Bromsgrove District High Quality Design Supplementary Planning Document (SPD)

Summary of Consultation

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

- Statutory Consultees, including Parish Councils 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.bromsgrove.gov.uk/council/policy-and-strategy/planning-policies/local-development-plan/supplementary-planning-guidance.aspx

Copies of the SPD were also placed in Council offices (Parkside) and local libraries for the duration of the consultation period. Finally, an advert publicising details of the consultation was also placed in the Bromsgrove Advertiser local newspaper.

Table 1 below records all representations made to Bromsgrove District Council during the consultation period. Alongside specific comments made by respondents, Table 1 also includes a response from the BDC 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	Stuart J Dudley	BDC	Thank you for the opportunity to comment on your draft design supplements. The draft design supplement looks like it will be a useful document, however, I do not believe the documents are clear on what can be achieved with Permitted Development Rights and if anything appear to me to put people off exploring these rights which often allow homeowners more flexibility than would be allowed through a traditional planning route. Indeed many of the projects that could be undertaken under PD would conflict with this document. The wording of Point 2.2.4 is slightly misleading and I would suggest is amended as it appears to suggest that developments which can be undertaken via permitted development are required to take into account the information with the SPD which is not technically the case.	The draft design supplement looks like it will be a useful document The documents are not clear on what can be achieved with Permitted Development Rights and appear to put people off exploring these rights. Many of the projects that could be undertaken under PD would conflict with this document. The wording of Point 2.2.4 is slightly misleading and I would suggest is amended as it appears to suggest that developments which can be undertaken via permitted development are required to take into account the information with the SPD which is not technically the case.	Comment noted. It is considered that para.2.2.1 and 2.2.2 explain the purpose of PD rights and advises property owners to contact the local authority planning department if they are in any doubt about the extent of PD rights on their property. Para.2.2.4 is written in the context of offering guidance to development proposals, whether carried out under PD rights or not, to take account of the information in the SPD in an attempt to deliver good design. It does not set out mandatory terms for development proposals.
02	Natural England	BDC	**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:** **Green Infrastructure** 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. 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. There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through: □ green roof systems and roof gardens; □ green walls to provide insulation or shading and cooling; □□new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity). 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". **Biodiversity enhancement** 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	Natural England don't wish to provide specific comments, but advise that the following issues are considered: • Green Infrastructure • Biodiversity enhancement • Landscape enhancement • Other design considerations (in NPPF) • Strategic Environmental Assessment/Habitats Regulations Assessment	The SPD has been amended to include reference to the County Green Infrastructure Strategy, but its primary purpose is to support the policy requirements of Policy BDP19 from the adopted Bromsgrove District Plan. Further policy provision for Green Infrastructure, including having regard to the County GI Strategy, is made by Policy BDP24 in the adopted plan. Further specific amendments have been made to the SPD in relation to these issues at: - Para.3.1.3 – new reference to biodiversity considerations - Para.4.2.34 – reference to open space layouts in the context of green infrastructure networks - Para.4.2.56 – reference to potential effects of lighting on wildlife - Para.4.2.58 – reference inserted to biodiversity enhancement - Para.4.2.63 – reference to the Worcestershire County Green Infrastructure Strategy in relation to wildlife habitats - Para.6.4.7 – new reference to wildlife as well as landscape in terms of the potential impacts of lighting Additional text added to paras. 3.1.3, 3.1.12, 4.2.53 to include references to biodiversity considerations.

			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. **Landscape enhancement** 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. **Other design considerations** The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 125). **Strategic Environmental Assessment/Habitats Regulations Assessment** 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.		Text concerning historic characterisation (and the Historic Environment Record) has been added at 4.2.12 under the 'Local character and distinctiveness' sub-section. 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>" Comment noted.
03	Wychavon District Council	BDC & RBC	**<u>Paragraph no. 2.4 pg 8</u>** In subsequent points, make reference to – • Each qualifying application should require a D & A statement outlining the intention and reasoning for design • 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) • Though not a necessity, it is worth while seeking pre-application advice from local authority • Listed building consent needed for works to listed buildings (and/or buildings in the immediate vicinity) <u>Reason</u> - Provides more information on aspects of the planning process and requirements. **<u>Paragraph no. 3.1.2 pg 9</u>** Sustainability/environmental effect –		Noted – no change

			• Consider the sustainability of alteration/extension ○ Is it built in a sustainable manner with consideration for the environmental impact? Reason - To provide information on environmental impacts within construction. **Paragraph no. 3.1.3 pg 9** Include 'conservation area' to list. Reason - Has significant effect on planning issues. **Paragraph no. 3.1.7 pg 10** Neighbour impact – • Would benefit from more/clearer illustrations and images Reason - Allows user to visualize design implications – existing image convoluted. **Paragraph no. 3.1.11 pg 12** Change point iii). – • Respect local styles and features to maintain built vernacular Reason - Saves repetition of word 'local'. **Paragraph no. 3.11 pg 15** Add section on contemporary/modern design – • Subtle design and material use, that whilst making improvements, do not detract from existing character Reason - Provides architectural design merit and innovation, and allows for 'high quality design'. **Paragraph no. 4.2 pg 17** Include as a consideration or have as a 'Please Note' – • All construction needs to comply with current Building Regulations and to be built in accordance with British Standards Reason - Demonstrates legalities for user. *(Continued overleaf)* **Paragraph no. 4.2.10 pg 18** Condense and/or bullet point middle sentence – *"the use of particular materials…local character of an area"* Reason - Sentence too long.		Noted – no change Noted – para.3.1.3 revised as follows: "Other planning considerations such as Green Belt, protected and priority species, Highways impacts, sustainability of construction, heritage assets ~~Listed Buildings~~ and nearby trees may need to be taken into account". Noted – no change Noted – no change Noted – however the entire SPD is written in the context of 'allows for high quality design', therefore no further change is considered necessary. Noted – no change. Noted – no change.

