

# additional papers 1



## Council

Mon 24 Jun  
2019  
7.00 pm

Council Chamber  
Town Hall  
Redditch

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# Council

Monday, 24th June, 2019

7.00 pm

**Council Chamber - Town Hall  
Redditch**

## Agenda

### Membership:

Cllrs:	Roger Bennett (Mayor)	Julian Grubb
	Gareth Prosser (Deputy Mayor)	Bill Hartnett
	Salman Akbar	Pattie Hill
	Joe Baker	Ann Isherwood
	Tom Baker-Price	Wanda King
	Joanne Beecham	Anthony Lovell
	Juliet Brunner	Gemma Monaco
	Michael Chalk	Nyear Nazir
	Debbie Chance	Mike Rouse
	Greg Chance	Mark Shurmer
	Brandon Clayton	Yvonne Smith
	Matthew Dormer	David Thain
	John Fisher	Craig Warhurst
	Peter Fleming	Jennifer Wheeler
	Andrew Fry	

### **8 .2 High Quality Design - Supplementary Planning Document (SPD)** (Pages 1 - 78)

Due to the amount of paperwork only the covering report for this item has been included in this agenda pack. The full report, including appendices, can be accessed in the Additional Papers 1 pack for this meeting.

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REDDITCH BOROUGH COUNCIL**EXECUTIVE  
COMMITTEE**11<sup>th</sup> June 2019**HIGH QUALITY DESIGN SUPPLEMENTARY PLANNING DOCUMENT**

Relevant Portfolio Holder	Cllr Matt Dormer
Portfolio Holder Consulted	Yes
Relevant Head of Service	Ruth Bamford
Ward(s) Affected	All
Ward Councillor(s) Consulted	N/A

**1. SUMMARY OF PROPOSALS**

- 1.1 The Borough of Redditch Local Plan No.4 2011-2030 (BORLP4) was adopted on 30<sup>th</sup> January 2017 and this High Quality Design Supplementary Planning Document (SPD) provides more detailed guidance on a number of policies contained in BORLP4.
- 1.2 A draft version of the SPD was consulted on in early 2018 and has since been subject to a number of revisions as a result of consultation responses.

**2. RECOMMENDATIONS**

**The Executive Committee is asked to NOTE**

**1) the 'Consultation Comments and Officer Responses' table made in response to consultation on the draft High Quality Design SPD, and the actions proposed by strategic planning officers to make subsequent revisions to the SPD;**

**2) the revised version of the High Quality Design SPD; and**

**the Executive Committee is asked to RECOMMEND that**

**3) the High Quality Design SPD be adopted at a meeting of Full Council.**

**3. KEY ISSUES****Financial Implications**

- 3.1 Work carried out on the preparation of the SPD, including public consultation and responding to issues arising, has been carried out in the context of existing departmental budget and additional finances are not required.

**Legal Implications**

- 3.2 The SPD has been produced in accordance with the relevant legislation, in particular the Town and Country Planning (Local Planning) (England)

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COMMITTEE**11<sup>th</sup> June 2019

Regulations 2012. Once adopted, the SPD will be a material consideration in the determination of planning applications.

- 3.3 The recommendations outlined earlier in this report seek approval by Executive that the High Quality Design SPD be presented to a meeting of Full Council with a recommendation to formally adopt the document.

**Service / Operational Implications**

- 3.4 The High Quality Design SPD will be a material consideration in planning decisions within the borough and will provide further guidance for determining planning applications. On adoption of this SPD two existing documents, the Encouraging Good Design SPG (2001) and the Designing for Community Safety SPD (2006), will be superseded.
- 3.5 Strategic planning officers have worked closely with colleagues in development management and the borough's conservation officers to ensure the SPD is fit for purpose in the determination of planning applications. Consultation meetings, and subsequent revisions to the SPD, have also taken place to ensure the consultation responses have where possible been fully incorporated into the document.

**Customer / Equalities and Diversity Implications**

- 3.6 The public consultation provided the opportunity for those living and working in the borough, and/or for those with an interest in planning and design in the borough to comment on the content of the SPD.
- 3.7 All statutory consultees, including Parish Councils, were consulted as part of the engagement process, as will a range of other interested parties. A range of internal Council colleagues were also consulted during the formal consultation period.

**4. RISK MANAGEMENT**

- 4.1 Without adopting this High Quality Design SPD, the existing Encouraging Good Design SPG and Designing for Community Safety SPD will continue to be used. These documents were adopted in 2001 and 2006 and are therefore considered to be extremely dated. Furthermore the guidance contained in these documents, whilst in some cases still relevant, also relates to the superseded Borough of Redditch Local Plan No.3 rather than the current BORLP4 adopted in 2017.
- 4.2 The new High Quality Design SPD will ensure that up-to-date guidance is available based on the existing BORLP4 policies. This will aid the achievement of high quality design in planning proposals, will help decision-making for planning applications, and should reduce the number of applications needed to be determined by appeal.

**EXECUTIVE  
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**5. APPENDICES**

Appendix A - Redditch Borough High Quality Design SPD (publication version)  
Appendix B - 'Consultation Summary and Officer Response' table

**6. BACKGROUND PAPERS**

Borough of Redditch Local Plan No.4 2011-2030

**7. KEY**

BORLP4 – Borough of Redditch Local Plan No.4  
SPG – Supplementary Planning Guidance  
SPD – Supplementary Planning Document

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# Borough of Redditch High Quality Design SPD

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PUBLICATION VERSION

June 2019





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**This SPD should be read in conjunction with the National Planning Policy Framework, Planning Practice Guidance, Borough of Redditch Local Plan No.4 (2011-2030) and Worcestershire County Council standards and requirements.**

# 1 Introduction

## 1.1 What is an SPD?

**1.1.1** This Supplementary Planning Document (SPD) supplements the Boroughs adopted Development Plan and therefore reflects the Council's policies. As such it is a material consideration in the determination of planning applications and will be given substantial weight in the decision making process. An SPD guides various forms of development, ensures consistency in decision making and provides clarity for applicants in knowing the parameters of what is expected by the Council.

**1.1.2** The purpose of this High Quality Design SPD is to supplement the policies in the development plan and to provide detailed guidance on how a high standard of design could be achieved in new development.

**1.1.3 The Borough of Redditch Local Plan No 4 (Adopted 2017) contains Policy 39 'Built Environment' and 40 'High Quality Design and Safer Communities'. These Policies set out what the Council expects new developments to achieve.** The purpose of this SPD is not to repeat the principles within these policies but to expand upon them and provide more detailed design guidance for applicants seeking planning permission.

## Policy 39 Built Environment

**39.2** All development in the Borough should contribute positively to the local character of the area, responding to and integrating with the distinctive features of the surrounding environment, particularly if located within a historic setting.

### Policy 39

**39.3** All development proposals should:

- i. seek to optimise the potential of the site to accommodate sustainable development through making the most efficient use of the space available;
- ii. be innovative and resilient to the effects of climate change, whilst also protecting and enhancing locally distinctive and historic features to improve the character and quality of the local environment; and
- iii. incorporate features of the natural environment including Green Infrastructure into the design to preserve and continue Redditch's unique landscape features;

**39.4** To ensure character and appearance isn't compromised, temporary buildings will be approved for a maximum of 3 years where it is related to an approval for a permanent building. The Borough Council will not look favourably on applications for renewal of temporary permissions.

**39.5** Areas should be designed to ensure they make places better for people and proposals have demonstrated that community views have been taken into account in the design of the development.

## Policy 40 High Quality Design and Safer Communities

**40.1** Good design improves the local environment, helps new development to fit in with its wider surroundings and creates a distinctive sense of place. A well planned environment in which to live and work can help to fight crime and the fear of crime. By using good design the opportunities to commit crime can be limited and this can have an effect on the quality of people's lives.

### Policy 40

**40.2** Good design should contribute positively to making the Borough a better place to live, work and visit. All development, including proposals for individual buildings, public and private spaces and wider development schemes will be expected to:

- i. be of a high quality design that reflects or complements the local surroundings and materials;
- ii. be of an appropriate siting and layout with distinctive corner buildings, landmarks, gateways and focal points at key junctions and other important locations;
- iii. protect and enhance key vistas to create visual links between places in the Borough;
- iv. include where appropriate, public art that is well designed, takes into account the risk of crime, is integrated within the overall design and layout of the development, located where it can be easily observed, improves public outdoor space and legibility and creates landmarks;
- v. aid movement by ensuring all developments benefit from accessibility, connectivity, permeability and legibility, particularly aiding sustainable modes of movement such as walking, cycling and access to public transport;
- vi. encourage community safety and 'design out' vulnerability to crime by incorporating the principles, concepts and physical security standards of the 'Secured by Design' award scheme; providing infrastructure for policing and emergency services; and considering the incorporation of fire safety measures;
- vii. provide appropriate space for waste and recycling to minimise any adverse visual impact on the property or the street-scene; and
- viii. incorporate any relevant guidance contained within Supplementary Planning Documents, for example Designing for Community Safety and Encouraging Good Design.

**1.1.4** Once adopted, this SPD replaces the following supplementary planning guidance/documents:

- Encouraging Good Design SPG (2001)
- Designing for Community Safety SPD (2006)

**1.1.5** In addition to Policies 39 and 40, of particular importance to the guidance previously contained in the above supplementary planning guidance, which this SPD now supersedes, are the contents of BORLP4 Policies 36-38 concerning the Historic Environment and Heritage Assets, and Policies 41-42 concerning Shopfronts (and Shopfront Security) and Advertisements.

**1.1.6** Applicants for planning permission should ensure they are familiar with the statutory requirements of these policies and read the guidance contained in this SPD in the context of these development plan policies.

## 1.2 What does this SPD cover?

**1.2.1** This SPD focuses on how a high standard of design can be achieved on new types of development in the Borough. Design can be defined as the look, function, arrangement or workings of an area or building(s) including transport routes, waterways and open spaces. This Design SPD provides an overview of design principles and sets out the requirements the Council have when assessing planning applications.

**1.2.2** The Design SPD aims to:

- Be a starting point for the design process;
- Be a practical source of ideas and suggestions; and
- Help applicants assess the issues which may arise from a proposed development.

## 1.3 Who is the SPD for?

**1.3.1** The Council has produced this Design SPD to help anyone considering any type of building or landscaping works, whether or not it requires formal consent (planning permission). This includes:

- Home owners;
- Developers;
- Farmers;
- Local businesses including shop owners and occupiers;
- Utilities and other operators of public services;
- Agents acting on behalf of any of the above;
- Planning Officers;
- Planning Inspectors;
- Statutory and non-statutory consultees.

## 1.4 What is the purpose of this SPD?

**1.4.1** High quality design is crucial to promoting sustainable development and ensures that the character and appearance of an area, and the street scene in general, is not harmed but also enhanced. A well-designed development will enhance the existing built and natural environment, be appropriate to its intended use, support safer communities and include innovative design.

**1.4.2 BORLP4 was adopted on 30th January 2017 and therefore the local framework and policies against which planning applications are assessed changed on that date.** Although there may be previous developments in the vicinity, applications are based on their individual merits and assessed against current policy at that time. Therefore the outcome of an application will be independent of previous decisions.

**1.4.3** Proposed development will need to consider its immediate locality. Consideration must be given to the type of environment surrounding the development site, as this gives an understanding as to what may be permitted. Even with smaller proposals the local context and immediate surroundings will provide some understanding as to what may be permitted, and proposed development should seek to reflect the character and principles of this immediate locality. In terms of the definition of the immediate locality, this refers to what you can immediately see around you, what is in your field of vision.

**1.4.4** This SPD will help in the formulation of proposed development to ensure that it is policy compliant by being a reasonable scale, layout, height, material, and colour, as well as respect the existing surrounding built environment and local character.

**1.4.5** All applications will be considered on a case-by-case basis; however, they will be judged against the relevant policies in the Borough of Redditch Local Plan No. 4, National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG) as well as the Council's relevant SPDs and policies of any relevant made neighbourhood plans.

**1.4.6** Many applicants cite precedent as a reason their Planning Application should be approved. Precedent is when a planning application may have similar elements to that of a nearby or previous development which has been granted planning permission and has been implemented. In many cases there may be similar elements to planning applications but due to the nature of planning there are usually more elements which differ, making a decision and the role of precedent complex.

***“The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”***

- NPPF Paragraph 124

***“Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions”***

- NPPF Paragraph 130

## **1.5 When would this SPD be used?**

**1.5.1** This SPD must be used where consent is required and can be used as a guide where consent is not required, to ensure that the standards of design of all types of development are raised.

**1.5.2** It is important to note that this guidance is not intended to be a substitute for professional advice. You are responsible for ensuring that the correct permissions are obtained before undertaking any development.

## 2 Preparing your application

### 2.1 Before applying for planning permission

**2.1.1** Once you have decided what you want to do, you will need to design it appropriately taking into account the information within this Design SPD. You will also need to determine whether your proposal requires planning permission or if it can be undertaken via Permitted Development Rights (PDRs).

### 2.2 Permitted Development Rights (PDRs)

**2.2.1** PDRs are afforded to most developments to enable owners to carry out certain works without planning permission under the Town and Country Planning (General Permitted Development)(England) Order 2015 (as amended)<sup>1</sup>. The Order sets classes of development for which certain types of works and development can be completed without the need to apply for planning permission.

**2.2.2** Property owners should check with the Planning Department to determine whether their property still has its PDRs before commencing any building work to the property. If PDRs have been withdrawn any works covered by the regulations must be applied for via planning permission.

**2.2.3** It should be noted that PDRs are complex and subject to interpretation and exceptions, for instance, PDRs are restricted in Conservation Areas and different PDRs apply to commercial development, maisonettes, flats and Listed Buildings.

**2.2.4** Developments which can be undertaken via permitted development should take into account the information within this SPD to ensure there are no adverse impacts on neighbours. Regardless of whether formal consent is required or not, it is advised that you speak to your neighbours about the proposed development, and try to avoid impacting on neighbours privacy and amenity.

**2.2.5** Each site or building has its own unique characteristics, and different considerations will apply to different sites or buildings. Gaining an understanding of what a site's unique characteristics are should form an important early stage in the design process.

**1. Please note that there may be future changes/allowances to permitted development rights which may make some parts of this SPD obsolete.**

#### Planning Portal

The Planning Portal provides the most up to date guidance on PDRs and it provides useful interactive tools to assist in determining which projects would or wouldn't require planning permission. Please visit the Planning Portal website at [www.planningportal.gov.uk](http://www.planningportal.gov.uk)

For further information or clarification you can speak to the Council by:

- Contacting the Planning Services team **Monday to Friday 9am to 5pm on 01527 881 770;**
- Talking to a Planning Officer at Householder Planning Surgery (for domestic extensions only) **Tuesdays 10am-1pm at Parkside, Bromsgrove;**
- Emailing your enquiry to [Newplan@bromsgroveandredditch.gov.uk](mailto:Newplan@bromsgroveandredditch.gov.uk); or
- Attending a pre-application discussion, which you can organise using the above contact details (please see <http://www.redditchbc.gov.uk/planning/apply-for-planning-permission/check-if-you-need-planning-permission.aspx> for relevant fees).



Many of the works allowed under permitted development and those which require planning permission also require Building Regulations approval. Please contact the North Worcestershire Building Control Department for further details at **01527 881 402** or email **b.control@bromsgroveandredditch.gov.uk**

## 2.3 Submitting an application

**2.3.1** For information on the documents required for submitting a planning application, please visit the Council website: <http://www.redditchbc.gov.uk/planning.aspx>. It is advised you seek professional help in drawing up the plans. Please note, all plans and drawings must be drawn to an identified scale and, in the case of plans, shall show the direction north. Online applications can be made via the planning portal - [www.planningportal.co.uk](http://www.planningportal.co.uk)

**2.3.2** The Council balance a large number of factors when determining planning applications. It is strongly advised that applicants take into account the relevant information in this SPD and policies in the **BORLP4**, any relevant made neighbourhood plans, and the NPPF before submitting a planning application. All applications will be assessed on a case by case basis taking into account the individual circumstances specific to the application. Please note that only material planning considerations<sup>2</sup> will be taken into account when determining an application.

**2.3.3** Most Planning Applications will be publicised by either a site notice or through letters to neighbouring properties. Further forms of publicity will be used where the development is a Listed Building or in a Conservation Area. For information on how, when and who the Council consult on planning applications, please see the Statement of Community Involvement which is available on Redditch Borough Council's website: <http://www.redditchbc.gov.uk/council/policy-and-strategy/planning-policies/borough-of-redditch-local-plan/statement-of-community-involvement.aspx>

**2.3.4** Building regulations are completely separate to planning permission under Town and Country Planning Legislation. The granting of approval under either does not give consent for the other. In some cases only building regulations approval will be needed and sometimes only planning permission, although in most cases both will be required.

## 2.4 How are applications assessed?

**2.4.1** Planning Officers are required to assess each Planning Application on its own merits. It will be for the applicant to ensure they have maximised every opportunity for the scheme to be as well designed as possible and achieve the principles in this SPD.

**2.4.2** Case Officers will consider the merits of the individual application; case officers are more likely to consider an application favourably if the development has been designed as thoughtfully as possible, incorporating the principles of this SPD.

**2.4.3** For more information on how applications are assessed, please see the Statement of Community Involvement <http://www.redditchbc.gov.uk/council/policy-and-strategy/planning-policies/borough-of-redditch-local-plan/statement-of-community-involvement.aspx>

2. *Planning applications will be determined in accordance with the development plan for an area, unless material considerations indicate otherwise. Whilst not strictly defined, a material planning consideration is one which is relevant to making the planning decision in question. The courts have generally held that planning concerns land use in the public interest, and therefore purely private interests could not be considered a material planning considerations* <https://www.gov.uk/guidance/determining-a-planning-application>

## 3 Residential Development - Alterations and Extensions

### 3.1 Key considerations for all extensions

**3.1.1** When considering an alteration or extension to a property it is essential to consider whether in the first instance a property should and could accommodate an alteration or extension or not. In some cases it will not be appropriate for a property to have an alteration or extension due to a range of reasons such as character of the property or proximity to adjoining neighbours.

**3.1.2** To determine this, there are three main issues which alterations or extension applications will need to take into account and address:

1. Developments should ensure they protect and consider the impact on neighbouring amenity.
2. Consideration of the impact on neighbouring properties and the impact on the street scene.
3. Extensions should enhance, protect and give consideration to any impact of the development of the existing dwelling.

**3.1.3** Other planning considerations such as Green Belt, protected and priority species, highways impacts, sustainability of construction, heritage assets, and nearby trees may need to be taken into account.

**3.1.4** The following paragraphs under Section 3.1 detail the key considerations necessary for all alterations or extensions. Sections 3.2 to 3.10 of the SPD relate to specific types of alterations or extensions, for example side or rear extensions. The key considerations should be used in conjunction with the information in these sections.

#### Complement the original property

**3.1.5** Enhance the dwelling and protect and give consideration to any impact of the development on the existing dwelling. The alteration or extension should complement the scale, general massing and materials of the existing building and remain subservient to it. Matching bricks, roof tiles or other facing materials in form, colour and texture should be used. Where there are existing features of interest, these should be preserved.

#### Extensions must be subordinate

**3.1.6** Keep width, height and bulk in proportion to the existing property, thus avoiding making the extension the central feature of the building. The form and mass of an extension should take into account the scale and mass of the existing building and be proportionate in size.

#### Neighbour impact

**3.1.7** Ensure that consideration has been given to the impact on neighbouring occupiers and protection of neighbouring amenity. This can be achieved by ensuring proposals take account of:

- i) **Overlooking** - This may be a problem if a new extension allows views into the private amenity or living space of your neighbour. Problems may also arise where an extension would result in the loss of outlook. However, overlooking is desirable where the spaces being overlooked are public spaces as this provides surveillance and can deter criminal activity and anti-social behaviour.

ii) **Overshadowing** - Overshadowing occurs where a development reduces the supply of light to a neighbour's property or garden. Development should be designed to minimise impacts upon the amenity and living conditions of neighbours. The extent of overshadowing and the severity of its impacts upon amenity will depend upon:

- a) The aspect of the development relative to the path and height of the sun;
- b) The size and massing of the new development;
- c) The position of the extension relative to neighbouring properties;
- d) The nature and use of the rooms affected by shadowing;
- e) Distance between buildings;
- f) The presence of existing features that obstruct light; and
- g) Ground levels.

To ensure overshadowing does not occur, the Borough Council will refer to the Building Research Establishment's guide to good practice 'site layout planning for daylight and sunlight' published in 1991. A 45 degree line is drawn from the closest edge of the nearest habitable window of the neighbouring property, in the direction of the proposed two (or higher) storey extension. Habitable rooms do not include bathrooms, hallways, utility rooms and circulation space. If there are two windows in a room the impact on the closer one would be considered. Figure 1 below provides illustrative advice in this respect.

iii) **Overbearance** - A development would be considered overbearing if it dominated, overwhelmed, or had a visually intimidating impact on a neighbouring property. Overbearance can occur when an extension is positioned too close to a property boundary and has sufficient height and mass to dominate its neighbour. (See Figure 1 on page 11).

## Roofs

**3.1.8** The roof form (type and angle of pitch) should match that of the original development, (particularly where a two storey extension is proposed) and that of the adjoining property. This contributes to the harmony of the building and avoids the long term maintenance problems associated with flat roofs.

## Windows and doors

**3.1.9** Proposed openings should align horizontally and vertically to those in the existing property, as should other details such as sills and lintels. These features must be of a similar or matching design and size. This ensures that the harmony of the building is not disrupted. Dormer windows should not be deeper than half the depth of the roof slope, and ensure that they have square proportions or a vertical emphasis. They should be in keeping in terms of scale within the building and the street-scene.

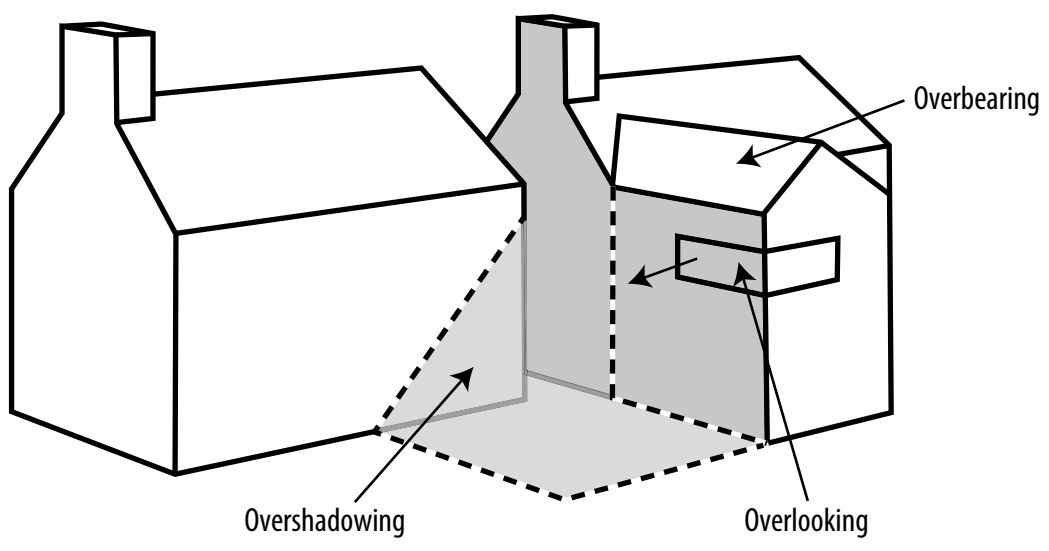
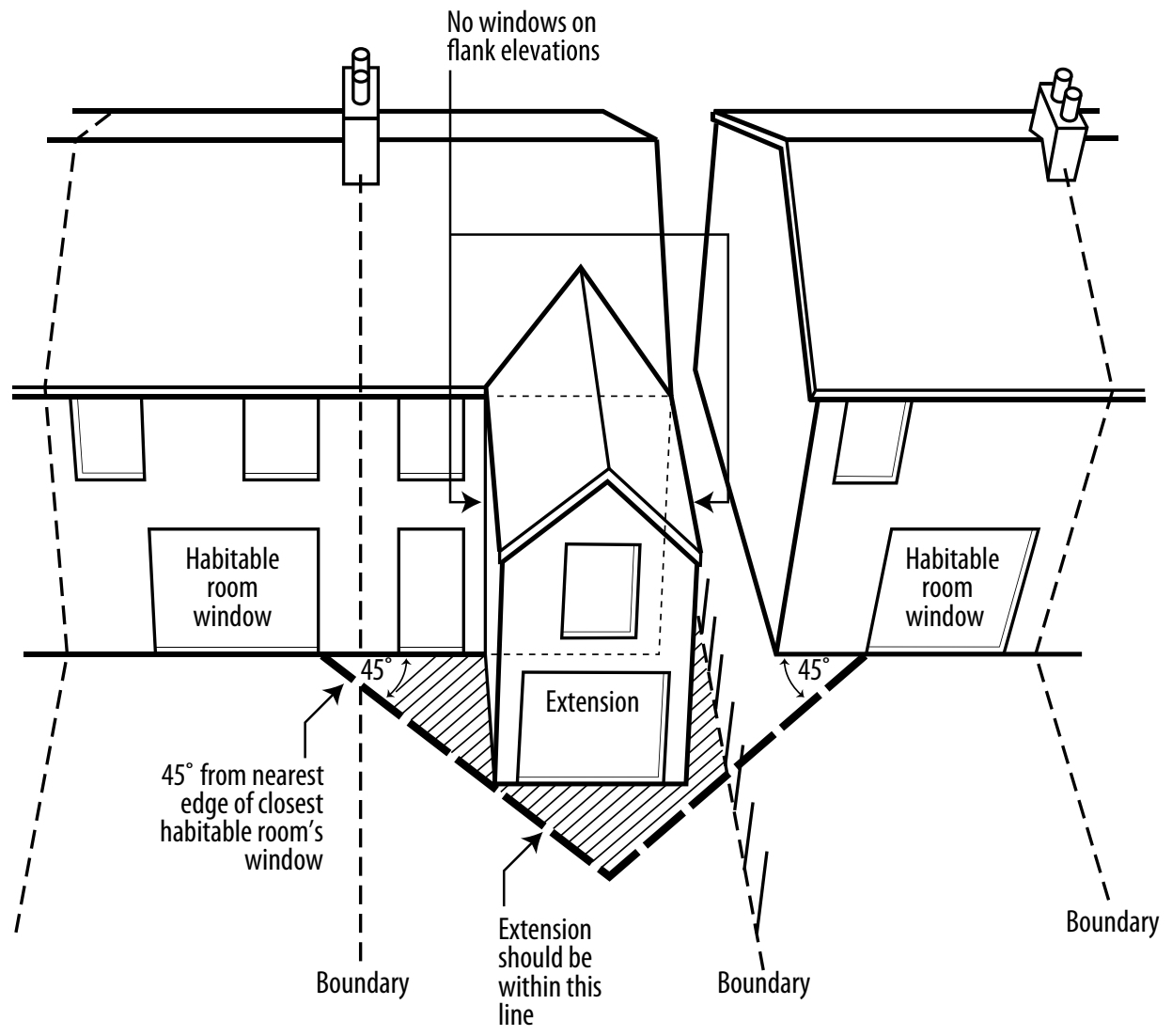
**3.1.10** Windows and doors installed in an extension or as part of an alteration should be certified to security standards approved by Secured by Design, in order to reduce the risk of crime.

