



Cheshire East Borough Council

Planning and Compulsory Purchase Act 2004 (as amended)

**The Town and Country Planning (Local Planning) (England)
Regulations 2012**

Statement of Consultation Report

**Cheshire East Borough Design Guide Supplementary Planning
Document**

March 2017

1: Introduction

- 1.1 This consultation statement has been prepared in accordance with Regulation 12 of The Town and Country Planning (Local Planning) (England) Regulations 2012. The statement sets out who was consulted on the Draft Cheshire East Borough Design Guide Supplementary Planning Document (“SPD”), when and how, and summarises the representations received and how they have influenced the revised final Cheshire East Borough Design Guide SPD.

2: Purpose of Supplementary Planning Documents

- 2.1 Local Planning Authorities may prepare Supplementary Planning Documents (“SPDs”) to provide greater detail on Local Plan policies. The National Planning Policy Framework (“NPPF”) supports the production of SPDs where they can help applicants to make successful planning applications or aid infrastructure delivery.
- 2.2 The SPD cannot set out new policy but will expand upon the Council’s existing policies as set out within the adopted Macclesfield Borough Council Local Plan (2004), the adopted Congleton Borough Council Local Plan (2005) and the adopted Crewe and Nantwich Local Plan (2005), as well as the design policies of the emerging Cheshire East Borough Council Local Plan Strategy.
- 2.3 It is intended that the SPD will be used to provide detailed design guidance; ensuring development is responsive to the context and environments into which they are set and securing the high design quality advocated in the NPPF and the design and other policies set out in both the saved policies of the legacy Local Plans, but also policy SE1 Design and other policies of the emerging Local Plan Strategy.

3: Who was Consulted?

- 3.1: As part of the SPD preparation process, to ensure appropriate and proportionate Stakeholder involvement in advance of full formal public consultation, focused pre-production work was undertaken with a variety of internal and external stakeholders.
- 3.2: This process and the way it informed the draft SPD are set out in the Interim Statement of Consultation, available from the link below:
<http://www.cheshireeast.gov.uk/planning/borough-design-guide-consultation.aspx>
- 3.3: In line with the Council’s Statement of Community Involvement, notifications were sent out to all the relevant bodies, and those people and organisations listed in the Council’s Local Plan Strategy Database at the time of the consultation. The statutory consultees set out in the Town and Country Planning (Local Planning) (England) regulations 2012 were all consulted. A number of developers, agents and consultants who had participated in stakeholder workshops during the preparation of the Design Guide were also specifically consulted.
- 3.4: Community consultation meetings were also held at and Crewe and Congleton on the evenings of 14th and 20th April, participants were parish and Town Councillors and representatives of Neighbourhood Planning Groups.

4: How were People Consulted?

4.1: The consultation period ran from Wednesday 6th April until Friday 27th May 2016. The consultation period was extended to ensure that sufficient time was provided for people to comment on the Design Guide SPD.

4.2: A notification email was sent to statutory consultees and other relevant consultees, including those registered on the Council's Local Plan Strategy database, in time for the start of the consultation. A copy of the email is attached as Appendix 1

4.3: The Draft SPD together with all supporting documentation was made available in a dedicated area on the Council's website

<http://cheshireeast.gov.uk/planning/borough-design-guide-consultation.aspx>

Hard copies were also made available at the following Council Offices; **Municipal Buildings**, Earle Street, Crewe, CW1 9HP, **Delamere House**, Delamere Street, Crewe, Cheshire, CW1 2JZ, **Macclesfield Town Hall**, Macclesfield, Cheshire, SK10 1EA and **Westfields**, Middlewich Road, Sandbach, CW11 1HZ during their normal opening hours.

4.4: An information leaflet was also available at all the libraries throughout the Borough during their normal opening hours, the Council issued a press release and also placed an advert in 3 local newspapers to promote the consultation within the local area.

4.5: A dedicated email address was set up to receive comments in addition to consultees being able to complete the online questionnaire.

5: Summary of Responses

5.1: 78 responses were received either by email or via the online questionnaire.

5.2: A summary of the representation comments received and the Officer responses to these, broken down by theme, is set out at Appendix 2 to this report.

6: Summary of the Main Issues Raised

6.1: Representations were principally concerned with:

Relationship to existing policy

- Conflict with National Planning Policy Framework (NPPF) re: level of prescription and requirements e.g. comprehensive Masterplanning
- Whether the SPD could require enhanced standards in terms of Part M of the Building Regulations

Viability

- Linked to the above level of prescription and impacts on viability
- Whether adequate viability assessment had been undertaken

Use of Design and Access Statements ("DAS"), Design Codes and Building for Life

- Need for clarity on mandatory and non-mandatory requirements
- Clarity as to when design codes will apply
- Clarity on relationship between DAS and design codes
- Requirements for Building for Life Assessment

Example sample settlements and character areas

- Additional sample settlements requested
- Content of the character area and sample settlement guidance
- Names of character areas

Relationship to neighbourhood plans

- Referencing in the design guide
- Clear criteria that neighbourhood plans can refer to
- Neighbourhood plans should take precedence over the Design Guide

Other related guidance

- Making sure there is reference to guidance such as Conservation area appraisals

Footpaths

- Retain dedicated footpaths in street design
- Provision for cyclists
- Lighting

Gateways

- Character of existing as well as proposed gateways

Ensuring good design

- As above in relation to clarity on requirement (codes, Design and Access Statements (“DAS”) etc.)
- Integration should not be repeating poor design
- Explicit definition of pastiche
- Colour and materials: the limited palette set out in the guide and need to protect historic materials
- Guide should not prevent innovation and become a ‘rule book’
- Quality of materials specified – only rich detailing and design solutions
- More detail on scale, massing and street enclosure

Street design, parking and cycling

- Encouraging more sustainable patterns of development and modal shift
- More info on cycle storage and provision
- Too much detail on parking provision
- Focus on suburban layouts determined by parking
- Traffic calming
- Width, finishes and specification for roads and footpaths
- Adoptability

Sustainability

- Unnecessary because covered in the Building Regs
- More explicit in relation to existing codes including national space standards
- Comprehensivity does not mean development is sustainable
- Setting out access distances to services and facilities
- Promoting self build

Quality of life

- Challenging unsustainable settlement patterns
- Unclear what is mandatory in the checklist
- Controlling noise pollution

Checklists

- Clarity on their use and status
- Refinement of questions in checklists
- Additional questions re: cycle provision
- Checklists too restrictive and could some criteria get missed by planning officers assessing proposals
- Clarity about the status of BfL12

Lighting

- Changes proposed by Cheshire East Highways (Street Lighting)

Green infrastructure (GI)

- Inclusion of links to best practice
- Provision for bats and birds
- Recognition of canals, rivers as part of natural and built heritage
- Design standards should be raised incrementally. Design Guide too prescriptive and introduces costs that could stall development due to abnormal costs including GI
- Protection of air, soil and water quality
- Substantial trees within layouts to break roofline

Sustainable Drainage Systems (SuDS)

- Clarification on adoption

Other issues

- Summary document would assist
- General editing of document
- Clarity of diagrams

7: How have the Issues raised been addressed in the Draft SPD?

