



REPORT TO EXECUTIVE

PORTFOLIO AREA: ECONOMIC DEVELOPMENT

Date of Meeting: 14th February

Public

Key Decision: Yes

Recorded in Forward Plan:

Yes

Inside Policy Framework

Title: HOUSING DESIGN SUPPLEMENTARY PLANNING DOCUMENT
Report of: Assistant Director Economic Development
Report reference: ED.07/11

Summary:

This report sets out the process which has been undertaken in the production of this Supplementary Planning Document (SPD) and includes a summary of responses received to the public consultation and the proposed changes to be made to the document in response to the comments received.

Recommendations:

1. This report is made available for consideration by the Environment and Economy Overview and Scrutiny Panel at its meeting on 24 February 2011.
2. A further report is brought to Executive for its meeting on 14 March 2011, to consider referring the Supplementary Planning Document to Council at its meeting on the 26 April 2011 for adoption.

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Note: in compliance with section 100d of the Local Government (Access to Information) Act 1985 the report has been prepared in part from the following papers: Executive Reports DS. 45/08; DS.60/08; DS.72/08; IOS Report DS.78/08; Council Report DS.89/08

1. BACKGROUND INFORMATION AND OPTIONS

- 1.1 Executive received report DS.45/08 which outlined that four Supplementary Planning Documents were prepared in line with their listing in the Council's Local Development Scheme forming part of the Local Development Framework.
- 1.2 In compliance with the requirements of planning legislation the Council consulted on draft versions of the Supplementary Planning Documents. The four SPDs were:
Achieving well designed housing
Planning Obligations
Designing Out Crime
Trees on Development Sites
- 1.3 The latter two SPDs have proceeded to adoption. The draft 'Achieving Well Designed Housing SPD is the subject of this report and is to be amended in the light of comments received.
- 1.4 The SPD expands on policies in the Local Plan in particular policies under the plan's Chapter 3 'Core Development Policies' CP5 'Design'; CP6 'Residential Amenity'; CP7 'Use of Traditional Materials'; CP8 'Renewable Energy'; CP9 'Development, Energy Conservation and Efficiency'; CP10 'Sustainable Drainage Systems' and policies contained in Chapter 5 of the Local Plan under the heading 'Housing'.

2. CONSULTATION

- 2.1 Informal consultation was undertaken on the individual topic papers in the autumn of 2007. This generated only a small number of responses but nevertheless allows for involvement at the initial stages of SPD preparation.
- 2.2 A 6-week public consultation was scheduled following approval of the consultation draft by Council. This commenced on Monday 9th March 2009 until Friday 24th April 2009.
- 2.3 Consultation proposed - No further consultation is planned.
- 2.4 In summary a number of alterations have been made in the light of 61 representations received. These representations and proposed changes are detailed in Appendix 1.

2.5 Key points raised include:

- rationalisation of references to movement and transport, to avoid duplication and to reflect new national guidance;
- strengthening of references to the designing out of crime and enhancement of public safety;
- strengthening of references to green infrastructure;
- expansion of the document's illustrative examples of householder extensions;
- consideration of housing density levels which respond to the character of the area in which they are to be built;
- sustainable design and the inclusion of environmental aspects such as water conservation and the use of sustainable drainage systems
- Parking provision and comments in respect of highway design/layout.
- Opportunities to enhance biodiversity on sites.

3. RECOMMENDATIONS

1. This report is made available for consideration by the Environment and Economy Overview and Scrutiny Panel at its meeting on 24 February 2011.
2. A further report is brought to Executive for its meeting on 14 March 2011, to consider referring the Supplementary Planning Document to Council at its meeting on the 26 April 2011 for adoption.

4. REASONS FOR RECOMMENDATIONS

To provide further guidance and clarity in the form of SPD in respect of policies CP5, CP6, CP7, CP8, CP9, and CP10 of the Carlisle District Local Plan.

5. IMPLICATIONS

- Staffing/Resources – Within existing resources of the Local Plans and Conservation Section. .
- Financial – The preparation of the draft SPD has been undertaken with external resources. The remaining work will be undertaken within existing resources of the Local Plans and Conservation Section
- Legal – In accordance with the Planning and Compulsory Purchase Act 2004 provisions

- Corporate – This document will assist with the Council's Environment priority by bringing forward development which will make a positive contribution to the local residential environment.
- Risk Management – Without this SPD there may remain a lack of clarity on the intention of the policies within the Local Plan.
- Environmental – Environmental Issues are covered within the SPD
- Crime and Disorder – Covered in additional SPD and where relevant referred to in this document
- Impact on Customers – This will provide additional guidance improving the service to customers of the planning service
- Equality and Diversity –

Impact assessments

Does the change have an impact on the following?

Equality Impact Screening	Impact Yes/No?	Is the impact positive or negative?
Does the policy/service impact on the following?		
Age	Yes	Positive
Disability	Yes	Positive
Race	No	
Gender/ Transgender	No	
Sexual Orientation	No	
Religion or belief	No	
Human Rights	No	
Health inequalities	Yes	Positive
Rurality	Yes	Positive

If you consider there is either no impact or no negative impact, please give reasons:

The document promotes changes to the physical environment that will improve the local area for many however it is considered to be neutral regarding race, gender, transgender, sexual orientation and religion/belief.

If an equality Impact is necessary, please contact the P&P team.