## Local Character

**3.1.11** An alteration or extension must consider the impact on the street scene. An alteration or extension must:

- i) Enhance and strengthen the local distinctiveness of an area, for example reflect the pattern and spacing of buildings;
- ii) Not normally project forward of the principal elevation, or that fronting the public domain. One exception would be the addition of a porch; and
- iii) Respect local styles and features to maintain local distinctiveness.

**Figure 1**



### **Nesting birds/bat roosts**

**3.1.12** The impact of the alteration or extension on protected and other species such as House Martins, Swallows and Swifts must be considered. It must also be ensured that suitable protection, conservation, enhancement or mitigation measures are undertaken, such as retention of entrance points to bat roosts or the provision of swift bricks or house martin boxes.

### **Attached garages**

**3.1.13** Proposals for attached garages will be considered as extensions

## **3.2 Extensions in the Green Belt**

**3.2.1** Extensions in the Green Belt will be assessed against **Policy 8 of BORLP4** which complements the NPPF. **The extension must also meet the following size requirements:**

**Extensions to existing residential dwellings up to a maximum of 40% increase of the original dwelling or increases up to a maximum total floor space of 140m<sup>2</sup> ('original' dwelling plus extension(s)) provided that this scale of development has no adverse impact on the openness of the Green Belt;**

**3.2.2** For the assessment of residential extensions in the Green Belt the above requirement is divided in to two separate elements:

- i) Either the extension is considered under the first part of the requirement - a maximum 40% increase of the original dwelling; **OR**
- ii) The total floor space increases to a maximum of 140m<sup>2</sup> made of the original floor space of the dwelling plus the floor space of the proposed extension.

**3.2.3** In the same way that a 'proportionate addition' is not defined in the NPPF, there is not a definitive guide to how a 40% increase should be calculated. It can be calculated either as floor space or volume.

**3.2.4** All measurements must be taken externally.

**3.2.5** An assessment to consider the impact of the proposal on the openness of the Green Belt can be undertaken in a number of ways. Generally, openness is considered to be the absence of buildings and development. However, positioning, mass, height and topography can all have an impact on this; in addition openness is a wider concept than that of the visual impact of the development on the Green Belt.

### 3.3 Side Extensions

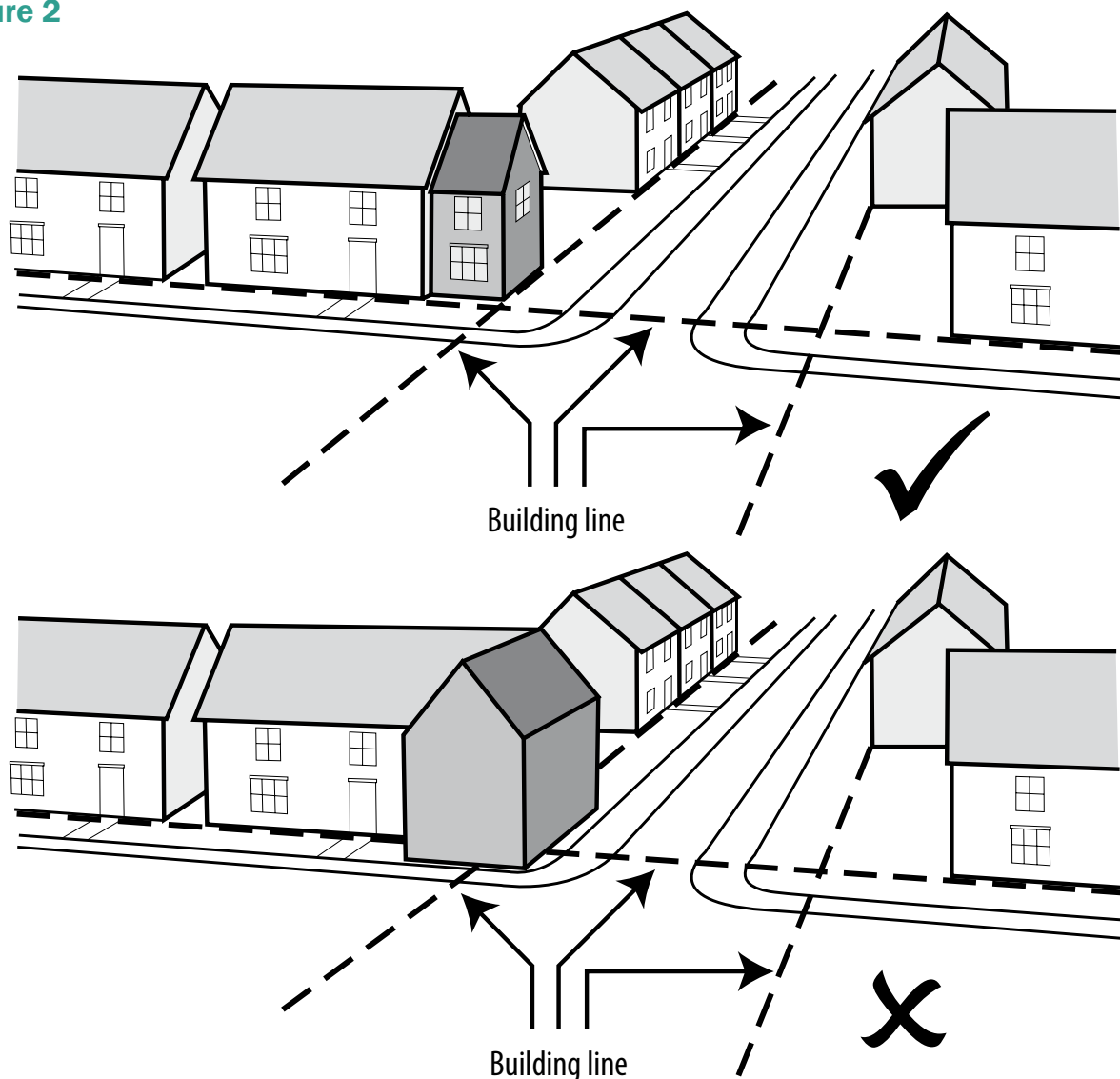
**3.3.1** Side extensions will be required to be subordinate in size and prominence. To achieve this, extensions should be clearly set down from the ridge of the dwelling and set back from the principal elevation. Each application will be considered on its own merits to ensure that the design of the side extension is appropriate to that property and its surroundings.

**3.3.2** Extensions should reflect the proportions of the original building. To achieve this, an extension should be of a smaller and less substantial scale than the main building, as over-large extensions can unbalance the proportion and harmony of the host building and can also have a detrimental effect on the street scene as a whole.

**3.3.3** Side extensions to dwellings on corner plots must respect the building line of both street frontages, provide interest on both elevations thereby avoiding blank elevations where possible, and allow for effective surveillance.

**3.3.4** In addition, side extensions to dwellings on corner plots should create adequate defensible space to provide a buffer between the public and private realm. This could be achieved by the use of appropriate boundary treatments (see Figure 2 below).

**Figure 2**



### **3.4 Rear Extensions**

**3.4.1** Although the rears of dwellings are usually the least prominent in terms of public views, reduced visibility is not an excuse for poor design. The general objective remains to produce harmonious extensions which do not harm the amenity of neighbouring properties.

**3.4.2** Two storey extension proposals should always match the main pitch of the roof.

### **3.5 Dormer Windows and Roof Extensions**

**3.5.1** Dormer windows and roof extensions can detract from the form and appearance of the original dwelling. Dormers which require planning permission will only be allowed where they are below the ridgeline and set away from the edges of the roof, subject to the character of the original dwelling. Dormers should preferably be pitched rather than flat roofed, and restricted in number and size in order to avoid a top heavy or unbalanced appearance.

### **3.6 Outbuildings**

**3.6.1** Outbuildings can include detached garages and sheds. Where outbuildings require planning permission they should be of an appropriate scale, orientation and design to ensure they do not compete with or detract from the dwelling they serve.

**3.6.2** Proposals should respect the design, materials and form of the original building, its setting and the residential amenities of neighbours.

**3.6.3** Outbuildings set forward of the principal elevation will not usually be appropriate as it may harm the character of the street scene.

### **3.7 Extensions in Conservation Areas**

**3.7.1** Where extensions to dwellings are proposed in Conservation Areas the impact on the character and setting of the Conservation Area as a whole must be considered, not just the street scene. Due to the nature of most Conservation Areas, particularly the rural ones, other spaces and elevations can be visible. Proposals must preserve or enhance the character and appearance of the Conservation Area in terms of new development.

**3.7.2** A starting point for any scheme should be a Heritage Statement which identifies the character and significance of the Conservation Area and its setting, and the site in question. This should explain how the proposed scheme preserves or enhances the Conservation Area. Where there is a valid Conservation Area Appraisal and Management Plan, this should be referred to in the Heritage Statement.

**3.7.3** Discussion should be had with the Conservation Officer prior to a planning application being submitted.

### **3.8 Extensions or works to Listed Buildings**

**3.8.1** A starting point for any potential works to a Listed Building should be a Heritage Statement. The Heritage Statement must identify the character and significance of the Listed Building; this should inform whether works or a proposed extension is appropriate in relation to the historic nature of the building. The Heritage Statement will also help guide appropriate application and type of materials as well as the form and massing of a potential extension.

**3.8.2** Works to Listed Buildings including interior alterations will require Listed Building Consent. Discussion should be had with the Conservation Officer prior to a planning application being submitted.

### **3.9 Extensions to non-designated heritage assets**

**3.9.1** A non-designated heritage asset is an asset of historic value which is not designated nationally, but is of local importance. Please be aware the Council do not have a definitive list of non-designated heritage assets, they are often identified through the submission of planning applications. It should be noted that the Council will record non-designated assets as part of a living document.

**3.9.2** In weighing applications that affect non-designated heritage assets a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

### **3.10 Extensions to previously converted rural buildings**

**3.10.1** Extensions will not normally be permitted as these detract from the plain, simple and utilitarian appearance of most rural buildings.

**3.10.2** However where extensions to previously converted rural buildings are proposed they will be treated differently to extensions on purpose built dwellings. The original nature and character of the building should have been retained through the conversion, and it should be retained where extensions are proposed. Proposed extensions must reflect the form, character and utilitarian nature of the building and proposed openings should reflect the character and scale of the original building. Materials should match those of the existing building and where possible, thoughtfully selected reclaimed materials should be used to blend the old and new sections together.

**3.10.3** Conservatories, including lantern style orangeries, will not be permitted as they do not reflect the character of the original building.



## 4 Residential Development - Creation of New Dwellings

*“Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests.”*

- NPPF Paragraph 128

### 4.1 Types of new dwellings

**4.1.1** This section sets out the various design requirements for new dwellings. In the Green Belt new dwellings will generally not be permitted.

#### A) Replacement dwellings

- Replacement dwellings are considered by the Council as new dwellings.
- Replacement dwellings should be sited comfortably within the plot, follow the established building line and take into account the majority of key considerations in Section 4.2, where applicable.

#### B) Small scale development (1-9 dwellings)

- Small scale developments can have a great impact on the character and nature of an area. The below key considerations (section 4.2) will need to be taken into account as well as whether the development is part of a plot subdivision or back-land development.
- Plot subdivision will be resisted in most cases unless the plot is of sufficient size for both the existing and proposed development and no adverse impacts result from the development to either the proposed or existing dwelling(s). Plot subdivision which adversely impacts the grain of the existing area will be strongly resisted.
- Back land development or rear-garden development will be resisted, in line with Policy 5 (of BORLP4).

#### C) Large scale development (10 or more dwellings)

- Developments of 10 or more dwellings will require a considered approach taking into account the below key considerations (Section 4.2) as well as the detailed layout of the site and other requirements, such as for affordable housing and public open space.
- Affordable housing should be integrated into the site and should be indistinguishable from market housing to ensure a cohesive community is created.

#### D) Conversion of Rural Buildings to Residential Use

- These applications are treated differently to other types of new dwellings. Please see section 5 for more information.

## 4.2 Key considerations for all new dwellings

**4.2.1** There are a number of principles which should be given due consideration to ensure that the design of new development is of a high standard. It is important that new housing is appropriately designed to deliver sustainable and attractive environments in Redditch Borough for both new and existing residents.

**4.2.2** It is advised that neighbours are consulted about the proposed development, and try to avoid impacting on neighbours privacy and amenity. The key considerations which should be taken into account for the development of all new dwellings, including replacement dwellings (unless otherwise stated) are detailed below.

### Layout and surroundings

#### Layout

**4.2.3** New residential developments will be required to be suitably sited taking into account neighbouring dwellings, the size of the plot and the orientation of the sun. New developments should be legible with easily identified landmark buildings and clear and accessible links through the site.

**4.2.4** Urban block layouts provide an efficient template, with building fronts and entrances to public spaces and private backs to private spaces. Such layouts minimise the creation of unsupervised and unsafe public spaces and unsafe access routes. Where footpaths are essential to give access to the rear of properties, for example in some forms of terraced housing, they should meet the relevant Secured by Design standards.

#### Infill

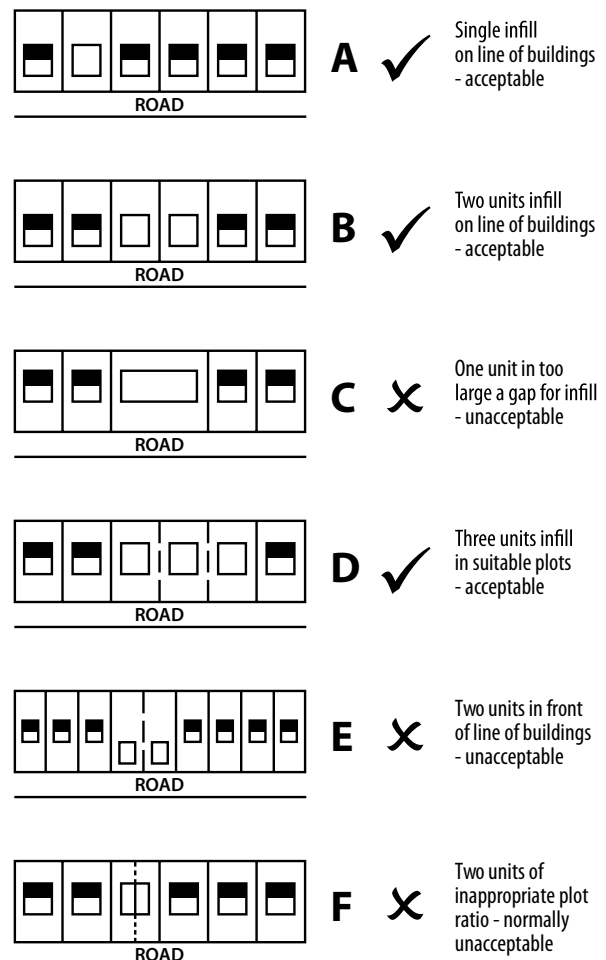
**4.2.5** Where infill is proposed, it must reflect the existing urban form (see Figure 3).

#### Adequate bin storage

**4.2.6** Accessible refuse stores within new developments should be provided. The size of the bin storage will be influenced by that of the containers housed. In designing and positioning refuse stores it is important to balance the functional requirements of servicing against other design objectives. Bin storage should be well designed and integrate with the property and curtilage to allow bins to be unobtrusive on the street scene.

**4.2.7** Individual properties are required to place their bins 'at the kerbside' on refuse collection day to enable refuse lorries ease of access from the public highway. New developments should ensure there is adequate access for refuse collection vehicles, including turning space in cul-de-sac or keyhole developments, or if not possible should provide a designated collection point.

**Figure 3**



**4.2.8** Bin storage areas must be well designed and located in relation to properties. If the bin store is a gated under cover enclosure, it will require enough room to move bins through the opening and for easy access.

**4.2.9** The access from the storage areas to the nearest vehicle access:

- a) Should be no further than 30 metres from the access roadway;
- b) Should be free from steps and kerbs;
- c) Should be smooth with a continuous finish;
- d) Should be level with a gradient falling away from the store of less than 1:14; and
- e) Should be a minimum width of 2 metres in the case of communal bins

**4.2.10** Communal bin stores will be required to:

- a) Provide suitable capacity to allow for correct number of bins (based on 240 litre per fortnight waste and 240 litre per fortnight recycling per dwelling for capacity);
- b) Use fewer communal bins of larger sizes where possible ;
- c) Be fire proof in its construction;
- d) Avoid any negative impact on surveillance;
- e) Be designed to encourage the correct sorting and storing of recyclable and non-recyclable materials;
- f) Be conveniently located for use of all residents;
- g) Ideally have a locking mechanism that does not require keys; coded locks are preferable; and
- h) Ensure the provision does not have an impact on the amenity of occupiers, such as through consideration of underground storage. Where provision is above ground, storage units should be covered.

### **Local character and distinctiveness**

**4.2.11** New residential development should embody the particular characteristics of the built and natural environment in which it is located to provide a sense of place and identity. The use of particular materials and details in construction, the mix of building types, periods and styles, the street pattern and street furniture, the layout, scale and massing of buildings or arrangement and landscaping of spaces can be reflected in new development to ensure it retains and enhances the local character of an area.

**4.2.12** Applicants should identify the features that make a place locally distinctive and then identify how the proposal can retain these features and enhance them. Parish Design Statements, made Neighbourhood Plans, or other locally produced guidance may provide a useful indication of local character for prospective applicants to consider. In addition, historic characterisation evidence and the Worcestershire Historic Environment Record (HER) provide a valuable resource for the identification of local heritage assets, which help define the many and varied elements of local distinctiveness across the Borough.

### **Views, vistas and the setting of heritage assets**

**4.2.13** The development should retain, enhance and/or create views, vistas, skylines, landmark buildings and other features such as trees, hedgerows and other landscape features where possible. Views of local landmarks should remain visible to enable legibility. Where appropriate, development can frame locally important views through the creation of boulevards which direct the eye or strategic gaps in development.

**4.2.14** Proposals may have an impact on the wider setting of a heritage asset even if the asset is not located directly on or adjacent to a development site. Therefore where an important view or vista includes a heritage asset, a setting assessment should be carried out in line with Historic England guidance at <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

## Topography

**4.2.15** Developments should work with the contours of the site to ensure overlooking, overbearance and overshadowing are not issues.

## Urban grain

**4.2.16** The pattern of the arrangement of street blocks, plots and their buildings in a settlement should be continued through any new development to ensure proposals successfully integrate into the existing urban fabric.

## Streetscape

**4.2.17** Developments should fit suitably into the streetscape and follow the established building line. Materials for developments should reflect those in the existing vicinity in order to harmonise existing and new development. As a general rule all development should be positioned to front onto the street.

## Corner plots

**4.2.18** Where buildings are situated at corner plots they should wrap-around the corner or be double-fronted to ensure that both sides front onto the street make a positive contribution to the street scene and surveillance is provided to both frontages.

## Connectivity

### Safe and convenient movement

**4.2.19** An area must have a variety of pleasant, convenient and safe routes through it. New developments should offer a choice of routes to, from and through the site, with a preference towards walking and cycling. Developments which are easy to navigate and are well connected should in turn make residents and visitors feel safe and secure.

**4.2.20** The needs of pedestrians and cyclists should be put before the needs of vehicles with appropriate traffic calming measures that are integral to the overall design. All routes should be designed having regard to the needs of all people including the mobility and visually impaired, in order to promote greater activity, and so increase the surveillance.

**4.2.21** Footpaths and cycle paths should be as direct as possible and should be more convenient than vehicle routes. Paths must be well-lit, short, straight and not run at the side or rear of properties. Integrated routes are preferable, that is those that run alongside vehicle routes but which are distinct from the highway, and are well signposted.

**4.2.22** Residential developments must carefully consider designing for through movement in order to provide an appropriate degree of connectivity. Where included, pedestrian through-routes must be integrated into the local movement network so that they connect to locations where residents want to go and as such are well-used. Providing too many footpaths dilutes pedestrian activity and may increase the fear of crime along these routes, discouraging residents from choosing to walk or cycle. Where through-footpaths are required within a development they must be desired/well-used, short, wide, well-lit and subject to good surveillance from the active rooms of neighbouring properties. They must not run at the side or rear of properties and must not contain possible hiding places.

**4.2.23** How networks, including Green Infrastructure networks, connect locally and more widely, and the way developments, routes and open spaces relate to one another should be designed in to new development.

## Legibility

**4.2.24** The development will enhance the legibility of the Borough through the appropriate design and siting of distinctive corner buildings, landmarks, gateways and focal points at key junctions and other important locations; and by the protection and enhancement of key vistas that create visual links between places.

## Cycle storage

**4.2.25** Adequate cycle storage for residents of the property of an appropriate size should be included as part of the development. These standards are set out by Worcestershire County Council Highways Department. Please refer to their specific requirements regarding cycle storage.

**4.2.26** In addition to these standards, where communal cycle storage for a block of flats or similar is provided external to the building then this must be as close to the building as possible, subject to effective surveillance, well-lit and constructed using robust materials to a resilient design. Communal cycle storage may also be provided within the building itself. Access should only be provided to residents of the building

## Electric car charging points

**4.2.27** Developments should consider the inclusion of electric car charging points and are encouraged to be incorporated as part of the scheme.

## Road Design

**4.2.28** Surface materials should be selected that are robust, suitable for the use, easy to maintain and that respect the character of the area.

## Amenity

### Private Amenity Space and Spacing Standards

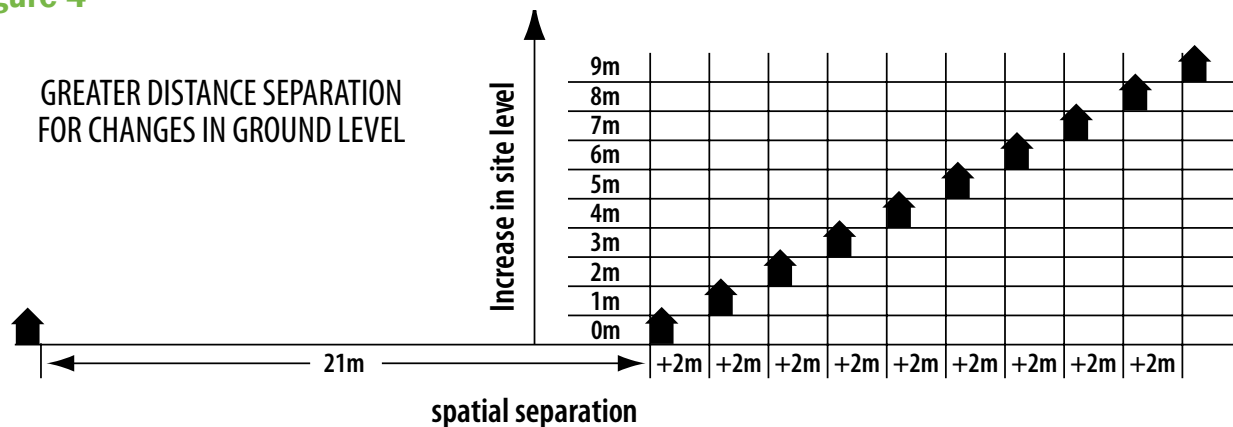
**4.2.29** Private amenity space will be required to be of a usable size, with a minimum of 70sqm for dwellings. Amenity space in the canopy of trees or on a steep gradient will not be included within the 70sqm requirement. A more flexible approach will be used for communal amenity space for flats. Rear private amenity space will usually be expected to be a minimum of 10.5 metres in length for a two storey dwelling. This applies independently of the minimum amenity space requirement. Private amenity space will be expected to be suitably sited and in scale with the plot and surrounding buildings and reflect existing local density.