			<u>Paragraph no. 4.2… pg 17+</u>
			
			To include in an existing/new section –
			
			• 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 –
			  ○ Bin lorries
			  ○ Delivery lorries/vans
			  ○ Emergency services
			• Make reference to the County Councils draft 'Streetscene Guide'
			
			<u>Reason</u> - To ensure adequate thought and design is given to traffic management and infrastructure.
			
			<u>Paragraph no. 4.2.66 pg 25</u>
			
			Make reference to West Midlands crime officer and crime prevention design advisory.
			
			<u>Reason</u> - To ensure developments are designed in accordance with crime prevention.
			
			<u>Paragraph no. 5… pg 27+</u>
			
			Include a reference to Historic England guidance on barn conversions 'Adapting traditional Farm Buildings' October 2017.
			
			<u>Reason</u> - To ensure correct guidelines are followed.
			
			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.
					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).
					
					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.
					
					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.

04	James Cooper
	BDC/RBC
	Community Safety
		BDC & RBC	Thank you for your invitation to provide feedback on these documents.
			
			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.
			
			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.
			
			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.
			
			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.
			
			At other points, the documents miss opportunities to give clear guidance to help
				The documents require some amendments to reflect some of the key issues relating to community safety and crime prevention.
				
				More clarity is needed around issue of permeability, natural surveillance and boundary treatments. References to guidance need to be clear.
				
				There are missed opportunities to provide guidance on reducing the risk of crime and ASB relating to:
				
				• Security of sites prior to and during development
				• CCTV
				• Lighting
				• Defensible space
				• The Councils' stance on the Secured by Design scheme
				• Physical security standards for:
				  ○ Non-residential developments
				  ○ Commercial developments
				  ○ Retail units
					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_04) by contacting the BDC/RBC Strategic Planning team on strategicplanning@bromsgroveandredditch.gov.uk

			reduce the risk of crime and ASB relating to:
			
			• Security of sites prior to and during development
			• CCTV
			• Lighting
			• Defensible space
			• The Councils' stance on the Secured by Design scheme
			• Physical security standards for:
			  ○ Non-residential developments
			  ○ Commercial developments
			  ○ Retail units
			  ○ Bespoke developments such as those in Conservation Areas, near to Listed Buildings or non-designated heritage assets, rural buildings converted to residential use
			• Management & maintenance of developments after completion
			
			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.
			
			Thank you for your consideration of my comments.
				○ Bespoke developments such as those in Conservation Areas, near to Listed Buildings or non-designated heritage assets, rural buildings converted to residential use
				• Management & maintenance of developments after completion	

05	Bentley Pauncefoot Parish Council	BDC	Bentley Pauncefoot Parish Council accepts that, although legally not part of the Bromsgrove District Plan, this Supplementary Planning Document is intended to add further detail to policies expressed in that document regarding development sites. We also understand that its practical ideas and suggestions are intended to form a starting point for effective development planning and will be given substantial weight in any assessment of the merits of the eventual planning application. The draft document appears to be both comprehensive and well-illustrated, covering the mechanics of applying for planning permission and acceptable design principles for development at levels ranging from a request for alterations to a single dwelling house to large scale housing development for which a Design Guide would need to be prepared. There are, nevertheless, some sections of the document which, in the opinion of Bentley Pauncefoot Parish Council, would benefit from clarification. These are detailed in the following paragraphs:- 1. When seeking to describe the functions of the Supplementary planning Document, the first paragraph (1.1.1) refers to "clarity for architects and agents in knowing the parameters of what is expected from the Council." Paragraph 1.3.1 expands on this to include others who may find the information helpful. We query, however these latter groups would be better included in the introductory paragraph which, as it stands seems more "exclusive" than "inclusive". 2. Sections 2 and 3 concentrate on the preparation of application and advice regarding small scale domestic projects. Descriptions of help available from the Planning Officers are accompanied by the suggestion that "it is advised that you speak to your neighbour about the proposed development" (2.2.4) Interaction, at an early stage, between a person proposing to change and those likely to be affected by it, is thus explicitly encouraged. We can surmise that such interaction has the potential to speed up the formal application process and also engender more positive feelings between neighbours. In section 4 however, where the creation of new dwellings on a large scale is	The following sections of the document would benefit from being reworded for clarity: Para.1.1.1 is exclusive in only listing "architects and agents"	Noted – para.1.1.1 has been revised as follows: "…and provides clarity for ~~architects and agents~~ applicants in knowing…" Para.1.3.1 remains unchanged as it provides an example list of 'applicants' referred to in amended para.1.1.1. Noted. Noted – amended text from para.2.2.4 also added to