ACHIEVING WELL DESIGNED HOUSING SPD RESPONSES

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 43	6	Graeme Innes	Cumbria County Council	1	6	1.8
Details:	It is recommended that reference is made to RSS policy EM3 (as a relevant policy) in addition to DP7.					
Response:	Current text to para 1.8 reads: This SPD draws on national guidance, notably Planning Policy Statement 1 (PPS1) 'General Principles'; Planning Policy Statement 3 (PPS3) 'Housing'. Policy DP7 'Promote Environmental Quality' in the Regional Spatial Strategy for the North West provides support at a regional level'.					
	New text proposed to include reference to EM3 of the RSS (green Infrastructure).					
Proposed Change:	New text to para 1.8 to read: This SPD draws on national guidance, notably Planning Policy Statement 1 (PPS1) 'General Principles'; Planning Policy Statement 3 (PPS3) 'Housing'. Policy DP7 'Promote Environmental Quality' and EM3 'Green Infrastructure' in the Regional Spatial Strategy for the North West provides support at a regional level'					

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 37	13	Mrs Pauline Dalton	Dalston Parish Council	1	7	1.9
Details:	Dalston residents object strongly to Dalston being referred to as a "market town" would prefer "Large Village"					
Response:	This reference has been omitted from the revised draft. Dalston is specifically referenced elsewhere e.g. In the 'Form' chapter where local distinctiveness is discussed and specifically in para 5.17 - 'Some examples can be seen, for example at Dalston, where higher-class buildings use a combination of dressed quoins and fieldstone infill (Figure 76).'					
Proposed Change:	This specific text has been removed but references elsewhere to district-wide application of document are retained.					

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 36	13	Mrs Pauline Dalton	Dalston Parish Council	1	7	1.9
Details:	The whole document is more than welcome and we are pleased that the scope covers the whole District. Pleased to hear that the "wealth of historic quality design ..." in the rural areas is noted					
Response:	Comments noted. The particular sentence quoted however is proposed to be omitted from the Scope of Document section in order to edit the text to a more coherent form. Additional references are made elsewhere in the document to designing in context such as the first paragraph in the Form section - 'Whether urban or rural, full regard must be had to the form and character of the area around a development site in order to integrate the site with its surroundings.' It is considered that the document still retains its district-wide flavour despite the omission of part of para 1.9 specifically praised by the commentator.					
Proposed Change:	No change proposed.					

ACHIEVING WELL DESIGNED HOUSING SPD RESPONSES

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 07	12	Graeme Ives	English Heritage North West	2	11	2.6
Details:	Further analysis / characterisation should be undertaken to identify areas where it may be appropriate to increase density. Stating that the LPA will have an average density target of 40 dwellings per hectare suggests that the result, in design terms, will be 'average' i.e. limiting the options for diversity, interest and contextual development.					
Response:	<p>Text to para 2.7 and 2. 8 (which refer to density targets) read:</p> <p>'2.7 Government guidance is promoting increased residential density, appropriate to context, of 30-40 (rural) to 70 plus (urban) dwellings per hectare, (1990's averages were around 20-25). The Urban Task Force has argued that at a density of between 40 - 60 dwellings per hectare 'more people are close enough to communal facilities and an efficient bus service can be made viable' (1999 p60),' and</p> <p>2.8 Whilst recognising that a high density may not be appropriate in all cases, the planning authority will aim to have an average urban density of at least 40 dwellings per hectare within urban areas. Policy H3 in the Local Plan supports this.</p> <p>Recent central government announcements have removed the density targets from PPS3 rendering our Policy H3's reference to density null. In response to the objections, the text could be rephrased to remove specific density targets but instead to refer to local context and the broader sustainability of a developments host settlement.</p>					
Proposed Change:	<p>New text to paras 2.7 and 2.8 to read - '2.7 Density should be appropriate to context and characterisation studies can be used to identify those areas where increased density is appropriate. Early 1990's density averages in the UK were around 20-25. The Urban Task Force has argued that at a density of between 40 - 60 dwellings per hectare 'more people are close enough to communal facilities and an efficient bus service can be made viable' (Urban Task Force, 1999 p60).</p> <p>2.8 Whilst recognising that a high density may not be appropriate in all cases, the planning authority will encourage development which is contextual and which contributes to the sustainability of the settlement'.</p>					

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 39	13	Mrs Pauline Dalton	Dalston Parish Council	2	11	2.6
Details:	Support					
Response:	Comments noted.					
Proposed Change:	No action required.					

ACHIEVING WELL DESIGNED HOUSING SPD RESPONSES

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 38	13	Mrs Pauline Dalton	Dalston Parish Council	2	9	2.1
Details:	Strongly support all these aims					
Response:	Comments noted.					
Proposed Change:	No action required.					

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 06	12	Graeme Ives	English Heritage North West	2	10	2.4
Details:	Care is needed regarding the issue of density. The character of a particular area may be derived, partly, from a low density grain of development where it would be unfortunate to radically increase density with additional new development. Fig 9 indicates overlapping character areas and the scale of Carlisle probably lends itself to shops/services in one area being supported by residential populations in adjoining areas, which may have a lower density.					
Response:	The complexity of the issues regarding density and response to existing context is acknowledged. It is considered that sufficient references exist within the document to allow for flexibility in this area.					
Proposed Change:	No change proposed.					

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 05	12	Graeme Ives	English Heritage North West	2	9	2.1
Details:	I would strengthen the first bullet point to state that new residential development should seek to enhance the specific character of Carlisle and the distinctiveness of local character areas. The SPD needs to reinforce the requirement for new development to be based on a thorough understanding of local context.					
Response:	The reinforcement of local character is a recurring and key theme in the document. The text to the bullet points on p9, 'Objectives' is proposed to be clarified however.					
Proposed Change:	Existing bullet point one to be made more concise and a second bullet point added to strengthen the local distinctiveness theme. Revised text to read: <ul style="list-style-type: none"> • relates to its context and is integrated with its townscape or landscape setting; • enhances the special character and local distinctiveness of Carlisle. 					

ACHIEVING WELL DESIGNED HOUSING SPD RESPONSES

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 23	7	Andy Hunton	Cumbria Constabulary	2	9	
Details:		Suggested Text: <ul style="list-style-type: none">• To provide safe and secure environments which minimise the opportunities for crime and antisocial behaviour.				
Response:		Noted. This is included within the bulleted text. Previous text read: - 'To provide safe and secure environments which minimise the opportunity for anti-social behaviour'				
Proposed Change:		New bullet text to read: 2.1 This guidance seeks to promote development which: 'provides safe and secure environments which minimise the opportunity for crime and anti-social behaviour'				

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 29	2	Mark Hesketh	Natural England	3		
Details:		We support the movement hierarchy (p13, p15)				
Response:		Comments noted.				
Proposed Change:		No action required.				