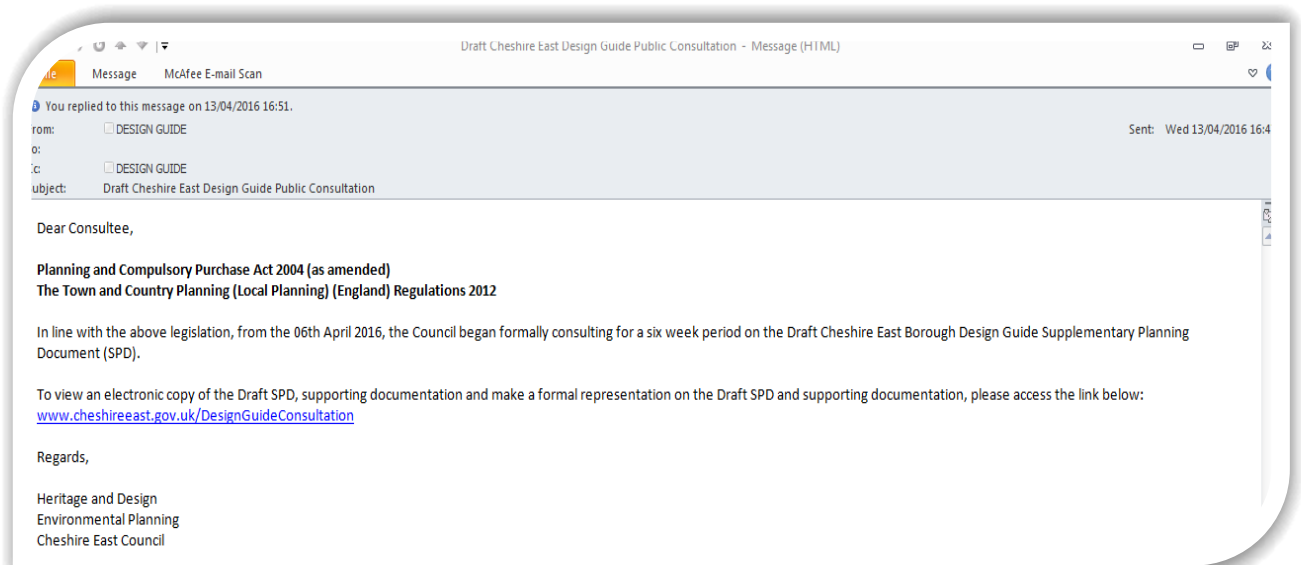
- 7.1: The table at Appendix 2 of this report sets out how these themed comments have been considered and what changes to the SPD have resulted from them. These have also been reviewed in terms of the Sustainability Assessment and Habitat Regulations Assessment.

8: Conclusions

- 8.1: The relatively modest response to the consultation, despite the notification being sent to circa 12,000 individuals and organisations and running for 8 weeks, is both a reflection of the specialist nature and interest of the Design Guide but also an indication that the vast majority are supportive of the Design Guide's primary intention. Namely, providing positive guidance to ensure that new development is of better quality and has a strong sense of place and local distinctiveness that reflects the character of the Borough.
- 8.2 Perhaps inevitably, guidance that will seek to reinforce existing policies to secure better quality, more place considered developments, has resulted in some less positive comment from individual organisations within the land and development industry. These contend that the Design Guide is too onerous in parts, does not properly take account of development viability and does not sufficiently consider more recent character within settlements, instead focusing on the more traditional characteristics of towns and villages and is therefore in conflict with the NPPF.
- 8.3 The comments received from the development industry have been fully and satisfactorily considered and where appropriate amendments have been undertaken to address concerns that are considered relevant and appropriate as set out in appendix 2.
- 8.4 Counter to the developer view, some comments have also been received, to the effect that, the design guide isn't sufficiently radical or far reaching, including those made by Places Matter! (the regional design review organisation). Again those comments have been fully considered and where appropriate amendments have been made. But, it is considered that the guide takes both a balanced and pragmatic view on design reflecting the NPPF in its entirety and the distinctive character of Cheshire East, its pressures and its needs.
- 8.5 Finally, the design Guide SPD has been considered in terms of Sustainability Assessment and Habitat Regulations Assessment with a positive assessment of the prospective impacts of the design guide on both the built and natural environment, subject to some minor revisions, which are set out in Appendix 2.
- 8.6 In conclusion therefore, notwithstanding some of the adverse comments received, the Design Guide is considered fit for purpose and capable of adoption as a SPD, subject to the changes as set out in Appendix 2 which will further refine and improve the guidance.

Appendix 1

Consultation notification email



Appendix 2

Summary of Responses Received & How They Have Influenced Development of the SPD

Appendix 2 Summary of issues raised during consultation and responses/proposed changes

Issue	Issue raised during consultation	Officer Response	Modification made
	Support for the Design Guide		
1	<p>Widespread support for the production of a design guide and its aspiration to improve the quality of design. This support is caveated with suggestion(s) of changes, including</p> <ul style="list-style-type: none"> Improving the organisation and clarity of sections of the design guide Support for rationalisation of the text The Design Guide should make clear what is mandatory 	<p>Support for the design guide is welcomed.</p> <p>The overall structure of the document is considered fit for purpose. Further editing has taken place to improve the usability of the document.</p> <p>It should be stressed that this is a guidance document which supports the implementation of Local Plan Policies / requirements of the National Planning Policy Framework (NPPF).</p> <p>Minor amendments have been made which further clarifies those elements which are mandatory and those which are guidance.</p>	<p>Proposed modifications in this table (appendix 2 - read together) seek to improve the overall usability and interpretation of the document.</p> <p>Please refer to issues 3 and 10-14 for proposed amendments relating to mandatory and non-mandatory requirements</p>
	Outcomes of the Sustainability Appraisal undertaken to support the Draft of the Design Guide		
2	<p>SA Recommendation 1: It is noted that social inclusion and community attributes are positively encouraged through design but no specific mention is made of diversity and equality. This might be inferred through inclusion, and section v Sustainable Development Principles (v02) does include</p>	<p>SA Recommendation 1 noted. Suggest include further clarification in chapter vi Quality of life</p>	<p>Recommendation 1 - Include the following as new paragraph following vol 2 vi/20</p> <p>“Housing should also be designed to consider the needs of different age groups and family circumstances. Lifetime Homes principles could be considered to create housing that meets current as well as future needs and which allows adaptability to respond to changing life circumstances”</p> <p>Insert link to Lifetime Homes http://www.lifetimehomes.org.uk/</p>

