

Coventry City Council

SUE Design Guidance Supplementary Planning Document
(SPD)

Regulation 12(a) Report of Consultation and Consultation
Statement

February 2019

Introduction

This report sets out the consultation that took place in the lead up to and during public consultation of the Draft SUE Design Guidance Supplementary Planning Document (in this document referred to as the Draft SPD) from 8th August 2018 and 23rd September 2018. It reviews the consultation responses received, the number of representations made and a summary of the main issues raised by the representors.

This document has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 which requires that Local Authorities set out the persons the local planning authority consulted when preparing the supplementary planning document, a summary of the main issues raised with the consultation responses, and how those issues have been addressed. Once adopted, the SUE Design Guidance Supplementary Planning Document will form part of the Council's Local Plan.

Background

The SUE Design Guidance Supplementary Planning Document has been prepared to provide technical guidance and support to the Master planning, Housing and Design policies set out in the Local Plan. This SPD has been developed with input from a range of council services, including Highways, Drainage and Public Health.

The SPD is structured to provide specific design guidance around key areas of development. This primarily includes new homes, but also relates to employment provision and community/commercial buildings. The design guidance also covers green infrastructure, highways and parking provisions.

Alongside the SPD a specific appendix is being issued to provide a high level, Indicative Masterplan for the Keresley Sustainable Urban Extensions (SUE). This reflects the fact that this SUE is split across multiple land ownerships and numerous development phases.

Public Consultation

The Draft SUE Design Guidance SPD was approved for public consultation by the Councils Cabinet Member on 6th August 2018. Public Consultation was held from 8th August 2018 and 23rd September 2018. Notification of the Draft SPD consultation was emailed to:

- Statutory Consultees including adjoining Local Authorities; and
- Local Plan database contacts including individuals, developers and community groups.

Hard copies of the Draft SPD were made available in the customer contact centre and Council House in the city centre. The consultation was posted on the council's Facebook and Twitter account as well as appearing on the main council webpages.

Comments were requested via email to localplan@coventry.gov.uk. An email address and contact telephone number was provided on all the consultation material and the website for those who wanted to ask questions and seek further information.

Summary of Response to the Consultation

The Council received a total of 10 responses via email and post to the consultation as well as a range of informal comments and suggestions made through email, stakeholder meetings and consultation drop in events. A summary of the representations made and the proposed action in response to the representations are set out in the table below.

Table 1 – Summary of responses

Summary of Point Raised	Officer Response
The Indicative masterplan for Keresley requires a caveat that the masterplan should be updated as different parcels of the scheme progress and become finalised.	Comment noted, an additional sentence has been added into the introductory section to confirm this.
I applaud the aim and substance of this document and look forward to seeing it again during any final consultation. Ensuring high quality and appropriate design which conforms to the philosophy of the Ancient Arden could make the delivery of new homes more tolerable for existing residents. We just need to make sure the standards are enforced.	Comment noted and support for the guidance is welcomed. The adoption of the SPD will give it strong material weight in the determination of planning applications. This will help ensure the Council can ensure high quality design in accordance with the document.
Support SPD and inclusion of natural landscape section with specific examples.	Comment noted.
SPD should require the 2 SUE areas to deliver a net gain in biodiversity in accordance with NPPF and Government's 25 year plan for the environment	Comment noted - This will be supported through wider Local Plan policy (GE3) however an additional sentence has been added to Page 80 for clarification.
Page 74 - boundary demarcation - we would recommend that permeable boundary features such as small gaps in walls and fences and gaps below gates are recommended in this section. This will help support the movement of wildlife and support their valuable habitats.	Point noted, connectivity to support movement of wildlife is a key component of the overarching local plan policies and is reflected in the green corridors that will run through the SUEs. An additional reference has been added to page 74 though in relation to boundary demarcation.
Page 80 - support content of this section - are keen to see the natural landscape designed to create nature networks through the development	Comment noted.