ACHIEVING WELL DESIGNED HOUSING SPD RESPONSES

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 44	6	Graeme Innes	Cumbria County Council	3	14 - 15	3.6-8
Details:	<p>The user hierarchy below should be included in Section 3 in order to ensure that designers give a higher priority to meeting the needs of pedestrians, cyclists and public transport users in order to encourage these modes of travel.</p> <p>EXAMPLE TABLE GIVEN</p> <p>The examples given show a shared area, i.e. No demarcation of road or footpath. However, it should be noted that there are concerns over the use of such areas with regards to the safety of blind and partially sighted pedestrians. The use of such areas will need careful consideration, especially in order to satisfy DDA requirements, and advice should be sought from the LPA at an early stage.</p>					
Response:	<p>Para 3.4 has been suggested to be amended to make clearer reference to the user hierarchy and to meeting the needs of pedestrians, cyclists and public transport users in order to encourage these modes of travel.</p> <p>Regarding shared surfaces, it is recognised that the issue is complex but it is suggested that the existing reference is appropriate for the level of detail suitable for this SPD.</p>					
Proposed Change:	<p>Revised text to para 3.3 to read: 'Schemes should make travelling by foot, cycle or public transport viable options. Developers should have regard to the movement hierarchy - this gives priority to meeting the needs of pedestrians, cyclists and public transport, in advance of private motor vehicles, in order to encourage these modes of travel'.</p>					

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 24	7	Andy Hunton	Cumbria Constabulary	3	14	3.4
Details:	<p>Suggested Text:</p> <p>'However, superfluous or unnecessary routes should be avoided and the scheme should be designed to serve the development, rather than provide unrestricted public access'.</p>					
Response:	<p>While the objectors point is understood it is considered that sufficient reference is made elsewhere to the need for sensible provision of appropriate access. In addition, the Council's adopted SPD on Designing out Crime covers this issue more fully.</p>					
Proposed Change:	<p>No Change Proposed.</p>					

ACHIEVING WELL DESIGNED HOUSING SPD RESPONSES

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 40	13	Mrs Pauline Dalton	Dalston Parish Council	3	15	3.8
Details:		Especially relevant to Dalston. Strongly Support				
Response:		Comments noted.				
Proposed Change:		No action required.				

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 46	6	Graeme Innes	Cumbria County Council	4	24	4.2
Details:		The photo shown is not of the local hedge-laying style, though it is an excellent style for creating strong, biodiversity-rich hedgerows.				
Response:		Comment noted.				
Proposed Change:		A replacement image is to be sourced showing a more locally appropriate hedge-laying style.				

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 26	7	Andy Hunton	Cumbria Constabulary	4	26	4.28
Details:		Suggested Text: Clear demarcation of public and private space and the creation of ‘defensible space’ around houses, where it will be obvious that a threshold has been crossed.’				
Response:		Current text reads - 'Clear demarcation of public and private space and the creation of ‘defensible space’ around houses, where it will be obvious that a border has been crossed'. The suggested text is not considered to be a significant improvement on the clarity of the point that is being made.				
Proposed Change:		Change 'border' to 'threshold'.				

ACHIEVING WELL DESIGNED HOUSING SPD RESPONSES

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 32	2	Mark Hesketh	Natural England	4		
Details:		We Support increased use of Sustainable Urban Drainage (SUDS) and agree with importance of “Green infrastructure” (GI). We support use of local materials to give “sense of place” and welcome the acknowledgement of importance of Hedges				
Response:		Comments noted.				
Proposed Change:		No action required.				
Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 30	2	Mark Hesketh	Natural England	4	17	4.2
Details:		We support the Open Space & Landscape section				
Response:		Comments noted.				
Proposed Change:		No action required.				
Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 25	7	Andy Hunton	Cumbria Constabulary	4	17	4.1
Details:		Suggested Text: 'Physical boundaries are more effective at defining space than symbolic examples'.				
Response:		The point of the objection is understood but the principle is covered more fully later in the document under 'Designing out Crime' p25. In addition, the Council's adopted SPD on Designing out Crime covers this issue more fully.				
Proposed Change:		No Change Proposed.				

ACHIEVING WELL DESIGNED HOUSING SPD RESPONSES

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 09	12	Graeme Ives	English Heritage North West	4	17	
Details:		Fig 27 I support the implications of this image, including on street parking. Clearly, much of the space indicated in this image pre-dated motorised vehicles. Such an approach would need to be supported by more flexible approaches to parking provision, including an acceptance that some new development should not provide private parking within the curtilage of the dwelling, which often restricts the potential for innovative design and generates standardised approaches. We support a more flexible approach to parking, with on-street parking, which can help calm traffic, but this will need to be agreed with other consultees including the highways authority.				
Response:		Manual for Streets 1 (2007) and Manual for Streets 2 (2010) support this flexible approach and strengthen the argument against standardised approaches. This is reflected in accompanying text.				
Proposed Change:		No change required.				

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 16	4	David Hardman	Unitied Utilities Water plc	4	20	4.9
Details:		Deep rooted shrubs and trees should not be planted in the vicinity of underground utility services as they may restrict access and particularly for public sewers their roots can cause blockages.				
Response:		Reference is made in para 4.12 to the possible use of root controlling barriers to overcome root damage. Reference is also made in the same paragraph to the adopted SPD 'Trees on Development Sites' which gives further detail on this issue.				
Proposed Change:		No change proposed.				

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 17	4	David Hardman	Unitied Utilities Water plc	4	22	4.14
Details:		In the worst situations, where watercourses and drainage systems are overwhelmed, surface water will then pass over land. Comment should be made that the layout of new development should leave 'flood pathways' clear of building to cater for the worst situation.				
Response:		An additional bullet point to take account of this advice has been added to the end of the section of 'Water'.				
Proposed Change:		Additional bullet point to read: 'Flood pathways' should be incorporated into layouts so that water can flow safely without excessive damage to property.'				