Issue	Issue raised during consultation	Officer Response	Modification made
	<p>comment on "...designing in flexibility for changes of use, lifestyle and demography." However, it would strengthen the sustainability of the Design Guide SPD with regard to SA accessibility/inclusion objectives if the different needs of people (for example, parents/carers with young children and the elderly) at different times of life were made explicit.</p> <p>SA Recommendation 2: The inter-relationships between motor car use, sustainable transport modes, greenhouse gas emissions, and climate change could be made more explicit and thus enhancing the sustainability of climate change SA objectives through increased awareness/education.</p> <p>SA Recommendation 3: The sustainability of the Design SPD could be enhanced against the SA objective relating to water quality by including a comment on avoidance of pollution of water – perhaps most useful in the section iv on Green/Blue</p>	<p>SA recommendation 2 noted. Suggest inserting additional information in Chapter ii urban design</p> <p>SA Recommendation 3 noted. Suggest inserting paragraph in chapter iv Green Infrastructure and landscape Design</p>	<p>Recommendation 2 - Insert paragraph before Vol 2 ii/16.</p> <p>"In designing new development, and considering connectivity and movement both within the development and the wider area, developers and designers should be mindful of the objectives of reducing greenhouse gas emissions by considering the interrelationship between the availability and effectiveness of public transport, walking and cycling, car usage and the consequent impacts on greenhouse gas emissions</p> <p>Recommendation 3 - Insert paragraph after vol 2 iv/63</p> <p>"In developing drainage proposals for a development a key objective should be to ensure the avoidance of water pollution"</p>

Issue	Issue raised during consultation	Officer Response	Modification made
	<p>Infrastructure or as part of general comment on construction principles.</p> <p>SA Recommendation 4: The positive sustainability of the Design SPD could be strengthened by making explicit that geodiversity and important geological features should be protected and enhanced. The explanation and justification for the socio-economic benefits of enhancing biodiversity could be strengthened by reference to ecosystem services.</p>	<p>SA recommendation 4 noted. Suggest making reference to geodiversity protection and the socio economic benefits of biodiversity in chapter iv Green Infrastructure and Landscape Design</p>	<p>Recommendation 4 - Vol 2 pg 56 Change title from Promoting biodiversity to “Protecting and promoting biodiversity and geodiversity”</p> <p>Insert paragraph after iv/09</p> <p>“geodiversity and important geological features should also be protected and enhanced”</p> <p>And insert paragraph after iv/11</p> <p>“The 2011 UK National Ecosystem Assessment (UK NEA) concluded that the natural world and its ecosystems are important to our well-being and economic prosperity. Yet they are consistently undervalued in conventional economic analyses and decision-making. Protecting and enhancing biodiversity and geodiversity as part of development proposals therefore contributes to both our social and economic wellbeing. This is discussed further in chapter vi”</p> <p>Insert link to UK National Ecosystems Assessment 2011 http://uknea.unep-wcmc.org/Resources/tabid/82/Default.aspx</p>
	<p>SA Recommendation 5: The sustainability of the Design SPD would be strengthened through specific mention of the significance of the settings of heritage features and assets, and the potential for impacts on the archaeological resource – which</p>	<p>SA recommendation 5 noted. Suggest making reference to heritage assets, including archaeology in Chapter i Working with the Grain of the Place</p>	<p>Recommendation 5 - Insert new paragraph after i/07</p> <p>“Within this contextual assessment it is important to consider the potential impacts of development upon heritage assets and their settings including archaeology which will require separate assessment as part of the DAS, a heritage assessment, or an archaeological impact assessment (either alone or as part of Environmental Impact Assessment (EIA) depending upon the scale of</p>

Issue	Issue raised during consultation	Officer Response	Modification made
	may require an archaeological impact assessment (alone or as part of any requirement for an Environmental Impact Assessment EIA depending upon the scale and location of the new development).		the development)”
	The SPD and existing policy		
3	Cheshire East should consider making building regulations Part M4 (2) part of the requirements for all new build properties; buildings accessible for all age groups so that the young can live there and it is adaptable for the elderly if required (effectively a lifetime home). This has been noted by the Neighbourhood Plan with people wanting to down size to smaller more accessible homes.	<p>The Design Guide SPD cannot introduce new policy. The Council will consider the introduction of enhanced building regulation requirements via the Site Allocations and Development Plan Document (SADPD).</p> <p>Vol 2 paras ii/114-117 discusses “Adaptable Living - Growing Homes” but the Design Guide should also make reference to the need for housing to be designed to changing life circumstances.</p> <p>Changes are recommended in relation to state that Principles of Lifetime Homes could be used in response to an issue raised by the Sustainability Assessment (see issue 2 above).</p>	See proposed changes in relation to issue 2 (Recommendation 1 of the SA)
4	<p>Status of the Design Guide</p> <p>The design guide is capable of being a material consideration; with significant weight given to it. Therefore it must accord with the National Planning Policy Framework (NPPF), including paragraphs:</p> <ul style="list-style-type: none"> • Para 59 NPPF: ‘Design policies should avoid unnecessary prescription or detail’. 	<p>The Ministerial Foreword the NPPF sets the context for the Design Guide. It says:</p> <p>“Our standards of design can be so much higher. We are a nation renowned worldwide for creative excellence, yet, at home, confidence in development itself has been eroded by the too frequent experience of mediocrity”</p> <p>Paragraph 153 of the National Planning Policy Framework (NPPF) states: “Supplementary planning documents should be used where they can help applicants make successful applications or aid</p>	<p>Insert the following into Vol 1 iii after iii/81</p> <p>“Viability assessment</p> <p>There may be occasions where the objectives set out in this guide impact significantly upon the viability and deliverability of a development, for example where there are unforeseen or significant extraordinary infrastructure costs. In such circumstances, in accordance with Para 173 of the NPPF, when planning applications are being determined there may be the opportunity (as with planning obligations) for an applicant to argue a case on the individual viability of a scheme, but only where the applicant adopts an open book approach to the viability appraisal. Importantly, Each</p>

