wording, and insertion of ‘amenity’ consideration.</p>
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			<p>north facing balconies with no access to sunlight during the year, or balconies in close proximity to adjoining main roads will not be considered to have fulfilled the obligations of this Principle. It is maintained that this Principle fails to recognise the contribution that north facing balconies make in providing amenity space for residents, particularly where it has been identified that the levels of sunlight received by an amenity space is not a material planning consideration.</p> <p>It is considered that Principle 28 requires a more holistic and pragmatic approach to amenity space provision in flatted developments which recognises the contribution of other, more innovative, forms of amenity space provision such as communal rooftop gardens and internal communal amenity spaces.</p> <p>The prescriptive approach to private amenity space provision in flatted developments proposed through Principle 28 will also have significant implications on the capacity of sites as well as the viability of schemes which should also be recognised by the Council. The approach proposed by the Council will therefore serve to restrict housing delivery in sustainable urban locations as well as the potential regeneration of brownfield sites</p>		
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<p>RDG 14.30</p>	<p>Claremont on behalf of Persimmon Homes (Central)</p>	<p>Principle 29</p>	<p><u>Principle 29</u></p> <p>Whilst this Principle is supported, Principle 29 should be renamed so that it clearly relates to Residential Care Homes.</p> <p>The Principle is currently named 'Outdoor Amenity' and thus is not easily distinguishable from other Principle's throughout the SPD.</p>	<p>Accepted for clarity – heading to be amended.</p>	<p>Heading to be amended to include "Residential Care Homes"</p>
<p>RDG 14.31</p>	<p>Claremont on behalf of Persimmon Homes (Central)</p>	<p>Principle 30</p>	<p><u>Principle 30</u></p> <p>Clarification of this is required where 'unrelieved' is ambiguous, and in particular clarification of whether this relates to materials, height or continuous frontage to ensure clarity in the application of this Principle.</p>	<p>Officers accept additional clarity on the principle in this case would be beneficial.</p>	<p>Clarification to 'continuous, unbroken' added to aid clarity</p>
<p>RDG 14.32</p>	<p>Claremont on behalf of Persimmon Homes (Central)</p>	<p>Principle 32</p>	<p><u>Principle 32</u></p> <p>Whilst this requirement is supported in principle, it is advised that the Council should instead identify the incorporation of soft landscaping into areas of hardstanding as an aspiration rather than requirement. Instead, the Council should recognise that it is not always appropriate or deliverable to incorporate soft landscaping into areas of hardstanding, for example where this may obstruct visibility splays.</p>	<p>Principle 32 outlines the Councils expectations with regards to boundary treatments, it does not seek to introduce new mandatory requirements and therefore no change is necessary.</p>	<p>No change required.</p>

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RDG 15.1	Marrons Planning/ Richborough Estates	General	<p><u>General</u></p> <p>Whilst the draft SPD is seeking to provide further guidance in respect of design and specifically Policy DE1, it is apparent that some of the proposed requirements go beyond those of Policy and therefore exceed what is allowed for in the Town and Country Planning (Local Planning) (England) Regulations 2012</p>	<p>This SPD seeks to outline the council’s expectations with regards to the design of new residential development, it does not seek to introduce new mandatory requirements.</p>	<p>No change required</p>
RDG 15.2	Marrons Planning/ Richborough Estates	Principle 5	<p><u>Principle 5: Street Design</u></p> <p>Even in recognition of the wording which sets out that shared spaces “should” be incorporated (rather than “must”, for example), the requirement is still considered to be not sufficiently evidenced and lacking any Policy support in the Local Plan.</p> <p>As recognised at Paragraph 6.10 of the SPD, it is important that the design of shared spaces is carefully considered to ensure that the needs of all road users are catered for. It is therefore inappropriate to suggest that all developments of over 80 dwellings should contain an element of shared spaces, as it may not be appropriate for all such schemes.</p> <p>On that basis, it is recommended that the sentence “developments of over 80 dwellings should contain a mixture of shared</p>	<p>The delivery of different approaches to street design aids wider scheme legibility and the delivery of street hierarchy on larger schemes and is therefore promoted as a positive consideration in schemes over 200 units.</p> <p>Alongside this, wording within the SPD at 6.10 embeds a case by case assessment of such design approaches</p>	<p>Revision to 200 unit threshold to accord with council definition of large scale development size.</p>