			discussed, there is no reference to the potential benefits of early interaction between those proposing and those affected by change. This would seem to be at odds with NPPF Paragraph 66 "Applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Proposals that can demonstrate this in developing the design of a new development should be looked at more favourably". We suggest that those who live and work in an area often understand its strengths and weaknesses and their priorities and concerns need to be aired at the pre-application stage to effectively inform an emerging plan. We can understand that planners and developers may be wary of consulting those who may, in the first instance have been against the general principle of development of a site but, once a local plan sets aside a site for potential development, it is in the interests of all if early and constructive discussions are undertaken to better enable the aspirations expressed in it and its Supplementary Planning Documents to be realised. In our own parish such an approach is exemplified in the developing relationship between The Foxlydiate Temporary Working Party set up by the Parish Council and the Case officer for the Foxlydiate development, Simon Jones, who relays and discusses the progress of planning for the SUE on a monthly basis and intends to arrange meetings with the developers for the group. The local community thus feels that it is making its voice heard. We suggest therefore that Section 4 should include reference to the continuing advisory role that local communities can play in the long process of the development of larger sites. 3. Translating the agreed principles of high quality design into action, over what could be some years, with the aim of creating a cohesive community, depends not only on the principles espoused, but on the manner in which they are implemented, reviewed and monitored; whether Planning Conditions are imposed which are reasonable and capable of being enforced if deemed necessary and whether the resources, both human and economic are available. Perhaps this Supplementary Planning Document would be brought to a realistic conclusion if these points were mentioned. In addition to the substantive points listed above, you might wish to consider the following suggestions for textual adjustments which could further clarify the document.		beginning of para.4.2.2 as follows: "<u>It is advised that neighbours are consulted about the proposed development, and try to avoid impacting on neighbours privacy and amenity".</u>
			1.4.1 Repetition "and may and may" needs amending. 2.3.2 presumption that readers will know what is meant by "material planning conditions" Whilst many do, an explanation, in that section, for those who don't, would be over long. Including an explanation in a glossary would be preferable. Page 7 PD Box "45 degree code" This can easily be understood by reference to Figure 1. We suggest that this is pointed out. 3.6 Outbuildings. It is not clear when outbuildings need Planning permission and/or where guidance might be available. Further detail in a glossary? 3.9.1 A helpful definition of a "non-designated heritage asset" but it is repeated		Noted - repetition deleted. Noted – footnote added relating to para.2.3.2 to provide definition of material planning considerations. Noted – cross reference to Figure 1 remains in document text but PD boxes removed from document on presentation grounds. Guidance on whether or not an outbuilding requires planning permission is addressed by the guidance at the start of the document on whether development may be permissible under permitted development rights (PDRs). Noted – the repetition is intended in light of the

			in 4.3.3 and again 6.1.7 use of a glossary would avoid repetition. 6.2.12 and 6.2.13 We read "to reduce the impact of noise or air quality". Do you mean "to reduce the impact of noise or any detrimental effect on air quality"? We trust that our comments will be of help to as you work towards producing the definitive version of the High Quality Design Supplementary Planning Document.		potential for an applicant to only use one section of the SPD depending on the nature of their proposed development. Noted – changes made to wording of para.6.2.12 and 6.2.13 as suggested.
06	Alvechurch Parish Council	BDC	Para 1.4.5 page 4 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. Para 2.3.2 page 5 & 6 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. Para 3.9.1 page 11, para 4.3.3 page 20 and para 6.1.7 page 25 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 adopted in due course. Para 4.2.10 page 14 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. Para 4.2.11 page 14 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. Para 6.2.2 page 25 The bullet list in this paragraph could be strengthened by the addition of "Odour" Odour together with noise, as an example a "farm" handling rotting animal waste and generating large amounts of complaints from local residents …We suggest such plants should not be given licenses for a change of use in rural residential area, therefore a mention of "odour" in the bullet list is relevant. Section 5 page 21-24 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		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. 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 the SPD is primarily to offer further guidance on the policies set out in the Bromsgrove District Plan. Certain additional references to neighbourhood plans have been added though as per suggestions at 1.4.5 and 4.2.10. Noted – the following text has been added to 4.2.10: "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 District." Noted – "odour" added to bullet point list in para.6.2.2. 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.