<p>Page 82 - Trees, Hedgerows and Open Space - welcome the illustration of how to retain these features. We are concerned however that if features such as hedgerows are used as garden boundaries then at least half of them will be at greater risk of mismanagement. The best way to protect them is to incorporate them fully within open spaces. We suggest that the visualisations is amended to show the first option of hedgerow retention being number 3 but with a grass buffer both sides and the second option being the garden boundary/public space option.</p>	<p>Comment noted. We consider this a key aspect of helping integrate development into the landscape. The reference has been slightly adjusted though to reflect that boundary demarcation could be private or public space and that where used for residential purposes this will need to have regard to ongoing protection and maintenance. A similar reference has also been added to page 84 to help strengthen this fact. The key here will be ensuring appropriate maintenance and conveyancing helps to secure natural features for the long term.</p>
<p>Page 85 - drainage and flood risk - We would like to see greater emphasis on multifunctional areas and natural and sustainable features. This should include more examples of green roofs water butts or rain gardens within each plot, permeable paving and road side attenuation.</p>	<p>Comment noted - additional slide added at page 86</p>
<p>In addition there should be a section on lighting to help manage the impacts of light pollution on wildlife and landscapes.</p>	<p>Comment noted, a new section providing a high level steer on lighting within new developments has been added.</p>
<p>Keresley Masterplan - the ancient woodlands need to be buffered from the built development. This should reflect the tree protection SPD buffer of 50m and be clearly stated in this document too.</p>	<p>The Trees and development Guidelines SPD sits alongside this SPD and will be considered as part of any application. The Trees SPD will reflect woodland trust guidance and seek to protect ancient woodlands as appropriate.</p>
<p>Currently natural habitats are shown on the plan next to an Arcadian Zone but it is unclear what the feature is as no description is given.</p>	<p>It is unclear which natural habitat is being referred to here. All woodlands, brook corridors or open spaces are labelled.</p>
<p>The Hall Brook should also be clearly buffered on both sides by natural habitat to protect it from harm. Currently open space is only shown on the northern side of the brook.</p>	<p>This is a reflection of the cartographic. The southern element of the scheme reflects that which has already been granted outline planning permission so will appropriately respect the land up to the brook corridor.</p>
<p>The Indicative masterplan does not show Sandpits Lane Meadow and Pastures LWS although it is mentioned in the text to be retained. The LWS should be shown on the plan.</p>	<p>Comment noted. The plan will be adjusted.</p>
<p>Reference to NPPF needs to be updated</p>	<p>Comment noted - updates have been made where appropriate but most notably page 4.</p>

<p>For the link road the useful cross section page immediately follows the first page of the link road but for other road types this is not the case. For avenues the cross section comes after all of the examples and for 'lanes' it is at the end of the section. If you are trying to quickly look through the document for key details such as the separation distances on the cross sections for the various road types they are not always in the place you would expect them to be.</p>	<p>Comment noted - have reordered slides as appropriate.</p>
<p>Lanes section makes reference to 'shared spaces' - thought we could not have these any more</p>	<p>The principles of shared spaces in quieter residential streets remains acceptable. This has been clarified by the DFT.</p>
<p>Examples of good design of large scale commercial development - don't think these are really relevant as not a scale of development would expect to see in SUE's</p>	<p>The employment allocation at Eastern Green could quite conceivably include some development similar to those used as positive examples.</p>
<p>This is a very lengthy document and difficult to quickly pick out key standards such as separation distances/ bin storage etc. Would be useful to have a summary of key info that includes things such as minimum separation distances (covering different scenarios - front to front, back to back. back to side etc.), minimum garden sizes, bin storage and max distance this can be from un-adopted road, garage space internal standards, parking space sizes, boundary treatment . Whilst most of this information is in there it is not easy to pick out from all of the text and examples</p>	<p>Comment noted. We have made some adjustments to the text and added a new section within the report to clarify separation distances etc.</p>
<p>SPD should make it clear in the introduction that the Urban Extension Design Guide does not replace the existing Ancient Arden Design Guidelines, but complements these guidelines with specific reference to the proposed large scale urban extensions. The existing Design Guidance for small scale proposals can be easily updated and should be completed to compliment this Design Guide.</p>	<p>Additional text has been added to page 3 of the document. This confirms that the new guidance will "apply to any developments of 6 or more dwellings or any other multiple property developments not accessed from a private drive. It should also apply to commercial and community developments. Extensions to existing properties, single dwelling proposals or small multiple developments off private drives or shared drives will continue to be considered under the 1995 guidance until such time as it is formally updated".</p>

