

## 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><u>Paragraph no. 2.4 pg 8</u></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>
--	--	--	--	---

			<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: <u>“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 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</u></p>
--	--	---	--

			<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 and</u> 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="753 1430 1421 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																							
	D mm	740																							
	W mm	580																							
	Footprint m <sup>2</sup>	0.43																							
1100 litre steel bins	H mm	1380																							
	D mm	1000																							

			<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>		W mm	1270		Footprint m <sup>2</sup>	1.23		
	W mm	1270									
	Footprint m <sup>2</sup>	1.23									
			<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>								
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>
--	--	---	--	---

		<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>
--	--	--	--	--

		<p>In other LPAs, the 45 degree code seems to be measured from the centre of the nearest window, rather than the closest edge. Is the closest edge approach well-established in Redditch?</p> <p>3.1.9 It may not be entirely clear what is meant by the sentence "Dormer windows should not be deeper than half the depth of the roof slope". Would a picture help to illustrate this point?</p> <p>PD Box on page 12 It is unclear why this box randomly appears here, after discussing green belt. The idea of PD has already been discussed in earlier pages, so may be better to add in any necessary references to front extensions there.</p> <p>3.6.4 This seems to duplicate the issues in 3.6.1.</p> <p>3.10 Extensions to previously converted rural buildings This section assumes that "rural buildings" are all of a certain type/age. Although para 3.10.1 refers to "most" rural buildings, thereby recognising that they are not all the same, the approach set out in the rest of the section does not seem to allow for any variation. Types of new dwelling box on page 16 The second bullet point in part B includes "no adverse impacts result from the development to either the proposed or existing dwelling(s)". The impacts on adjoining occupiers would seem important in this scenario.</p> <p>4.2.12 This states that "overbearance and overshadowing are not issues", but presumably overbearance and overshadowing could be very significant issues, depending on the context? This seems to contradict paragraphs 4.2.48 - 4.2.50.</p> <p>4.2.18 Footpaths and cyclepaths should ideally be clearly separated, well signposted and well lit, to ensure that people can safely and comfortably use the routes.</p> <p>4.2.27 What is "private amenity space"?</p> <p>4.2.31 The inclusion of circular routes within parks would benefit the physical activity agenda and serve all population groups. The inclusion of benches placed so as to encourage human interaction would support community cohesion and help to address social isolation. Public open spaces should be easily accessible from new developments, but should also be easily accessible for communities surrounding the site.</p> <p>4.2.33 Benches and other street furniture should be designed to ensure their function is immediately identifiable, so that those with cognitive problems, such as people living with dementia, can easily recognise them. Benches should be placed on crossroads/in strategic places to allow those with</p>		<p>Noted however no change considered necessary.</p> <p>This was due to an error with the layout of the document. However, following consultation it has been decided that PD boxes will be removed on presentation grounds.</p> <p>Noted and agreed – para.3.6.4 deleted to remove duplication</p> <p>Noted - however it is considered that the wording of para.3.10.1 is flexible enough to allow for the potentially different circumstances of extensions to previously converted rural buildings.</p> <p>Noted – it is considered that existing wording in this bullet point ("plot subdivision which adversely impacts the grain of the area will be strongly resisted") covers impact on adjoining occupiers.</p> <p>Punctuation typo – semi-colon replaced with comma so that previous para.4.2.12 reads: "Developments should work with the contours of the site to ensure overlooking, overbearance and overshadowing are not issues".</p> <p>Noted – previous para.4.2.18 revised as follows: "Integrated routes are preferable, that is those that run alongside vehicle routes <u>but are segregated from the highway, and are well signposted</u>".</p> <p>This refers to additional space within the curtilage of dwellings, such as gardens, as opposed to public areas of open space.</p> <p>Noted – para.4.2.31 refers to the Open Space SPD for further, more detailed consideration of the design and function of open spaces.</p> <p>Noted – previous para.4.2.33 revised as follows: "...and to ensure it benefits from natural surveillance, <u>whilst being functional for all users</u>".</p>
--	--	--	--	--

		<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>
--	--	---	--	---

			<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>
--	--	---	--	--

		<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>
--	--	--	--	---

		<p>It is usual for the fascia to have a projection above it, normally in the form of a moulded cornice which is both decorative and functional. Georgian and early Victorian fascias were traditionally positioned upright on top of pilasters with plain or decorated ends. Later Victorian fascias were put in console boxes and tilted forwards”.</p> <p>6.7.5 We would delete the last sentence, ‘Hardwoods were never painted’. As we are seeing an increasing use of hardwoods which can be painted.</p> <p>We would suggest including section 4.14 here or within section 6.6, “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 paints and varnishes and particularly brilliant whites are not appropriate for period properties. Matt or semi-gloss will give the best results”.</p> <p>6.7.6 Third line after listed buildings add, ‘or conservation areas’.</p> <p>7.1.2 ‘Sings’ should be ‘signs’ in the second line.</p> <p>7.2.4 We would omit wrought iron as this is almost impossible to obtain, we would suggest saying, “an appropriately designed metal bracket” instead.</p> <p>Again our existing guidance in respect of hanging or projecting signs, ‘Normally projecting signs should not exceed 0.4 sq. metres (4.3 sq. feet).’ Again this seems to have worked well. Occasionally larger signs have been permitted where they have been in proportion to the building or there has been historic evidence of larger signs</p> <p>No mention is made of illumination of signs. We would suggest this also follows SPG2 and something along the lines of, “Internally illuminated signs will not be permitted, however discreet top lighting will be considered”, should be added.</p> <p>The inclusion of section 9.3 of SPG2 might want to be reconsidered especially in respect of retail parks and supermarket outlets, especially as some are in the proximity of LBs and CAs. No mention is made of signage and petrol filling stations and again you might want to look at section 9.6 of SPG 2. Finally, A-boards have been an issue in the past in Bromsgrove High Street, and you may want to consider mentioning this.</p> <p>7.5.2 Should ‘and signage’ be added after Advertisements?</p> <p>7.5.3 We would tighten up this section as we do not necessarily want to encourage lighting on all buildings within conservation areas. I would suggest, “Illumination will not normally be permitted. Consideration may be given to halo or down lit lighting but should...”</p>		<p>Noted – text deleted at 6.7.5</p> <p>Noted – suggested text added following 6.7.5</p> <p>Noted – suggested text added.</p> <p>Noted – typo corrected at 7.1.2</p> <p>Noted – suggested change made at 7.2.4</p> <p>Noted – suggested text added following 7.2.4</p> <p>Noted – see text below re: 7.5.3</p> <p>Noted – issue covered in 7.3</p> <p>Noted – suggested text added at 7.5.2</p> <p>Noted – suggested text added at 7.5.3</p>
--	--	---	--	--

**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.