Issue	Issue raised during consultation	Officer Response	Modification made
	<ul style="list-style-type: none"> • Para 60 of NPPF states that policies ‘should not attempt to impose architectural styles or particular tastes’ • Para 173 of NPPF – pursuing sustainable development requirements attention to viability and costs in plan making and decision taking 	<p>infrastructure delivery, and should not be used to add unnecessarily (emphasis added) to the financial burdens on development.” This paragraph is supported by additional guidance within the online Planning Practice Guidance (PPG)1, which expands upon the NPPF to ensure that they must build upon and provide more detailed advice or guidance in the policies in the Local Plan.</p> <p>The design guide supports and supplements policies within the Local Plan, in particular paragraph SE1 - Design and it is considered that the guidance does not conflict with Para 59 of the NPPF. The design Guide aims to assist developers, amongst others, to deliver high quality developments by providing the parameters and process guidelines within which development proposals should be designed and assessed. It provides guidance on scale, density, massing, height, landscape, layout, materials and access. The Design Guide is not considered to be either overly prescriptive or detailed in this regard.</p> <p>In relation to Para 60, the NPPF also states that: “It is however, proper to seek to promote or reinforce local distinctiveness”. The Design Guide does not prescribe particular styles but it does advocate understanding local vernacular to achieve this locally derived sense of place within new developments.</p> <p>In response to Para 173 of the NPPF high level viability assessment of the implication of design policies has been undertaken as part of Cheshire East Council’s Draft Core Strategy Viability Assessment October 2013 [Ref BE 042] in the Examination Library.</p>	<p>case will be assessed on its own merits</p> <p>This does not exempt the land owner / developer, however, from utilising the appropriate professional inputs or adopting the systematic approach to design set out in this guide, to achieve the high quality design also required by the NPPF and the Local Plan Strategy.</p> <p>The systematic approach set out in the design guide may also assist in securing a more robust and viable development proposal through a better approach to urban design. The issue of viability should be brought to the LPAs attention at the earliest opportunity, ideally at the pre-application stage.”</p>

Issue	Issue raised during consultation	Officer Response	Modification made
		<p>This identifies that there is no issue in relation to NPPF compliance however, as with other material considerations, when a planning application is being determined each case will need to be assessed on its own circumstances and merits and there is the opportunity, as with planning obligations, for an applicant to argue a case on the individual viability of a scheme if the applicant adopts an open book approach to the viability appraisal.</p> <p>Suggest including clarification in Vol 1 iii</p>	
	Viability		
5	How the design guide will be used – the design guide should not be too prescriptive or onerous in its design requirements that would impact on the financial viability of schemes in line with para 173 of the NPPF	See response to issue 4	See response to issue 4
6	It is long on analysis - very long in fact - and too short on practical advice and design and materials requirements.	<p>Noted but disagree.</p> <p>The analysis is necessary to help users understand the context of Cheshire East which is a large and relatively complex Borough.</p> <p>It is also considered that the level of practical advice, including design and materiality is right for the varied audience of the Guide and to comply with the requirements in the NPPF regarding level of prescription (it is a guide not a design manual or code). Clear summary principles are set out in the</p>	No further action required

Issue	Issue raised during consultation	Officer Response	Modification made
		individual chapter summaries, comprising checklists and case studies.	
	Design and Access Statements, Design Codes and BfL12		
7	Local Review Panel The need for a wider (regional) Design Review Panel	Noted	The Council will consider setting up a Design Review in line with policy SE 1 (design) – point 2(i).
8	There needs to be more clarity about the relationship between design Codes and Design and Access Statements (DAS)	<p>Information between iii/29 and 43 provides a clear explanation as to why design codes are required and what level of code applies to different stages of the planning process. These terms are explained in the glossary to appendix 2.</p> <p>However, in order to improve the clarity of when coding will apply (and mandatory as opposed to non-mandatory requirements) for planning applications, an additional concise table is proposed to be included in vol 1 chapter iii.</p> <p>Design and access statements are mandatory for outline and full applications for new residential development</p> <p>The local validation requirements for planning applications are being revised and the Council will consider additional guidance to accompany the local validation checklist.</p> <p>The Council will also consider whether further policy clarification also is required to be made in the SADPD</p>	<p>A summary table will be inserted after vol 1 iii/79 identifying the mandatory and non-mandatory elements in relation to design. It will also refer to local validation and associated additional supporting information.</p> <p>The Design Guide will provide additional clarity on the trigger for design coding including alignment with definition in Local Plan of 150 units for strategically important development (Vol 1 iii/30-32).</p> <p>The Council will consider separate guidance to support the local validation checklist for planning applications and also whether further policy guidance should be included in the SADPD.</p>
9	Design and Access Statements Large developments of 300 or more dwellings. It appears that such proposals will need to be	In the Design Guide no figure has been applied to the requirement for production of a masterplan but it identifies that comprehensive masterplans are required for larger sites of multiple ownership (iii/11)	<p>Please refer to issue 8 with regards the production of a summary table and links to local validation/additional supporting information</p> <p>As for issue 8, revise the figure to 150 to reflect the Local Plan</p>

Issue	Issue raised during consultation	Officer Response	Modification made
	<p>accompanied by a Masterplan, BfL12 questionnaire to obtain 9 greens, Design Code and DAS. (Design and Access Statement)</p> <p>Please would you be so kind as to clarify.</p>	<p>and illustrative masterplans or testing layouts are required as part of Design and Access Statements (iii/67).</p> <p>BfL 12 is a government endorsed industry standard signed up to by the HBF. Developers are encouraged to use it to guide discussions and design development. The Guide identifies BfL12 as part of the quality toolkit it will be using to discuss design with developers and their teams at pre-app and during a planning application. This will apply to both outline and detailed schemes. This approach will be applied to all major applications of 10 or more dwellings (iii/28). BfL12 seeks to secure schemes that perform as well as possible against the 12 criteria by achieving as many greens as possible, minimising ambers and eliminating reds. To achieve Built for Life status a scheme must achieve 9 greens and no reds.</p> <p>Design codes will automatically be required for all strategically important and larger scale developments, dependent on size, sensitivity or their impact in relation to heritage assets, sensitive landscape or existing settlements.</p> <p>At present the Design Guide identifies a rule of thumb for outline proposals of 300 dwellings or more (or smaller sites that form part of a larger development area that equates to 300 or more dwellings. However, the Local Plan Strategy (LPS) identifies strategically important sites as those being 150 dwellings or greater. There is a benefit therefore in aligning the Design Guide with the figure set by the LPS</p> <p>Further policy clarification could also be made in the</p>	<p>definition of strategically important development, subject to re-consultation requirements.</p> <p>The Council will consider separate guidance to support the local validation checklist for planning applications and also whether further policy guidance should be included in the SADPD.</p>