<p>SPD and examples are informative and welcomed however the document could possibly provide a greater focus on good examples from the local rural Warwickshire Arden area, reflecting its 'local distinctiveness' and a 'sense of place', to help provide an enriching design and landscaping</p>	<p>Comment noted, unfortunately there are very limited examples of local developments within this area that are reflective of scale and context that the 2 SUEs will deliver. It's for this reason that we have sought to bring together examples of small scale developments in the local area with good practice examples from wider afield to help show how the principle of local vernacular can be utilised in larger scale developments.</p>
<p>It is vitally important that the homes built here are well-designed new developments that are sensitively accommodated into the rural-urban fringe by reason of their siting, materials, design and appropriate landscaping, while minimising noise and light pollution, inappropriate street lighting, the proliferation of urban signage and advertising, and helping to secure overall 'net gains' in biodiversity. This would be consistent with the latest NPPF 2018.</p>	<p>Comment noted</p>
<p>As these proposed urban extensions will also be well served by public transport, consideration could be given to designing part of the schemes as car-free '<i>quiet lanes</i>' developments, thus limiting standardised suburban treatment of the highway, where walking and cycling are actively promoted as preferred modes of transport (Local Plan Policy AC4: Walking & Cycling), and offering a more sustainable and peaceful lifestyle choice for some home buyers, including first-time buyers.</p>	<p>This principle is encapsulated in the concept of shared spaces and highways that are promoted throughout the guidance.</p>
<p>With reference to the proposed list of tree and shrub species, these should predominantly reflect the locally occurring native species recommended in the Ancient Arden Design Guidelines (page 38) and the complementary Arden Landscape Guidelines produced by Warwickshire County Council, consistent with the Warwickshire, Coventry & Solihull sub-regional Green Infrastructure Strategy and supported by Warwickshire Wildlife Trust.</p>	<p>Comment noted - the list does include native trees. It has been agreed with the Councils tree officers as a list of appropriate species to support developments of this type and location.</p>

<p>In general the SPD and indicative masterplan for Keresley are supported. There will be a range of matters that will require attention through the future phases of masterplans. These include Policies EM4, EM5 and EM6 in particular. This relates specifically to the management of the brook corridors, the provision of SUDs and delivery of improvements under the Water Framework Directive.</p>	<p>Comment noted</p>
<p>Support the principles of the SPD. Wish to promote additional development parcels within the existing SUE boundary and would not want the indicative masterplan to unduly prevent delivery of other sites where they are suitable and deliverable.</p>	<p>The masterplan is indicative. Its primary purpose is to ensure that different development parcels have regard to the expected areas of other development and the initial site identification/assessment process that was undertaken through the SHLAA. It will be regularly monitored and updated to reflect evolution of the SUE through the planning process. Any additional development plots that continue to fit in with the overriding principles of the Masterplan would not necessarily be discouraged, but would need to be considered in the context of the SUE and on their own merits. The primary focus for non-development will be along the Hill fort view corridor, moving down into Hounds Hill and the Hall Brook corridor. This is outlined in the indicative masterplan.</p>
<p>Examples provided on pages 7-12 are not relevant to a large scale development such as the SUE's and as such are not necessary to include.</p>	<p>Comment noted, however these examples are not reflective of the exact developments we expect to see within the SUE, but instead establish good examples of the sort of materials and design principles that we would expect to see reflected in the new developments. This is set out in the draft SPD as a principle and has previously been communicated. This reflects the lack of larger scale developments within this character area.</p>
<p>Many of the example are not local (e.g. pages 15-19) and are not relevant to the Arden</p>	<p>Comment noted, unfortunately there are very limited examples of local developments within this area that are reflective of scale and context that the 2 SUEs will deliver. It's for this reason that we have sought to bring together examples of small scale developments in the local area with good practice examples from wider afield to help show how the principle of local vernacular can be utilised and interpreted in larger scale developments.</p>