ACHIEVING WELL DESIGNED HOUSING SPD RESPONSES

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 18	4	David Hardman	Unitied Utilities Water plc	4	22	4.14
Details:	United Utilities recognises that there is a lot of interest in grey water recycling and/or rainwater harvesting. However, a lot of research studies have been undertaken, which have demonstrated that they are currently expensive to install and to maintain, often use significant amounts of energy (increasing carbon emissions) and have public health concerns. Therefore, before seeking to require developers to implement these systems, you should be aware that acceptable and sustainable use of such systems has not been proved and so United Utilities cannot endorse their use at present.					
Response:	<p>The use of rainwater harvesting and greywater harvesting systems is addressed more fully in the draft SPD on Energy Efficiency. However, the first bullet point in the section relating to 'Water' is poorly phrased. It currently reads:</p> <p>The first bullet currently reads:</p> <p>‘• Developers and householders should look to harvest rainwater into collection systems, greywater recycling and rainwater harvesting;’</p> <p>It is proposed to change this to read -</p> <p>‘• Developers and householders should look to conserve water through harvesting rainwater into collection systems, and greywater recycling’</p>					
Proposed Change:	<p>Change text on first bullet point at close of section relating to 'Water' to read -</p> <p>‘• Developers and householders should look to conserve water through harvesting rainwater into collection systems, and greywater recycling’</p>					

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 45	6	Graeme Innes	Cumbria County Council	4	19	4
Details:	Natural England identifies ‘Amenity Green space’ to include informal recreation areas, housing green spaces, domestic gardens, village greens, urban commons. This and other green spaces within built areas form the green infrastructure. It therefore seems inappropriate to only refer to green infrastructure in section 6.12, and better to use it as the over-arching term.					
Response:	It would be appropriate to introduce the overarching term green infrastructure and to explain what comprises it.					
Proposed Change:	<p>It is proposed to add a paragraph to the introductory section on 'Open Space and Landscape' to read:</p> <p>"Informal recreation areas, housing green spaces, domestic gardens, village greens, urban commons and other green spaces within built up areas form the green infrastructure of the District".</p>					

ACHIEVING WELL DESIGNED HOUSING SPD RESPONSES

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 22	5	Dr Kate Willshaw	Cumbria Wildlife Trust	4	19	4.7
Details:		Cumbria Wildlife Trust supports the second bullet point in Para 4.7 "Open space should be made to contribute to as many functions as possible, including civic quality, benefit to residents, wildlife and the environment and the enhancement/conservation of biodiversity."				
Response:		Noted.				
Proposed Change:		No change required.				
Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 31	2	Mark Hesketh	Natural England	4	21	4.13
Details:		we agree that water is an asset. You could note that River Eden is classified as both a European Special Area of Conservation (SAC) and also a Site of Special Scientific Interest (SSSI). Good design is extremely important in conserving and enhancing this watercourse.				
Response:		Comments noted. For the purpose of the target audience for the document this additional detail is considered unnecessary as part of this particular document.				
Proposed Change:		No change proposed.				
Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 54	6	Graeme Innes	Cumbria County Council	5	39	5.39
Details:		Rural - There is an over emphasis on roads with this section, especially given the user hierarchy suggested above which places pedestrians first when considering design solutions.				
Response:		It is proposed to remove this section in order to reduce the volume of the document and to focus on its core objectives.				
Proposed Change:		Omit section 5.39-5.41.				

ACHIEVING WELL DESIGNED HOUSING SPD RESPONSES

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 55	6	Graeme Innes	Cumbria County Council	5	39	5.42
Details:		Regional Parking Standards are being reviewed and it is proposed that standards for residential developments are to be included.				
Response:		The document refers applicants to the highways authority at an early stage in their development. It is expected that clarification of current standards will arise from these early contacts.				
Proposed Change:		No change proposed.				
Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 52	6	Graeme Innes	Cumbria County Council	5	38	5.36
Details:		It should be noted that “street trees” require a commuted sum to be provided in respect of future maintenance.				
Response:		In order to reduce the volume of the document and to focus on its core objectives this paragraph should be omitted. However, the topic is addressed in full in the SPD 'Trees on Development Sites' and the benefits of trees are discussed earlier in this SPD in the section relating to 'Open Space and landscape'.				
Proposed Change:		Omit section 5.36-5.37.				
Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 51	6	Graeme Innes	Cumbria County Council	5	38	5.35
Details:		Advice should be sought from the Local Highway Authority with regards the appropriate standard to be applied.				
Response:		In order to reduce the volume of the document and to focus on its core objectives this paragraph should be omitted.				
Proposed Change:		Omit paragraph.				

ACHIEVING WELL DESIGNED HOUSING SPD RESPONSES

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
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House 50	6	Graeme Innes	Cumbria County Council	5	37	5.33
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Details: This issue is covered by legislation and therefore outside the remit of the SPD.

Response: In order to reduce the volume of the document and to focus on its core objectives this paragraph should be omitted.

Proposed Change: Omit paragraph.

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
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House 49	6	Graeme Innes	Cumbria County Council	5	37	5.31
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Details: Comments' relating to paragraphs 3.6 to 3.8 with regards the use of shared spaces also applies to paragraph 5.31.

Response: This is a duplicate paragraph which it is suggested to remove from the final draft.

Proposed Change: Remove duplicated paragraph.

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
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House 48	6	Graeme Innes	Cumbria County Council	5	36	5.28
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Details: National guidance has established the hierarchy given (Objection House 44) , which recognises specialist service vehicles being considered before other motor traffic.

Response: In the interests of brevity it is not appropriate in this document to significantly expand the existing text, which focuses on the primacy of foot traffic - applicants for significant developments will be made aware of the user hierarchy in full detail in relation to specialist service vehicles via their early discussions with the highways authority.

Proposed Change: No change proposed.