Issue	Issue raised during consultation	Officer Response	Modification made
		SADPD	
10	General – The document will obviate the need for Design and Access Statements as the document dictates the design and access requirements that must be followed. This is contrary to national Guidance where the approach is to design a scheme based on the site specifics, environmental, local vernacular, topography and site constraints which make developments unique.	<p>Noted but disagree</p> <p>A Design and Access Statement (DAS) will still be necessary for certain types of application as set out in the Design Guide, reflecting the requirements set out in The Town and Country Planning (Development Management Procedure) (England) Order 2015.</p> <p>The Design Guide sets out the information and approach that the authority expect to see within a DAS and encourages the use of Building for Life 12 through the life of the design and application phase to quality enable positive discussion and quality check development proposals. This reflects Policy SE1: Design of the Local Plan Strategy (LPS).</p> <p>It is advocated that a BfL assessment should form part of the DAS to help demonstrate the qualities of the proposal. This is reflected in wording within BfL12 3rd edition 2015.</p> <p>This ‘structure’ does not preclude, but conversely positively endorses, a developer/designer properly assessing the site and its wider context Physical Context and Local Character – iii/55-58 and Constraints and Opportunities iii/59-61</p> <p>It is considered that this approach is consistent with both the NPPF and Policy SE1 of the LPS in aiming to secure better quality, place led development through an evidence based approach to design.</p>	No further action required

Issue	Issue raised during consultation	Officer Response	Modification made
11	The section on Design and Access statements seeks these to provide a BfL 12 final assessment. We do not believe this should be considered as a prerequisite.	<p>Noted. Building for Life assessment is not mandatory within a Design and Access Statement (DAS), however as outlined in response to issue 12 above, Cheshire East Council is actively promoting and using BfL 12 as part of its approach to elevating design quality in the Borough. BfL12 is also embedded as a process within the Local Plan via Policy SE1 Design (point 2(iii)).</p> <p>BfL 12 is the industry standard and is designed as a discussion tool throughout the design process and therefore provision of a BfL12 assessment as part of a DAS should not be onerous to produce. Such an assessment is also a way of succinctly demonstrating the design quality of a proposal. It is in the interest of a developer therefore to adopt this approach, which could also in speeding up the decision making process.</p> <p>Building for Life 12 Third Edition 2015 p 4 states:</p> <p>“...Instead, we recommend that local policies require all proposed developments to use BfL12 as a design tool throughout the planning process with schemes performing ‘positively’ against it.</p> <p>We also recommend that local authorities consider expecting developments to demonstrate they are targeting BfL12 where an application for outline planning permission is granted. A useful way to express this expectation is through either a condition or ‘note to applicant’.”</p>	No further action required
12	Design codes (Vol 1 paragraph 15) acknowledge that in some instances on large strategic sites design codes could be produced at Outline Stage. Design and	<p>Noted but disagree.</p> <p>Reserved matter and full applications do require DAS but a Design and Access Statement does not perform the same level of design management as a Design</p>	Please refer to response to issue 8 (above)

Issue	Issue raised during consultation	Officer Response	Modification made
	<p>Access Statement best practice structure omits the need for a design code at Reserved Matter or Detail Stages. Detailed issues regarding character and architectural language are addressed through Design and Access Statement mechanism</p>	<p>Code.</p> <p>Paragraph 35 of the Planning Practice Guidance (PPG) sets out the variety in circumstances within which Codes should be used. It does not say that Design Codes should not be prepared at the detailed stage. Indeed it states that “A design code is a type of detailed design guidance that is particularly useful for complex scenarios.”</p> <p>In relation to detailed applications (i.e. a full application), where design coding would be considered necessary, i.e. on a strategically important or sensitive site, then a comprehensive design code would be required, as set out in the Design Guide (vol iii/43).</p> <p>The approach to a 2 stage form of coding (spatial and character/detailed codes) has been conceived to assist both developer and the LPA, so that outline applications only require provision of the spatial/structural elements of a design code, reserving detailed elements of design coding and allowing housing developers to be actively involved in that stage of the Code’s preparation.</p> <p>Over the last few years many outline applications have been secured by companies who will not be the developer building out the site. The alternative would be to secure a comprehensive code for all strategically important and sensitive sites at the outline stage, but this would not be the most effective or pragmatic way in which to deal with Design Coding and secure high quality development.</p>	

Issue	Issue raised during consultation	Officer Response	Modification made
13	The requirements of the Design and Access Statements are supported - though, it all depends on how well the details are implemented.	Noted	No further action required
14	We can lend our support for <ul style="list-style-type: none"> • Design & Access Statements to accompany planning applications, as appropriate • Inclusion of one of the main considerations under highways/transport, alternative modes of transport • Flagging up pollution (both noise, air quality and ground contamination?) as a matter deserving of attention when addressing the design of new development 	Noted	No further action required
	Use of Example Settlements and Character Areas		
15	Example Settlements The use of example settlements has led to a feeling that settlements that are not mentioned specifically should have been (Poynton)	<p>It is not possible to provide settlement specific guidance for every settlement in each character area. These are 'sample settlements' and developers are expected to build on the character area guidance to develop and explain an understanding of the settlement where they are proposing to develop.</p> <p>However, given the role of Poynton as a Key Service Centre, it is suggested that sample guidance be prepared for Poynton.</p>	Prepare sample settlement guidance for Poynton and insert in Volume 1 chapter ii