<p>When discussing the historic character of the Arden there is little recognition that the area has already been compromised by recent developments e.g. Tamworth Road, power lines and proximity to the city itself. This should be covered.</p>	<p>The guidance does set out the character of the area. Even if we accept that some of the immediate area and its character have been compromised it is no excuse in itself to justify a bog-standard form of development within the SUEs - especially when we are talking about a substantial level of development within an undulating and otherwise undeveloped landscape. As such, this design guidance is intended to be positive and reflect future development this draws on good examples within the local area. It is not intended to pick out existing properties that cannot be influenced by the guidance.</p>
<p>The SPD is not reflective of an SUE of this size being delivered by major housebuilders. The statement on page 6 regarding the "very much traditional vernacular" is not an appropriate objective for a modern SUE especially in view of the examples. The guidance on page 7 is also too prescriptive and more suited to a Conservation Area.</p>	<p>Page 6 says: "It is important to note that whilst this is very much a traditional vernacular it will not be used as a basis to preclude creative, well thought out and innovative designs. As previously highlighted, modern interpretation of these historic characteristics are welcomed and encouraged and will always be treated on their own merits." Page 7 then stats "There is no fundamental expectation that these will be replicated verbatim across new developments, however these are intended to provide a helpful reference for how the more traditional elements of Ancient Arden design can be incorporated and interpreted within new development proposals." As such, we do not consider this too prescriptive - no change is proposed.</p>
<p>The guidance fails to take account of what can be realistically delivered by housebuilders e.g. sash windows are not widely used in commercial housebuilding due to implications for building regulation related to fire ingress and escape routes.</p>	<p>We respectfully disagree and are aware of numerous examples across the country where such options are incorporated into new build developments. The scale of these developments also offer a degree of scale to support such opportunities. These issues can also be considered further through the planning application stages. In terms of Building Regulations it is our understanding that any window at first floor level needs to facilitate a means of escape and incorporate an area of 0.33sq.m with at least one length of the windows being 450mm. It is our view that this can be managed through a wide range of window types meaning the guidance would be appropriate in terms of Building Regulations and fire safety. No changes are proposed to the guidance.</p>

<p>There are other examples of features that are unlikely to be commercially viable at this scale including roof pitches at 40 degrees, tile verges, the specific mix of bricks, dormer windows with eaves below 2 stories and real chimney stacks. These features would be more suited to landmark buildings rather than general design.</p>	<p>The guidance reflects this and would allow for such proposals. The guidance is not a requirement for a slavish recreation of all Arden characteristics within every single property. The guidance invites modern creative approaches and interpretation to traditional characteristics. We would agree though that feature buildings or landmark buildings could be used in a more traditional way.</p>
<p>In the housing design section the SPD states that a diverse approach to housing design is encouraged and that this will ensure there is a variety of character and texture across the developments as opposed to a homogenous swathe of development. If this is a key objective it is generally supported and should be clarified in earlier sections.</p>	<p>Comment noted. In our view this is reflected throughout the document.</p>
<p>There is no local/ Arden evidence to support linked dwellings. If used on all street types it will result in homogenous street scenes which conflicts with wider aims and objectives.</p>	<p>There are examples of smaller scale linked dwellings and the courtyard example also lends itself towards this. We have used these by way of example to help highlight a good quality street scene. We would not expect them to be used continuously across the whole development but they are an option as part of the main street scenes and a way of helping incorporate on plot car parking.</p>
<p>Linked dwellings can create difficulties in meeting parking requirements without relying on on-street parking which in turn can affect the street scene.</p>	<p>This is not our experience in the schemes we have researched and not our intention for any examples here. It's not our intention for the scheme to be entirely covered by linked dwellings, they are one housing type that can add texture and interest to the street scape and can, in some cases lead to more efficient use of land. In this respect, the examples we have seen help bring cars off the street and incorporate them into the development plot in a safe and efficient way. We do appreciate this will require specific plot design but the examples quoted here are intended to support this process.</p>
<p>Linked dwellings tend to be smaller properties so could impact on housing mix and prevent delivery of larger family homes</p>	<p>This is not our experience in the schemes we have researched and not our intention for any examples here.</p>
<p>The example of landmark/corner buildings on page 21 would require remote parking which is not a preferred option for residents or under the concepts of design out crime</p>	<p>Comment noted the following reference has been added to the text "In these circumstances parking could be provided to the side or rear of the property or in a suitable on street alternative close to the property."</p>