ACHIEVING WELL DESIGNED HOUSING SPD RESPONSES

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 47	6	Graeme Innes	Cumbria County Council	5	35	
Details:		Highway Layout - reference should be made to the County Council's role as the Highway Authority.				
Response:		This section has been edited down to a more concise form. However, a paragraph is suggested for insertion into the earlier 'Movement' chapter to emphasise the primacy of the Highway Authority.				
Proposed Change:		New text at end of 'Movement' chapter to read: 'The County Council, as Highway Authority for the District, should be approached for advice at an early stage in any development'				

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 53	6	Graeme Innes	Cumbria County Council	5	38	5.38
Details:		It should state that early consultation with the Local Highway Authority is required for any proposals that will affect the highway.				
Response:		It is proposed to remove this section in order to reduce the volume of the document and to focus on its core objectives. However, additional text at end of 'Movement' chapter is proposed to read: 'The County Council, as Highway Authority for the District, should be approached for advice at an early stage in any development'				
Proposed Change:		Omit section 5.38.				

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 56	6	Graeme Innes	Cumbria County Council	5	39	5.43
Details:		The use of minimum standards should not be discounted for residential developments. The use of maximum standards can result in designs not providing sufficient parking which results in a car dominated street scene due to on street parking and conversion of garden areas to provide parking. Also safety issues can occur due to indiscriminate parking such as restricting available road width which may impede service/emergency vehicles, obstruction of footways which results in pedestrians having to walk on the carriageway etc.				
Response:		The document refers to and quotes directly from PPG13 'Transport'. Full text reads: 'PPS3 (Housing) requires that developments take 'a design-led approach to the provision of car-parking space, that is well-integrated with a high quality public realm and streets that are pedestrian, cycle and vehicle friendly'. PPG13 (Transport) states that 'There should be no minimum standards for development, other than parking for disabled people'. The suggested levels in the Cumbria Design Guide (1996) should be considered a maximum level'.				
Proposed Change:		No change proposed.				

ACHIEVING WELL DESIGNED HOUSING SPD RESPONSES

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 27	7	Andy Hunton	Cumbria Constabulary	5	39	5.42
Details:	Suggested Text:'If parking provision is not perceived to be secure, vehicle owners may create congestion or obstructions in the locality or elsewhere as they seek more convenient alternatives.'					
Response:	A similar point is made in para 5.44 which states that - 'Parking is usually considered to be more secure when contained within the curtilage of the property although as density of development increases, on street parking in well-overlooked locations, and parking in well-overlooked parking courts is likely to be a useful method.' Para 5.46 reinforces this - 'Communal parking areas can help to provide for additional parking in mixed developments. These should be well lit and overlooked by primary windows to enable surveillance.' - Existing references to appropriately located and secure parking are considered adequate.					
Proposed Change:	No change is proposed.					

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 61	15	Jock Gordon		5	41	5.52
Details:	Under Building Regulations legislation a kitchen is not defined as a habitable room, and therefore does not require a window, only a means of ventilation. However under Planning legislation kitchens seem to be classed as habitable rooms, even though they do not require to have a window. I say 'seems to be classed', because in any planning application where a two story new build or extension is proposed opposite an existing kitchen window in a neighbouring property the 14 meter privacy distance is applied by the Authority, and the application is refused. The application of this arbitrary 14 metre distance in these situations precludes most semi-detached properties from being extended.					
Response:	Current relevant text reads: '5.52 Where a development faces or backs onto existing residences, in order to respect privacy within rooms a minimum distance of 21 metres between dwellings should usually be allowed between primary facing windows (and 14 metres between a gable end and primary window). However, if a site is an infill, and there is a clear building line that the infill should respect, these distances need not strictly apply.' This is a drafting error and the correct figure between gables and primary windows should be 12m. It is proposed to alter the text to include this lower figure. It is also proposed to clarify the text so that it is clear that the distances relate to new buildings and any existing buildings, not just existing residential property, and also any building walls, not just gable walls.					
Proposed Change:	New text to read: '5.52 Where a development faces or backs onto existing development, in order to respect privacy within rooms a minimum distance of 21 metres should usually be allowed between primary facing windows (and 12 metres between any wall of the building and a primary window). However, if a site is an infill, and there is a clear building line that the infill should respect, these distances need not strictly apply.'					

ACHIEVING WELL DESIGNED HOUSING SPD RESPONSES

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 10	12	Graeme Ives	English Heritage North West	5		
Details:	This should be given far more prominence in the SPD, potentially a whole section, and be placed earlier in the structure of the document. For example, a section could be provided on 'how to' understand character and what kind of analysis the LPA will expect in any Design and Access Statement submitted with planning applications. This could be followed by a section on the key urban design / townscape issues such as form, mass, grain, street pattern, plot size, proportions of enclosure, formality/organic layout, permeability, rhythm of frontages, spatial structure, view analysis to landmarks etc. These, among other issues, contribute to the fundamental urban design / characterisation issues that define an area and which can then be followed by more detailed character issues such as materials, landscape or boundary treatment.					
Response:	The revised document increases the primacy of the 'Form' section - However, the document seeks to strike a balance between various target users - These will vary in scale from individual applicants to volume builders. The townscape issues referred to above are referenced in the document but it is not considered appropriate to expand on them further in this particular document. Expansion on these themes is in part covered by the Council's adopted 'Urban Design Guide and Public Realm Framework' SPD.					
Proposed Change:	The primacy of the 'Form' chapter has been expanded in the revised document, with additional illustrations and reference in particular relating to existing streetscape, sympathetic design and appropriate extensions.					

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 11	12	Graeme Ives	English Heritage North West	5	30	5.5-6
Details:	I agree with the principle, but would make this far more prominent. Reference could be made to the EP Urban Design Compendium, the DETR By Design guide and the English heritage Guide on Conservation Area Appraisals. Reference could also be made to the joint English Heritage / CABE Building In Context guide.					
Response:	A balance needs to be struck between the various target audiences for the document. It is not considered appropriate to refer to these documents within the main text but reference to the documents should be added to the Bibliography/Further Reading appendix.					
Proposed Change:	No change required to main text. Inclusion of omitted documents in Bibliography/Further Reading.					