Issue	Issue raised during consultation	Officer Response	Modification made
16	<p>Settlements which fall into more than one Character Area</p> <p>Some settlements (Holmes Chapel) fall within more than one character area and it is uniquely disadvantaged because sample settlement guidance has not been provided.</p>	<p>Design Guidance has been prepared as part of the Holmes Chapel Neighbourhood Plan, which has recently held a successful referendum. However, it is felt that sample settlement guidance should be prepared for Holmes Chapel with the Design Guide SPD.</p>	<p>Prepare sample settlement guidance for Holmes Chapel and insert in volume 1 chapter ii</p>
17	<p>The method used is that densities shown are generally very low and I am very concerned developers will misinterpret these in order to justify unsustainable patterns of development. I would suggest for each settlement that a morphological tissue sample is taken for a number of areas and both street and housing typologies, enclosure ratios and densities arrived at (you do not have to work out density for entire settlements, but simply identify types through a morphological study as described).</p>	<p>Noted. However, in relation to the issue of density, these are gross figures but reflect the changes in density within those settlements.</p> <p>However, the issue of density is discussed in volume ii/28-30 and ii/50-54</p> <p>The process section of the Design Guide in volume 1 Figure iii:01 and paras iii/55-61 in relation to DAS identify that detailed site and area character assessment should be undertaken. The sample settlements are identified as the starting point by the Guide (ii/42) and the information in the Design Guide should be supplemented by designers "it should be overlaid by further site/areas specific assessment by the design team"</p> <p>This issue could be further clarified by identifying that the density grids are based on gross figures (by adding this to the figure label for each density grid) and stressing that tissue studies should be undertaken in relation to density as part of the detailed assessment by designers/developers by modifying vol 1 iii/57</p>	<p>Insert reference to gross density on the figure label for each density grid</p> <p>Modify vol 1 para iii/57 to add "Tissue studies of the grain, density and enclosure ratios of the different parts of the settlement should be undertaken as part of the contextual assessment of the site and its wider context."</p>

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18	North Cheshire Fringe is illustrated with 'traditional' materials for a large area. Care must be taken that developers do not interpret these generalities literally for every place in the North Fringe.	<p>The Character Areas approach is described in Vol 1 paragraphs 20/21</p> <p>"The settlement character areas within Cheshire East are then described and illustrated, providing developers and their design teams with an <u>overview</u> of the District's local vernacular and how it varies in terms of historic evolution, geographic location, settlement form, layout, archetypes, materials and detailing etc. i.e. what makes different areas distinct.</p> <p>As stated later in the document the local vernacular should not be slavishly followed on new developments to create 'chocolate box' pastiche developments, but for design teams to creatively reinterpret and use this for inspiration and to knit development into the place."</p>	No action except make 'overview' bold in para 20 of Vol 1 (underlined left).
19	<p>A baseline assessment of vernacular in each perceived character area has been undertaken within the residential design guide.</p> <p>The vernacular studies are heavily reliant on historical architectural examples most of which show no parking arrangements or motor cars.</p> <p>The character areas illustrated show no example of the majority of housing stock within the locality.</p> <p>The examples used are highly</p>	<p>The character assessment in volume 1 seeks to identify local vernacular and positive elements of town and villagescape to inform place led development that relates positively to existing settlements.</p> <p>The vast majority of developments that have taken place in recent times, have detracted from the distinctiveness of Cheshire East's settlements, consequently, it would be inappropriate to refer to these as positive elements of local town/ villagescape.</p> <p>Paragraph 60 of the NPPF advises that</p> <p>"Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is,</p>	No further action required

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	<p>selective and unrepresentative of other, more recent styles that were deemed acceptable and inform the local character of an area.</p> <p>Given that the vast majority of housing provided in Cheshire East over the past thirty years has been by national house builders there is little reference to this within the document and the commercial reality underpinning this.</p>	<p>however, proper to seek to promote or reinforce local distinctiveness.”(emphasis added)</p> <p>Volume 2, includes guidance for Using the Vernacular without Creating Pastiche (i/23-28), whilst chapter ii includes a section relating to making house types unique (ii/97-103). This provides scope for using contemporary and innovative approaches provided it works with ‘the grain of place’.</p> <p>The examples included in Volume 2, both in terms of illustration or photographs, including case studies, are from recent residential developments. They are not ‘historic’ precedents. They also include both contemporary and more traditional designs.</p> <p>The reasoning for not using local examples is that, at the moment, the quality of development within the Borough is not sufficiently high; consequently there is a need to use examples from elsewhere. It is hoped that in time local examples will arise as a consequence of this design guidance and that these can be showcased in some way.</p>	
20	<p>Naming of character areas is unhelpful. Gritstone Edge Salt and Engineering towns ok but North Cheshire Fringe should be North Cheshire Plain, Silk Cotton and Market Towns should be Silk Cotton and Rural mid-Cheshire and Market Towns and Estate Villages should be South Cheshire Plain</p>	<p>Noted but the character areas do need to be identified in some way. The character area names chosen positively reflect the character of those places in a succinct manner</p> <p>The general information for character areas provides more general guidance for the areas as a whole, including those settlements not specifically identified as sample settlements</p>	No further action required

Issue	Issue raised during consultation	Officer Response	Modification made
	<p>Silk, Cotton & Market Towns: It doesn't mention Macclesfield's industrial areas. To call it a silk or market town is to romanticise it, it is more a dormitory town these days</p> <p>Gritstone Edge - North Cheshire Fringe The descriptions of this area reflects the towns rather than the smaller villages. Can it be updated to reflect the villages as well?</p>		
	Neighbourhood Plans		
21	Where Design Supplements have been developed as part of Neighbourhood Plans they should be referenced in the Design Guide	<p>Noted. It is recognised that the connection between Neighbourhood Plans (NP) and the Design Guide SPD does need to be made.</p> <p>It would not be appropriate however to specifically list those with design supplements as this could quickly render the Design Guide out of date. Instead a more generic link to the NP webpage could be made, highlighting that certain Neighbourhood Plans have or are going to have design supplements.</p>	<p>Propose insertion of paragraph relating to after the Local Plans section - after i/27</p> <p>“Neighbourhood Plans</p> <p>A number of communities have already, or are preparing Neighbourhood Plans. Some have already or intend to include specific design guidance for their village or town.</p> <p>Those design supplements should be read in conjunction with the Guidance presented here in the Cheshire East Design Guide to inform and shape new development proposals that respond positively and add to those places”</p> <p>http://www.cheshireeast.gov.uk/planning/neighbourhood_plans/neighbourhood-planning.aspx</p>