<p>The rationale behind the street hierarchy is appreciated however the section is too prescriptive and more associated with a site specific design code. The illustrative drawings show a low level of parking or no parking at all. It would appear that little consideration has been given to how the guidance will deliver the requirements in Appendix 5 of the local plan.</p>	<p>The guidance highlights that the focus will be for on plot parking supported by well-designed parking options on street designed into the highway in a safe and effective way. It is our view that the examples shown reflect such opportunities, with examples of drive ways, car ports, undercrofts spaces and in some cases spaces to the side and rear (predominantly accessed through undercrofts) of the property. We would again stress that these are indicative examples however highlighted to help steer more detailed site specific design as part of the planning application process. We can confirm that the standards in appendix 5 of the Local Plan have been taken into consideration as part of this guidance.</p>
<p>The guidance should specify the circumstances where there can be access onto the Keresley link road</p>	<p>Comment noted - additional text has been added to the Keresley Link Road section of the Indicative masterplan.</p>
<p>The lanes section in particular is prescriptive and raises concerns over the references to continues built frontages and the linking of dwellings, detached and semi-detached properties should not be limited to occasional use.</p>	<p>The layout in relation to the lanes is again indicative and an example of what could be delivered. We fully expect the land typology to be widely used within the development and recognise that this could form longer or shorter lanes, hence a wider number of examples are shown. We would not be against more frequent use of different house types as part of these areas though if this was appropriately designed and managed within the overall layout. In deed we fully expect the SUE's to provide a focal point for larger family homes with more detached and semi-detached properties.</p>
<p>Page 39 states that building heights on lanes should be 1.5 storeys however it is not clear what the justification is for the low height. Furthermore, page 40 states that dwellings should be 2 storeys which is more appropriate.</p>	<p>The guidance provides the option for a limited mix of property heights. Page 39 has been adjusted slightly though to provide consistency about the focus on 2 storey dwellings.</p>
<p>Point 9 on page 40 states that dwellings will have an informal front garden however this lacks any clear public/private demarcation and is often seen as undesirable to residents.</p>	<p>In the context of the lanes typology the primary focus of this point is to prevent the provision of formal boundary treatments such as walls or fences. Point 9 is clear that planting and decoration by households to add a degree of personalisation would still be acceptable and expected within this area. In our experience such boundary appearances are not uncommon within residential areas.</p>

<p>The overuse of varying house types with different roof heights and pitches could create a disjointed street scene rather than a varied one and requires more careful consideration.</p>	<p>We respectfully disagree. We are aware of numerous examples across the city and the country where varied roof heights as part of different house types can help create a highly interesting street scene and represent excellent design principles. Again, the images here show an indicative example of how a street scene could be created.</p>
<p>With regards shared spaces it should be clarified that the highways adoption teams are satisfied with this approach. Anything with flush kerbs or edging (e.g. Lane section) is not suitable for visually impaired and should be reconsidered. The narrowing of lanes and pinch points may also create issues due to a lack of visibility (page 44)</p>	<p>We can confirm that the SPD and proposals within it have, in principle, been endorsed by the Highways Authority. There may be locationally specific circumstances within development phases that may require adjustment but this would be dealt with on a case by case basis having regard to the transport assessment and highway safety considerations. The document itself does need to specify that this is acceptable to the Highways Authority as it is a council document.</p>
<p>It is unclear what the vision is for the edge road typology. Page 56 are all 3 storey examples however it is unclear if this is something that would be supported bearing in mind such streets are likely to form the rural fringe of the development. The Poundbury example in this regard is inappropriate as it has no links to the Arden character. Do the council want a higher density edge road (e.g. Poundbury) or a lower density less formal style to achieve a smoother urban-rural transition.</p>	<p>The section on edge roads has been amended to respond to these comments. This includes clarification over heights of dwellings etc.</p>
<p>The highways authority need to confirm that irregular designed internal junctions will be acceptable.</p>	<p>We can confirm that the SPD and proposals within it have, in principle, been endorsed by the Highways Authority. There may be locationally specific circumstances within development phases that may require adjustment but this would be dealt with on a case by case basis having regard to the transport assessment and highway safety considerations.</p>