**4.2.30** Gardens should be located to the rear of buildings, and wherever possible, back onto other gardens or private spaces to reduce the risk of unauthorised access. Where gardens back onto public space then the use of appropriate boundary treatments and gates to reduce the risk of crime and anti-social behaviour is vital.

**4.2.31** 21m will be required between rear dwelling windows that directly face each other. Where there is a difference in gradient further distance may be required (please see Figure 4 on page 21).

**4.2.32** Balconies will only be acceptable where it can be demonstrated that the privacy of adjacent residents can be safeguarded by ensuring that there is no direct overlooking of windows or, at close quarters, the rear gardens of adjacent dwellings.

Figure 4



### Public open space

**4.2.33** For larger residential development Open space should be located in a prominent position which maximises surveillance from surrounding development, should be easily accessible from the whole development and be of a sufficient size to provide a variety of uses. Small 'pocket' parks will not be permitted. Public space boundary treatments should allow clear views into and out of the site. (For more information on the design of Open Space please see the Open Space SPD).

**4.2.34** Play areas for younger children should be designed so that they are safe locations for children to occupy. Whilst play areas should be close enough to properties to allow for surveillance.

**4.2.35** Layouts should respond to existing local green infrastructure, seeking to maintain and enhance ecological connectivity both within site and in the wider context. Public open space should be permeable to wildlife and well connected to surrounding ecological networks where appropriate.

### Street Furniture

**4.2.36** For larger residential development there should be a co-ordinated approach to the provision of all street furniture and this should be appropriately sited and designed to reinforce the character and identity of the area and to ensure it benefits from surveillance, whilst being functional for all users.

### Car Parking

**4.2.37** Where car parking within a residential building curtilage is provided, measures should be taken to mitigate its impact on the building by locating the garage or car-port alongside the house and set back from the building-line. Where garages are provided, the entrances should be located towards the front of dwellings where they can easily be seen and accessible. Flat roofs should be avoided. Incorporating garages into the main form of the dwellings should be avoided.

**4.2.38** In appropriate circumstances consideration should be given to on street parking in designated parking bays.

**4.2.39** Where courtyard parking is unavoidable, it should be located to the rear of development and be well lit, overlooked by adjoining properties and in general not include more than 10 spaces. The entrance(s) to the courtyard between buildings or through an archway needs to respect the street frontage and avoid harming the continuity of the street.

**4.2.40** Parking courtyards should be clearly defined as private space using symbolic boundary treatments, and where appropriate the use of gates. Where gates are provided they should make a positive contribution to the building or street scene and should be set back from the highway.

**4.2.41** Where shared driveways are proposed, they should be designed to provide sufficient width to allow cars from both properties to be parked, car doors to be opened (without touching the other car) and room to allow wheelie bins to be moved past the vehicle.

**4.2.42** Parking should be designed to adapt the users preferences therefore where possible, should be in close proximity to their property, with a direct line of sight.

### **Boundary treatments**

**4.2.43** Boundary treatments should utilise existing features and vegetation, such as hedgerows and mature trees.

**4.2.44** Buildings and structures should be arranged to clearly demonstrate which areas are private and public, with a range of physical or symbolic boundary treatments used, depending on the context. Boundary treatments may include symbolic barriers, such as subtle changes in paving material, or physical barriers as such as gates, fences, walls and hedges.

**4.2.45** The choice of boundary treatments should relate to the wider physical, ecological and social context of the surrounding environment and seek to make a positive contribution to the character of the area and the building(s).

**4.2.46** Where they are adjacent to public spaces, boundary treatments should allow clear views into and out of the site and not hinder vision on the highway, particularly at road junctions.

**4.2.47** Boundary treatments should comply with the Secured by Design guidance. 'Aggressive' boundary treatments (such as razor-wire, barbed wire or bare metal palisade fencing with spiked pales) will be resisted in a residential setting. Careful attention must be paid to the design and construction of boundary treatments in order to avoid the creation of climbing aids.

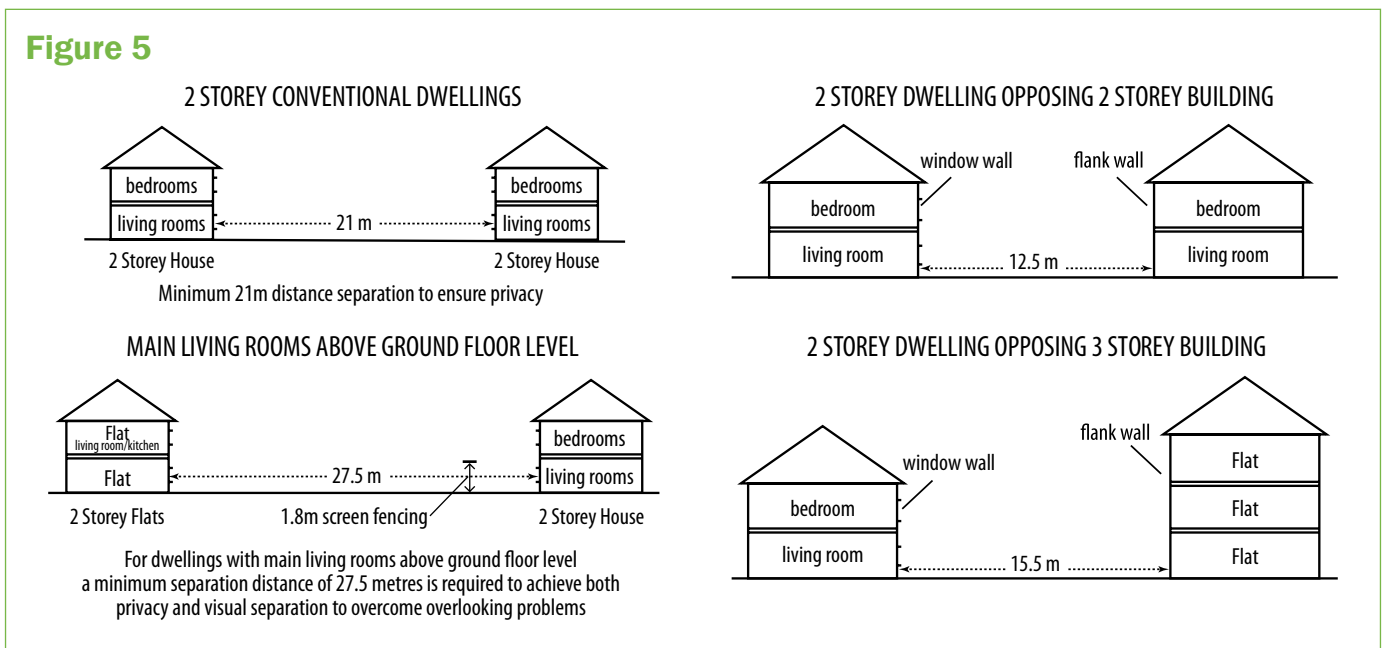
### **Overlooking**

**4.2.48** Overlooking may be a problem if new development allows views into the private amenity (including outdoor space) or living space of a neighbouring property. The impact of overlooking is affected by a number of factors including in particular:

- a) The distance between buildings;
- b) The presence of openings;
- c) Whether properties face each other directly or are offset;
- d) Changes in levels across a site and relative to neighbouring properties; and
- e) The types and use of rooms facing each other.

**4.2.49** A minimum separation distance of 21 metres will be required between opposing faces to achieve a degree of privacy between habitable rooms of two-storey dwellings. Habitable rooms do not include bathrooms, hallways, utility rooms and circulation space. Where housing is proposed with main living rooms above ground floor level it is necessary to have a greater separation distance of 27.5 metres between opposing faces to achieve both privacy and adequate visual separation. Care must be taken when windows overlook adjacent flank walls to ensure overshadowing and any overbearance is avoided. Where a two storey dwelling faces a flank wall on a two storey building, a minimum separation distance of 12.5 metres will be required. Where a two storey dwelling faces a flank wall of a three storey building, a separation distance of 15.5 metres will be required. Where there are changes in the ground level between dwellings, applications will need to take account of this and minimum separation distances increased where necessary (see Figure 5 below).

**Figure 5**



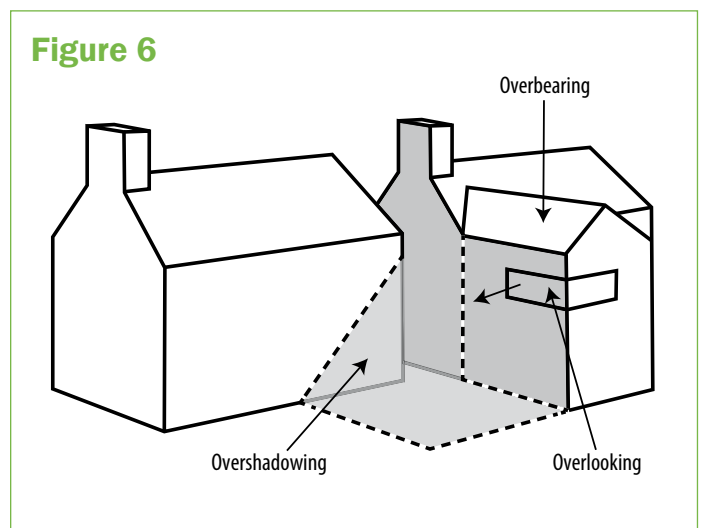
## Overshadowing

**4.2.50** Overshadowing occurs where a development reduces the supply of light to a neighbour's property or garden. Developments should be designed to minimise impacts upon the amenity and living conditions of neighbours.

**4.2.51** The extent of overshadowing and the severity of its impacts upon amenity will depend upon:

- The aspect of the development relative to the path and height of the sun;
- The size of the new development;
- The position of dwelling(s) relative to neighbouring properties;
- The nature and use of the rooms affected by shadowing;
- The presence of existing features that obstruct light;
- Ground levels; and
- Distance between buildings

**Figure 6**





## Overbearance

**4.2.52** Where new dwellings are located and are of sufficient height and mass to dominate neighbouring dwellings, this will not be acceptable.

## Noise

**4.2.53** Disturbance caused by noise may potentially be an issue where neighbouring uses and associated patterns of activity are dissimilar. Accordingly, careful consideration should be given to the siting of residential development where disturbance may be caused by established lawful uses, particularly in the late evening and early morning.

## Lighting

**4.2.54** Artificial light sources may cause significant harm to residential developments and wildlife. New street lights and security lighting within developments should be positioned in locations where they do not shine directly in dwelling windows, but provide sufficient lighting for safety and security on the street.

**4.2.55** The type of lighting selected should be relevant to the local context, character and use of the area and minimise the impact of light pollution as well as being as energy efficient as possible.

**4.2.56** Care should be taken to ensure that landscaping, tree planting and lighting schemes take each other into account and in particular work to mitigate the effects of seasonal variations. The effects of new lighting on wildlife should also be a key consideration in lighting strategies associated with development.

**4.2.57** There should be a clear strategy, addressing relevant standards, for the provision of lighting within an area in support of the primary movement patterns. The decision to light or not light public spaces should be well thought through.

## Trees, hedges and landscaping

**4.2.58** The Council will expect to see important trees, hedges and historic boundary features retained through incorporating these features into the design and layout of developments. Existing trees and hedges can provide maturity to a development and may be a fundamental contributor to the established character of the area. An arboriculture report can help identify the health and amenity value of trees on the site and so inform this process.

**4.2.59** Landscaping should be used to improve the attractiveness of an area, support biodiversity enhancement and positively protect property. Where trees and shrubs are planted, care must be taken to ensure that they do not obstruct visibility into or out of public areas. Where they are planted alongside footpaths or cycle ways they should not obscure views along the length of the route or provide for hiding places. It is essential therefore that appropriate species are selected and necessary maintenance regimes are set in place.

**4.2.60** Defensive planting such as thorny or spiny shrub species should be used to help protect vulnerable boundaries and buildings.

**4.2.61** Landscaping must be carefully sited and designed so as not to obscure existing CCTV, lighting, signage, windows and entrances.

**4.2.62** Trees should not be planted in places which will assist as climbing aids into or onto properties.

## Sustainability

### Energy conservation and efficiency

**4.2.63** Development should incorporate measures within its design, layout and orientation, in the use of materials and operation of services that promote energy efficiency and support energy conservation. Low carbon energy sources should be incorporated where appropriate. Energy storage should be considered to increase the efficiency of renewables where applicable. As properties become increasingly well insulated, heated and air-tight adequate ventilation, shading and cooling also need to be considered, while maintaining energy conservation.

### Habitats

**4.2.64** The opportunities to incorporate and enhance wildlife habitat features and species should be taken, particularly those identified as priorities by the Worcestershire Biodiversity Partnership and in the Worcestershire Green Infrastructure Strategy, both within the layout of the proposal and through sympathetic construction techniques. This ensures connectivity and sufficient suitable habitats to support viable and sustainable populations.

### Resources

**4.2.65** Developments should seek to reduce the volume of resources consumed and should help to promote more sustainable lifestyles. Consideration should be given to water efficiency and lifecycle costs of materials.

### Passive Solar Design

**4.2.66** Sensitive layout and orientation of buildings can have a considerable impact on the amount of sunlight and overshadowing within a development. Good building design should seek to trap the heat generated by the sun in order to reduce consumption of conventional fuels. Layouts which are planned with the orientation of the sun in mind can be described as having Passive Solar Design. Solar gain can be beneficial in providing heat but can also result in overheating; therefore layouts should be carefully designed.

## Safety and Security

### Public and private space

**4.2.67** It is important to clearly define the function of each space within a development. Public, private and communal spaces should be demarked with appropriate physical or symbolic boundary treatments. The type and design of these should be informed by the local context.

**4.2.68** The development of buildings containing multiple dwellings will often create communal entrances and interior communal spaces which can be particularly vulnerable to crime. As the number of dwellings served by a single entrance or communal space increases, the ability of residents to monitor and control these areas decreases. To reduce the risk of crime and anti-social behaviour these developments should observe the following:

- Communal entrances meet physical security and access control standards as recommended by Secured by Design
- In larger buildings, communal areas are compartmentalised to restrict movement by unwanted persons from one part of the building to another, for example by using secondary access control doorsets and controlled lift access

## Secured by Design

The Council supports the Secured by Design Scheme; applicants are expected to meet those standards wherever possible. Further information can be found at <https://www.securedbydesign.com/>

Windows and external doors, including roof lights and garage doors, installed in a residential development should be certified to security standards approved by Secured by Design, in order to reduce the risk of crime.

## Surveillance

**4.2.69** Surveillance from dwellings should be ensured to provide safe and secure places to live. Blank walls along road ways, footpaths and cycle ways can create unwelcoming and oppressive routes. Siting dwellings which overlook or open onto routes through and between sites can reduce antisocial behaviour, littering and crime.

**4.2.70** As far as possible, pedestrian and cycle routes should be overlooked by development to allow for surveillance.

**4.2.71** Surveillance should be incorporated quite easily into a development scheme through a number of design features which should ensure:

- i. careful consideration is given to the design of corner plots to ensure that they make a positive contribution to the street-scene on both sides and provide sufficient surveillance;
- ii. entrances to the property are overlooked;
- iii. flatted developments maximise front doors onto the street and ground floor flats should generally have separate entrances as this minimises the shared access space;
- iv. the primary access to buildings is from the public realm with well-defined entrances at frequent intervals.

### **4.3 New dwellings within the setting of designated and non-designated heritage assets**

**4.3.1** New residential developments within the setting of a designated heritage asset will need to pay special attention to the street scene and must preserve or enhance the character of the area.

**4.3.2** Where new residential developments are proposed within the setting of a designated heritage asset, great care will need to be had to ensure the setting of the heritage asset is sustained and enhanced. Appropriate siting and design of the new development will need to be considered, as well as materials, layout and appropriateness.

**4.3.3** New residential developments which are located within the setting of a non-designated heritage asset will need to be appropriately designed to not detract from the setting of that asset. A non-designated heritage asset is an asset of historic value which is not designated nationally, but is of local importance. Please be aware the Council do not have a definitive list of non-designated heritage assets, they are often identified through the submission of planning applications.

**4.3.4** A starting point for any scheme with an impact on a heritage asset should be a Heritage Statement which identifies the character and significance of the heritage asset and its setting, as well as the site in question. This should explain how the proposed scheme preserves or enhances the heritage asset. Where there are any relevant documents to provide information on the asset, such as a Conservation Area Appraisal and Management Plan, these should be referred to in the Heritage Statement.

**4.3.5** Where a proposal is within or close to a site of archaeological interest, advice should be sought from Worcestershire County Council Archaeological Service on any survey or recording work that may be needed to further knowledge of the site.

#### **Please note**

Proposals within the setting of a heritage asset should be discussed with the Conservation Officer prior to applications being submitted.

## 5 Conversion of Rural Buildings to Residential Use

**5.1** Converting buildings to residential use allows the survival of the character and form of existing buildings while giving them a new lease of life. A well-designed conversion should retain the original, utilitarian character of the building, allowing ample use of the existing structure. Buildings which have become so derelict that they could be brought back into use only by complete or substantial reconstruction fall outside the scope of this guidance.

**5.2** Factors to consider include:

- a. The building should have some intrinsic conservation value and should be suitable for conversion. The new use should conserve the form and character particularly where buildings are listed, are of listable quality or form part of a particularly fine group of traditional buildings, or if a lone building is of traditional form or character.
- b. The building should be large enough for the proposed use without the need for significant enlargement or alteration. Extensions will not normally be permitted as these would detract from the plain, simple and utilitarian appearance of most rural buildings.
- c. The building should be structurally sound and capable of conversion without the need for major rebuilding.
- d. The building should have safe and adequate access to a public road and its conversion should not materially increase traffic on narrow country lanes leading to a demand for their improvement.
- e. The re-use should not lead to the provision, improvement, renewal or extension of utility services which would be damaging to the landscape.

**5.3** Where planning permission is granted for the conversion of buildings to a dwelling, the residential use and any associated use rights will only extend over the land within the approved curtilage. This is usually denoted by the red line on the approved site plan.

**5.4** Where a building is of archaeological interest, is within or close to a site of archaeological interest, advice should be sought from Worcestershire County Council Archaeological Service on any survey or recording work that may be needed to further knowledge of the site. This may also apply to some farmsteads, which have been settled for many years and contain a wealth of historic interest.

**5.5** Agricultural buildings are characterised by large unbroken roof slopes and few window and door openings. Large unbroken roof slopes should be respected as they can be seen from some distance, so new opening would normally be opposed, and dormers and similar structures will not be allowed. New windows and door openings should preferably be located on the inside elevations away from public view. Window and door frames should be painted/stained a dark colour to decrease visual impact and should be recessed behind the main face of the brickwork.

**5.6** On less visible slopes flush fitting roof lights may be possible. An alternative to roof lights may be a suitable opening in the gable end to supplement light levels. Existing openings should be utilised and new openings will be resisted. Where new openings are deemed necessary, they must be in keeping with the character of the original building and be located on the inside elevation, away from public view.

**5.7** Existing features of interest should be retained and incorporated in the design of the conversion. This includes such items as external steps, lanterns, dovecotes, ventilation slits, barn door openings and lean-tos etc. Proposals should seek to enhance the building or group of buildings where there have been previous unsympathetic additions, to an otherwise attractive buildings, the Council will seek their removal.

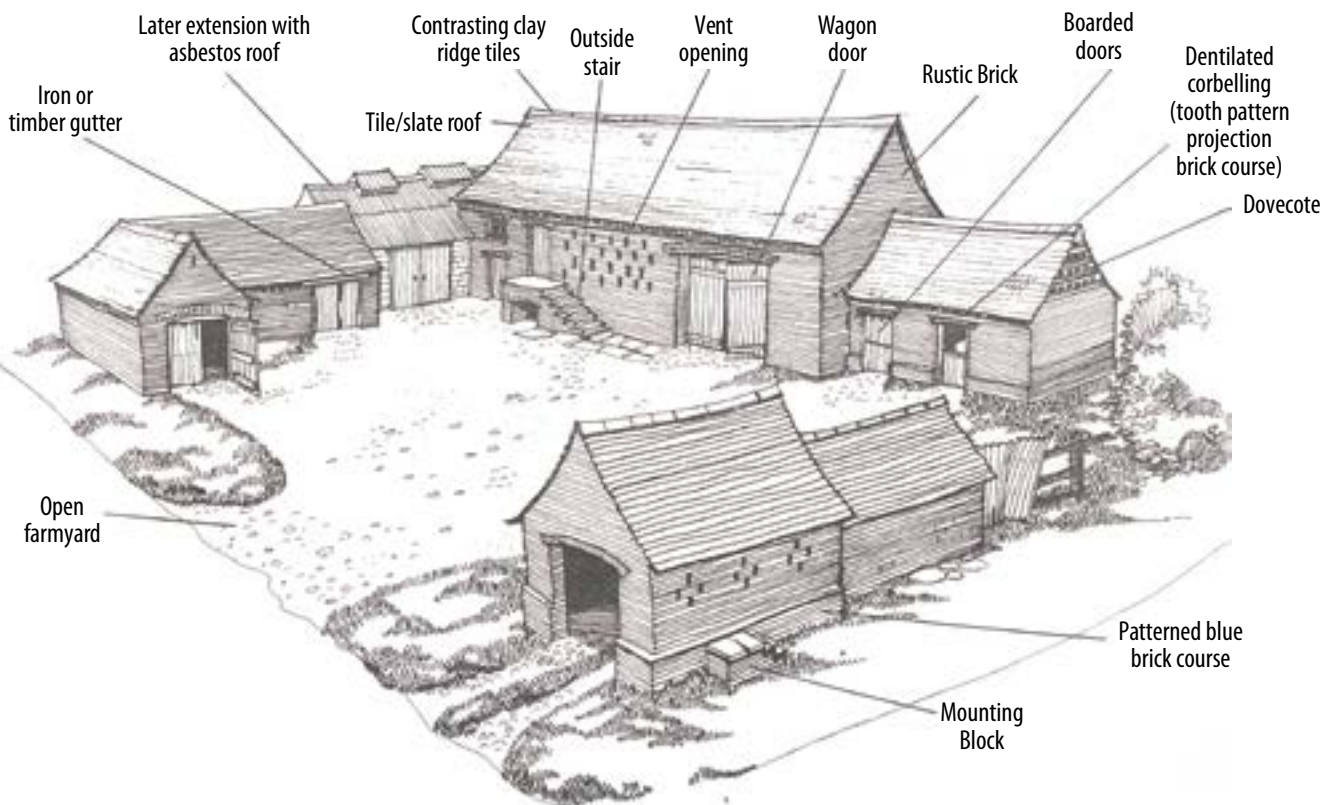
- 5.8** Wagon arches should be fully glazed and if possible the great doors should be retained and sealed. If glazing is used, the vertical dimensions should be emphasised with no obvious signs that the conversion forms two floor levels. The glazing of wagon arches can often provide illumination to the main internal spaces of the building and borrowed light to other rooms. This may also apply to large doorways which were a feature of threshing bays and essential as part of the winnowing process.
- 5.9** Rain was often allowed to run directly off the eaves of farm buildings. Any gutters and downpipes in rural conversions should therefore be discrete, of a dark colour and made of metal.
- 5.10** Rebuilding should be kept to a minimum and where considered to be required must be quantified on the submitted drawings. Existing materials should be re-used or new/ reclaimed traditional materials incorporated that blend harmoniously with old.
- 5.11** Chimney stacks are inappropriate in rural conversions since they damage the character of a traditional rural building by introducing domesticity. Alternative treatments such as a small metal flue may be acceptable provided that they are sensitively positioned. Small balanced flues are acceptable for oil or gas fired heating but fuel tanks sited to comply with Health and Safety Regulations can be intrusive features and will need to be sensitively sited.
- 5.12** Providing adequate private parking for converted buildings can be challenging. Parking should be located away from the main façade of the building, either within a traditional yard area or within other agricultural buildings in the vicinity.
- 5.13** In rural conversions proposed new areas of hardstanding for parking will be resisted, as this will both impact on the rural nature and character of the building and wider area. The re-use of existing stone, setts or stone blocks is encouraged. These are more likely to be in keeping with the farm building.
- 5.14** Traditional farm buildings are sited with yards or in open fields. To avoid domesticity, the curtilage of a converted farm building should remain open and uncluttered. There may be scope for private areas, but these should be screened with hedging and walls of old bricks.
- 5.15** Where residential use is proposed, garaging requirements should be carefully considered. It may prove possible to incorporate an internal garage, perhaps by making use of an existing opening in a lean-to. Alternatively it may be possible to use an ancillary building such as an open cart shed for garaging.
- 5.16** Regard will be had for the materials used to create an access. No access will be permitted to run over open fields where this would be especially visible in the open countryside. Where an agricultural building is part of a farmstead, use of the existing access will be required.
- 5.17** In rural conversions tall brick walls, elaborate gates and gate piers at the entrance to the conversion will not be permitted, as this will not reflect the agricultural roots of the building(s).
- 5.18** Planting will not be accepted as an excuse for poor design and disregard to the original building.
- 5.19** Old farm buildings are often used as roosts for owls or bats and provide valuable habitats for other birds and animals. A Preliminary Ecological Assessment (PEA) is likely to be required to identify the ecological potential of the site. PEAs are simple surveys that help to inform planning applications. Further specialist survey work may then be needed for specific species identified. Survey work will need to be undertaken by an appropriately qualified ecologist at an appropriate time of year. Where the nature conservation interest is considerable, mitigation measures will be required or permission could be refused. In all cases there will be potential for biodiversity enhancement and the Council will expect applicants to heed the guidance contained in the NPPF.