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22	Essential that there are well-defined criteria for design so that non-specialists can comment meaningfully. Neighbourhood Plans will often need to establish specific design codes in their areas and these will have to align with clear statements of the principles and practices in this Guide	The guide does include specific criteria summarised in each chapter of volume ii via quality checklists and summaries.	No further action required
23	It is essential that all of Knutsford's heritage and character is recognised in the Design Guide because this is what both planning officers and developers will be referring to in planning decisions. Without this Knutsford's character will be misrepresented and its sense of place will be lost forever. For this reason the description of Knutsford must be fair accurate and regarding; design, trees, hedging, materials, palette etc.	<p>The sample settlements seek to provide an introduction as to the character and design prompts for a particular settlement. It would not be possible to go into the level of detail requested as that would make the document excessively long.</p> <p>There are other sources of information to provide further detail, such as conservation area appraisals. It is understood that Knutsford is also producing a design guide as part of the Neighbourhood Plan</p>	No further action required
24	CEC's Design Guide should dovetail locally and in a complementary way with the Knutsford Neighbourhood Plan . The Design Guide should include building extensions and adaptations, and uses other than residential.	<p>See response to issue 21</p> <p>It is hoped that further guidance will be undertaken as part of Cheshire East suite of design guidance covering other areas of design in addition to new residential development</p> <p>The Council is considering if any additional design policies are required in the forthcoming Site Allocations DPD which will be subject to public consultation.</p>	<p>Please refer to action 21 (above)</p> <p>The Council will consider the production of further guidance covering other areas of design in addition to new residential development. In addition, we will consider the inclusion of additional design policies in Site Allocations DPD</p>

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25	It is noted that within the policy context/ justification section no reference is made to Neighbourhood Plans which are being progressed across the district. It should, therefore be noted within the document that if there is a conflict between the design aspirations of a community as set out within a 'made' Neighbourhood Plan and this proposed SPD, the Neighbourhood Plan will take precedence.	Noted. Response as above for issue 21	Please refer to action 21 (above)
	Other related Guidance to be included / cross referenced		
26	There are some existing Supplementary Planning Guidance (e.g. Wilmslow Park) which have not been included	Noted. Where SPGs and other Planning Guidance related to design have been omitted they will be referenced but it is preferable to do this by linking to the SPG/SPD guidance page of the Planning website that can be updated more readily than the Design Guide.	Insert link to the SPG/SPD guidance page of the Planning website http://www.cheshireeast.gov.uk/planning/spatial_planning/cheshire_east_local_plan/supplementary_plan_documents/supplementary_plan_documents.aspx
27	It is strongly suggested that CEC promptly adopt the 6Cs Design Guide.	6Cs has now been adopted by CEC. 6Cs is currently under review to ensure integration with Manual for Streets 1 and 2	ix) amend paragraph iii 12 of volume 2 to reflect the adoption of 6 Cs
28	Knutsford has 5 Conservation Areas but the illustrations for Knutsford focus on the town centre with no mention of the Watt's buildings, no illustration of a detached villa or arts and crafts buildings or of pre-war and 1950—1970s estates.	The evidence base contained within CA appraisals for Knutsford will assist developers in gaining a fuller appreciation of those parts of the town. A link is provided within the document to conservation areas at para ii/40 of vol 1. The Design Guide SPD requires designers and developers to properly assess the context of a site (Fig 111:01 vol 1) and to set this out in the DAS (iii/55-64).	A link to the conservation area page on the Council website is provided at para ii/40

Issue	Issue raised during consultation	Officer Response	Modification made
		This will include considering the historic context and the townscape quality within the respective conservation areas	
	Footpaths		
29	More detail on footpaths to ensure they are user friendly and not dominated by parked cars	Vol 2 Footpaths/cycleways iii/36-39 provides sufficient detail.	No further action required
30	iii 29, iii 30 – Removal of designated footpaths is strongly objected to. Volume 1, i 23 references ‘designing for pedestrian priority’ and Volume 2, iii 07 states ‘the user hierarchy now has pedestrians at the top’ though safe paths have been removed.	<p>This approach has been agreed with highways as part of the working group approach adopted for the Design Guide and is a way of deformatizing streets consistent with both Manual for Streets (MfS) and 6Cs.</p> <p>It should be stressed that removal of footpaths will be limited to streets that would carry lower traffic volumes where speed reduction is designed into the layout and speed managed to 20mph.</p> <p>In relation to shared spaces, Vol 2 iii/43 identifies the principle of contrasting flush kerbs/thresholds to define pedestrian refuges and through routes for the partially sighted” This is entirely consistent with placing pedestrians at the top of the street user hierarchy.</p>	No further action required
31	Typical Residential Issues – (i/46) - not CEH policy to light alleyways, however any consideration for lighting alleyways or footpaths must be agreed with the Authority’s Street Lighting Dept, prior to design submission.	Noted. Amend as suggested.	<p>Amend i/46 to read as follows:</p> <p>“Alternatively the layout and orientation of the proposed properties could aid the surveillance of the original route. It is not Cheshire East Highways’ policy to light alleyways, consequently, any consideration for lighting alleyways or footpaths must be agreed by the Authority’s street lighting department prior to design submission.”</p>
32	Footpaths/Cycleway - specific reference should be made to canal towpaths and the vital role the towpath network play in	Noted. There are specific references to canals included in Vol 1 within the sample settlements, however there is scope to reference tow paths and canals as an important aspect GI and open space in	<p>Amend para iv/17 by adding further sentence.</p> <p>“The canal towpath network also plays an important role in widening travel choices and providing recreational opportunity.”</p>

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	widening travel choices. Towpath design/material would be very much dependant on the context.	chapter iv of Vol 2.	
33	<p>iii/59 – footpath widths – agree that generally should be 2 metres wide but disagree with iii/61 that combined footpath/cycleway should be 3 metres. They should be a minimum of 4 metres. However, MfS advocates ‘cyclists should be catered for on road if at all practicable’ and therefore careful examination of whether a separate facility is required for cyclists at a design speed of 20mph</p> <p>This guide is not clear. Why do you not just refer to LTN 08 - Cycle Infrastructure design that makes it clear that combination paths are very much the last resort, not the first as this guide promotes?</p>	<p>Noted but disagree.</p> <p>This is a guide for residential developments only and not for cycling provision in a more general sense. The creation of 4 metre cycleways would unacceptably undermine the design quality of developments that this guide strives to deliver. In most circumstances within residential developments, cyclists will be able to be accommodated within the carriageway without defined cycle lanes. However, combination paths/cycle routes are more suited to residential developments on the occasions when they are required.</p> <p>Link to LTN/08 could be included for information.</p>	<p>Insert para and link to LTN 2/08 after Vol 2 iii/39:</p> <p>“More guidance on the design of cycling infrastructure is available in the Government publication LTN 2/08”</p> <p>https://www.gov.uk/government/publications/cycle-infrastructure-design-ltn-208</p>
	Gateways		
34	Vol 2 Page 12 - checklist - does this need to say something about existing settlement " gateways " and being sympathetic	Noted. This is addressed by Vol 2 ii/33-35 but it could be referenced in the checklist to chapter ii.	Amend bullet 6 by adding at the end, "...and does the design reinforce existing or create new gateways appropriate to the settlement"
35	Gateways (ii/35) - new gateways – should specify that "gateways" to new estates should not be characterised by permanent advertising or estate names	<p>Vol II Urban Design ii 31-35 considers the issue of gateways, ii/35 stating: "All (Gateways)are very much dependent on the location and size and of each site."</p> <p>It is not necessary to state all the things it will NOT be.</p>	No further action required