ACHIEVING WELL DESIGNED HOUSING SPD RESPONSES

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 13	12	Graeme Ives	English Heritage North West	5	31	
Details:	Fig 68 – ‘anywhere’ post war development – this is extremely dismissive of a type and period of development that has been influential in shaping many urban areas. It is important to objectively assess such areas, as there are some good examples, and to understand their contribution to the legibility of an area. Our guide on Suburbs may be helpful reference.					
Response:	The interwar housing pictured has influenced the development of many areas but is of a generic type which repeats with little local variance across the UK. Nonetheless, the annotation could be altered to be more constructive. Current text reads: ‘Anywhere’ post-war development, slavishly applying standard layout resulting in a monotonous layout that ignores local precedent.’					
Proposed Change:	It is proposed to change this to - ‘Anywhere post-war development. Developers should strive to make their proposals locally distinctive and relevant to Carlisle.’					

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 14	12	Graeme Ives	English Heritage North West	5	32	
Details:	Fig 71 – other images may be helpful in demonstrating innovative or creative contemporary design.					
Response:	There are a number of images of contemporary development throughout the document. Space constraints and the need to keep the document as succinct as possible mean that it is difficult to expand this to a greater extent.					
Proposed Change:	No change proposed.					

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 03	9	John Jackson MRTPI	Persimmon Homes Lancashi	5		
Details:	Manual for Streets has changed the "engineered" approach to the layout of roads and streets found in earlier guidance to one which is now design led. In most instances road layouts which depart from the "standard approach" stumble when it comes to their being adopted either because of non standard road/footpath widths or due to the choice of surface materials. It is important therefore that Cumbria County Council as Highways Authority have a clear input into the "Highway Layout" and "Parking Provision" sections of the documents to avoid future conflicts.					
Response:	Chapter 3 - Movement - emphasises the replacement of Design Bulletin 32 with the Manual for Streets 1 (2007) and the new Manual for Streets 2 (2010). These new guidance documents emphasise the creation of 'place' as having primacy over 'movement' in highway design. This is elaborated on in Chapter 5 -Form - under the subsection Highway Layout. The text notes that "The Cumbria Design Guide Vol 1: Layout of new residential developments' is now being revised in the light of Manual for Streets 1 and 2.					
Proposed Change:	No change is proposed but need for Cumbria County Council to accommodate proposals which accord with Manual for Streets 1 and 2 is noted.					

ACHIEVING WELL DESIGNED HOUSING SPD RESPONSES

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 34	2	Mark Hesketh	Natural England	6	49	
Details:		We welcome the use of the “checklist” to support policies.				
Response:		Comments noted.				
Proposed Change:		No action required.				

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 33	2	Mark Hesketh	Natural England	6		
Details:		We fully support the Sustainable Design Chapter. It would be desirable if the Local Authority had a specific policy to ensure GI was incorporated into new development. Natural England is advocating that “all new development should be within 300m access to green space” as Natural England is advocating. Please also refer to the Natural England “Accessible Natural Green space Standards” which is available via our web site.				
Response:		<p>Policy LC2 'Primary Leisure Areas' of the Carlisle District Local Plan requires that all new dwellings should be within 400m of an open space of between 2 and 10 hectares which caters for informal recreational needs'; and that ' all dwellings should be within 200m of a small formal or informal open space between 0.2 and 2 hectares that is suitable for informal use and has high amenity value'.</p> <p>Current text to para 4.8 states that 'Accessible open space within 500m of every home is a desirable target. Further details of the requirement for open space are contained in Policy LC4 of the Local Plan'.</p> <p>It is reasonable to update the current text to reflect the adopted Local Plan and to incorporate the desirability of the 300m figure.</p>				
Proposed Change:		<p>New text to para 4,8 to read:</p> <p>'Accessible open space should be within reach of every new home. Policy LC2 of the Local Plan requires that all new dwellings be within 400m of open space of between 2 and 10 hectares and that all dwellings should be within 200m of a small formal or informal open space between 0.2 and 2 hectares.'</p>				

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 57	6	Graeme Innes	Cumbria County Council	6		
Details:		It is considered that this section would benefit from referring to how good design can contribute to an optimal approach to environmental sustainability. A good example is Rowan Road, Merton which is referred to in the Urban Design Compendium 2 page 72.				
Response:		Comment noted. The broad thrust of the document is to illustrate the benefits of good design and environmental sustainability. It is considered that existing references are adequate.				
Proposed Change:		No change proposed.				

ACHIEVING WELL DESIGNED HOUSING SPD RESPONSES

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 58	6	Graeme Innes	Cumbria County Council	6	47	
Details:	Figure 113 refers to Amsterdam as a sustainable environment, the County Council would question if this is a relevant example in the context of Carlisle. We would question whether there is evidence that such an approach which involves high density development would be viable in Carlisle. Carlisle serves predominately rural catchments with higher levels of car ownership.					
Response:	The illustration seeks to indicate that higher density urban development can contribute to a higher quality of life and enable reduced car ownership. However, in order to reduce the document to a more manageable size this particular illustration is proposed to be omitted.					
Proposed Change:	Omit figure 113.					

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 60	6	Graeme Innes	Cumbria County Council	6	49	check list
Details:	The checklist omits specific reference to measures that can be taken to protect and enhance biodiversity specifically. A suggested wording would be: 'Ensure that developments, as far as possible, identify, retain and strengthen wildlife corridors and biodiversity features, using locally appropriate native species in more natural settings, and non-native species of high wildlife value.'					
Response:	It is considered appropriate to expand reference to biodiversity in the checklist. This accords with representations from Objector 5, representation 21 of 61.					
Proposed Change:	New second bullet point on page 49 to read- <ul style="list-style-type: none"> Assess the biodiversity value of any site and enhance where possible - this can include elements such as bat and bird boxes incorporated into the design of new housing, as well as the protection and enhancement of existing landscape features. 					