**5.20** Where consent is given for the conversion of a traditional rural building, it is likely that the Council will include a condition to remove Permitted Development Rights for extensions and alterations, to ensure the building remains rural in character.

**5.21** Windows and external doors, including roof lights and garage doors, installed in a rural building conversion should be certified to security standards approved by Secured by Design, in order to reduce the risk of crime.

**Figure 7**

**BEFORE**  
**Typical Traditional Worcestershire Barn and Outbuildings**



**Main Characteristics**

**Simple Shapes**

**Limited number of openings - solid dominates over void**

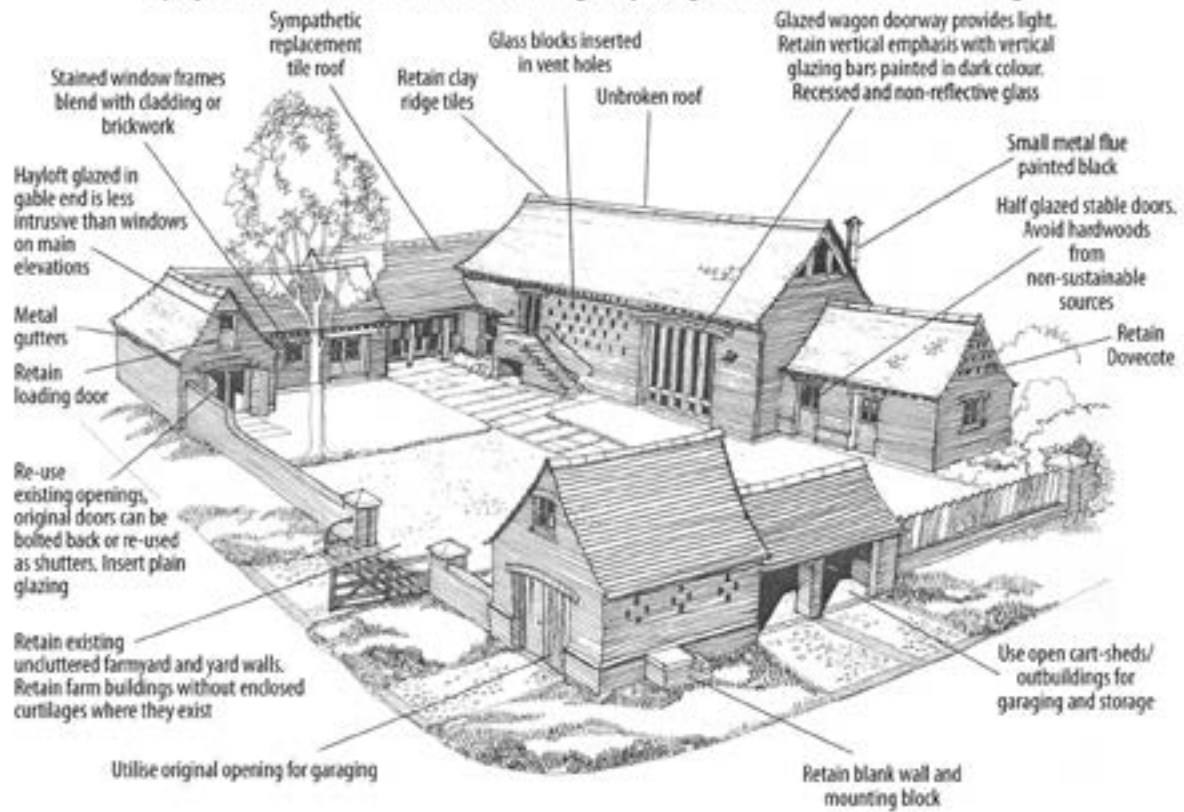
**Absence of over-elaboration - details kept simple at eaves, verges and openings**

**Simple and open agricultural setting**

Figure 8

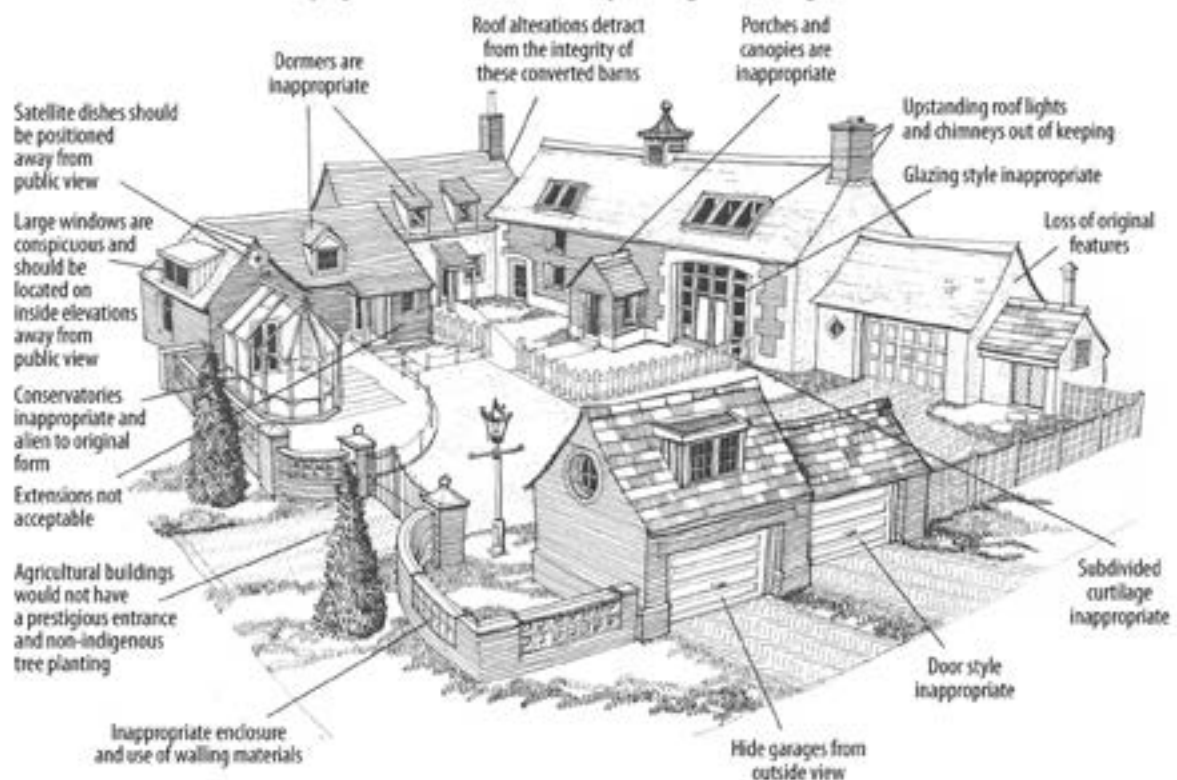
### A PREFERRED SCHEME

Sympathetic conversion scheme retaining simple, agricultural character of buildings



### UNACCEPTABLE CONVERSION MISTAKES

Unsympathetic conversion incorporating urbanising features





### **Further Guidance on the Conversion of Rural Buildings**

More detailed guidance is available for proposals concerning the conversion of rural buildings from Historic England, as well as more locally specific advice from Worcestershire County Council.

In particular, applicants should make use of guidance contained in Historic England's 'Adapting Traditional Farm Buildings (Oct 2017)' and the suite of guidance documents concerning historic farmstead characterisation, including the summary for Redditch Borough, produced by Worcestershire County Council at [http://www.worcestershire.gov.uk/info/20230/archive\\_and\\_archaeology\\_projects/1023/historic\\_farmstead\\_characterisation](http://www.worcestershire.gov.uk/info/20230/archive_and_archaeology_projects/1023/historic_farmstead_characterisation)

## 6 Non - Residential Development

### 6.1 Key considerations

**6.1.1** Non-residential development is defined as all types of Use Classes except those under Class C of the Use Class Order 2016 (or subsequent).

**6.1.2** Guidance is provided for the following types of non-residential development:

- Retail units;
- Commercial/Industrial buildings;
- Agricultural buildings; and
- Shopfronts;
- Change of use;
- Equestrian development.

**6.1.3** All non-residential development must take account of the following considerations:

- BREEAM;
- Local character; and
- Impact on neighbouring amenity; and
- Crime prevention and community safety

**6.1.4 BREEAM** - BREEAM is the Building Research Establishment's Environmental Assessment Method. **In line with Policy 15 'Climate Change' all new non-domestic development must be assessed against the BREEAM assessment method (or any other national scheme which supersedes it). Where this requirement affects the viability of the scheme justification must be provided for not fully meeting this requirement.**

**6.1.5 Impact on neighbouring amenity** - Developments should not impact on neighbouring amenity of buildings, regardless of their use. This includes through overbearance, overshadowing and overlooking nearby buildings and developments.

**6.1.6 Local character** - Developments should respect and enhance the local character through the use of appropriate materials, siting, scale and massing.

**6.1.7 Heritage assets** - Non-residential developments within the setting of a heritage asset will need to pay special attention to the heritage asset as a whole and must preserve or enhance the character of the area. New development should not adversely impact the significance of heritage assets, notably Listed Buildings and Conservation Areas, where there is a statutory requirement to consider the impact on setting. The setting of non-designated heritage assets must also be considered. A non-designated heritage asset is an asset of historic value which is not designated nationally, but is of local importance. Please be aware the Council do not have a definitive list of non-designated heritage assets, they are often identified through the submission of planning applications.

**6.1.8** As with any development near heritage assets, designated or not, applicants need to use an appropriate Heritage Statement as a starting point, and they also need to carry out a setting assessment using Historic England guidance (for more information see the Historic England website:

<https://historicengland.org.uk/advice/hpg/has/setting/>

**6.1.9 Crime prevention & community safety** - non-residential developments should design out vulnerability to crime by incorporating the principles, concepts and physical security standards of the Secured by Design award scheme.

#### Please note

- Proposals within the setting of a heritage asset should be discussed with the Conservation Officer prior to applications being submitted.

## 6.2 Commercial Development

**6.2.1** Better designed buildings, landscapes, townscapes and places contribute towards more productive employees, a healthier and happier workforce, and communities are more likely to be committed to the maintenance and improvement of their surroundings.

**6.2.2** Planning permission will only be granted for new commercial and industrial buildings which are of high quality design and are appropriate for their use and context. Development will not be permitted where it is considered to have a detrimental impact on the townscape or landscape character. The following considerations should be taken into account when designing a commercial/industrial scheme:

- Scale and form;
- Lighting;
- Access;
- Landscaping;
- Noise;
- Boundary treatments;
- Parking.
- Surveillance;
- Layout;
- Materials;
- Biodiversity enhancement;
- Odour;
- Bin storage; and

**6.2.3 Scale and form** - The proposed development should be in scale with surrounding developments and not be visually intrusive due to its scale and massing. Where possible large buildings should minimise their impact through having low building heights and use of a curved roof.

**6.2.4 Surveillance** - All new commercial development will be expected to create continuous active frontages and minimise blank walls and fencing. There should be a clear relationship between any new and existing development and the building should be well integrated into its surroundings. Formal surveillance may be appropriate via a monitored CCTV system and/or on-site security staff.

**6.2.5 Lighting** - The type of lighting selected should be relevant to the local context, character and use of the commercial development and minimise the impact of light pollution as well as being as energy efficient as possible.

**6.2.6** Care should be taken to ensure that landscaping, tree planting and lighting schemes take each other into account and in particular work to mitigate the effects of seasonal variations. The effects of new lighting on wildlife should also be a key consideration in lighting strategies associated with development.

**6.2.7** There should be a clear strategy for the provision of lighting within an area in support of the primary movement patterns. The decision to light or not light public spaces should be well thought through.

**6.2.8 Layout** - The relationship between the proposed development and existing buildings and features in the area should be considered when designing the proposal or determining the location on the site.

**6.2.9 Access** - Entrances should be directly visible and easily accessible. Access and circulation should contribute to a network of direct, connected and visible routes within and beyond the site.

**6.2.10 Materials** - Commercial developments should be constructed to produce a visually attractive scheme. Materials, building methods and details in the design should aim to enhance the local distinctiveness of an area. Where there is no precedent set for specific types of materials to be used, a high quality area with a distinct character needs to be created, either from traditional or more modern materials. It is the degree to which any material is appropriate to its surroundings and its function that should determine its use.

**6.2.11 Landscaping** - A balance of both hard and soft landscaping should be included to ensure that attractive amenity spaces are enhanced and their use, both night and day, encouraged. Landscaping can also include appropriate screening to help reduce noise, light and air pollution.

**6.2.12** Landscaping proposals should enhance the existing built and natural environmental features already present in the location, for example, careful retention of healthy trees can give a sense of maturity to a new development and can be a significant asset to any development. The use of native species and regard to soil conditions, drainage, shelter and space should be undertaken when designing the landscaping element of a scheme.

**6.2.13** Proposed landscaping schemes should be included in planning applications and planning permissions will not be granted where the site is overdeveloped and the landscaping is piecemeal.

**6.2.14 Noise** - The scale, nature and frequency of vehicles that service industrial businesses can be a major source of conflict with neighbouring activities, including other industrial uses. The design objective is to manage noise, disturbance and potential danger from deliveries, servicing and storage in order to reduce the impact on neighbours, the natural environment and the general appearance of the area. The best place for this to occur is behind frontage buildings, or to the rear of the main building.

**6.2.15** Mitigation measures may be needed, such as earth bunds, reed beds and tree planting to reduce the impact of noise or any detrimental effect on air quality.

**6.2.16** The location of the servicing areas, routes in and out of the site and location of mitigation measures combined should reduce the impact of noise or any detrimental effect on air quality.

**6.2.17** In addition, working hours may be restricted especially where there are residential areas nearby in order to reduce disputes and conflicts.

**6.2.18 Boundary treatments** - must be appropriately designed and utilise existing features and vegetation, such as hedgerows and mature trees.

**6.2.19** The choice of boundary treatments should relate to the wider physical, ecological and social context of the surrounding environment and seek to make a positive contribution to the character of the area and the building(s). Visually aggressive boundary treatments adjacent to public space will be resisted.

**6.2.20** Where they are adjacent to public space, boundary treatments should be transparent to allow clear views into and out of the site and not hinder vision on the highway, particularly at road junctions.

**6.2.21 Bin storage** - Bin storage areas must be well designed and located in relation to properties. They should be located no more than 30 metres from the access roadway and be free from steps and kerbs.

**6.2.22** Provision should be made for storage and collection of both residual waste and recyclable waste. A compactor could be considered for offices and light industrial developments for residual waste only with separate provision for recycling.

**6.2.23 Parking** - Adequate parking should be provided, with areas for service vehicles to park and turn if necessary. Parking areas should include some landscaping features and screening in order to reduce the visual impact. Cycle parking must also be provided along with cycle paths and footpaths in and out of the site. Adequate cycle storage of an appropriate size should be included as part of the development. These standards are set out by Worcestershire County Council Highways Department. Please refer to their specific requirements regarding cycle storage.

## 6.3 Agricultural buildings

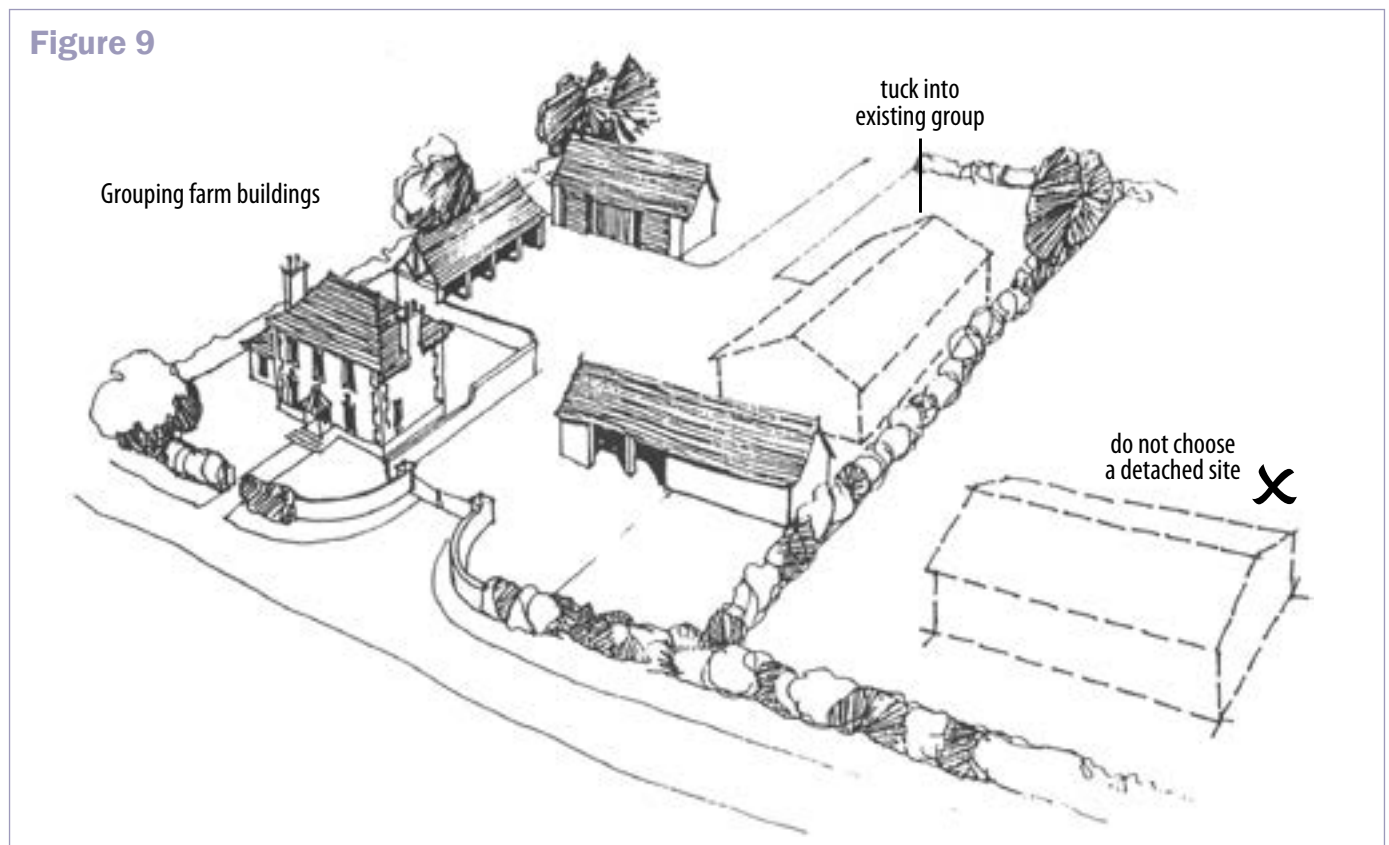
**6.3.1** Successful building design is not just a matter of what a new agricultural building will look like. In the countryside it is important to look beyond that to consider how new development will relate to its landscape setting and its impact on any settlement where it is to be located.

**6.3.2** Buildings for agriculture and forestry are not considered inappropriate development in the Green Belt, however, the preservation of the Green Belt remains of paramount importance to the Council and it is important that the visual amenities of the Green Belt are retained and enhanced through ensuring new buildings are appropriately designed.

**6.3.3** The following factors should be considered prior to a project being designed and commenced:

- Grouping;
- Boundary treatments;
- Skyline;
- Colour;
- Landscaping;
- Physical Security Standards.
- Access;
- Viewpoints;
- Materials;
- Biodiversity enhancement, and
- Lighting;

**6.3.4 Grouping** - When seen from a distance it is not the siting of a building which is apparent but its scale in relation to adjacent buildings. Tight clusters of buildings generally look more settled in the landscape than scattered ones. For this reason, new buildings should form part of a group rather than stand in isolation. The siting of new proposals within the setting of a heritage asset is of particular importance. New development sited within a group of other buildings will also benefit from surveillance and be less vulnerable to crime than if located on a detached site or screened site.



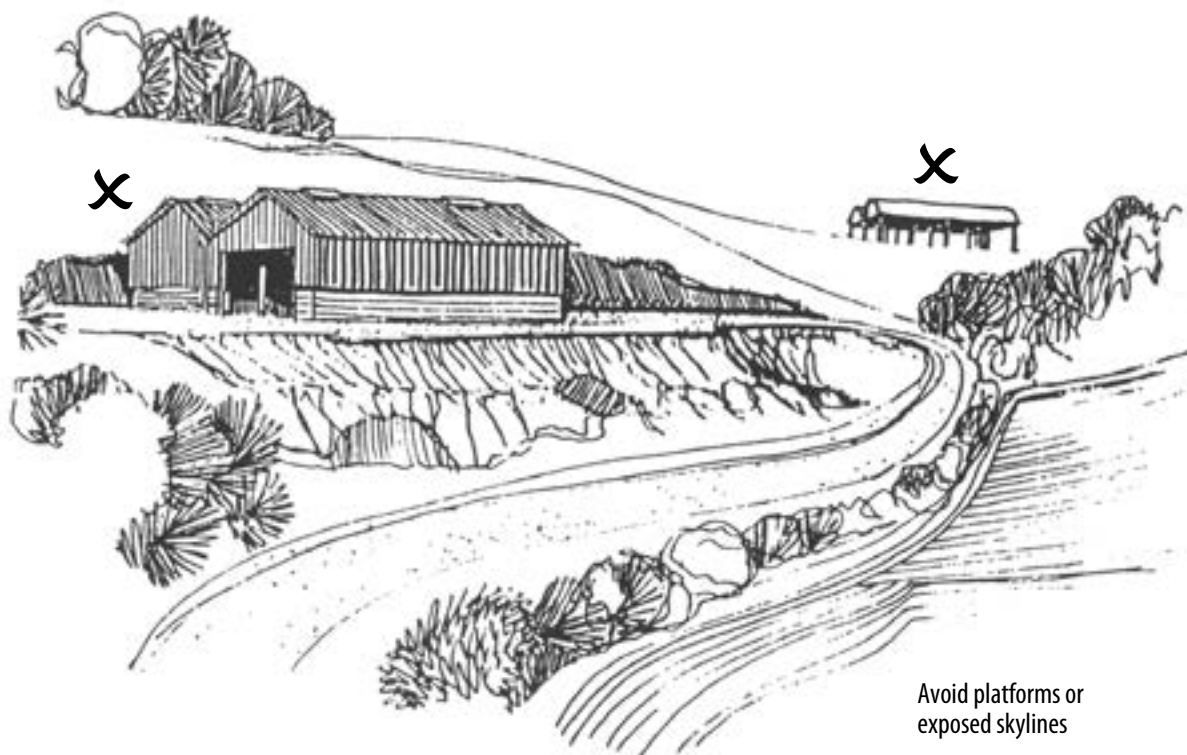
**6.3.5 Access** - New agricultural buildings should be located close to existing accesses or exiting buildings where possible to ensure long tracks and large areas of hardstanding are not required.

**6.3.6 Boundary treatments** - Must be appropriately designed and utilise existing features and vegetation, such as hedgerows and mature trees.

**6.3.7** The choice of boundary treatments should relate to the wider physical and social context of the surrounding environment and seek to make a positive contribution to the character of the area and the building(s).

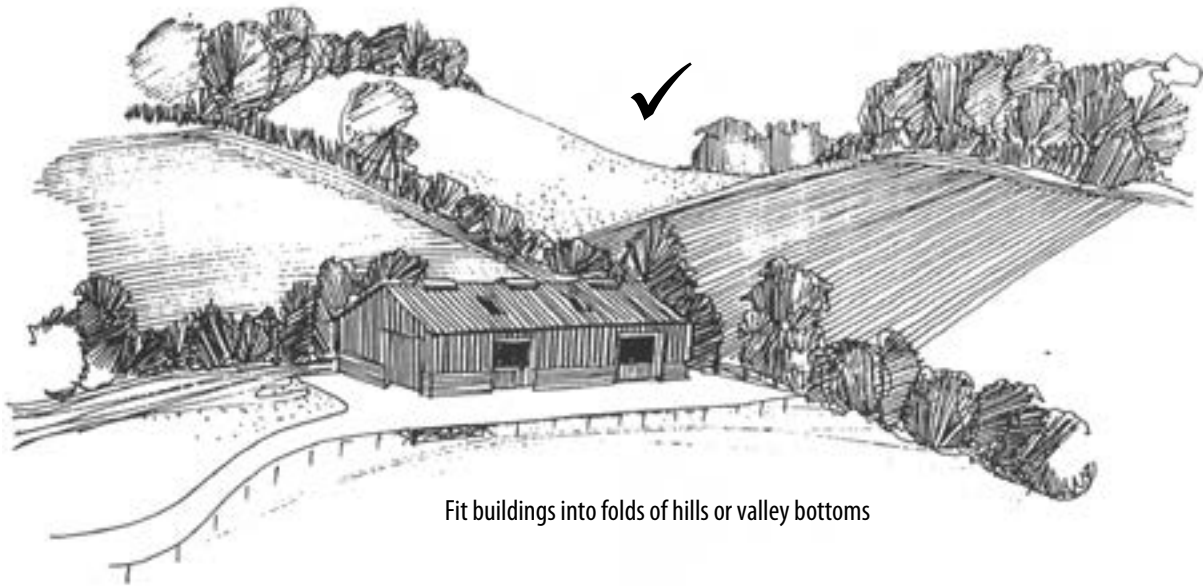
**6.3.8 Viewpoints** - A modern farm building by nature of its scale and materials can form a prominent feature in the landscape. It is important therefore, that views into and out of the site are accounted for (please see Figure 10).