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			<p>space and zones where the movement of vehicles takes a higher priority” is removed from the second criterion of Principle 5. As a minimum, it is requested that the reference to developments of over 80 dwellings is removed from the Principle text and is added to the supporting text, with reference instead to large-scale residential developments being encouraged to incorporate shared spaces where they are appropriate.</p>		
RDG 15.3	Marrons Planning/ Richborough Estates	Principles 9/10/12,	<p><u>Principles 9/10/12</u> Even in recognition of the wording which is clear that such parking arrangements “should” be made (rather than “must”, for example), the requirements are still considered to be not sufficiently evidenced and lacking any Policy support in the Local Plan.</p> <p>There are likely to be schemes where more than 3 parking spaces can be provided without intervening landscaping, where on-plot parking is more suitable to the frontage, or where a cluster of more than 3 on-street parking bays is suitable. As drafted, the inclusion of such criteria in Principles 9, 10 and 12 mean they are unduly onerous and restrictive, and could prevent sustainable development proposals from coming forward</p>	As clearly indicated in the policy (and noted in the representation) the Principle does not set new requirements and is an articulation of good design. As such it will not be able to fetter development but help ensure that well designed developments come forward. If there are site circumstances that prevent the expectations discussed in the SPD then they will be dealt with on a case by case basis. As such, there is no need to lower our standards in order to incorporate all possible constraints.	No action required.

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			As such, it is recommended that the criteria referenced are removed from Principles 9, 10 and 12. As a minimum, it is requested that such references are removed from the Principle text and are added to the supporting text, where parking design which has intervening landscaping, side or rear on-plot parking and on-street parking bays which limit large clusters are encouraged where appropriate.		
RDG 15.4	Marrons Planning/ Richborough Estates	Principle 19	<p><u>Principle 19</u> The National Planning Policy Framework is clear at Paragraph 131 f) that “planning policies and decisions should ensure that [...] developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users”, with Footnote 49 adding that “planning policies for housing should make use of the Government’s optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standard, where the need for an internal space standard can be justified”</p> <p>Insufficient justification is provided for the need to impose the optional nationally described space standard, and in any case this requirement would need to be established in a</p>	The SPD does not seek to place a requirement for the application of the National Described Spatial Standards, rather sets an expectation, and therefore no changes are necessary.	No change required.

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			<p>Development Plan Document such as the Local Plan rather than through a SPD, particularly where there is no Policy support.</p> <p>As such, it is recommended that Principle 19 is removed, or at the very least amended to provide support for residential development proposals which adhere to the nationally described space standard, but recognise that such a standard is not necessary in all residential schemes.</p>		
RDG 16.1	NSC		<p><u>General</u></p> <p>Over-emphasis in the report on ‘city-scapes’ and not enough on major estate housing schemes.</p> <p>Developers are still getting away with unimaginative ‘tick-tacky’ boxes cheap estate builds with very poor visual integrity.</p> <p>Little pressure on developers to integrate imaginative architectural detailing, architectural design.</p> <p>Boundary treatments – unmanaged/unmaintained/unpoliced – Road ‘adoption’ delays (some outstanding for over 20 years!).</p> <p>Historically, insufficient soft landscaping on new housing estates.</p>	<p>Comments noted. However, this SPD sets the design expectations for new residential development across the city, and deals in detail with the matters such as architectural detailing, visual integrity and boundary treatments.</p> <p>Due to the nature of the document it cannot create new requirements on matters such as PV panels, for example.</p>	No changes required.

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			No direction on photovoltaic or heat-source energy integration into major housing developments.		
RDG 16.2	NSC		<p><u>Cumulative effect of residential developments</u></p> <p>However, there has never been account taken of the cumulative effect of residential development across a region – all applications and assessments are made on their individual merits only. When aggregated, their overall effect appears to be ignored. The outcome is to completely ignore the cumulative effects on adjacent neighbourhoods. Assessments are only ever ‘site-specific’.</p>	The nature – and legal framework – of planning is that each application is judged on its own merits. However, cumulative impacts on matter such as, for example, transport or biodiversity, are considered in detail.	No change required.
RDG 16.3	NSC		<p><u>Community Engagement</u></p> <p>Inadequate or non-existent Community and neighbour engagement at the pre-planning stage, e.g. the Bruker development on Banner Lane CV4.</p> <p>The progress of major applications has historically NOT been communicated by developers to the local community or neighbours after the initial Outline Application, e.g. the Bruker development on Banner Lane CV4.</p>	Noted but such matters are not relevant to this SPD which focuses on design guidance for new residential development	No change required.