<p>Parking needs a greater focus throughout the document. All examples show very little or no off street parking. Examples should be demonstrated for each street typology. For example the car ports concept on page 66-67 are generally avoided in good urban design as they are often used for storage and can be unsightly in the street scene.</p>	<p>The integration of appropriate parking solutions has been a priority of this guidance. This is emphasised by the specific section on parking and number of examples shown. In our view all street scene examples and plot examples show parking opportunities, with a primary focus for on plot parking. With regards car ports, we have identified these as an alternative to garages and a way of integrating on plot parking in an efficient and effective way. We note the point about storage etc., but this can be true for any property regardless of having a car port or not. If anything such a provision would provide a focal point to the side of the house instead of having it to the front where it would be even more visible.</p>
<p>Page 69 requires parking to the front of dwellings to be kept to short runs. This is generally supported however the inclusion of linked dwellings makes this difficult</p>	<p>We do not necessarily agree with this. The examples within the document (pages 64-70) show how short run front of plot parking can be incorporated within linked dwellings. This can include undercrofts and front forecourts integrated into the highway, as well as on street bays to the front of homes.</p>
<p>Public realm materials - this list should be clarified as not being exhaustive or overly prescriptive. It's questionable whether or not it should be included as it would be more suited to a design code.</p>	<p>The provision of high quality public realm will be essential to integrating these developments into their landscape and supporting the overarching aims and objectives of the allocations and the Local Plan. This section already clarifies that "The following slides provide good (but not exhaustive) examples of appropriate materials". Set in the context of the wider SPD we are happy to consider alternatives that will help create a high quality public realm. In our view, no further clarification is therefore needed.</p>
<p>Natural landscape section generally supported, however it should be clarified in the drainage and flood risk section to acknowledge the dual use potential of open spaces</p>	<p>Reference already included on page 80. Following wording added to page 85 "Where appropriate areas for drainage and flood mitigation measures should be utilised as multi-functional green/blue infrastructure in accordance with Local Plan policy and to support efficient and effective use of land."</p>
<p>The indicative masterplan should clarify the position around onsite and offsite open space and how that links in with the 80% net/gross ratio of development.</p>	<p>Comment noted, the text within the indicative masterplan has been adjusted to add further clarification and explanation around the green corridor and its role as a focal point for green/blue infrastructure.</p>

<p>Many of the design requirements are more suited to smaller developments and not to major housebuilders who have limited house type options. They are more suited to smaller or bespoke house builds. The Council needs to demonstrate an acceptance and understanding of the pressures facing large scale house builders in respect of translating local characteristics into a design scheme that is both viable and deliverable.</p>	<p>We respectfully disagree and are aware of numerous examples across the country where specific design options are incorporated into new build developments. The scale of these developments also offer a degree of scale to support such opportunities. These issues can also be considered further through the planning application stages. It is important to note that this SPD has been developed with targeted developer involvement over an extensive period of time to test its deliverability with no prior concerns raised. It is also important to note that the guidance provides an opportunity for flexible integration of local characteristics, it does not require everything to be delivered on all properties. The key is a local interpretation of the characteristics outlined in this guidance, not a slavish replica. No changes are proposed to the guidance.</p>
<p>The word "exactly" should be removed from the text on page 3</p>	<p>No change is proposed. The word "exactly" sits well within the context of this guidance. This section is talking about how the local characterises can be interpreted into a new modern development. It is not about a slavish recreation of historic buildings or characteristics.</p>
<p>Landscaping features from the local vernacular should be referenced as potentially helping shape the development - not just built form.</p>	<p>The importance of landscaping features is referenced throughout the document. This includes local tree species, hedgerows, blue infrastructure features and open spaces. The appendix to the rear in relation to trees is also an important reference relating to local species.</p>
<p>There should be greater use of negative examples to show upper and lower levels of acceptable development</p>	<p>This has been considered, however we felt on balance that the document was already becoming very long and detailed. As a result we have focused on positive examples. Some negatives have been included where appropriate and necessary. We also felt that by providing too many examples of upper and lower limits may result in overly prescriptive guidance.</p>
<p>The DWH scheme at Upton is an example of a bespoke scheme and not one that would be viable to reproduce on mass. If this happened it would become lost in the massing and the development would be at risk of becoming monotonous.</p>	<p>Comment noted. This is not a scheme we would expect to see duplicated on mass. It is however a scheme we have researched that offers some good quality examples. We would therefore like to see some of the best quality elements considered for integration as a feature or bespoke options within a bigger overall development. In our view this could mirror the approach taken at Upton where a bespoke scheme forms part of a larger development phase.</p>