			document. Overall we find this is a comprehensive new reference that will be useful to bring 4 supplementary documents into one more useful one.		
07	Hagley Parish Council	BDC	Hagley Parish Council have the following comments to make on this document: 3.1.6 *Add* This is often achieved where the width of a building is increased by the extension being set down or set back. 3.8 *Add* Alterations that can easily reversed to restore the Listed Building to its previous state are more likely to be acceptable than ones incapable of being reversed; also those removing modern alterations to restore it to an earlier state. 4.2.12 could usefully be cross-referenced to 3.1.7. 4.2.20 *Add* Where adjacent sites are being developed by different developers, the Council may require each to make a path as far as their boundary and dedicate it to the public. 4.2.31 We welcome the prohibition of pocket parks. 4.2.40 *add* The use of close boarded fences where there is already a live hedge should be avoided as the withdrawal of light from one side of the hedge will stunt its growth. 4.2.48-50 are covering the same ground as at around 3.1.7. Would it not be better to cross-reference to that? 4.2.55 Several Parish Councils in the District are Lighting Authorities. In such cases the lights should conform to their standards. 4.2.56 see comment on 4.2.40. 4.2.64 *Add* Consideration should be given to orienting roofs so that they can house solar panels, even if their inclusion is not part of the scheme. 4 *addition*. There has in recent years been a spate of applications to convert urban outbuildings (e.g. garages and stables) to dwellings. Chapter 5 does not apply to these as they are often urban, but some further criteria on these may be necessary: ·Granny flat condition – that a building converted under special circumstances for the needs of an elderly or disabled relative should remain in common occupation with the main dwelling. ·Extensions to outbuildings converted to dwellings will not normally be allowed. 5.8 *Refer also to* doors to threshing bays. These may not in fact be for waggons, but have large doors on each size to enable the wind to pass through to aid winnowing.		Noted – no change Noted – however this change is considered too prescriptive. Paragraph 3.8 already requires applicants to discuss proposals with the Council's Conservation Officer(s) where works are proposed to a Listed Building. Noted – no change. It is necessary for the SPD in some instances to repeat an issue already raised earlier in the SPD, dependent on the nature of that section of the SPD, e.g. Section 3 Residential Development – Alterations and Extensions as opposed to Section 4 Residential Development – Creation of New Dwellings. Noted – no change. This would require a change in higher level policy, e.g. the BDP, to enforce such a requirement on a new development. Noted – no change Noted – change made to 4.2.42 to include ecological considerations in relation to boundary treatments. Noted – no change. See comment above in response to suggested change at 4.2.12. Noted – add following text to 4.2.55: There should be a clear strategy, addressing relevant standards, for the provision of lighting within an area…" Noted – see response to 4.2.40. Noted – considered that the issue of orientation to improve energy efficiency is already covered by para.4.2.61. Noted – whilst not covered by Section 5, urban outbuildings are covered by 3.6 within Section 3 concerning extensions and alterations to residential development. No further change necessary. Noted – text added to end of para.5.8 "This may also apply to large doorways which were a feature of threshing bays and essential as part of the winnowing process".

			6.3 CPRE has had cases in other parts of Worcestershire of large chicken rearing establishments in rural locations without adequate provision having been made for servicing them, including disposing in an appropriate manner of waste (dung) arising. 7.2 *Add* Hanging or projecting signs will not be permitted on the angles of buildings, where they will disproportionately hide the faacia of neighbours. *This suggestion arises from a street in Stourbridge (in writer's ownership), where the façade bends back. This means that a projecting sign at the corner will tend to hide the fascia of a neighbour to their detriment.*		Noted – no change. Noted – no change. Para.7.2.2 reflects that hanging signs should respect the character of an area, which by implication would include not having a negative impact on the fascia of neighbouring buildings.
08	Catshill and North Marlbrook Parish Council	BDC	**Section 2. Preparing your application** 2.3 Submitting an Application Paragraph 2.3.3 (Page 6) At line 2 Delete '*neighbouring properties'* and insert '*the affected neighbourhood i.e. properties facing the front, rear and adjacent to the application.* **Section 3. Residential Development – Alterations and *Extensions*** 3.1 Key considerations for all extensions Paragraph 3.9.1 Extensions to non – designated heritage assets (Page 11) After '*applications'* on line 5 insert '*It is recommended that Parishes should submit their non - Heritage sites to BDC for listing.* **Section 4. Residential Development – Creation of New Dwellings** 4.2 Key considerations for all new dwellings ***Layout and surroundings*** Paragraph 4.2.14 Streetscape (page 15) After *'street'* on line 6 insert *' It is highly recommended that all new buildings are identified by either a number or name plate to assist emergency services to speedily locate specific dwellings'* ***Amenity*** **Private amenity space and spacing standards** Paragraph 4.2.28 Page 16, delete this paragraph and insert the following: *Where possible, there should be garden areas at the front and rear of new buildings, especially in rural areas to aid local habitat. The rear garden should back onto other gardens or open spaces.* Paragraph 4.2.38 Page 17 ***Car parking*** After '*vehicle* 'on line 5 insert '*all driveways should be made of permeable material in order to reduce the risk of flooding'*		Noted - Planning Officers must meet the requirements for consultation on a planning application as set out in Article 15 of The Town and Country Planning (Development Management Procedure) (England) Order 2015. However applications are dealt with on a case by case basis and Officers therefore have discretion to consult beyond these minimum requirements where it may be considered necessary; this includes properties that may be to the front, rear or adjacent to an application site. Noted – text added to end of para.3.9.1 as follows: "It should be noted that the Council will record non-designated assets as part of a living document, in line with the Local Heritage List Strategy which was adopted in 2016". Noted - however this comment is considered to be too prescriptive for inclusion within the Design SPD. Noted – habitat and biodiversity considerations in the context of design are referred to elsewhere in the SPD; this sub-section relates to the scale and layout of private amenity space such as gardens. Noted - however this issue concerns permitted development rights, with attention drawn to Section 2.2 of the SPD.
09	Worcestershire Wildlife Trust		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.'		Noted.