Figure 10



**6.3.9 Skyline** - New buildings should respond to contours and the natural form of the land by fitting into folds or valley bottoms and avoiding platforms or exposed skylines or ridges (please see Figure 11).

**Figure 11**



**6.3.10 Materials** - Choice of materials should always take account of the adjacent landscape, buildings, walls and gates. Materials should be appropriate for the purpose and reflect the intrinsic nature of agricultural buildings. Over engineered buildings will not be permitted.

**6.3.11 Colour** - Generally, colours should be 'earth colours' such as browns, greys or greens to reflect local materials e.g. red bricks with a rustic finish. Juniper green (12B29) and Vandyke brown (08B29) are example colours which should be used. There is no need for new buildings to match the colour of existing buildings where they are sited in or nearby existing buildings (please see Figure 12).

**Figure 12**



**6.3.12 Landscaping** - Landscaping will be encouraged to soften the appearance of agricultural buildings (please see Figure 13)

**Figure 13**



**6.3.13 Lighting** - Proposals including external lighting in rural areas must pay particular attention to the physiological, ecological and aesthetic impacts of light pollution.

**6.3.14 Other material considerations** - The effects of noise, lighting and smell on nearby dwellings should be taken into account in detailed site and design planning. Agricultural buildings that are domestic in appearance shall be refused.

### Secured by Design

**The Council supports the Secured by Design Scheme; applicants are expected to meet those standards wherever possible. Further information can be found at <https://www.securedbydesign.com/>**

**Windows and external doors, including roof lights and garage doors, installed in a commercial or agricultural development should be certified to security standards approved by Secured by Design, in order to reduce the risk of crime.**



## 6.4 Equestrian developments

**6.4.1** The keeping of horses on the smallest scale is likely to require development of some kind and it is rare for equestrian development not to need planning permission.

**6.4.2** Regardless of the type of development proposed - be it a simple field shelter, stabling or new access and tracks - consideration will need to be given to a number of factors including siting, scale, design, materials, colour and landscaping. Fitting in with the character of the landscape and respecting existing ecological value should be key considerations of the design.

**6.4.3** The change of use of land, from agricultural to equestrian land may be required. If poorly designed and managed, stabling can contribute to the rapid spread of disease, cause injury and pose significant fire risks.

**6.4.4** Stables and shelters should be kept to a minimum and consist of only essential facilities, therefore stables should:

- Contain no more than a small tack room/hay store and the number of stables should reflect the number of horses present on the land. They should not be large enough to enable easy conversion to other uses;
- Have doors a width of 1.25 metres;
- Have stables a minimum size of 3.65 metres x 3.65 metres (12ft x 12ft) in accordance with the British Horse Society recommendations;
- Stable height should be between 2.8 metres and 3.3 metres (9ft to 11ft);
- Be constructed of timber with no more than a single course of brickwork for the stables to sit on;
- Design floors to ensure good drainage, taking stable waste away from the horse;
- Include adequate ventilation and air circulation. There should be a good flow of air throughout the building without unnecessary draughts;
- Be sited as to reduce the amount of hardstanding or track required;
- Be closely related to existing groups for buildings or adjacent to natural screening; and
- Allow easy access to grazing land.

**6.4.5** It will be down to the applicant to provide reasonable justification(s) if an application differs to the above.

**6.4.6** Where a manège is proposed, it should be no larger than 40m x 20m. As a flat surface is needed for a manège it is essential to choose a location where the re-grading of land is limited or not necessary. Manèges should be located close to the corners of a paddock and boundaries and be close to existing buildings and as inconspicuous as possible.

**6.4.7** Light pollution is a growing concern. External lighting can make a site appear prominent in the landscape and affect wildlife and the valued sense of rurality. Any planning applications should set out clearly whether or not artificial lighting is proposed, and if so, how light pollution will be minimised. Floodlighting will be strongly resisted.

Figure 14

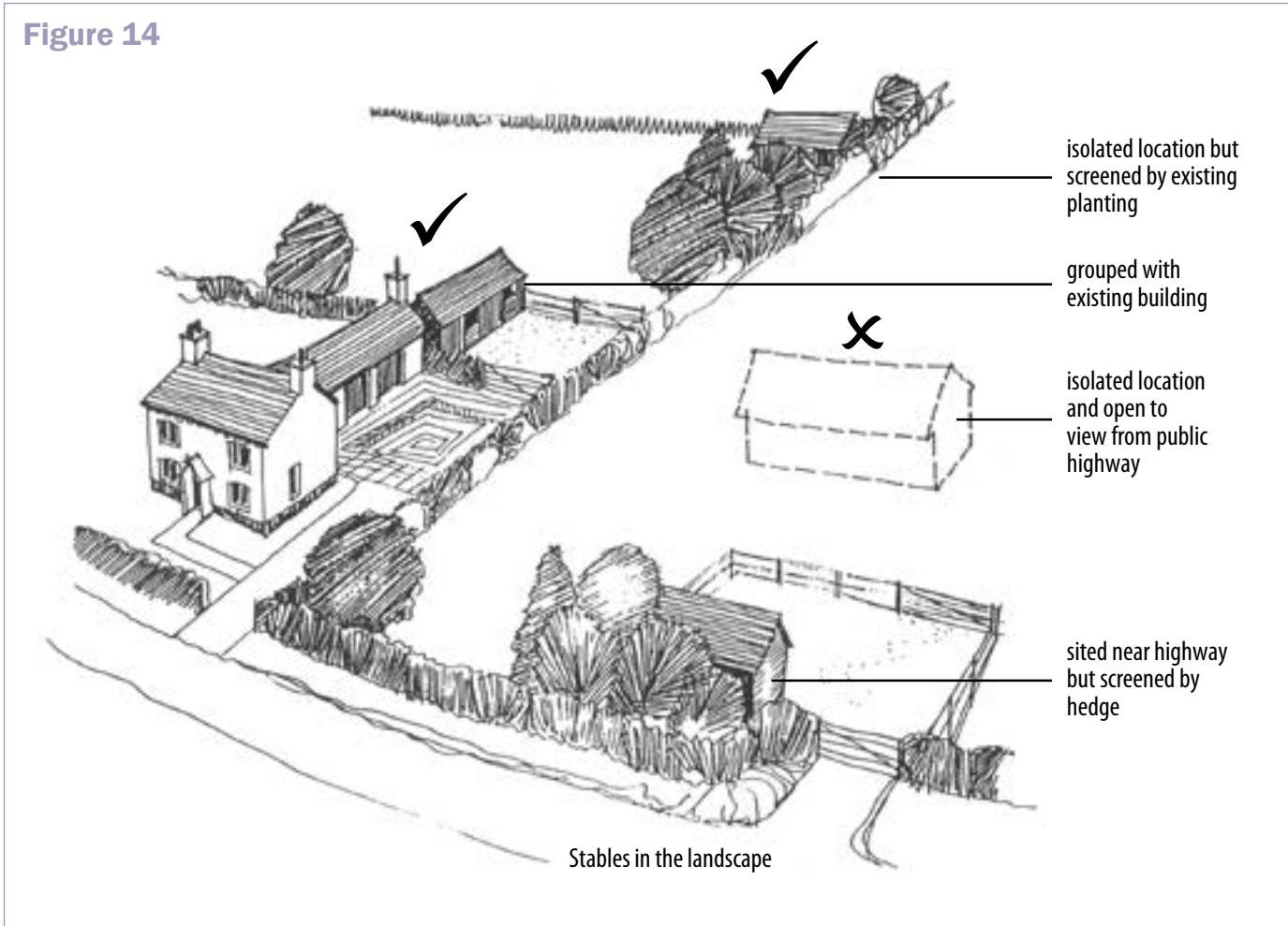
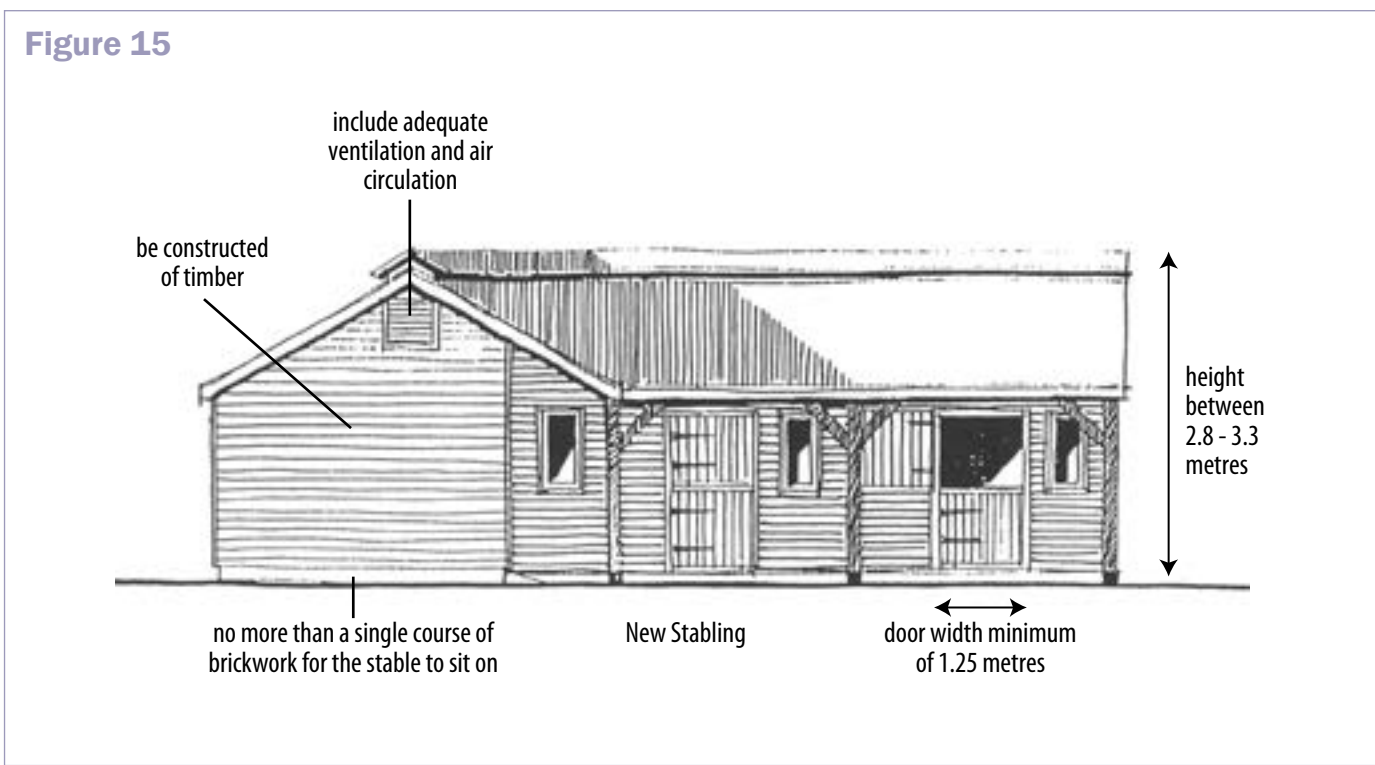


Figure 15



## 6.5 Retail units

**6.5.1** An emphasis on good quality design enhances the character of a shopping environment, encourages investment and spending and brings benefits to all commercial interests.

**6.5.2 Retail developments should be located in accordance with the retail hierarchy set out in Policy 30 of BORLP4. Retail proposals that are not in accordance with the retail hierarchy as set out in Policy 30 will not be favourably considered.**

**6.5.3** Retail proposals on the edge of settlements will not be favourably considered unless all other options have been discounted and there is an overwhelming need for retail development.

**6.5.4** The Council will pay close attention to the outside design of shops such as signage schemes, parking spaces, gradients and design of access pathways, particularly where a retail unit is proposed outside the pedestrianised core of the Town Centre.

**6.5.5** Adequate bin storage for the size and scale of refuse the unit will create should be provided and be capable of being made secure. Bin storage should ideally be no further than 30 metres from the access road and should be free from steps and kerbs. Provision should be made for storage and collection of both residual waste and recyclable waste. A compactor could be considered for residual waste only with separate provision for recycling. Where retail and residential uses co-exist there needs to be sufficient storage for separate residential and commercial waste storage.

**6.5.6** Where residential accommodation is provided above retail units it should have a separate access with good surveillance.

## 6.6 Shopfronts

**6.6.1** Changing a shopfront is often seen as a way to modernize a shop, especially when ownership changes or when the use of a shop alters.

**6.6.2** Good design need not necessarily be traditional and there are many locations where a well-designed modern shopfront will be acceptable but it must be sympathetic to the building above and the streetscape.

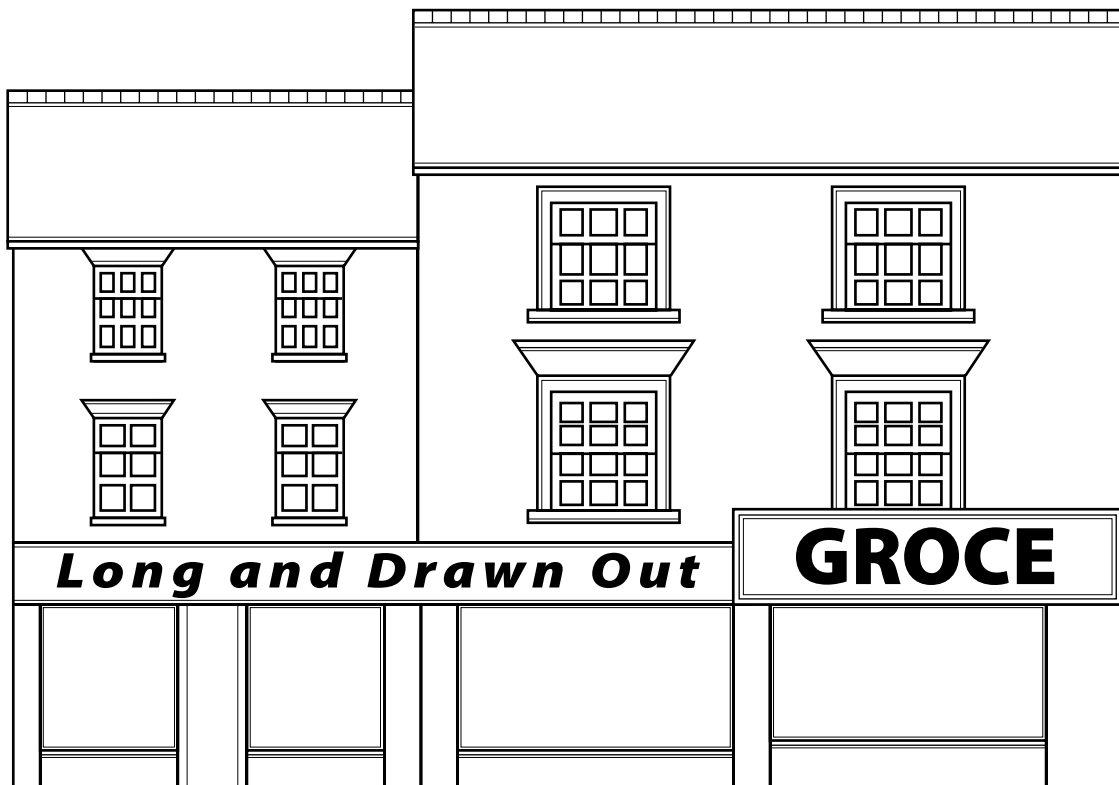
**6.6.3** If a traditional style replacement is to be used, it should be appropriate to the building and locality. It must never appear to be of earlier date than the rest of the building.

**6.6.4** The presence of unsympathetic shopfronts already within a host building or features elsewhere within the street is not sufficient argument for the installation of equally unattractive or inappropriate features in a new shopfront. Betterment will be sought in all cases to improve the character and appearance of the street scene and complement and enhance features of the building in question.

**6.6.5** New and replacement shopfronts should:

- Relate to the building of which it is an integral part;
- Respect the proportions and architectural detailing of the building;
- Ensure that the ground floor is not divorced from the rest of the building;
- Reflect the surrounding character of the area;
- Take account of the variation of individual buildings where a shop occupies more than one building and the elevations are of different design. There should be a variation in the design of the individual shopfronts; and
- Avoid extensive glazing so that a shopfront looks structurally supported whilst also framing the display window.

Figure 16



Structural discordance.  
These shopfronts disregard the proportions of the buildings.

**6.6.6** A fascia should state only the name of the trader and, if necessary, the nature of the trade. Unnecessary duplication of a name on a single fascia will not be permitted.

**6.6.7** The existence of any former unsuitable fascia should not influence the design of a replacement and any new fascia should not be applied over the top of an existing one.

**6.6.8** New fascias must be of a scale and design in proportion to the design of the shopfront and height of the building as a whole. The fascia must be no higher than the bottom the first floor windowsill above (this includes shops and businesses on upper floors). Fascias should not generally exceed 0.6 metres (2 feet) in depth.

**6.6.9** Lettering should generally be restricted to a maximum height of 0.3 metres (12 inches) unless exceptional circumstances prevail e.g. large scale building. The materials for the lettering should be appropriate to the context of the area. Hand painted lettering on fascias will be encouraged.

Figure 17



**6.6.10** In areas where canopies are considered to be acceptable in principle, the following criteria will be applied:

- Traditional matt woven retractable or fan type blinds are preferred. They may be acceptable on listed buildings and in conservation areas but they will not be acceptable where they disrupt the architectural rhythm of unified terraces or street facades or where they obscure architectural detail or features.
- Continental ‘Dutch’ blinds, often made from shiny plastic are inappropriate in conservation areas and on listed buildings. Their structure obscures the fascia and introduces a dominant shape out of character with the street.
- Canopies and blinds should only be sited at ground floor fascia level.
- The design and siting of a canopy should complement the design of the building, be located within the pilaster and should respect the architectural subdivisions of doors and windows.
- New canopies must reflect any existing canopies on adjacent buildings in order to provide a continuous canopy frontage.
- Advertisements should relate solely to the trade or name of business and lettering on the canopy should be no greater than 150mm in height.
- Canopies and blinds should always retract fully into the fascia and should provide safe and adequate ground clearance (minimum 2.4m above ground floor level).

Where a shopfront has a recessed door, a metal gate of an open design can be considered.

**6.6.11** The Council seeks to resolve potential conflict between the security needs of shopkeepers and the detrimental appearance of shutters on townscape quality. There is no clear security advantage in using solid shutters rather than other security measures. Proposals for solid shutters will not generally be permitted. Security features should be considered from the outset of shop front design and included as integral parts of a shop front rather than added as an after-thought. A wide range of security products are available that specifically aim to enhance shop front security without detracting from the appearance. These include:

- Laminated glazing;
- Internal window security grilles;
- External removable window security grilles;
- Visually permeable roller shutters (internally or externally mounted)

## 6.7 Shopfronts in Conservation Areas and on or near to Listed Buildings

**6.7.1** Extra care will need to be taken around heritage assets to ensure that shopfront design does not adversely affect the special character of a Conservation Area or Listed Building and its setting.

**6.7.2** Conservation Areas are areas of special architectural or historic interest. Development of shopfronts should preserve the special character of a Conservation Area and its setting. It is a legal requirement to pay special attention, in the exercise of planning functions, to the desirability of preserving or enhancing their character or appearance.

**6.7.3** New traditional shop windows should draw the eye and be of interest, reflect the vertical emphasis of the building above. Window subdivisions, mullions and piers should be used for this purpose.

**6.7.4** Existing features of traditional shopfronts such as pilasters, fascias, old ironmongery and fire insurance signs should be retained for their historic interest and aesthetic value. Original fascias should always be retained as they form part of the design of the shopfront.

**6.7.5** A stallriser gives protection to a shop window and creates a solid visual base to a building. Stallrisers often consist of panelled timber or brick forming a deep moulded skirting which is painted. Occasionally glazed tiles or marble are used. The depth of stallriser must be in sympathy with the overall design of the shopfront and the inclusion of a stallriser in the door may also be appropriate.

**6.7.6** Where traditional shopfronts have previously been removed, these should be reinstated and a similar design used when replacing a shopfront. Traditionally most shopfronts were constructed in softwoods and painted. Occasionally hardwoods were used and finished with a glossy varnish.

**6.7.7** The two main considerations in determining the exterior finish of shopfronts are location and appearance. The traditional approach has been to favour a painted finish but care should be taken to respect local tradition and it should be borne in mind that high-gloss paint and varnishes, and particularly brilliant whites, are not appropriate for period properties. Matt or semi-gloss will give the best results.

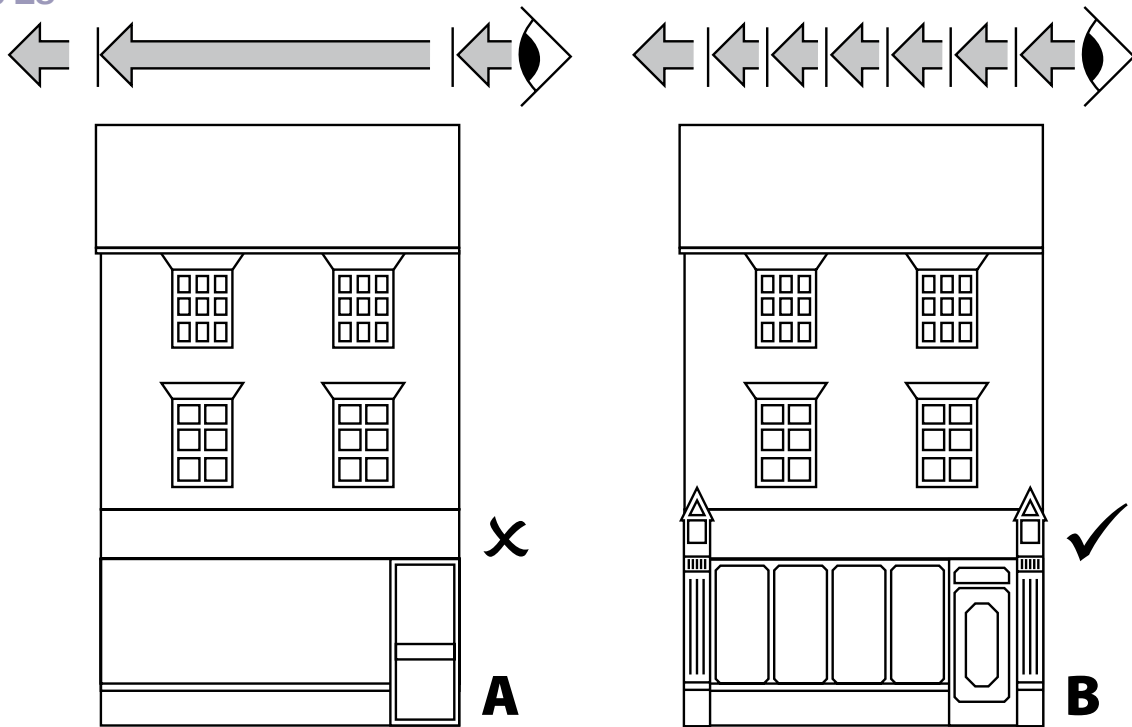
**6.7.8** Particular attention will be given to materials in any proposal for a shopfront and no glossy surfaces such as acrylic sheeting or plastic will be permitted on Listed Buildings or in Conservation Areas. The traditional material for shopfronts is timber and its continued use will be desirable in many instances.

**6.7.9** Sensitive use of colour, respecting the age and setting of a building offers scope to improve the shopping environment and in general rich dark colour or those that are muted in tone give the most suitable background to highlight a window display.

### Please note

- Proposals within a Conservation Area or for or near a Listed Building should be discussed with the Conservation Officer prior to applications being submitted.