<p>The use of linked dwellings in principle is acceptable but this should be restricted to specific character areas - not a predominant form of development.</p>	<p>Comment noted. The intention of the guidance is that linked dwellings provide a good quality and effective opportunity to be delivered as part of the overall development. We would not expect to see them used in isolation.</p>
<p>Greater clarity is requested on what would be acceptable for a corner / landmark building. There are currently too many examples.</p>	<p>We appreciate that the examples are varied, but all provide a reflection on the text on page 20. This is the key overarching guidance. The number of examples are reflective of the flexibility and opportunity to interpret landmark buildings and corner features.</p>
<p>Additional information on each street typology would be helpful. This could include clarification over acceptable building heights or number of storeys</p>	<p>Comment noted. We have tried to strike a balance between providing adequate detail and clarity without being overly prescriptive on the different parts of the guidance. In our view adding further detail may lead to guidance being too complex in this respect. With regards building heights, there is already references included for each typology. Page 39 and 47-49 reference heights for Lanes with an appropriate height to width ratio, with reference on page 39 being adjusted to ensure consistency. Page 34 references avenues with buildings at an appropriate height to width ratio and 38 references a height to width ratio of around 3:1 for internal roads to create a sense of enclosure. Page 50 covers courtyards and suggests heights of around 1.5-2 storeys. Height reference has been added to page 56 for edge roads. Heights on the link road are then left more open with the section referencing the opportunity for taller buildings along this route. Additional reference has also been added to page 77 with regards heights for commercial and community buildings.</p>
<p>Page 28 lists the street hierarchy which includes reference to cul-de-sac/turning heads typology - this is not however included in the document.</p>	<p>Comment noted. We have amended page 28 accordingly. Page 44 has also been adjusted to clarify the context of the turning head and cul-de-sac option.</p>

<p>Link road - the principle of the link road is objected to. If it is delivered then there should be flexibility over how properties relate to it and ideally they should back on to it. The nature of the link road - which would be like a bypass supporting Prologis, would not be conducive to a suitable residential area. In that context the road typology needs to be amended. For example the graphic shown on page 31 is not representative of the section on page 30.</p>	<p>Variations between page 30 and 31 are noted, however the examples on page 31 does include some active frontage which is the overarching principle of that which is suggested on page 30. The overarching principle of the Link road is established within the Local Plan. We would accept that there is some flexibility in how the road will be delivered, but we have to have regard to the fact it will run through a new residential development. If the properties turn their back on it then it only serve to separate the 2 parts of the development. This will not support sustainable communities. Where the link road does not relate directly to new homes however, there may be scope to deliver it differently and this can be discussed through the planning application process.</p>
<p>Tree lined avenues require clear support from the highways authority around maintenance and suitability</p>	<p>We can confirm that the SPD and proposals within it have, in principle, been endorsed by the Highways Authority. There may be locationally specific circumstances within development phases that may require adjustment but this would be dealt with on a case by case basis having regard to the highways and landscape design proposals</p>
<p>Private front gardens on avenues of up to 6m is wasteful and should be reduce to 1-3m</p>	<p>Guidance suggests between 2 and 6m with wider distances reflecting provision of on plot parking. This provides a flexible range within which to deliver this typology.</p>
<p>The internal road typology switches between "internal roads" and "streets" this is confusing and a consistent terminology should be used.</p>	<p>Comment noted - wording changed to "internal roads" to ensure consistency</p>
<p>Page 37 refers to internal road typology being narrower than boulevards, however there is no boulevard typology, should this refer to avenues?</p>	<p>Comment noted, yes it should refer to "avenues"</p>
<p>Page 38 - the parameters for these roads to be set back by 3-6m is too high and should be amended to 1-3m</p>	<p>Comment noted. Text will be adjusted to provide a similar steer to the avenues example. This will allow for gardens of between 2 and 6m with wider distances reflecting provision of on plot parking as appropriate. This provides a flexible range within which to deliver this typology.</p>
<p>Page 40 - point 1 and 12 - the document refers to the "street". The Lane is also identified as "the street" on page 41. this should be amended to "lane"</p>	<p>Comment noted - text has been amended.</p>