			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.		Noted – text revised to add "protected and priority species"
			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 of house martin boxes.		Noted – text added to end of 3.1.12 as follows: "…or mitigation measures are undertaken, such as retention of entrance points to bat roosts or the provision of swift bricks or house martin boxes".
			Para. 4.2.3 17 We would recommend adding wording to the effect that '*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'*. 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.		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 wording.
			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.		Noted.
			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 '*and wildlife*' after '*residential developments'* in the first sentence. Expanding on this in a new paragraph would also be helpful. We would recommend wording along the lines of '*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 cowls) and these should be used as required.'*		Noted – suggested addition of "and wildlife" now added to this sentence at previous para.4.2.52. 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: "The effects of new lighting on wildlife should also be a key consideration in lighting strategies associated with development."
			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.		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.
			Para. 4.2.57. Page. 24. We are pleased to support this paragraph and the weight it attaches to the need for		Noted – previous para.4.2.57 revised to refer to biodiversity enhancement, rather than just

			landscaping to support biodiversity (we recommend that you add the word '*enhancement'* after the word *'biodiversity'*) and the need for management to be secured. 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. Para. 5.17. 28 We welcome the tenor of this paragraph but we would recommend some changes to the wording as set out here. '*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 expect applicant to provide some enhancements in line with guidance in the NPPF (see for example paras 9, 109 and 118)*'.		biodiversity. Noted – text added to previous para.4.2.62 as follows: "…identified as priorities by the Worcestershire Biodiversity Partnership <u>and in the Worcestershire Green Infrastructure Strategy</u>"… 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 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>
			Para. 6.2.2. Page 32. We would recommend adding '*Biodiversity enhancement opportunities*' 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). Para 6.2.9 Page 32. We support the wording in this paragraph and welcome the guidance it gives. 6.2.11 33 We would recommend the addition of new wording in the 2nd sentence of this paragraph so that it reads *'…impact on neighbours, the natural environment and the general appearance of the area…'* so as to better reflect the impact of noise on wildlife. Para. 6.2.16. Page 33 We would recommend the addition of some wording to this paragraph so that it reads *'…should relate to the wider physical, ecological and social context…'* 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). Para. 6.3.3. Page 34 We would recommend adding '*Biodiversity enhancement opportunities'* 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		Add bullet point for 'biodiversity enhancement' in para.6.2.2. Noted. Noted – para.6.2.11 revised as follows: "…impact on neighbours, <u>the natural environment</u> and the general appearance of the area." Noted – para.6.2.16 revised as follows: "…should relate to the wider physical, <u>ecological</u>, and social context of the surrounding environment…" See 6.2.2 above – biodiversity enhancement also added to list at para.6.3.3.

			NPPF (see for example paras 9 and 109). 6.4.2 38 We would recommend amending the wording of the last sentence to read '*Fitting in with the character of the landscape and respecting existing ecological value should be key considerations of the design.*' 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. Para 6.4.7. Page 38 We would recommend amending the second sentence of this paragraph to read '*External lighting can make a site appear prominent in the landscape and affect wildlife and the valued sense of rurality.*' This would better reflect the impact of light pollution on important species such as bats.		Noted – suggested text added to para.6.4.2. Noted – para.6.4.7 revised as follows: "…can make a site appear prominent in the landscape and affect <u>wildlife and</u> the valued sense of rurality."
10	Anna Wardell-Hill Environmental Policy & Awareness Officer	BDC	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: 1. 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. 2. 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. 3. 4.2.9 for communal bin areas, if storage space is restricted on the site then developers should consider underground storage facilities. 4. 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.		*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.* *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>* *Noted – text added to end of 4.2.9 (g) as follows:* *"…amenity of occupiers, <u>such as through consideration of underground storage.</u>* *Noted – new text added in relation to point 2 above which addresses this comment.*

			5. The dimensions of the bins will be required to correctly allow for adequate storage: **Bin sizes available** / **Dimension** / **Bromsgrove** 240 litre wheelie bin / H mm / 1085 / D mm / 795 / W mm / 575 / Footprint m² / 0.50 1100 litre steel bins / H mm / 1470 / D mm / 1160 / W mm / 1280 / Footprint m² / 2.18 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.		*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.*
11	The Coal Authority	BDC	Thank you for your consultation received on the 22 January 2018 in respect of the above consultation. As you will be aware Bromsgrove area has limited coal mining legacy, with two mine entries and an area of coal outcrops, these features are located within the north of the district. We also note that these features are not located within areas where it is likely that development proposals will come forward. The Draft Bromsgrove High Quality Design Supplementary Planning Document includes, at BDP 19, consideration of the suitability of sites for development, in respect of such issues as contamination. We would generally seek to have land stability issues included within such a document, however, we appreciate that in this case the coal mining legacy present in the district is limited and somewhat isolated in location. On this basis we have no objection to the draft SPD as proposed. We would however expect any development proposals which may come forward in the areas where the coal mining legacy is present to be supported by a Coal Mining Risk Assessment, or equivalent report.		Comments noted, particularly regarding consideration of development proposals in areas of coal mining legacy.
12	Worcestershire County Council	BDC	**Archive and Archaeology** 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		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

			Assessment Framework to ensure that the historic character and setting of traditional farmsteads is considered at the earliest stages of development design. **Green Infrastructure** 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 BDP24 Green Infrastructure and other related policies including BDP20 Managing the Historic Environment, BDP21 Natural Environment, PDP23 Water Management, BDP25 Health and Wellbeing, 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. **Health and well-being** 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. Bromsgrove faces a number of health challenges, such as an ageing population, health inequality1 and excess weight in adults2, 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. Bromsgrove District Plan policy BDP25 Health and Well Being also provides strong policy support for healthy developments.		Buildings'. 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 Policy BDP19 High Quality Design, and not the more detailed natural environment considerations of the BDP's approach to green infrastructure (BDP24) and the natural environment (BDP21). 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. Para.4.2.20 revised as follows: How networks, <u>including Green Infrastructure networks</u>, connect locally and more widely…" Comments noted – it is agreed that parts of the SPD already contain guidance that covers the priorities for high quality design in terms of its impact on health and well-being. However as acknowledged in the consultation response, most of the suggested considerations would be better suited to a more specific SPD which could provide more detailed guidance on Policy BDP25 Health and Well Being, as they fall outside the remit of this Design SPD.