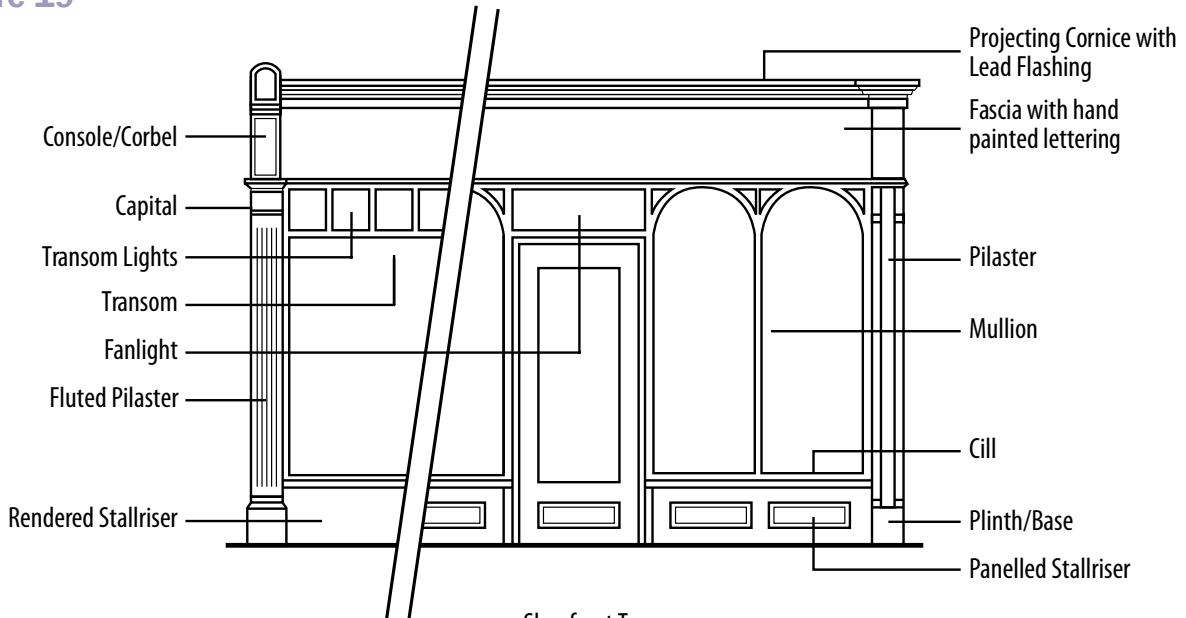
Figure 18



Horizontal and vertical emphasis.

Diagram B retains the interest for longer than A due to the longer period for the eyes to travel across the vertical lines on the frontage

Figure 19



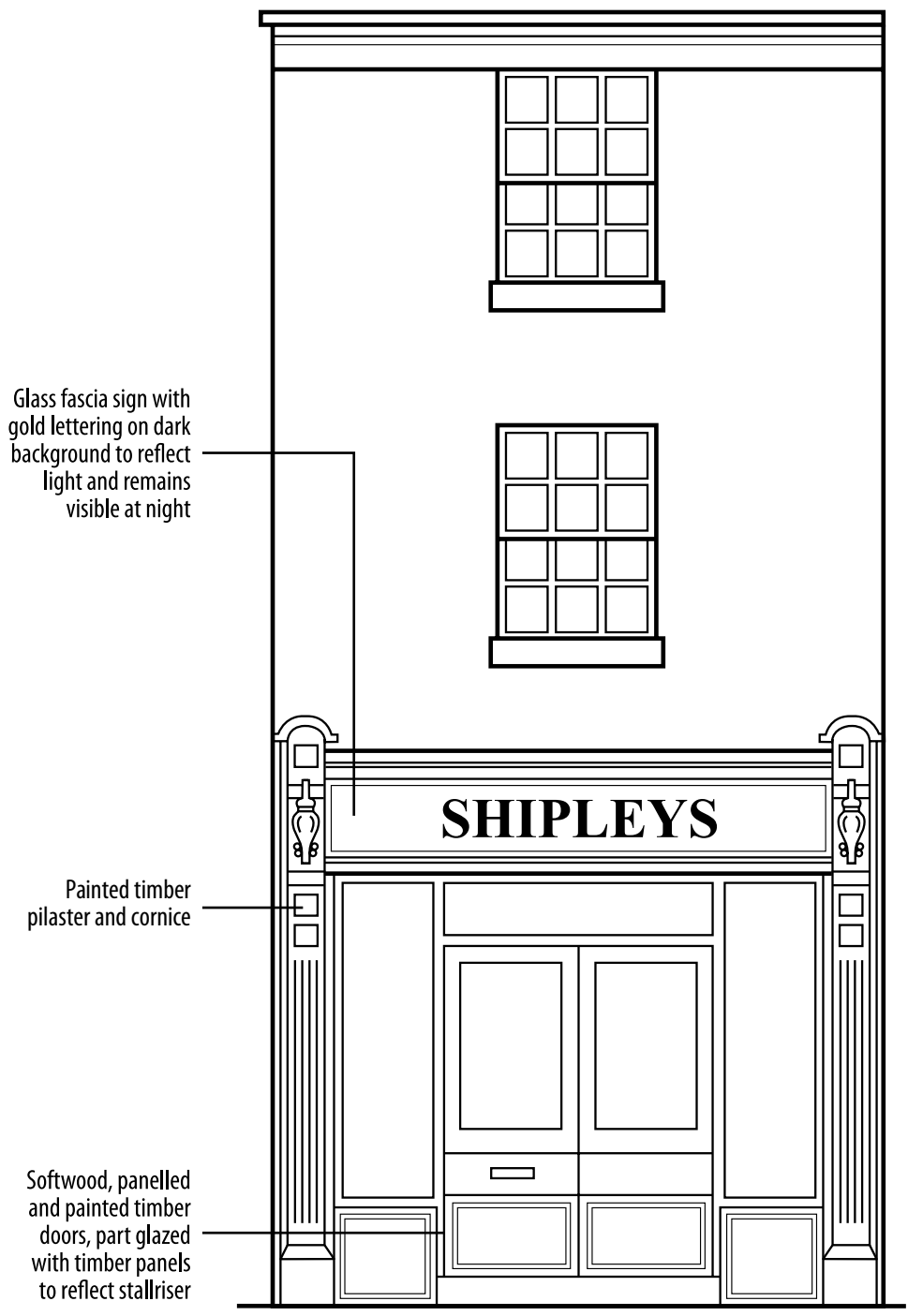
Shopfront Terms.

The various elements each have a visual and practical function.

The pilasters identify the vertical division between the shopfronts, the fascia provides the space for advertising, the cornice gives a strong line at the top of the shopfront and protection from the weather, the stallriser gives protection at ground level and provides a solid base.

Reproduced by kind permission of the English Historic Towns Forum

Figure 20



New shopfront respects the proportions of the building



## 7 Advertisements and Signage

### 7.1 Key considerations

**7.1.1** Advertisements and signage can make a significant contribution to the character of an area and a shopfront or business. Poorly designed signage can detract from the character of a building and area.

**7.1.2** Many advertisements require Advertisement Consent, which is similar to planning permission. Where advertisement consent is required, the council will expect the content of signs to be kept to a minimum.

**7.1.3** Excessive advertisement should be avoided.

**7.1.4** The Borough Council will expect corporate advertising to be adapted to fit buildings and townscape, particularly on Listed Buildings and in Conservation Areas.

***“The quality and character of places can suffer when advertisements are poorly sited and designed... Advertisements should be subject to control only in the interests of amenity and public safety, taking account of the cumulative impacts.”***

- NPPF Paragraph 132

**DEEMED CONSENT BOX** - A number of types of advertisements and signage have the benefit of deemed consent under the Town and Country Planning (Control of Advertisements) (England) Regulations 2007 (as amended) subject to the standard conditions and the conditions and limitations relating to that advertisement. Deemed consent means that certain types of development which comply can be undertaken without the need for advertisement consent.

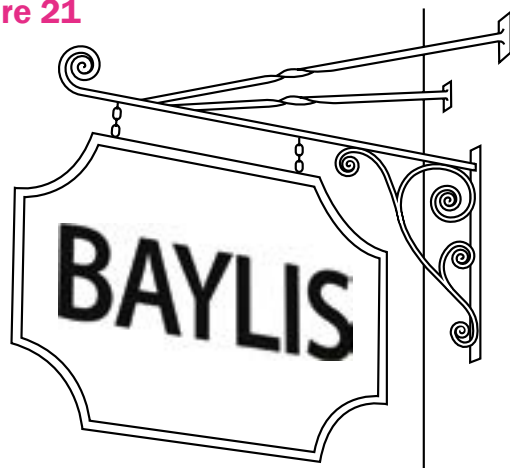
### 7.2 Hanging or Projecting Signs

**7.2.1** Well-designed hanging or projecting signs can add to the character of the area.

**7.2.2** Hanging and projecting signs should relate to the size and scale of a building and neither appear over intrusive nor too small. The materials and colours of the signage should reflect the fascia of a business and respect the character of the area.

**7.2.3** Projecting signs should generally be in line with the fascia panel and not above the first floor sill level.

Figure 21



**7.2.4** Traditional hanging signs denoting a trade may be suitable for historic buildings. They should be constructed in metal or wood and be hung from an appropriately designed metal bracket.

**7.2.5** The Council will not permit more than one projecting or hanging sign per shopfront in order to avoid street clutter and will not normally allow illuminated projecting signs. Projecting signs should not exceed 0.4 sq. metres (4.3 sq. feet).

### **7.3 Free standing signage**

**7.3.1** Any free standing signs for business premises should be incorporated into a landscaping scheme and should preferably be located near the main site entrance.

**7.3.2** Signs can include the logo of the business and the name of the business.

**7.3.3** Appropriate colours should be used so as not to detract from street signage.

**7.3.4** A proliferation of advertisements, especially on sites fronting main roads and railways, will not be permitted.

### **7.4 Window signs**

**7.4.1** Window signs provide a suitable method of advertising first floor premises.

**7.4.2** Lettering on window panes of the shared advertising space of the ground floor trader can be used to advertise retail space on higher floors.

**7.4.3** Lettering should generally be restricted to a maximum height of 0.3 metres (12 inches) unless exceptional circumstances prevail e.g. large scale building.

### **7.5 Conservation Areas and Listed Buildings**

**7.5.1** Within Conservation Areas, advertisements and signage should reflect the character and nature of the Conservation Area and be of traditional materials or be traditional in appearance materials.

**7.5.2** Advertisements and signage on Listed Buildings will need to reflect the historic nature of the building and be of traditional materials and colours.

**7.5.3** Illumination will not normally be permitted unless it is halo or down lit, but should be finalised in discussion with the Council's Conservation Officer.

## **8 Mixed use Development**

**8.1** Mixed use developments will need to take into account the guidance in both the 'Residential Development - Creation of New Dwellings' and 'Non-residential Development' sections of this High Quality Design SPD.

**8.2** Mixed use developments should contain an appropriate mix of uses, depending on the location and nature of the proposal and policy requirements in the **Borough of Redditch Local Plan No.4**.



**If you need this information in another language or format, please contact us to discuss how we can best meet your needs.**

**Phone: 01527 548284**

**Email: [equalities@bromsgroveandredditch.gov.uk](mailto:equalities@bromsgroveandredditch.gov.uk)**

**REDDITCH** BOROUGH COUNCIL

*making  
a  
difference*

[www.redditchbc.gov.uk](http://www.redditchbc.gov.uk)

## **Strategic Planning and Conservation**

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**Redditch Borough High Quality Design Supplementary Planning Document (SPD)****Summary of Consultation**

Public consultation on the draft High Quality Design supplementary planning document (SPD) for Redditch Borough was undertaken from Monday 22 January 2018 – Sunday 4 March 2018. Using the consultee database held by the Strategic Planning team at Redditch Borough Council, the following broad groups were consulted via email/letter to give notification of the consultation period:

- Statutory Consultees, including Feckenham Parish Council and neighbouring local authorities;
- Other interest groups and relevant stakeholders;
- General members of the public who were on the database;
- Representatives from the development industry;
- Local Councillors; and,
- Internal Council colleagues from other departments.

The draft SPD was available to view and download from the Council's website during this period at <http://www.redditchbc.gov.uk/council/policy-and-strategy/planning-policies/borough-of-redditch-local-plan/supplementary-planning-documents.aspx>

Copies of the SPD were also placed in the Town Hall, Redditch Library, the Mobile Library and Council Customer Service Centres at Batchley, Winyates and Woodrow for the duration of the consultation period. Finally, an advert publicising details of the consultation was also placed in the Redditch Standard/Advertiser local newspapers.

Table 1 below records all representations made to Redditch Borough Council during the consultation period. Alongside specific comments made by respondents, Table 1 also includes a response from the RBC Strategic Planning team on that particular comment as well as the detail of any proposed action to change the SPD where it has been deemed necessary to make a suggested change by a respondent.

**Table 1 - Consultation Comments Received and Officer Response / Action for Revised SPD**

Response No.	Name/Organisation	BDC/RBC	Response	Summarised response	Officer response
01	Peter Aston Designing Out Crime Officer West Mercia Police	RBC	<p>I am concerned that encouraging a 'Variety' of routes will introduce excessive permeability to a site and encourage crime. Please note the advice given in the Secured By Design' Homes 2016 (paragraph 8.3) A review of available research in this area concluded that: "Neighbourhood permeability... is one of the community level design features most reliably linked to crime rates, and the connections operate consistently in the same direction across studies: more permeability, more crime. Several studies across several decades link neighbourhood property crime rates with permeability versus inaccessibility of neighbourhood layout. Neighbourhoods with smaller streets or more one-way streets, or fewer entrance streets or with more turnings have lower property crime rates..." Source: Taylor R B 2002 "Crime Prevention Through Environmental Design (CPTED):Yes, No, Maybe, Unknowable, and all of the above" in Bechtel RB (ed) "Handbook of Environmental Psychology", John Wiley, New York, Pages 413 – 426. Cited by Professor Ted Kitchen Sheffield Hallam University 2007.</p> <p>This paragraph implies that parking courtyards will be acceptable. Please note the advice given in Secured By Design Homes 2016 (Paragraph 16.3).Rear car parking courtyards are discouraged for the following reasons:</p> <ul style="list-style-type: none"> <li>• They introduce access to the vulnerable rear elevations of dwellings where the majority of burglary is perpetrated</li> <li>• In private developments such areas are often left unlit and therefore increase the fear of crime</li> <li>• Un-gated courtyards provide areas of concealment which can encourage anti-social behaviour</li> </ul> <p>I would like this paragraph to reflect the above and ideally quote it and then go onto give the advice about design.</p>	<p>Encouraging a variety of routes will increase permeability and encourage crime.</p> <p>Car parking courtyards at the rear of properties should be discouraged on the basis of crime/safety issues.</p>	<p>Noted – however the intention of the suggested change potentially compromises the intention of encouraging walking and cycling within and around new developments through good design. Whilst it is important that issues of safety and security are covered in the SPDs, including cross-references to guidance provided by Secured by Design, this must not be at the expense of encouraging other elements of good design.</p> <p>Noted – amendment made to beginning of former paragraph 4.2.36 to reflect these comments and those of Community Safety Officer (see respondent no.06 in this table). However it is considered the essence of this point being made is already covered by paragraphs 4.2.36 and 4.2.37 within the SPD.</p>
02	Network Rail Diane Clarke	RBC	<p>(1) It has come to our attention that where applications have an impact on the railway network, in particular on level crossings, the application is delayed or is objectionable because negotiations with developers are not agreed before a Planning Application is submitted.</p> <p>I am sure you are aware that Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of the Development Management Procedure Order) and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the Development Management Procedure Order); in addition you are required to consult the Office of Rail and Road (ORR).</p> <p>Where there is an adverse impact on the operation of the railway, Network Rail will require appropriate mitigation measures to be delivered as part of the planning application process. By this stage in the process our request for further information such as a Transport Assessment (to provide detail of the suspected impact) and where necessary, the provision of planning obligations can cause significant delay. This can be highly frustrating for any developer who has undertaken pre-application advice, and invested time and money, in working through mitigation measures including Heads of Terms for Section 106 agreements.</p> <p>To help alleviate this problem it is requested that you add a standard paragraph to</p>		<p>Thank you for your comments. These appear to be related to the planning application (and pre-application) process for development proposals, in the context of potential impacts on the rail network, rather than specific comments on the Design SPD. Your comments have been passed on to the Development Management team at Bromsgrove and Redditch Councils.</p>

			<p>any pre- application response you provide. I have put together a paragraph which if included as general advice, may help avoid any disruption further along the process.</p> <p><i>Should your development be likely to increase the level of pedestrian and / or vehicular usage at a level crossing any future planning application should be supported by a full Transport Assessment assessing such impact. Any required qualitative improvements to the level crossing as a direct result of the development proposed should be included within the Heads of Terms.</i></p> <p>(2) Within Transport Assessment’s there is a review of local needs regarding public transport; this usually focuses on buses. However, Transport Assessments should also take into account their impact upon footfall at railway stations. Developers are encouraged to consider including within Transport Assessments trip generation data at railway stations. Location of the proposal, accessibility and density of the development should be considered in relation to the relevant railway station in the area.</p> <p>Where proposals are likely to increase footfall at railway stations the Local Planning Authority should consider a developer contribution (either via CIL, S106 or unilateral undertaking) to provide funding for enhancements as stations as a result of increased numbers of customers.</p> <p>Should you wish to discuss the impact of your proposal on the railway network you are advised to contact Network Rail via <a href="mailto:TownPlanningLNW@networkrail.co.uk">TownPlanningLNW@networkrail.co.uk</a></p>		
03	Natural England	RBC	<p><b>While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major effects on the natural environment, but may nonetheless have some effects. We therefore do not wish to provide specific comments, but advise you to consider the following issues:</b></p> <p><b>Green Infrastructure</b> This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area. The National Planning Policy Framework states that local planning authorities should plan ‘positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure’. The Planning Practice Guidance on Green Infrastructure provides more detail on this.</p> <p>Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities.</p> <p>There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through:</p> <ul style="list-style-type: none"> <li>☐ green roof systems and roof gardens;</li> <li>☐ green walls to provide insulation or shading and cooling;</li> <li>☐ new tree planting or altering the management of land (e.g. management of verges</li> </ul>	<p>Natural England don’t wish to provide specific comments, but advise that the following issues are considered:</p> <ul style="list-style-type: none"> <li>• Green infrastructure</li> <li>• Biodiversity enhancement</li> <li>• Landscape enhancement</li> <li>• Other design considerations (in NPPF)</li> <li>• Strategic Environmental Assessment/Habitats Regulations Assessment</li> </ul>	<p>The proposed SPD, as referenced at para.1.1.3 supports policy requirements in the adopted Borough of Redditch Local Plan (no.4), including Policy 39 Built Environment, which requires development proposals to:</p> <p><i>“iii. incorporate features of the natural environment including Green Infrastructure into the design to preserve and continue Redditch’s unique landscape features”</i></p> <p>Further specific amendments have been made to the SPD in relation to these issues at:</p> <ul style="list-style-type: none"> <li>- Para.3.1.3 – new reference to biodiversity considerations</li> <li>- Para.4.2.34 – reference to open space layouts in the context of green infrastructure networks</li> <li>- Para.4.2.56 – reference to potential effects of lighting on wildlife</li> <li>- Para.4.2.58 – reference inserted to biodiversity enhancement</li> <li>- Para.4.2.63 – reference to the Worcestershire County Green Infrastructure Strategy in relation to wildlife habitats</li> <li>- Para.6.4.7 – new reference to wildlife as well as landscape in terms of the potential impacts</li> </ul>

			<p>to enhance biodiversity).</p> <p>You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans. Further information on GI is include within The Town and Country Planning Association’s "Design Guide for Sustainable Communities" and their more recent "Good Practice Guidance for Green Infrastructure and Biodiversity".</p> <p><b>Biodiversity enhancement</b> This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.</p> <p><b>Landscape enhancement</b> The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might makes a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts. For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.</p> <p><b>Other design considerations</b> The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 125).</p> <p><b>Strategic Environmental Assessment/Habitats Regulations Assessment</b> A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance. Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p>		<p>of lighting</p> <p>Additional text added to paras. 3.1.3, 3.1.12, 4.2.53 to include references to biodiversity considerations.</p> <p>Text concerning historic characterisation (and the Historic Environment Record) has been added at 4.2.12 under the ‘Local character and distinctiveness’ sub-section.</p> <p>New text added to para.4.2.53 as follows: <u>“The effects of new lighting on wildlife should also be a key consideration in lighting strategies associated with development.”</u></p> <p>Comment noted.</p>
04	Highways England	RBC	<p>Thank you for consulting Highways England on the <b>Draft Redditch High Quality Design SPD Consultation</b>.</p> <p>As the proposals will not have any impact on the Strategic Road Network (Motorways and Trunk Roads), we do not have any comment to make on the documents.</p>	No comments	N/A
05	Wychavon District Council	BDC & RBC	<p><b>Paragraph no. 2.4 pg 8</b></p> <p>In subsequent points, make reference to –</p> <ul style="list-style-type: none"> <li>Each qualifying application should require a D &amp; A statement outlining the intention and reasoning for design</li> </ul>		Noted – no change



		<ul style="list-style-type: none"> <li>• All new developments encouraged to comply with 'Buildings for Life 12' creating a more sustainable and improved quality built environment (could also make reference to 'MADE' – Midlands Architecture and Design Environment)</li> <li>• Though not a necessity, it is worth while seeking pre-application advice from local authority</li> <li>• Listed building consent needed for works to listed buildings (and/or buildings in the immediate vicinity)</li> </ul> <p><u>Reason</u> - Provides more information on aspects of the planning process and requirements.</p> <p><b><u>Paragraph no. 3.1.2 pg 9</u></b></p> <p>Sustainability/environmental effect –</p> <ul style="list-style-type: none"> <li>• Consider the sustainability of alteration/extension <ul style="list-style-type: none"> <li>○ Is it built in a sustainable manner with consideration for the environmental impact?</li> </ul> </li> </ul> <p><u>Reason</u> - To provide information on environmental impacts within construction.</p> <p><b><u>Paragraph no. 3.1.3 pg 9</u></b></p> <p>Include 'conservation area' to list.</p> <p><u>Reason</u> - Has significant effect on planning issues.</p> <p><b><u>Paragraph no. 3.1.7 pg 10</u></b></p> <p>Neighbour impact –</p> <ul style="list-style-type: none"> <li>• Would benefit from more/clearer illustrations and images</li> </ul> <p><u>Reason</u> - Allows user to visualize design implications – existing image convoluted.</p> <p><b><u>Paragraph no. 3.1.11 pg 12</u></b></p> <p>Change point iii). –</p> <ul style="list-style-type: none"> <li>• Respect local styles and features to maintain built vernacular</li> </ul> <p><u>Reason</u> - Saves repetition of word 'local'.</p> <p><b><u>Paragraph no. 3.11 pg 15</u></b></p> <p>Add section on contemporary/modern design –</p> <ul style="list-style-type: none"> <li>• Subtle design and material use, that whilst making improvements, do not detract from existing character</li> </ul> <p><u>Reason</u> - Provides architectural design merit and innovation, and allows for 'high quality design'.</p>		<p>Noted – no change</p> <p>Noted – para.3.1.3 revised as follows: “Other planning considerations such as Green Belt, protected and priority species, Highways impacts, sustainability of construction, <u>heritage assets</u> <del>Listed Buildings</del> and nearby trees may need to be taken into account”.</p> <p>Noted – no change</p> <p>Noted – no change</p> <p>Noted – however the entire SPD is written in the context of 'allows for high quality design', therefore no further change is considered necessary.</p>
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			<p><b>Paragraph no. 4.2 pg 17</b></p> <p>Include as a consideration or have as a 'Please Note' –</p> <ul style="list-style-type: none"> <li>All construction needs to comply with current Building Regulations and to be built in accordance with British Standards</li> </ul> <p><u>Reason</u> - Demonstrates legalities for user. (Continued overleaf)</p> <p><b>Paragraph no. 4.2.10 pg 18</b></p> <p>Condense and/or bullet point middle sentence – “the use of particular materials...local character of an area”</p> <p><u>Reason</u> - Sentence too long.</p> <p><b>Paragraph no. 4.2... pg 17+</b></p> <p>To include in an existing/new section –</p> <ul style="list-style-type: none"> <li>Consideration should be given to car parking/congestion on new developments – ensuring there is enough space for free movement and ample space for parking. To include the movement of larger vehicles – <ul style="list-style-type: none"> <li>Bin lorries</li> <li>Delivery lorries/vans</li> <li>Emergency services</li> </ul> </li> <li>Make reference to the County Councils draft 'Streetscene Guide'</li> </ul> <p><u>Reason</u> - To ensure adequate thought and design is given to traffic management and infrastructure.</p> <p><b>Paragraph no. 4.2.66 pg 25</b></p> <p>Make reference to West Midlands crime officer and crime prevention design advisory.</p> <p><u>Reason</u> - To ensure developments are designed in accordance with crime prevention.</p> <p><b>Paragraph no. 5... pg 27+</b></p> <p>Include a reference to Historic England guidance on barn conversions 'Adapting traditional Farm Buildings' October 2017.</p> <p><u>Reason</u> - To ensure correct guidelines are followed.</p> <p>I trust this can help with the production of the SPD and am happy to clarify any points if necessary. If you have any further queries, please do not hesitate to contact me using the details below.</p>		<p>Noted – no change.</p> <p>Noted – no change.</p> <p>Noted – car parking as a design consideration is included in the SPD at paras.4.2.34 – 4.2.39. More detailed consideration of traffic management and highways infrastructure would be outside the remit of this SPD, with the issues referred to in this comment now covered in Worcestershire County Council's Streetscape Design Guide (June 2018).</p> <p>Noted – information regarding 'Secured by Design' guidance is now in an information box based on consultation comments received by the BDC/RBC Community Safety Officer.</p> <p>Noted – new information box included in Section 5 relating to guidance available from Historic England and Worcestershire County Council for conversion of rural buildings and issues relating to historic farmsteads.</p>
06	James Cooper BDC/RBC Community Safety	BDC & RBC	<p>Thank you for your invitation to provide feedback on these documents.</p> <p>I note that the content relating to community safety and crime prevention through environmental design is the same in both documents, so the following comments apply equally to each.</p>	<p>The documents require some amendments to reflect some of the key issues relating to community safety and crime prevention.</p> <p>More clarity is needed around issue of permeability, natural</p>	<p>Suggested text amendments made by respondent via a 'track change' version of SPD; for specific comments and officer responses, please see track change version (BDC_RBC Design SPD Rep_06) by contacting the BDC/RBC Strategic Planning team on <a href="mailto:strategicplanning@bromsgroveandredditch.gov.uk">strategicplanning@bromsgroveandredditch.gov.uk</a></p>