<p>Page 40 - points 12 and 13 - again clarify that trees are desirable subject to highways authority approval.</p>	<p>We can confirm that the SPD and proposals within it have, in principle, been endorsed by the Highways Authority. There may be locationally specific circumstances within development phases that may require adjustment but this would be dealt with on a case by case basis having regard to the transport assessment and highway safety considerations. The document itself does need to specify that this is acceptable to the Highways Authority as it is a council document.</p>
<p>Too many examples of lanes - gets confusing as to what's acceptable.</p>	<p>We have considered this at length and remain of the view that the Lanes will be one of the most common typologies used throughout the development. They are therefore likely to vary between longer and shorter lanes. As such a range of options and sub-typologies are, in our view, helpful to provide flexibility and support different aspects of the detailed design process.</p>
<p>Lanes should be designed to be less urban through built form not grass verges - this could be achieved by breaking up the continuous frontages.</p>	<p>Although we would encourage the delivery of linked dwellings the guidance does not prevent the breaking up of continuous frontages and remains supportive of different dwelling types. The use of grass verges and front gardens will form an important part of different street scenes and in our view will help provide an attractive and well-designed residential area. This reflects some of the examples we have seen and highlight within this guidance.</p>
<p>Courtyard examples require more flexibility - the examples here are currently a slavish reflection of the Arden characteristic schemes which is not the intention of the guidance.</p>	<p>Comment noted, but of all street typologies, this is the one that does link back most to the Arden character and for which there are some good local examples. For clarity, we would not expect to see this occur a lot across the development but it does provide an opportunity to incorporate a bespoke element of a development that provides a positive reflection of the Arden character, especially in terms of lay out.</p>
<p>Edge roads - parameters are too large. A 6.8m carriageway is too big, especially if there is a dedicated cycle/footpath next to the road.</p>	<p>Comment noted, the width has been amended to be 4.5-6.8m the text that supports this has then been extended to clarify that the exact width of the highway will depend on the location of the footpath/cycleway relative to the road.</p>

<p>A general edge road is normally interpreted as a private road with a width not exceeding 4.25m with 1-3m deep gardens. Either the edge road needs to be more flexible or the guidance should add a private drive typology.</p>	<p>Comment noted, the width has been amended to be 4.5-6.8m the text that supports this has then been extended to clarify that the exact width of the highway will depend on the location of the footpath/cycleway relative to the road. The garden depth is intended to reflect the opportunity for on plot parking. This has been adjusted to a wider range of 2-6m though to reflect the avenues and internal road typologies.</p>
<p>The guidance should be clearer about where priority and no priority junctions should be used</p>	<p>Comment noted, additional information has been added about the priority and non-priority of junctions.</p>
<p>Page 62 - the comment about parking courts is not correct and should be amended. Where they are well designed and with surveillance they work well.</p>	<p>The guidance is reflective of our own research and assessment. It also has specific regard to Coventry examples, which is something that comments have encouraged. The wording of the sentence does not suggest it is a blanket position though as it does say "does not always make for an efficient use of land", the use of "always" therefore recognises that there may be some cases where it does work. Our experience however is that it's not very common.</p>
<p>Parking undercrofts shown on page 67 are not popular with residents and are an inefficient use of land.</p>	<p>This section is clearly headed 'Suggested Design' - it is not to be interpreted as a request for slavish recreation across the developments. Instead it provides a guide to what could be delivered and what could help achieve the aims of the guidance and the parking strategy element of it. This can be discussed further through the planning process. We are however aware of numerous schemes across the country where they have worked.</p>
<p>Public realm materials are over prescriptive and above standard specification. This will have viability issues for development if its insisted upon. The materials pallet needs more flexibility and should not put forward conservation style kerbs and edging when the area is not a conservation area.</p>	<p>The provision of high quality public realm will be essential to integrating these developments into their landscape and supporting the overarching aims and objectives of the allocations and the Local Plan. This section already clarifies that "The following slides provide good (but not exhaustive) examples of appropriate materials". Set in the context of the wider SPD we are happy to consider alternatives that will help create a high quality public realm. In our view, no further clarification is therefore needed.</p>
<p>With regards trees - page 87 should carry a note to clarify that the list is not exhaustive.</p>	<p>Comment noted. This list is however intended to be reflective of the species of trees common to the Arden area and therefore provides an opportunity for planting and landscapes to be reflective of the character area within which they are planted. It will be reviewed before the SPD is reissued.</p>

The list of trees and positioning of trees needs to be considered in the context of highway management and drainage.

Comment noted. The tree species recommended will be reflective of the trees common to the Arden area. The provision of trees within the street scene are also an attempt to promote high quality street scenes and good quality design.