			We recommend that a section is included within the High Quality Design SPD to improve understanding of policy BDP 25 and other relevant policies within the Local Plan from a health and 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): - The provision, quality and accessibility of green spaces, community facilities and play areas. - The design of buildings and developments to ensure they cater for the needs of all population groups throughout their lives. Lifetime homes standards3 could be referred to in this section. - 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. - Site design which promotes physical activity by encouraging walking and cycling. - Supporting healthy foods through provision of allotments, community orchards and street fruit trees. 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 Bromsgrove District Plan policies from a public health perspective. 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 Bromsgrove District Council follows a similar approach to developing the Health SPD. The South Worcestershire Health SPD can be viewed via this link: http://www.swdevelopmentplan.org/wp-content/uploads/2017/09/Adopted-Planning-for-Health-SPD-Sept-2017.pdf 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. 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. 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. The South Worcestershire HIA Screening template, which could be adapted for Bromsgrove District Council's purposes, can be found here: http://www.swdevelopmentplan.org/wp-content/uploads/2017/10/Health-SPD-HIA-Screening-Template-Oct-2017.pdf **Section-by-section comments** PD Box at top of page 7 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		Provision is made within Policy BDP19 for issues such as age-friendly developments. In particular, the sub clauses of BDP19 at g), j), k), and m) are considered especially relevant in this context. Noted - PD boxes removed from document on presentation grounds.

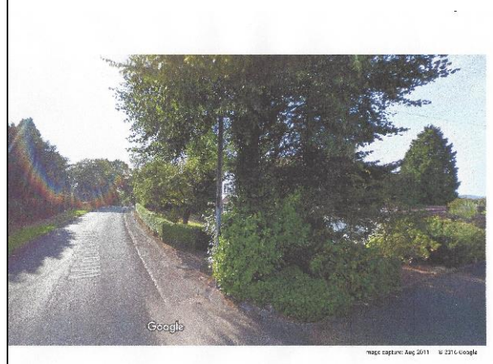
			what the 45 degree code actually is. 3.1.7. (iii) In other LPAs, the 45 degree code seems to be measured from the centre of the nearest window, rather than the closest edge. Is the closest edge approach well-established in Bromsgrove? 3.1.9 It may not be entirely clear what is meant by the sentence "Dormer windows should not be deeper than half the depth of the roof slope". Would a picture help to illustrate this point? PD Box at bottom of page 9 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. 3.6.4 This seems to duplicate the issues in 3.6.1. 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 12 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. Types of new dwelling box on page 13 It is not clear why the fourth bullet point under part C only applies to large-scale development, as part (g) of policy BDP23 Water management seems to apply to all scales of development. 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. 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. 4.2.27 What is "private amenity space"? 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.		Noted however no change considered necessary. 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. Noted and agreed – para.3.6.4 deleted to remove duplication 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. 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. Noted – this bullet point now removed from SPD as the detail of flood risk management / SuDs requirements beyond the scope of this SPD. 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, and overshadowing are not issues”. 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> This refers to additional space within the curtilage of dwellings, such as gardens, as opposed to public areas of open space. Noted – para.4.2.31 refers to the Open Space SPD for further, more detailed consideration of the design and function of open spaces.

			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 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. 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. 4.2.52 - 4.2.55 This section should also recognise the impact of lighting on biodiversity (especially bats). 4.2.66 This section may benefit from including a brief description of what 'Secured by Design' is. 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. 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.). 5.1 This states that "A well-designed conversion should retain the original, utilitarian character of the building", but not all buildings will be utilitarian purely because they are in the countryside. 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. 6.2.8 This states that "A balance of both hard and soft landscaping should be included to		Noted – previous para.4.2.33 revised as follows: "…and to ensure it benefits from natural surveillance, whilst being functional for all users". New text has been added to end of previous para.4.2.55 as follows: "The effects of new lighting on wildlife should also be a key consideration in lighting strategies associated with development." Noted – a web link to the Secured by Design guidance is provided at this part of the SPD. Noted – point (ii) has been deleted and replaced with previous point (X) to remove duplication. Noted – point viii has been deleted as not relevant to surveillance. 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'. 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. 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. This term refers to spaces that are aesthetically