ACHIEVING WELL DESIGNED HOUSING SPD RESPONSES

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 04	9	John Jackson MRTPI	Persimmon Homes Lancashi	6	46	6.4
Details:	Whilst it may be a desire, the requirements that all new residential developments should achieve Code for Sustainable Homes Level 4 in advance of the Government's timetable is too onerous.					
Response:	National planning policy allows LPAs to set requirements for building level sustainability exceeding the statutory minima of the Building Regulations, (CLG Supplement to PPS1, 2007). The tabled draft SPD states in Para 6.4 that 'Pursuit of a Code 3 rating will be required by 2010 however the City Council will seek higher ratings (Code 4 and above) in all new developments'. - It is not considered that seeking a higher rating is too onerous, and will be encouraged in all new developments. However, the reference to 2010 should be omitted and it is suggested that 'encouraged' should be substituted for 'required'.					
Proposed Change:	Revised text to read: 'Pursuit of a Code 3 rating or above will be encouraged in all new residential developments. Further to this, in deciding whether housing development is granted planning permission for other than allocated sites, account will be taken of its location and whether there are adequate transport networks available that will allow for and enable walking, cycling and the use of public transport'.					

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 19	4	David Hardman	Unitied Utilities Water plc	6	47	6.9
Details:	United Utilities recognises that there is a lot of interest in grey water recycling and/or rainwater harvesting. However, a lot of research studies have been undertaken, which have demonstrated that they are currently expensive to install and to maintain, often use significant amounts of energy (increasing carbon emissions) and have public health concerns. Therefore, before seeking to require developers to implement these systems, you should be aware that acceptable and sustainable use of such systems has not been proved and so United Utilities cannot endorse their use at present.					
Response:	<p>The use of rainwater harvesting and greywater harvesting systems is addressed more fully in the draft SPD on Energy Efficiency. However, the first bullet point in the section relating to 'Water' is poorly phrased. It currently reads:</p> <p>The first bullet currently reads:</p> <p>‘• Developers and householders should look to harvest rainwater into collection systems, greywater recycling and rainwater harvesting;’</p> <p>It is proposed to change this to read -</p> <p>‘• Developers and householders should look to conserve water through harvesting rainwater into collection systems, and greywater recycling’</p>					
Proposed Change:	<p>Change text on first bullet point at close of section relating to 'Water' to read -</p> <p>‘• Developers and householders should look to conserve water through harvesting rainwater into collection systems, and greywater recycling’</p>					

ACHIEVING WELL DESIGNED HOUSING SPD RESPONSES

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 20	5	Dr Kate Willshaw	Cumbria Wildlife Trust	6	48	6.12
Details:	<p>The PPS9 Good Practice Guide says: “PPS9 states that plan policies should promote opportunities for the incorporation of beneficial biodiversity and geological conservation features within the design of development. The design, layout and landscaping of new developments offer enormous opportunities to add to, or enhance, biodiversity or geological conservation. These can range from minor additions to the fabric of buildings, for example to provide nesting spaces for species such as swifts, through to providing major new areas of biodiversity habitat alongside development.”</p> <p>The Biodiversity and Geological Conservation section could go much further than it does to encourage biodiversity into new build housing. Considering that PPS9 and the PPS9 Good Practice Guide provide a lot of detail about how to incorporate biodiversity into development, it is disappointing to see only a very short paragraph in this draft SPD dealing with biodiversity.</p> <p>The PPS9 Good Practice Guide has some very useful detail about how to incorporate biodiversity into development and this is reproduced below.</p> <p>Cumbria Wildlife Trust considers that this advice should be incorporated into the housing SPD:</p> <p>PPS9 Good Practice Guide, page 55 (http://www.communities.gov.uk/documents/planningandbuilding/pdf/143792.pdf) 5.34species, such as bats and swifts, are highly dependent on built structures for survival. Maintenance of existing, and the design of new, buildings can take account of this. Biodiversity can be incorporated into small-scale developments through wildlife-friendly landscaping, installation of sustainable drainage schemes, and features such as green walls, balconies, roofs and nesting and roosting spaces.</p> <p>5.35 At a simple level, nest and roosting boxes can be easily incorporated in or onto existing and new buildings. A wide range of boxes to benefit birds, bats and some invertebrates are available. There are also opportunities for incorporating artificial nesting burrows in the walls and embankments of civil engineering structures to benefit species such as the sand martin and kingfisher.</p> <p>5.36 Development control decisions which embrace biodiversity and geological conservation can be of broad benefit to communities by creating employment through new projects, creating cost effective naturally functioning utilities (such as for flood relief and drainage), enhancing the local economy through tourism and improving local surroundings which enhance quality of life.</p>					
Response:	<p>The draft document makes a number of references to enhancing biodiversity throughout the document, notably in sections pertaining to Public Open Space, Landscaping, Trees, Water, Layout and Biodiversity. It is considered that this is an appropriate level of reference given the diverse issues which need to be addressed within the document and the need to keep it reasonably concise.</p>					
Proposed Change:	No change is proposed.					

ACHIEVING WELL DESIGNED HOUSING SPD RESPONSES

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 21	5	Dr Kate Willshaw	Cumbria Wildlife Trust	6	49	
Details:		Cumbria Wildlife Trust has concerns over the first paragraph on the Checklist				
		•❑Use previously developed sites for housing....				
		This is fine where the previously developed site does not have biodiversity value, but many brownfield sites are also high in biodiversity value.				
		Therefore ecological survey of brownfield sites should be carried out at the earliest stages of considering its suitability as a housing site.				
		Cumbria Wildlife Trust would like to see biodiversity enhancement as described in the section above as part of the checklist on page 49 along the lines of:				
		•❑incorporate beneficial biodiversity enhancements into the design of new housing				
Response:		An additional bullet could reasonably be added to this section. New text to read -				
		•❑ Assess the biodiversity value of any site and enhance where possible - this can include elements such as bat and bird boxes incorporated into the design of new housing, as well as the protection and enhancement of existing landscape features.				
Proposed Change:		New second bullet point on page 49 to read-				
		•❑ Assess the biodiversity value of any site and enhance where possible - this can include elements such as bat and bird boxes incorporated into the design of new housing, as well as the protection and enhancement of existing landscape features.				