			<p>I welcomed the opportunity to engage with the Officers leading the development of these documents around the issues of community safety and crime prevention, prior to the formal public consultation that is now underway. I would like to acknowledge the efforts of these Officers to understand and represent my earlier feedback within the draft for public consultation.</p> <p>At this stage, I believe that the documents require further amendments to adequately and accurately reflect some of the key issues relating to community safety and crime prevention through environmental design.</p> <p>Some of the required amendment relates to the clarity of the proposed guidance around the issues of permeability, natural surveillance and boundary treatments. In these cases it is clear that crime prevention issues have been considered but the expression of the guidance can be somewhat ambiguous and/or repetitious.</p> <p>At other points, the documents miss opportunities to give clear guidance to help reduce the risk of crime and ASB relating to:</p> <ul style="list-style-type: none"> <li>• Security of sites prior to and during development</li> <li>• CCTV</li> <li>• Lighting</li> <li>• Defensible space</li> <li>• The Councils' stance on the Secured by Design scheme</li> <li>• Physical security standards for: <ul style="list-style-type: none"> <li>○ Non-residential developments</li> <li>○ Commercial developments</li> <li>○ Retail units</li> <li>○ Bespoke developments such as those in Conservation Areas, near to Listed Buildings or non-designated heritage assets, rural buildings converted to residential use</li> </ul> </li> <li>• Management &amp; maintenance of developments after completion</li> </ul> <p>These issues are core community safety concerns, reflected in National Planning Guidance and the Redditch "Designing for Community Safety" SPD which the proposed Redditch SPD is set to replace. I believe it is reasonable that further attention is paid to their representation in the documents.</p> <p>Thank you for your consideration of my comments.</p>	<p>surveillance and boundary treatments. References to guidance need to be clear.</p> <p>There are missed opportunities to provide guidance on reducing the risk of crime and ASB relating to:</p> <ul style="list-style-type: none"> <li>• Security of sites prior to and during development</li> <li>• CCTV</li> <li>• Lighting</li> <li>• Defensible space</li> <li>• The Councils' stance on the Secured by Design scheme</li> <li>• Physical security standards for: <ul style="list-style-type: none"> <li>○ Non-residential developments</li> <li>○ Commercial developments</li> <li>○ Retail units</li> <li>○ Bespoke developments such as those in Conservation Areas, near to Listed Buildings or non-designated heritage assets, rural buildings converted to residential use</li> </ul> </li> <li>• Management &amp; maintenance of developments after completion</li> </ul>	
07	Alvechurch Parish Council	RBC	<p>Para 1.4.5 page 5 It is felt that a mention should also be made here in this paragraph, and (2.3.2, PAGE 6) that applications will also be judged on relevant policies within any neighbourhood Plans that have been adopted in the District.</p> <p>Para 2.3.2 page 8 The SPD is a good document, and we feel slight improvements could be made by the opportunity of including the mention of Neighbourhood Planning and the design policies and statements that NPs may contain and that are particularly relevant in the smaller settlements within the District and that they too must also be considered for design guidance at the very local level.</p> <p>Para 3.9.1 page 15, para 4.3.3 page 26 and para 6.1.7 page 31 NPs, such as the Alvechurch parish Neighbourhood plan, when adopted have such heritage lists and policies that are relevant to them, so this could be mentioned at these noted paragraphs. These paragraphs would be appropriate ones to mention that for NPs that may be</p>	<p>Document should make clear that applications will be determined in accordance with any adopted Neighbourhood Plan policies.</p>	<p>Noted - text added to paras.1.4.5 and 2.3.2 to refer to any relevant neighbourhood plan policies also being a consideration when assessing development proposals.</p> <p>Noted - however it is not considered necessary to make wholesale references to neighbourhood plans, which ultimately may or may not include detailed policies on design, in this SPD. The intention of this SPD is primarily to offer further guidance on the policies set out in the Borough of Redditch Local Plan No.4. Certain additional references to neighbourhood plans have been added though as per suggestions at 1.4.5 and 4.2.10.</p>

		<p>adopted in due course.</p> <p>Para 4.2.10 page 18 Mention could be made here of Parish Design Statements which bring a very local picture and identify very local characteristics of settlements within the District.</p> <p>Para 4.2.11 page 18 Again in this paragraph, policies within NPs are also valuable to highlight some of the locally valued views and landmarks within the District, and could be mentioned.</p> <p>Section 5 pages 27-30 This part of the SPD could be strengthened by use of and reference to the Worcestershire Farmsteads Guidance and WORCESTERSHIRE FARMSTEAD ASSESSMENT FRAMEWORK. This framework aims to inform and achieve the sustainable development of historic farmsteads, including their conservation and enhancement. It is of interest to those with an interest in the history and character of the county's landscape, settlements and historic buildings. The APNP also refers to this document and we think this would add further guidance and strength for your document.</p> <p>Overall we find this is a comprehensive new reference that will be useful to bring 4 supplementary documents into one more useful one.</p>		<p>Noted – the following text has been added to 4.2.10: <u>“Parish Design Statements, made Neighbourhood Plans, or other locally produced guidance may provide a useful indication of local character for prospective applicants to consider. In addition, historic characterisation evidence and the Worcestershire Historic Environment Record (HER) provide a valuable resource for the identification of local heritage assets, which help define the many and varied elements of local distinctiveness across the Borough.”</u></p> <p>Noted – new information box included in Section 5 relating to guidance available from Historic England and Worcestershire County Council for conversion of rural buildings and issues relating to historic farmsteads.</p>
08	Worcestershire Wildlife Trust	<p>Whole Document – general comment We are generally pleased to support the tenor of this important document and the guidance provided in its various sections. We have made some recommendations for additional wording on the environment that we believe would be helpful and would provide useful guidance for applicants in relation to Policy 39 Built Environment (39.3 sub-section iii), which requires development to ‘incorporate features of the natural environment including Green Infrastructure into the design to preserve and continue Redditch’s unique landscape features.’</p> <p>Para. 3.1.3. Page 9 We would recommend adding ‘protected and priority species’ to the list of example issues that may need to be taken into account. Such species, including bats and birds, are often found in dwellings and therefore extensions that might have an impact on roof spaces or eaves are capable of having significant effects that need to be considered. We note that this is picked up in Para. 3.1.12. but given the relatively high risk it would be helpful to highlight the issue here. Giving such matter a relatively high profile in the SPD would help demonstrate the council’s commitment to discharging its biodiversity duty under Section 40 of the Natural Environment Act 2006 and compliance with paras. 98 and 99 of ODPM Circular 06/2005.</p> <p>Para. 3.1.12. 12 We are pleased to support the wording in this paragraph but it may also be helpful to list examples of mitigation and enhancement steps that should be taken, e.g. retention of entrance points to bat roosts or the provision of swift bricks or house martin boxes.</p> <p>Para. 4.2.3 17 We would recommend adding wording to the effect that <i>‘layouts should respond to existing local green infrastructure, seeking to maintain and enhance ecological connectivity both within site and in the wider context. Public open space should be</i></p>		<p>Noted.</p> <p>Noted – text revised to add <u>“protected and priority species”</u></p> <p>Noted – text added to end of 3.1.12 as follows: <u>“...or mitigation measures are undertaken, such as retention of entrance points to bat roosts or the provision of swift bricks or house martin boxes”</u>.</p> <p>Noted, however it is considered the suggested wording would not sit appropriately in para.4.2.3. New para. inserted at 4.2.34 that incorporates suggested</p>

		<p><i>permeable to wildlife and well connected to surrounding ecological networks where appropriate</i>. This would be in line with guidance in the NPPF (see for example para. 109) and would support the aspirations in Policy 39, part 39.3, sub-section iii. Whilst this could be captured under para. 4.2.31 we consider that it is more helpfully placed here given the overarching importance of ecological connectivity.</p> <p>Para. 4.2.40 Page 21. We welcome the weight given to retaining such features and there will be situations where their use as boundaries will be helpful. However we would counsel caution with using such features as the curtilage of a dwelling or dwellings because of the risk that householders will remove or reduce important features in future. This is a particular issue with mature hedges and large trees and we would recommend that these be maintained in public spaces (with secured management) where possible.</p> <p>Para. 4.2.52. 23 Lighting may also have significant adverse effects on wildlife and so care will be needed to avoid harm, especially to bats and other nocturnal species. It would therefore be worth adding <i>'and wildlife'</i> after <i>'residential developments'</i> in the first sentence. Expanding on this in a new paragraph would also be helpful. We would recommend wording along the lines of <i>'The effects of new lighting on wildlife should be a key consideration in lighting strategies associated with development. Light-spill must be kept to a minimum and important corridors for bats and other wildlife (for example hedgerows, wetlands and woodland fringes) should not be illuminated unless lighting can be controlled so as to avoid harmful effects. Lighting decisions should be based on appropriate levels of biodiversity information in line with guidance and the law. A range of options for controlling light spill exist (for example timers and cowl) and these should be used as required.'</i></p> <p>Para. 4.2.56. Page 24. We would also suggest that reference be made to the ecological value of trees and hedges here. This may not be picked up by a standard arboricultural report but may be a significant consideration in the retention (or otherwise) of a tree or hedge.</p> <p>Para. 4.2.57. Page. 24. We are pleased to support this paragraph and the weight it attaches to the need for landscaping to support biodiversity (we recommend that you add the word <i>'enhancement'</i> after the word <i>'biodiversity'</i>) and the need for management to be secured.</p> <p>Para. 4.2.62. 24 We are pleased to support the commentary provided in this paragraph. We would however recommend that you add priorities set out in the Worcestershire Green Infrastructure Strategy by the Green Infrastructure Partnership alongside those of the BAP Partnership.</p> <p>Para. 5.17. 28 We welcome the tenor of this paragraph but we would recommend some changes to the wording as set out here. <i>'Old farm buildings are often used as roosts for owls or bats and provide valuable habitats for other birds and animals. A Preliminary Ecological Assessment (PEA) is likely to be required to identify the likely ecological potential of the site. PEAs are simple surveys that help to inform planning applications. Further specialist survey may then be needed for specific species identified. Survey work will need to be undertaken by an appropriately qualified ecologist at an appropriate time of year. Where the nature conservation interest is considerable, mitigation measures will be required or permission could be refused. In all cases there will be potential for biodiversity enhancement and the council will</i></p>	<p>wording.</p> <p>Noted.</p> <p>Noted – suggested addition of “and wildlife” now added to this sentence at previous para.4.2.52.</p> <p>Noted - however it is not considered necessary for this SPD to have a separate para. for this issue. New text added to previous para.4.2.55 as follows: <u>“The effects of new lighting on wildlife should also be a key consideration in lighting strategies associated with development.”</u></p> <p>Noted – however it is considered that the extent of ecological importance of a particular feature (i.e. whether it is worthy of retention or not) is considered to be outside the remit of this SPD.</p> <p>Noted – previous para.4.2.57 revised to refer to biodiversity <u>enhancement</u>, rather than just biodiversity.</p> <p>Noted – text added to previous para.4.2.62 as follows: <u>“...identified as priorities by the Worcestershire Biodiversity Partnership and in the Worcestershire Green Infrastructure Strategy”</u>...</p> <p>Noted – para.5.17 revised to read as follows: “Old farm buildings are often used as roosts for owls or bats and provide valuable habitats for other birds and animals. A <u>Preliminary Ecological Assessment (PEA)</u> is likely to be required to identify the likely ecological potential of the site. <u>PEAs are simple surveys that help to inform planning applications. Further specialist survey work may then be needed for specific species identified. Survey work will need to be undertaken by an appropriately qualified ecologist at an appropriate time of year.</u> Where the nature conservation interest</p>
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		<p><i>expect applicant to provide some enhancements in line with guidance in the NPPF (see for example paras 9, 109 and 118)'. </i></p> <p>Para. 6.2.2. Page 32. We would recommend adding '<i>Biodiversity enhancement opportunities</i>' to the list of considerations here. Large commercial buildings offer significant potential for species like birds (in particular swifts) and bats and it would be helpful to reflect this in the SPD. This would be in line with policy 39 and guidance given in the NPPF (see for example paras 9 and 109).</p> <p>Para 6.2.9 Page 32. We support the wording in this paragraph and welcome the guidance it gives.</p> <p>6.2.11 33 We would recommend the addition of new wording in the 2<sup>nd</sup> sentence of this paragraph so that it reads '<i>...impact on neighbours, the natural environment and the general appearance of the area...</i>' so as to better reflect the impact of noise on wildlife.</p> <p>Para. 6.2.16. Page 33 We would recommend the addition of some wording to this paragraph so that it reads '<i>...should relate to the wider physical, ecological and social context...</i>' so as to better reflect the need to integrate development with existing Green Infrastructure and ecological corridors. This would be in line with guidance in the NPPF (see para 109 for example).</p> <p>Para. 6.3.3. Page 34 We would recommend adding '<i>Biodiversity enhancement opportunities</i>' to the list of considerations here. Agricultural buildings can offer significant potential for species like birds (in particular swallows and barn owls) and bats and it would be helpful to reflect this in the SPD. This would be in line with Policy 39 and guidance given in the NPPF (see for example paras 9 and 109).</p> <p>6.4.2 38 We would recommend amending the wording of the last sentence to read '<i>Fitting in with the character of the landscape and respecting existing ecological value should be key considerations of the design.</i>' This would better reflect the importance of small grassland parcels in Worcestershire. The county has 20% of the UK's remaining species rich neutral meadows (a habitat that has declined by 97% since the end of World War 2) and so appropriate steps must be taken to safeguard those that may be subject to development. Equine development may have a significant adverse impact on species-rich grasslands and so basing design on appropriate levels of survey and site understanding is essential.</p> <p>Para 6.4.7. Page 38 We would recommend amending the second sentence of this paragraph to read '<i>External lighting can make a site appear prominent in the landscape and affect wildlife and the valued sense of rurality.</i>' This would better reflect the impact of light pollution on important species such as bats.</p>		<p>is considerable, mitigation measures will be required or permission could be refused. <u>In all cases there will be potential for biodiversity enhancement and the council will expect applicants to heed the guidance contained in the NPPF.</u>"</p> <p>Add bullet point for 'biodiversity enhancement' in para.6.2.2.</p> <p>Noted.</p> <p>Noted – para.6.2.11 revised as follows: "<i>...impact on neighbours, <u>the natural environment</u> and the general appearance of the area.</i>"</p> <p>Noted – para.6.2.16 revised as follows: "<i>...should relate to the wider physical, <u>ecological</u>, and social context of the surrounding environment...</i>"</p> <p>See 6.2.2 above – biodiversity enhancement also added to list at para.6.3.3.</p> <p>Noted – suggested text added to para.6.4.2.</p> <p>Noted – para.6.4.7 revised as follows: "<i>...can make a site appear prominent in the landscape and affect <u>wildlife</u> and the valued sense of rurality.</i>"</p>
09	Anna Wardell-Hill Environmental	RBC	In response to the SPG draft there are a number of points to be made in relation to waste collection which are not conveyed in this document:	

<p>Policy &amp; Awareness Officer</p>	<ol style="list-style-type: none"> <li>Where individual bins are used there is no reference to how much capacity is required. The statutory service is 1 x 240L for refuse and 1 x 240L for recycling. There is also an option 240L bin for garden waste. For communal bins this is provided in 4.2.9a.</li> <li>Where properties have individual bins, residents must present these at the kerbside on their collection day. Where there are apartments collection crews collect and return these to the bin storage point on their collection day. This has an impact on how long the bins are left out at the collection point and this does cause some issues for us. Often in key hold developments we come across incidents where a number of householders are placing bins in the only sensible location available to them on the public road - directly outside a neighbour's property. This often presents to us as complaints as there has been no forethought to provide a suitable location for bins to be located all day. They block the pavement, cause visual disturbance for the resident, vehicles and pedestrians and can result in littering as they are knocked over and moved during the course of the day.</li> <li>4.2.9 for communal bin areas, if storage space is restricted on the site then developers should consider underground storage facilities.</li> <li>There is no mention of the service being primarily a public road end collection service. Adding this would give clarity to where bins are to be placed for collections. Residents are required to place their refuse on the curtilage of their property next to the nearest public highway. We do not normally provide collections from inside gated developments, private drives and unadopted roads therefore in such instances developers will need to identify suitable collection points adjacent to a highway for properties associated with these features.</li> <li>The dimensions of the bins will be required to correctly allow for adequate storage: <table border="1" data-bbox="750 1430 1418 1864"> <thead> <tr> <th>Bin sizes available</th> <th>Dimension</th> <th>Redditch</th> </tr> </thead> <tbody> <tr> <td>240 litre wheelie bin</td> <td>H mm</td> <td>1100</td> </tr> <tr> <td></td> <td>D mm</td> <td>740</td> </tr> <tr> <td></td> <td>W mm</td> <td>580</td> </tr> <tr> <td></td> <td>Footprint m<sup>2</sup></td> <td>0.43</td> </tr> <tr> <td>1100 litre steel bins</td> <td>H mm</td> <td>1380</td> </tr> <tr> <td></td> <td>D mm</td> <td>1000</td> </tr> </tbody> </table> </li> </ol>	Bin sizes available	Dimension	Redditch	240 litre wheelie bin	H mm	1100		D mm	740		W mm	580		Footprint m <sup>2</sup>	0.43	1100 litre steel bins	H mm	1380		D mm	1000		<p>Noted – a reference to the size/volume of bins is considered important in the context of communal bin storage due to the space requirements that should be considered in designing the location of such storage into a scheme. It is not however considered necessary to refer to the traditional size/volume of bins for individual properties, which will be served by the statutory collection service.</p> <p>Noted – new paragraph added between previous 4.2.6 and 4.2.7 as follows:  <u>“Individual properties are required to place their bins ‘at the kerbside’ on refuse collection day to enable refuse lorries ease of access from the public highway. New developments should ensure there is adequate access for refuse collection vehicles, including turning space in cul-de-sac or key hole developments, or if not possible should provide a designated collection point.”</u></p> <p>Noted – text added to end of 4.2.9 (g) as follows:  <u>“...amenity of occupiers, such as through consideration of underground storage.</u></p> <p>Noted – new text added in relation to point 2 above which addresses this comment.</p> <p>Noted – however considered to be too detailed to include in a more general Design SPD. Consultation on planning applications will allow for the detail of refuse provision and storage, including size and volumes of bins, to be required of development.</p>
Bin sizes available	Dimension	Redditch																						
240 litre wheelie bin	H mm	1100																						
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			<table border="1"> <tr> <td></td> <td>W mm</td> <td>1270</td> </tr> <tr> <td></td> <td>Footprint m<sup>2</sup></td> <td>1.23</td> </tr> </table> <p>We would ask for these points to be considered and amended to clearly reflect the statutory waste collection service and to assist developers in allowing adequate provision for storage and design features within their development. If any further information is required please don't hesitate to contact me on this matter.</p>		W mm	1270		Footprint m <sup>2</sup>	1.23		
	W mm	1270									
	Footprint m <sup>2</sup>	1.23									
10	Worcestershire Regulatory Services (WRS) Land and Air Quality Team	RBC	<p><i>Electric car charging points</i> 4.2.25 Developments should consider the inclusion of electric car charging points and are encouraged to be incorporated as part of the scheme.</p> <p>WRS recommends that cabling infrastructure complying to the appropriate British Standard to suitable charging point locations for electric vehicles for developments of greater than 10 dwellings and commercial/industrial developments with 10 or more parking spaces (minimum 10% of allocated parking spaces) should be compulsory rather than encouraged.</p> <p><i>Low Emission Boilers</i> Boiler NOx emissions from building heating systems contribute to background NOx concentrations, WRS recommend that a section on the installation of Ultra-Low NOx boilers with maximum NOx Emissions less than 40 mg/kWh is included in the SPD.</p> <p>Below is the condition WRS recommends for developments of greater than 10 dwellings but it is also applicable to a single dwelling development:</p> <p><b>Low Emission Boilers</b> <i>Boiler NOx emissions from building heating systems contribute to background NOx concentrations and the following condition is recommended; (note this is also an option in BREEM assessments and the cost of a low NOx boiler is the same as a standard boiler).</i></p> <p><b>Low Emission Boilers Condition</b> <i>Details shall be submitted to and approved by the local planning authority prior to the first occupation of the development for the installation of Ultra-Low NOx boilers with maximum NOx Emissions less than 40 mg/kWh. The details as approved shall be implemented prior to the first occupation of the development and shall thereafter be permanently retained.</i></p> <p><i>Reason:</i> <i>In the interests of the living conditions of occupiers of nearby properties and future occupiers of the site.</i></p>		<p>Noted – however the Design SPD cannot make this requirement compulsory when there is no statutory policy hook in the current adopted development plan. Supplementary planning documents can only provide guidance for existing higher level policy requirements.</p> <p>Noted – however the Design SPD cannot make this requirement compulsory when there is no statutory policy hook in the current adopted development plan. Supplementary planning documents can only provide guidance for existing higher level policy requirements.</p>						
11	Worcestershire County Council	RBC	<p><b>Archive and Archaeology</b> We recommend reference is made to Green Infrastructure as a mechanism to mitigate the environmental impact of new development and to enhance place and connectivity. We recommend reference to Worcestershire's strategic GI goals and signposting to the Worcestershire Green Infrastructure Strategy 2013 – 2018. We recommend reference and signposting to the Worcestershire Landscape Character Assessment and Worcestershire Historic Landscape Characterisation Assessment as planning tools to inform new development so that it responds to local character and distinctiveness. We recommend reference and signposting to the Worcestershire Farmstead Assessment Framework to ensure that the historic character and setting of</p>		<p>The County Council's Green Infrastructure Strategy is referred to at 4.2.62 (also see comment below in response to Green Infrastructure representation). Text concerning historic characterisation (and the Historic Environment Record) has been added at 4.2.12. The SPD has also been amended to include reference at Section 5 to the Worcestershire Farmstead Assessment Framework and other relevant guidance such as Historic England's 'Adapting Traditional Farm Buildings'.</p>						