			ensure that quality visual spaces are enhanced". It is unclear what "quality visual spaces" are. PD Box on page 27 It is unclear why this randomly appears here. Lots of things are covered by PD, so why single out front extensions in the section on agricultural buildings? 6.3.8 It is unclear what "Over engineered buildings" are. 7.1.5 This paragraph would more naturally appear before 7.1.2 (or they could be combined to a single paragraph, with 7.1.5 coming first). 8.2 This paragraph doesn't seem to add anything or say much. **Minor points** 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.		pleasing – amend wording in para.6.2.8 from "…~~quality visual~~ spaces…" to "…attractive amenity spaces…" PD boxes removed from document on presentation grounds. Noted – add following text to para.6.3.8 "Materials should be appropriate for the purpose and reflect the intrinsic nature of agricultural buildings". Noted – para.7.1.5 now combined with para.7.1.2 with the wording of 7.1.5 beginning the sentence. Noted – no change. Noted – spelling error corrected at 3.1.11(ii), 3.3.1 and 3.6.3.
13	Historic England	BDC	Many thanks for consulting Historic England on the above consultation, we have the following comments: We support clause 'e' in Policy BDP19 about the need to 'ensure that development enhances the character and distinctiveness of the area'. Within paragraph 3.1.3 it may be better to refer to 'heritage assets' as a general term and then state such as listed buildings, conservation areas etc. Paragraph 3.1.11 touches upon the need to respect local character and local distinctiveness which we support as an important element of good design. 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? We welcome the specifications raised in paragraph 3.7.1 and 3.7.2. 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. Our comments are the same as above, for paragraphs 3.8.1 and 3.8.2, though we welcome the inclusion of a specific section dealing with extensions/ alterations to listed buildings. 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. https://historicengland.org.uk/listing/what-is-designation/local/local-designations/ 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. https://historicengland.org.uk/advice/caring-for-heritage/rural-heritage/farm-buildings/		Noted – 3.1.3 now refers to 'heritage assets'. 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. Noted – setting of conservation areas now referred to in both paragraphs 3.7.1 and 3.7.2. Noted – setting also referred to in context of Listed Buildings at 3.8.1. 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. As resources allow, the Council intends to produce a more formalised list of non-designated assets in line with the Local Heritage List Strategy (2016). Noted – see changes made in relation to Section 5 and reference to historic farmstead guidance.

			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 that applicants know what is locally distinctive about different areas, such as historic characterisation evidence.		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 distinctiveness.
			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. https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/		Noted – new text added following 4.2.11 referring to setting of heritage assets in relation to views and vistas.
			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.		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.
			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. 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. Similar text to that referenced in paragraph 5.4 later in the document may be appropriate.		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. Further text added at new paragraph 4.3.4 regarding Heritage Statements. Further text added at new paragraph 4.3.5 regarding sites of archaeological interest and the need to seek advice from Worcestershire County Council.
			When referring to heritage assets within this section, it is the significance of heritage assets that need to be protected and where possible, enhanced, and this may include its setting. We would recommend amending the text in paragraph 4.3.2 to refer to the significance of listed buildings, including setting. 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.		4.3.2 is amended to refer to the setting of all heritage assets.
			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.		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.
			We welcome the references to the historic environment within paragraph 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. Under the 'please note' section here there could also be developments within the		Noted – 6.1.7 amended to refer to consideration of all heritage assets and their setting.

			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. Paragraph 6.1.17 would benefit from re-wording to take account of the comments made through this representation and for clarity of intention as it is somewhat unclear in its present form. Figure 11 would need to reference the need to consider the significance of any heritage assets and how these may be affected by proposed development. 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. 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. We welcome the reference in paragraphs 7.1.4 and 7.2.4 and Section 7.5. 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. Many thanks for the opportunity to comment and if you have any questions about our response please contact me on the above details.		Noted – figure 11 removed from document as not considered to add further to illustration at figure 10. Noted – change made to 6.7.1 to refer to 'heritage assets'. Noted – however this is not considered to be a significant enough issue within the District to include in this SPD.
14	Keith Sprason		I ask that consideration is given to observations listed below including items relating to quality of development design and effect on the environment within our communities: 1) My concerns with effective implementation of Local Plan BDP19 clauses; 2) Improvement to quality of application documentation; 3) Comments on current SPD Draft. I believe these matters can be beneficially addressed within this SPD. **1) implementation of BDP19 clauses.** **Policy BDP19 e :** Following the principles of the NPPF, the clause aims to ensure that ***"development enhances the character and distinctiveness of the local area".*** It is suggested that the presence of trees and hedges within existing settlements provides a prime element in establishing the distinctive character of an area. **Policy BDP19 p :** aims to ensure ***"all trees that are appropriate ... are retained and integrated within new development".*** **Aims of policies can be thwarted by a) pre-emptive felling and b) post application removal.** **a)** It is not unknown for landowners/ developers to pre-emptively remove trees and hedges prior to making an application for development. Perfectly legal of course without TPO protection, yet potentially devastating to the established character of the area. Removal of such beneficially contributory features may adversely affect the locality's character and thereby potentially contrary to those policies.		Noted. Noted – para.4.2.56 (consultation version) recommends an Arboriculture Report is used in support of applications to help inform the health and amenity value of existing trees that should be retained and incorporated into the design and layout of development proposals. Furthermore, additional wording added to 4.2.56 as per suggestion of

			[Example of pre-emptive tree felling adversely affecting character - application refused twice - appeal rejected - result is loss to community!]  Before tree removal After tree removal **b)** Trees are sometimes shown to be retained on applications (and/or reference made in Design Statements) and then subsequently removed. This changes the nature of the application which may otherwise attracted adverse comment from consultees and public. My view is that the laudable intentions of the above clauses to "enhance the character and distinctiveness" and "retain appropriate trees"/ tree groups can be readily circumnavigated unless trees are subject to a TPO. Whether these adopted clauses are workable is doubtful. It is suggested inclusion of clauses within the SPD should be considered to improve opportunity for compliance with the aims of the adopted clauses. Standards for TPO designation are high. However, many trees/tree groups and hedges can be an asset, providing significant visually important contribution to the character and distinctiveness of an area without achieving TPO designation. It is suggested that such valuable features should be considered as "non-designated environmental assets" [As with "non-designated heritage assets" referred to this SPD clauses 3.9.1, 4.3.3 and 6.1.7, "environmental assets" may be identified through submission of planning applications and/ or highlighted within a Neighbourhood Plan] **Suggested additional SPD Clauses to support BDP19 :**  To help protect the interests of the wider community, it is suggested the SPD should include: *a) all applications should include a land survey of the full land area, showing trees;* *b) where trees and hedges have been pre-emptively removed, the application will be considered on the same basis as if the trees had not been previously*		respondent – see response to comment below (p.19 4.2.56).