ACHIEVING WELL DESIGNED HOUSING SPD RESPONSES

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 59	6	Graeme Innes	Cumbria County Council	6	48	6.12
Details:	<p>The proposal to protect, and enhance, green infrastructure within the built environment is to be welcomed, and would be in line with RSS Policy EM3. However the SPD is incorrect in including this concept only under the biodiversity section 6.12. It is recommended above under page 19 that the green infrastructure concept should be used as an overarching term, in order to adequately reflect RSS policy EM3.</p> <p>The section should include reference to biodiversity features such as the identification and strengthening of green wedges and wildlife corridors. Previously used land can be of biodiversity importance, as recognised by PPS 9 paragraph 13 ‘...where such sites have significant biodiversity or geological interest of recognised local importance, local planning authorities, together with developers, should aim to retain this interest or incorporate it into any development of the site.’</p> <p>Development of sites that have recognised interest which would result in the loss of such interest would therefore be inappropriate.</p> <p>It is recommended that such a caveat should be incorporated into the checklist.</p>					
Response:	<p>It is proposed to add additional reference to green infrastructure under the chapter addressing Open Space and Landscape.. An explicit reference to EM3 is also suggested for inclusion under para 1.8.</p>					
Proposed Change:	<p>It is proposed to add a paragraph to the introductory section on 'Open Space and Landscape' to read:</p> <p>"Informal recreation areas, housing green spaces, domestic gardens, village greens, urban commons and other green spaces within built up areas form the green infrastructure of the District".</p>					

ACHIEVING WELL DESIGNED HOUSING SPD RESPONSES

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 42	6	Graeme Innes	Cumbria County Council	General		
Details:	It is important that Green Infrastructure is considered as part of the SPD as it is relevant to housing development. Natural England has produced Green Infrastructure Guidance 2009, available on www.naturalengland.org.uk . Natural England definition of green infrastructure is given in full.					
	RSS Policy EM3 Green Infrastructure again highlights the relevance to this SPD and detail is given.					
	There is no mention within the SPD of how existing heritage and culture assets will be retained and enhanced through high quality design.					
Response:	Reference to green infrastructure in its general sense is made throughout the section relating to 'Open Space and Landscape' under the themes of 'Landscaping', 'Trees' and 'Water', and specifically later in the document in para 6.12. It is not proposed that any additional reference is required to be made. Reference to existing context, local distinctiveness and appropriate design is made throughout the document and it is considered that this reflects the need to retain and enhance heritage and cultural assets.					
Proposed Change:	No change is proposed.					
Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 41	13	Mrs Pauline Dalton	Dalston Parish Council	General		
Details:	An impressive piece of work. All references to rural areas are imaginative, intelligent and appropriate, especially P42 (5.59), P39 (5.39); all references to "materials" P31 -33 and "Form" P29-33, although rural areas may be left behind at times.					
Response:	Comments noted.					
Proposed Change:	No change proposed.					

ACHIEVING WELL DESIGNED HOUSING SPD RESPONSES

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
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House 01	3	Alan Hubbard	The National Trust	General		
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Details: The production of this SPD is welcomed. It is considered that seeking to improve the quality of residential development is extremely important and that addressing related issues, such as the impact of highways, is necessary if appropriate standards are to be achieved that meet the aim of reinforcing local distinctiveness.

The Trust especially welcomes the intentions set out in the section on Sustainable Design, in particular the approach to energy, water and waste minimisation. It is not considered that the requirements set out are unduly onerous. Indeed practical work has shown that it is quite possible, for example, to achieve energy efficiency standards for dwellings that are well in excess of the current Building Regulations requirements, e.g. Stamford Brook development of c.700 houses in Trafford developed in partnership by Redrow, Taylor Woodrow and the National Trust which, amongst its sustainable construction achievements, has pioneered high standards of insulation and air tightness along with careful orientation to maximise passive solar gain in a conventional form of structure. Further information on this project is available in the dissemination of the outcomes of the project in the document titled 'Volume' a copy of which is attached for your information.

Response: Support for the document is welcomed.

Proposed Change: No change required.

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
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House 02	9	John Jackson MRTPI	Persimmon Homes Lancashi	General		
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Details: The overall document reflects design guidance contained at the national level and from Central Government advisors, such as CABE. However it too often repeats at length this guidance unnecessarily without citation and elaboration of enough local examples of "good design" and the identification of the principles which made them successful.

Response: The document is intended to utilise the principles set out in national guidance and translate this into useable guidance at the local level. We accept that there is some degree of repetition of national guidance within the document which may be unnecessary.

Proposed Change: Review the references made to other guidance and reduce the number of references where they are duplicated.

ACHIEVING WELL DESIGNED HOUSING SPD RESPONSES

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 15	12	Graeme Ives	English Heritage North West	General		
Details:	The draft SPD makes no specific reference to the historic environment, particularly with respect to listed buildings and conservation areas. Emphasis should be given to the need to prepare a specific character appraisal of each conservation area in order to provide specific design guidance to ensure that new development preserves and enhances the special character of those areas as it is not possible to provide sufficient detail in a single SPD for a whole city area that gives sufficiently detailed guidance to respond to the distinctiveness of each conservation area.					
Response:	The document is primarily focused on the design of new housing. Nonetheless, Local distinctiveness, historic detailing, conservation areas and respect for context are made reference to. Detailed guidance regarding conservation areas and listed buildings does not comfortably fall within the reasonable scope of the document and as such no change is proposed.					
Proposed Change:	No change is proposed.					

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 35	2	Mark Hesketh	Natural England	General		
Details:	You may wish to look at The Salford Borough Council SPDs on “Design and Sustainable Design” which are regarded as good practice examples by ourselves and others.					
Response:	Comments noted. A further SPD on energy efficiency is under production to reflect the scale and complexity of this area.					
Proposed Change:	No change proposed.					

Rep No:	Objector No:	Contact:	Organisation	Chapter:	Page:	Para:
House 28	2	Mark Hesketh	Natural England	General		
Details:	We welcome the approach of this SPD and are supportive of the proposals. Conserving and enhancing landscape and townscape character (locally distinctive character), biodiversity (including opportunities for creating new habitat) and meeting our standards for green space are all to be encouraged.					
Response:	Comment noted.					
Proposed Change:	No action required.					