		<p>traditional farmsteads is considered at the earliest stages of development design.</p> <p><b>Green Infrastructure</b>  We would like to see further focus on site design and layout of residential, mixed use and commercial developments - in particular the integration of green infrastructure. It is crucial that the role of green infrastructure and its components (biodiversity, the historic environment, blue infrastructure (including sustainable drainage), landscape, access and recreation) within site design is referenced in the SPD. This would be supported by Policy 11 Green Infrastructure and other related policies including Policy 12 Open Space Provision, Policy 16 Natural Environment, 17 Flood Risk Management, Policy 18 Sustainable Water Management, Policy 19 Sustainable Travel and Accessibility, etc.  We note that habitats, trees, hedges and landscaping are mentioned within the document but the real benefit of these and other GI features comes from the multifunctional role that they play within developments. For example, a swale that can be a part of sustainable drainage can also become a wildlife feature when planted with wild flowers, as well as a landscape feature making the development more attractive. This can benefit the applicants by increasing property/land values (due to greener and more attractive development) and by limiting the land they need to dedicate to multiple 'roles' required by the planning system, whilst benefiting the natural and built environment. As such, we would encourage the SPD to require the following:  - protection, buffering and enhancement of important green infrastructure features such as wildlife habitats, including trees, woodlands, hedges, grasslands, existing water features, streams, and ponds; and landscape features including views towards and from the site and designated and undesignated historic environment assets.  - consideration of the functions delivered by the existing features on the site.  - consideration and creation of other features which could be provided to deliver green infrastructure functions.  - creation of green infrastructure networks and corridors and consideration of corridor connectivity on and off site (for example, the creation of tree canopy connectivity to serve as wildlife "hop-overs" or the creation of "fingers" of green space linking the centre of developments with other green areas on and off site).  - consideration of the long-term maintenance and management of the green infrastructure of these corridors and assets.  These priorities should apply to all development, whether large or small. Whilst there are more opportunities to create multifunctional GI at the larger scale, small sites of a single dwelling or handful of dwellings can and should also deliver meaningful green infrastructure. Even a small grass verge or a single tree could be turned into a green infrastructure feature which links with other green areas in the locality and contributes to wider environmental goals.</p> <p><b>Health and well-being</b>  Health is in part determined by genetics, age and lifestyle, but also fundamentally by the environments in which people live and work. There is therefore a need to plan for healthy developments and better living environments which enable people to make healthier lifestyle choices. Redditch faces a number of health challenges such as ageing population, health deprivation and inequality, obesity, asthma, chronic heart disease and diabetes<sup>1</sup>, all of which could be reduced by creating health-promoting developments and environments.  The National Planning Policy Framework (2012) sets out the Government's requirement to promote healthy communities and to draw on evidence of health and wellbeing needs. This is supported by Planning Practice Guidance which also emphasises the importance of health and wellbeing in planning.  We recommend that a section is included within the High Quality Design SPD to improve understanding of relevant policies within the Local Plan from a health and</p>		<p>Some of the more detailed Green Infrastructure considerations raised in this response go beyond the remit of the Design SPD, which aims to provide guidance principally for the implementation of BORLP4 Policies 39 and 40, and not the more detailed natural environment considerations of the BORLP4's approach to green infrastructure (Policy 11) and the natural environment (Policy 16). Where changes have been made these are detailed below and also as changes made in response to other relevant representations, e.g. Natural England, Worcestershire Wildlife Trust.</p> <p>Noted – revise para.4.2.20 as follows: <u>How networks, including Green Infrastructure networks, connect locally and more widely...</u>"</p> <p>Comments noted – agreed that where relevant the Design SPD already covers the priorities for high quality design in terms of its impact on health and well-being, and that other issues raised in the response are outside the remit of the Design SPD. Comment also noted regarding potential SPD for Health.</p>
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		<p>wellbeing point of view. This additional section should include guidance relating to the health-promoting design of buildings, developments and the public realm, and should cover the following (although we appreciate that some of these priorities are, to some extent, already covered within the SPD):</p> <ul style="list-style-type: none"> <li>- The provision, quality and accessibility of green spaces, community facilities and play areas.</li> <li>- The design of buildings and developments to ensure they cater for the needs of all population groups throughout their lives. Lifetime homes standards<sup>2</sup> could be referred to in this section.</li> <li>- Age-friendly developments, including the provision of safe and walkable environments including benches and shading; the provision of opportunities for social cohesion including parks, seating areas and community gardens and orchards; ensuring that bus stops are within walking distance; and the provision of segregated walking and cycling routes within developments.</li> <li>- Site design which promotes physical activity by encouraging walking and cycling.</li> <li>- Supporting healthy foods through provision of allotments, community orchards and street fruit trees.</li> </ul> <p>We also suggest that the planning authority considers developing a Supplementary Planning Document for Health to provide guidance on links between planning and health that are wider than just design, and to help interpret the Redditch Local Plan policies from a public health perspective.</p> <p>Worcestershire County Council's Strategic Planning and Public Health teams worked collaboratively with the South Worcestershire authorities to develop a 'Planning for Health in South Worcestershire' SPD. The SPD has been adopted by all three South Worcestershire authorities and it is currently used to inform planning decisions. We suggest that Redditch Borough Council follows a similar approach to developing the Health SPD. The South Worcestershire Health SPD can be viewed via this link: <a href="http://www.swdevelopmentplan.org/wp-content/uploads/2017/09/Adopted-Planning-for-Health-SPD-Sept-2017.pdf">http://www.swdevelopmentplan.org/wp-content/uploads/2017/09/Adopted-Planning-for-Health-SPD-Sept-2017.pdf</a></p> <p>Additionally, we recommended that a Health Impact Assessment Screening requirement is introduced, either through the existing High Quality Design SPD or in any future Health SPD. We would encourage HIA screening to be undertaken for large housing, mixed-use, commercial, and industrial developments, including shops, takeaways, leisure facilities and other relevant proposals.</p> <p>Health Impact Assessment (HIA) is a structured way of predicting the health implications of a planning proposal on a population. HIA should aim to enhance the positive aspects of a proposal through assessment, while avoiding or minimising any negative impacts, with particular emphasis on disadvantaged sections of communities that might be affected.</p> <p>HIA Screening is a process to determine the scale of health and wellbeing impacts generated by the development proposal. A HIA Screening should be undertaken and submitted by the applicants. If the screening exercise identifies significant health and wellbeing impacts on the local population, it may lead to the applicant being asked to undertake a full HIA.</p> <p>The South Worcestershire HIA Screening template, which could be adapted for Redditch Borough Council's purposes, can be found here: <a href="http://www.swdevelopmentplan.org/wp-content/uploads/2017/10/Health-SPD-HIA-Screening-Template-Oct-2017.pdf">http://www.swdevelopmentplan.org/wp-content/uploads/2017/10/Health-SPD-HIA-Screening-Template-Oct-2017.pdf</a></p> <p><b>Section-by-section comments</b></p> <p>PD Box on page 9</p> <p>It would seem more logical for the order of these two bullet points to be swapped, as the first bullet point talks about specific PD issues before the idea of PD itself has been explained in the second bullet point. Similarly, the first bullet point launches straight into what happens when the 45 degree code is broken, before explaining what the 45 degree code actually is.</p> <p>3.1.7. (iii)</p>		<p>Noted - PD boxes removed from document on presentation grounds.</p>
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		<p>cognitive problems to gather their thoughts and rest. Placing benches under street trees allows people to safely rest during hot summers – this is particularly important for vulnerable population groups, such as the elderly.</p> <p>4.2.46 This section states that "Where housing is proposed with main living rooms above ground floor level it is necessary to have a greater separation distance of 27.5 metres between opposing faces to achieve both privacy and adequate visual separation". Whilst privacy is clearly important here, it is unclear why adequate visual separation is an issue related to main living rooms being above the ground floor.</p> <p>4.2.52 - 4.2.55 This section should also recognise the impact of lighting on biodiversity (especially bats).</p> <p>4.2.66 This section may benefit from including a brief description of what 'Secured by Design' is.</p> <p>4.2.69 Point (ii) states that design features should ensure that "corners are built positively". It is unclear what this means. Point (ii) also states that "corners ... should not provide 'dead' frontages", but this seems duplicated in point (x). Point (viii) refers to "a change in road surface material", but the nature and location of any changes is unclear.</p> <p>5. Conversion of Rural Buildings to Residential Use Should this section actually be called "redundant agricultural buildings"? This seems to be what it's all about, whereas "rural buildings" could include almost anything (houses, pubs, churches, etc.).</p> <p>5.1 This states that "A well-designed conversion should retain the original, utilitarian character of the building". Not all buildings are utilitarian purely because they are in the countryside.</p> <p>5.2 Part (a) states that "The building should have some intrinsic conservation value". Why is this a necessary requirement for conversion? The building may be of no particular merit, but may still be able to offer a decent home once converted, and conversion could be an opportunity for improvement.</p> <p>6.2.8 This states that "A balance of both hard and soft landscaping should be included to ensure that quality visual spaces are enhanced". It is unclear what "quality visual spaces" are.</p> <p>6.3.8 It is unclear what "Over engineered buildings" are.</p> <p>7.1.5 This paragraph would more naturally appear before 7.1.2 (or they could be combined</p>		<p>New text has been added to end of previous para.4.2.55 as follows: <u>"The effects of new lighting on wildlife should also be a key consideration in lighting strategies associated with development."</u></p> <p>Noted – a web link to the Secured by Design guidance is provided at this part of the SPD.</p> <p>Noted – point (ii) has been deleted and replaced with previous point (X) to remove duplication.</p> <p>Noted – point viii has been deleted as not relevant to surveillance.</p> <p>Noted – whilst the guidance in this section may predominantly relate to conversion of former agricultural use buildings in rural areas, the SPD does apply equally to cases of converting other 'rural buildings'.</p> <p>Noted - the rationale for the text at 5.1 is to ensure the original character and appearance of a rural building related to its previous function is retained as far as possible, i.e. not a building that is already used as a domestic dwelling. Whilst a conversion will change the use of the building, it should not wholly change the appearance of the building to that of an originally built domesticated dwelling.</p> <p>Noted – section 5 concerns rural buildings which will all have some intrinsic rural conservation/heritage value in terms of their impact on local character and distinctiveness, even where this is relatively minor.</p> <p>This term refers to spaces that are aesthetically pleasing – amend wording in para.6.2.8 from <u>"...quality visual spaces..."</u> to <u>"...attractive amenity spaces..."</u></p> <p>Noted – add following text to para.6.3.8 <u>"Materials should be appropriate for the purpose and reflect the intrinsic nature of agricultural buildings"</u>.</p> <p>Noted – para.7.1.5 now combined with para.7.1.2 with</p>
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			<p>to a single paragraph, with 7.1.5 coming first).</p> <p>8.2 This paragraph doesn't seem to add anything or say much.</p> <p><b>Minor points</b> Note spelling of "principal" (3.1.11(ii), 3.3.1, 3.6.3) We assume the figures and information boxes will have full titles in the final document, rather than the current "Figure 5", "Figure 6", "Please note", etc.</p>		<p>the wording of 7.1.5 beginning the sentence.</p> <p>Noted – no change.</p> <p>Noted – spelling error corrected at 3.1.11(ii), 3.3.1 and 3.6.3.</p>
12	The Victorian Society		<p>Thank you for consulting us on this draft policy. Whilst we have no specific comments to make at this stage, we welcome the document and particularly the positive statements regarding preservation of the historic environment notably listed buildings and conservation areas. Reference to other heritage assets such as locally listed buildings is also important.</p>		<p>Comments noted.</p>
13	Historic England	RBC	<p>Many thanks for consulting Historic England on the above consultation, we have the following comments:</p> <p>We welcome the inclusion of the relevant Local Plan policies within the SPD to set a relevant framework for the SPD and the varied references to the historic environment.</p> <p>We welcome the inclusion of references to the National Planning Policy Framework (NPPF) and its requirements for good design.</p> <p>We welcome the reference to local distinctiveness and character within paragraph 3.1.11 Does the Council have up to date Conservation Management Plans and Appraisals, historic characterisation assessment, made Neighbourhood Development Plans that could be referenced to offer detail about what is locally distinctive in different areas of the Borough? Without specific information how will the Council be able to assess whether applications meet this criteria?</p> <p>We welcome the inclusion of section 3.7 and the requirements for design considerations for new development in conservation areas. We further support the reference to the need for a Heritage Statement to accompany planning applications. Where significance is referenced, we recommend that it states, 'including setting' as this will often be a key consideration. We consider that it would be useful to provide additional detail about what should be contained in a Heritage Statement as well as a link to other documents that can offer further assistance in understanding significance and setting such as Historic England's Good Practice Advice Notes 2 and 3 and Conservation Principles.</p> <p>We further welcome references with section 3.8 and 3.9. Where a Heritage Statement is required we would recommend that this states how the significance of a heritage asset will be affected by the proposed development, rather than simply a notation of the significance of heritage assets. This should also relate to the setting of heritage assets, where setting is relevant to the significance of that asset.</p> <p>Is the Council preparing a local list of heritage assets? This would be useful in order for applicants to comply with paragraph 3.9.1. I attach a link below to advice from Historic England on how to prepare a Local List. <a href="https://historicengland.org.uk/listing/what-is-designation/local/local-designations/">https://historicengland.org.uk/listing/what-is-designation/local/local-designations/</a></p> <p>Section 3.10 deals with conversions to rural farm buildings, we would recommend that a section is included to deal with applications for conversions of historic farmsteads and attach some advice below from Historic England's website. <a href="https://historicengland.org.uk/advice/caring-for-heritage/rural-heritage/farm-buildings/">https://historicengland.org.uk/advice/caring-for-heritage/rural-heritage/farm-buildings/</a></p> <p>Section 4.2 deals with design for new dwellings, whether these comprise of one dwelling or a large scale development. How is the Council ensuring that these new developments are respecting local character and local distinctiveness across Bromsgrove, rather than standardised new build developments? Paragraph 4.2.10 should also refer to the historic environment and reference additional material so</p>		<p>Noted – 3.1.11 has been re-titled 'Local Character'. Further more detailed text on how new development should take account of local character and distinctiveness has been added to Section 4 – see response to later comments re: 4.2.10.</p> <p>Noted – setting of conservation areas now referred to in both paragraphs 3.7.1 and 3.7.2.</p> <p>Noted – setting also referred to in context of Listed Buildings at 3.8.1.</p> <p>Noted – the Council will continue to work with local communities, including applicants, in recording non-designated assets as part of a living record of assets.</p> <p>Noted – see changes made in relation to Section 5 and reference to historic farmstead guidance.</p> <p>Noted – new text added following 4.2.10 referring to locally produced documents such as parish design statements or neighbourhood plans, as well as historic characterisation evidence and the HER, as a means of offering guidance on local character and</p>

		<p>that applicants know what is locally distinctive about different areas, such as historic characterisation evidence.</p> <p>We further recommend that paragraph 4.2.11 refers to the setting of heritage assets and the importance of views and vistas in adding to the significance of heritage assets. Good Practice Advice Note 3 offers further advice on setting and views, of which some additional information may be useful to include here.  <a href="https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/">https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/</a></p> <p>Paragraph 4.2.56 refers to trees and hedges and important examples needing to be retained as part of developments, which we support. However, we recommend that the applicant refers to the Historic Environment Record to ascertain whether there are any important heritage features such as hedges on or near to development sites and how best to protect these assets and retain them within developments.</p> <p>We support the inclusion of section 4.3 but consider that it needs to include more detail than in its current form. Any development that may impact upon heritage assets, of any type, should be accompanied by a Heritage Statement that sets out the significance of affected heritage assets, including their setting and how the proposed development will affect heritage assets, as well as protect and enhance them.</p> <p>We support the inclusion of section 4.3 but consider that it needs to include more detail than in its current form. Any development that may impact upon heritage assets, of any type, should be accompanied by a Heritage Statement that sets out the significance of affected heritage assets, including their setting and how the proposed development will affect heritage assets, as well as protect and enhance them.</p> <p>It would be useful for the Council to set out what they expect to be included within a Heritage Statement and that this will be required at the validation of a planning application. Additionally, Heritage Statements should be prepared by an appropriate qualified individual so that the information included is relevant and appropriate. New development could affect all types of heritage assets, not just those currently referenced and it may be that where Scheduled Monuments or non-designated archaeology may be affected that a desk based archaeological assessment is required, potentially with field trench surveys additionally. This comment also relates to paragraph 5.4 later in the document.</p> <p>Additionally, it may be helpful to include some photographic examples about the type of issues that you would normally deal with when receiving planning applications that affect heritage assets, in this respect and use the tick and cross approach to highlight what the Council considers to be positive or negative examples. We welcome the reference to pre application discussions with your Conservation Officer and are pleased to see that this vital service is being retained in house.</p> <p>In Section 5 we would recommend a specific paragraph on how to deal with historic farmsteads and the specific issues that applicants may face and the detail the Council will require in order to determine a planning application.</p> <p>We welcome the references to the historic environment within paragraph 6.1.7 and 6.1.8 and how it refers to any heritage assets. We would recommend that the paragraph relates to understanding the significance of heritage assets that may be affected, that can include the setting of heritage assets and we welcome the reference to Historic England's own advice within this paragraph.</p> <p>Under the 'please note' section here there could also be developments within the setting of Conservation Areas that would require a pre-application discussion and/ or a Heritage Statement, if the significance of the Conservation Area were to be affected and indeed a need to relate to all heritage assets rather than only two types.</p> <p>Figure 10 would need to reference the need to consider the significance of any heritage assets and how these may be affected by proposed development.</p>		<p>distinctiveness.</p> <p>Noted – new text added following 4.2.11 referring to setting of heritage assets in relation to views and vistas.</p> <p>Noted – not considered necessary to include reference to HER at this part of document, however further text added to paragraph concerning 'historic boundary features' and the potential importance of boundary features to local character.</p> <p>Noted – both title and wording of Section 4.3 changed to include consideration of new development within the setting of both designated and non-designated heritage assets.</p> <p>Further text added at new paragraph 4.3.4 regarding Heritage Statements.</p> <p>Further text added at new paragraph 4.3.5 regarding sites of archaeological interest and the need to seek advice from Worcestershire County Council.</p> <p>4.3.2 is amended to refer to the setting of all heritage assets.</p> <p>Noted – information added at end of Section 5 highlighting guidance to be used in consideration of historic farmsteads, produced by both Historic England and Worcestershire County Council.</p> <p>Noted – 6.1.7 amended to refer to consideration of all heritage assets and their setting.</p> <p>Noted – figure 10 removed from document as not considered to add further to illustration at figure 9.</p>
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		<p>Development to the rear, as shown in the illustration may be appropriate, but without understanding the impact to any heritage assets or the type of development proposed, it is difficult to make a judgement. It is also worth noting that setting does not refer to a visual outlook only and there may be examples where the planting/screening prevents a visual relationship between a heritage asset and new development but where issues such as noise, smell etc. may still negatively impact upon a heritage asset.</p> <p>We support Section 6.7 and the varied references to the need to protect Conservation Areas and Listed Buildings from inappropriate shopfront development and we welcome this. We would recommend for clarity that the opening sentence of paragraph 6.7.1 is re-worded. We support the use of illustrations to reiterate the advice and would welcome the inclusion of photographic examples as well.</p> <p>We welcome the reference in paragraphs 7.1.4 and 7.2.4 and Section 7.5.</p> <p>Has the Council considered including specific information relating to the height of new development and what considerations may need to be taken into account? We are commenting on a variety of tall building applications and would welcome Council's setting out specific considerations to guide tall buildings in appropriate locations.</p> <p>Many thanks for the opportunity to comment and if you have any questions about our response please contact me on the above details.</p>		<p>Noted – change made to 6.7.1 to refer to ‘heritage assets’.</p> <p>Noted – however this is not considered to be a significant enough issue within the Borough to include in this SPD.</p>
14	BDC/RBC Development Management Team	<p>Both of the EXISTING SPG's refer to the 45 degree guidance which itself derives from the Building Research Establishment's guide to good practice 'Site layout planning for daylight and sunlight' published in 1991. Many if not most Councils refer to the BRE guidance in their policy documents which has now become almost established practice – see Page 14 of the Bromsgrove SPG1 and also Page 13 of the Redditch SPG. The Redditch SPG is rather poorly worded because it refers to overbearing and loss of outlook, terms which should not be confused with overshadowing which is different. The reference to the 45 degree guidance in the Redditch SPG does at least however come under the 'umbrella' Para 4.3 titled overshadowing.</p> <p>The existing Bromsgrove SPG is more detailed and explicit and correctly refers to the 45 degree guidance where it should be on 'daylighting issues'.</p> <p>The problem with both draft versions is that the 45 degree reference comes under the section 'Overbearance' – 3.1.7 iii). It should come under part (ii) – <u>Overshadowing</u> which is a much more condensed version of the existing Bromsgrove SPG which deals with daylighting matters.</p> <p>Something I have also noted is that the Redditch and Bromsgrove SPG's current refer to both single and 2 storey extensions. The existing Redditch SPG states that a 60 degree line should be used for single storey extensions and 45 degree line for 2 storey. The existing Bromsgrove SPG states that you can apply the 45 degrees to both single and 2storey extensions.</p> <p>We have decided as a team NOT to apply the 45 degree code to single storey extensions, although it will apply to 2 storey extensions (and higher 3 storey extensions etc). Also a two storey extension to the front of a property can have the same impact on amenity as to the rear. Just because 'many' two storey extensions are to the rear, a two storey extension to the front or a two storey ext to the side can also impact, especially when a row of properties has a 'staggered' arrangement.</p> <p>Para.3.1.7 (under (ii) following point g)) should be amended as follows:</p> <p><u>To ensure that overshadowing does not occur, the District / Borough Council (<del>delete as applicable</del>) will refer to the Building Research Establishment's guide to good practice 'Site layout planning for daylight and sunlight' published in 1991.</u></p>		<p>Noted – previous text relating to 45 degree code under 'Overbearance' sub-heading amended and moved under 'Overshadowing' at 3.1.7 as per suggested amendments.</p>

			<p>A 45 degree line is drawn from the closest edge of the nearest rear-habitable window of the neighbouring property, in the direction of the proposed 2 (or higher) storey extension. Habitable rooms do not include bathrooms, hallways, utility rooms and circulation space. If there are two rear windows in a room, the impact on the closer one would be considered. See Figure 1 on Page 8 provides illustrative advice in this respect.</p>		
15	BDC/RBC Conservation Officers	BDC and RBC	<p>3.10.2 This needs to be tighter, see comments below in respect of 5.2b otherwise it will undermine the conversion of rural buildings to residential buildings section. In the second to last line the word 'selected' needs to be inserted between thoughtfully and reclaimed.</p> <p>4.3 This omits new development near to conservation areas. I would suggest 'or near' in the heading above. The note box at the bottom of page 20 also needs to be reworded to "Proposals within or near a conservation area or near a listed building should be....."</p> <p>4.3.1 Following on from the above, "or within their setting" should be added to the first line.</p> <p>5.2 (a) We do occasionally find lone historic farm buildings, so I would suggest "or if a lone building is of traditional form or character".</p> <p>5.2 (b) We are still of the view that section 3.7 in the existing SPG4 is more appropriate, "Extensions will not normally be permitted as these would detract from the plain, simple and utilitarian appearance of most rural buildings". The existing wording I feel will encourage extensions.</p> <p>5.5 In respect of windows and doors the rest of section 3.3 needs to be added, "New windows and door openings should preferably be located on the 'inside' elevations away from public view. Window and door frames should be painted/stained a dark colour to decrease visual impact and should be recessed behind the main face of the brickwork".</p> <p>5.12 – 5.15 We note that sections 5.12 to 5.15 cover landscaping in its broadest respects. For completeness I would suggest including the old section 3.13, "Traditional farm buildings are sited with yards or in open fields. To avoid domesticity, the curtilage of a converted farm building should remain open and uncluttered. There may be scope for private areas, but these should be screened with hedging and walls of old bricks."</p> <p>Section 5 This section does not cover garaging, and I would suggest the addition of 3.14 of the existing guidance, "Where residential use is proposed garaging requirements should be carefully considered. It may prove possible to incorporate an integral garage, perhaps by making use of an existing opening in a lean-to. Alternatively it may be possible to use an ancillary building such as an open cart shed for garaging." New</p>		<p>Noted – wording of 3.10.2 follows on from 3.10.1 which already states that "Extensions will not normally be permitted as these detract from the plain, simple and utilitarian appearance of most rural buildings". 'Selected' added to last sentence of 3.10.2 as per suggestion.</p> <p>Noted – heading of 4.3 amended as follows: "New dwellings within or near the setting of designated and non-designated heritage assets"</p> <p>Noted – suggested change made to 4.3.1. Further text added at new paragraph 4.3.4 regarding heritage statements to include consideration of the setting of heritage assets.</p> <p>Noted – suggested change made to 5.2 (a).</p> <p>Noted – suggested text added to 5.2 (b).</p> <p>Noted – suggested text added to 5.5.</p> <p>Noted – suggested text added following paragraph 5.13.</p> <p>Noted – suggested text added following paragraph 5.13.</p>



		<p>buildings for garages should not be permitted.</p> <p>6.6 We would suggest amalgamating Section 6.6 Shopfronts with Section 7 Advertisements and Signage, as these sections overlap to a great extent. In their current form these sections do not read coherently, for example hanging signs are adverts but are attached to the building and need to relate to it. Fascias are covered in shopfronts, but are a form of advertising.</p> <p>6.6.2 You might want to insert for clarification section 2.3 from SPG 2 “If a traditional style replacement is to be used, it should be appropriate to the building and locality. It must never appear to be of earlier date than the rest of the building”.</p> <p>6.6.4 In respect of the last bullet point we have been trying to avoid, in these situations, the two or more shopfronts looking the same, so would suggest the addition of “There should be a variation in the design of the individual shopfronts”.</p> <p>6.6.4 – new bullet point suggested: “Extensive glazing should be avoided so that a shopfront looks structurally supported whilst also framing the display window.”</p> <p>We think section 4.7 from SPG 2 on stallrisers should also be added bearing in mind it appears in the illustration on page 36. “A stallriser gives protection to a shop window and creates a solid visual base to a building. Stallrisers often consist of panelled timber or brick forming a deep moulded skirting which is painted. Occasionally glazed tiles or marble are used. The depth of stallriser must be in sympathy with the overall design of the shopfront and the inclusion of a stallriser in the door may also be appropriate”.</p> <p>6.6.7 The original guidance suggested that fascias should generally be no more than 600mm deep. From my experience, particularly in the Bromsgrove High Street Conservation Area this has worked well. We would therefore suggest that this is added to this section. ‘Fascias should not generally exceed 0.6 metres (2 feet) in depth’</p> <p>In addition no mention has been made of lettering in this guidance, and again the section in the original guidance, from my experience has worked well and I would therefore suggest that this is also added, “Lettering should generally be restricted to a maximum height of 0.3 metres (12 inches) unless exceptional circumstances prevail e.g. large scale building”. No mention is made of materials for lettering is mentioned and we would suggest, “The materials for the lettering should be appropriate to the context of the area. Hand painted lettering on fascias will be encouraged”.</p> <p>6.6.9 The use of gates to recessed doorways is not mentioned in this section and has been an issue in the Bromsgrove High Street Conservation Area where there are recessed doorways, a common feature in historic shopfronts. We would therefore suggest the following bullet point, “Where a shopfront has a recessed door, a metal gate, of an open design can be considered”.</p> <p>6.7.4 For greater clarity we think section 6.2 (of SPG2) should also be added here maybe as an extra bullet point, “The fascia is possibly the most noticeable element of a shopfront. Traditional fascias are narrow in depth and should not exceed 0.6m (2ft.).</p>		<p>Noted – no change.</p> <p>Noted – suggested change made at 6.6.2</p> <p>Noted – suggested change made at 6.6.4</p> <p>Noted – new bullet point added at 6.6.4</p> <p>Noted – new paragraph at 6.7.5 added.</p> <p>Noted – suggested text added following 6.6.7</p> <p>Noted – suggested text added following 6.6.7</p> <p>Noted – suggested text added as new bullet point</p> <p>Noted – no change.</p>
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**Note:** References to changes made to the SPDs as a result of consultation suggestions relate to paragraph numbers in consultation versions; paragraph numbering may have changed in final versions of the SPDs where text/paragraphs have been added or removed.