			removed. *c) any trees proposed for retention should not be removed without agreement of the Council. Any trees removed without permission may be required to be replaced by substantial trees.* [Google would normally provide a good guide to the original visual contribution to the street scene] **2) Application documentation :** **Inadequate information:** The SPD aims to benefit the community by requiring developments to embrace good design. Very many applications do not show the relationship of the proposals to its neighbours and street scene. (see SPD 3.3.11) [A high quality of information may help Parish Councillors/ public gauge the suitability/ compatibility of the development proposals to the character of the area] It is suggested for all developments. the SPD should require applications to include : *a) a land survey which includes the outline of adjacent buildings, trees, hedges and* *b) a street scene elevation including adjacent buildings.* In cases where Design and Access Statements are not specifically required, can BDC request a Design Statement to be prepared by applicants to design reasoning (or lack of it) in sensitive situations? **3) Comments on Draft :** Page 9: Where PDRs allow porch extensions at front of property, (ref PD Box) the description "certain requirements" should be defined. Page 10: A simple associated diagram may improve interpretation of the Cl. 3.3.1 Page 12: B) Small scale development- Plot subdivision - last line amend: *"Plot subdivision will be strongly resisted where the grain and established character of the existing area is adversely affected".* Page 15: Ease of movement Cl. 4.2.16 - 19 add or incorporate with another clause *"Clear, spacious pedestrian routes should be regarded as a prominent element of the framework of the development layout positively linking to other new developments, existing built up and rural recreational routes. Major recreational footpaths should be segregated from vehicular traffic in larger developments"* Page 17: Car Parking a) Parking bays to frontages of terraced dwellings can be overbearing and should avoided in new development. b) Cl.4.2.34 - last sentence "Incorporating garages into the main form of the dwellings should be avoided". Comment - there are many circumstances where integral garages are found within an existing settlement, maybe forming part of the established character of the area. Page 19: Trees, hedges and landscaping Cl. 4.2.56 After first sentence - add - "*Existing trees and hedges can provide maturity to a development and may be a fundamental contributor to the established character of the area.*" [this applies to both extensions as well as all new developments]		Diagram already included at Figure 2 to illustrate text at para.3.3.1. Noted – existing wording considered strong enough to protect the existing grain / character of an area from the potential adverse impacts of plot subdivision. Noted - para.4.2.18 concerning footpaths and cycle paths 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> Noted – para.4.2.35 refers to parking bays “in appropriate circumstances”. Noted - no change. Noted – previous para.4.2.56 revised to add suggested wording.

15	BDC/RBC Development Management Team		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. The existing Bromsgrove SPG is more detailed and explicit and correctly refers to the 45 degree guidance where it should be on 'daylighting issues'. 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) - Overshadowing which is a much more condensed version of the existing Bromsgrove SPG which deals with daylighting matters. 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. 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. Para.3.1.7 (under (ii) following point g)) should be amended as follows: To ensure that overshadowing does not occur, the District / Borough Council (***delete as applicable***) 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 ~~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.		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.
16	BDC/RBC Conservation Officers	BDC and RBC	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. 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		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. Noted – heading of 4.3 amended as follows: "New dwellings within or near the setting of designated and

			reworded to “Proposals within or near a conservation area or near a listed building should be……” 4.3.1 Following on from the above, “or within their setting” should be added to the first line. 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”. 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. 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”. 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.” 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 buildings for garages should not be permitted. 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. 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”. 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”.		non-designated heritage assets” 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. Noted – suggested change made to 5.2 (a). Noted – suggested text added to 5.2 (b). Noted – suggested text added to 5.5. Noted – suggested text added following paragraph 5.13. Noted – suggested text added following paragraph 5.13. Noted – no change. Noted – suggested change made at 6.6.2 Noted – suggested change made at 6.6.4

			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.”		Noted – new bullet point added at 6.6.4
			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”.		Noted – new paragraph at 6.7.5 added.
			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’		Noted – suggested text added following 6.6.7
			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”.		Noted – suggested text added following 6.6.7
			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”.		Noted – suggested text added as new bullet point
			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.). 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”.		Noted – no change.
			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.		Noted – text deleted at 6.7.5
			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”.		Noted – suggested text added following 6.7.5
			6.7.6 Third line after listed buildings add, ‘or conservation areas’.		Noted – suggested text added.

			7.1.2 'Sings' should be 'signs' in the second line. 7.2.4 We would omit wrought iron as this is almost possible to obtain, we would suggest saying, "an appropriately designed metal bracket" instead. 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 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. 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 filing 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. 7.5.2 Should 'and signage' be added after Advertisements? 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…"		Noted – typo corrected at 7.1.2 Noted – suggested change made at 7.2.4 Noted – suggested text added following 7.2.4 Noted – see text below re: 7.5.3 Noted – issue covered in 7.3 Noted – suggested text added at 7.5.2 Noted – suggested text added at 7.5.3

<u>Note:</u> 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.