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	within features		
36	Wooded gateways are a feature in Knutsford and should be replicated in the town and noted in the Design Guide	Noted. Additional bullet could be added into Key settlement design cues for Knutsford (vol 1 ii/113)	Insert additional bullet under Knutsford key settlement design cues (vol 1 para ii/113) <ul style="list-style-type: none"> “Wooded gateways and tree lined streets are a key townscape characteristic of the approaches into Knutsford”
	Traffic		
37	New development (Handforth) will create traffic problems	Comments noted but the design guide does not set the level of development or its overarching spatial distribution. Comments were forwarded to the Spatial Planning Team for consideration as part of the proposed changes to the Local Plan Strategy consultation.	No further action required.
	Ensuring Good Design		
38	Large Volume Housebuilders. Whilst the Design Guide states early on that many of the housing developments coming forward are large developments which need to have regard to this document to raise standards it does not really address the issue – It appears that- <ul style="list-style-type: none"> - an outline application requires a Spatial Design Code - Reserved matter requires a Detailed/Character Area Design Code - Detailed application requires a Comprehensive Design Code. 	This cross refers to the comments made in relation to level of prescription and what is considered mandatory in the context of the NPPF. The interpretation set out (left) is in accordance with the current wording within the Design Guide SPD Currently the rule of thumb trigger for coding is 300 units but strategic scale development is identified in the LPS as 150 dwellings	Please refer to response to issue 1 (above) General approach to coding to remain unchanged but further clarification on what is mandatory and when a design code will be required. Also revise the trigger for design coding to 150 units having regard to the figure of 150 for strategically important development (150 units) set out in the LPS

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	Please would you be so kind as to clarify the queries raised above.		
39	Integration and blending in should not lead to existing poor design being repeated	<p>Noted. The intention is not to replicate uncharacteristic and poor design, hence the focus on local character, vernacular and sense of place of settlements in volume 1 of the Design SPD.</p> <p>Chapters i and ii of volume 2 of the Design Guide SPD provide advice about how this can be achieved in new developments supported by the associated checklists to chapters i and ii.</p>	No further action required
40	Good design is achieved by good designers, therefore the Guide should be directed towards them not towards developers	The Design Guide SPD is intended to be used by communities, decision takers and the development industry. It is both community planning and designer/developer guidance. It is important therefore that it contains information relevant to built environment professionals as well as non-specialists, but is also presented in a way as to avoid jargon as much as possible.	No further action required
41	<p>Pastiche is not appropriate and the vernacular of settlements should be a strong reference and influence for designers to create developments that reflect the character of the place but not copy it, promoting both innovative and more traditional approaches underpinned by an understanding of vernacular</p> <p>Pastiche should be defined in the glossary</p>	<p>Noted. Volume 1 chapter ii is intended to give users a headline understanding of Cheshire East and the various settlements within it. In volume 2, i/23-28, ii/20-25 and ii/97-103 consider the issues of local character, vernacular and avoiding pastiche, to enable developers to achieve a sense of place within new developments</p> <p>However, to improve the usability of the document - pastiche will be specifically defined in i/23-28 and/or ii/102 as suggested</p>	<p>Pastiche to be specifically defined in i/23-28 or ii/102</p> <p>“A novel, poem, painting, etc., incorporating several different styles, or made up of parts drawn from a variety of sources.” (Oxford English Dictionary)</p>

Issue	Issue raised during consultation	Officer Response	Modification made
	Without a clear definition of pastiche all examples in volume II could be regarded as such because of the guide's requirement to creatively reinterpret existing design cues. A good majority of purchasers want "chocolate box" design		
42	<p>Colour and materials - Question the limited colour and materials palettes, including the incorporation of tarmac</p> <p>Would like something on redevelopment of existing streets - could previously installed setts and cobbles be exposed again where tarmac laid over them is due for replacement? Can you specify that historic paving details are retained (eg old grey stone flags that marked the coach lane behind the Royal George in Knutsford were ripped up and replaced with 'fake' ones in a beige colour that didn't tie in with the rest of the town</p>	<p>The materials 'palette', both in the character area section of volume 1 and the street design and landscape design sections of volume 2 are a reflection of the predominant material types and tones in particular parts of the Borough. They are not intended as a definitive list of colours and materials but aim to give an indication of the typical materials and finishes that largely characterise particular parts of the Borough. It would be extremely difficult to provide an exhaustive list. There will be some localised variety but this amplifies the need for developers/designers to use the Design Guide SPD as the starting point in their assessment of place and devising development that has local distinctiveness (para ii/42 of vol 1)</p> <p>Consequently, the SPD does not prevent innovation in the materials used, provided this is justified and evidenced from a design perspective within the design process undertaken by the designer/developer (Paras i/26-28, ii/97-ii/103).</p> <p>In relation to streets, the palettes identified in chapter iii have been agreed with highways, and therefore will be accepted for adoption without commuted payment. Again this does not prevent use of alternatives provided that these are justified in design</p>	<p>Insert paragraph after vol 2 iii/89</p> <p>"Where the proposal involves redevelopment of existing streets or lanes, existing historic or vernacular materials should be retained/re-used where this meets the adoption requirements of the highway authority."</p>

Issue	Issue raised during consultation	Officer Response	Modification made
		<p>terms and meet highway requirements. Para iii/87 states “The following paragraphs set out under the title ‘Materials’ and the associated tables provides guidance on a simple palette of durable materials that will add to the aesthetic quality of the streetscape that Cheshire East Council expects to be developed in design proposals...”</p> <p>In respect to tarmac, that does form part of the materials palette and is an inevitable material choice for some streets carrying higher traffic volumes, however the guide within the tables in chapter iii (pages 44-50) show a gutter detail for bitmac surfaced Avenues and Streets to reduce the visual expanse of bitmac and to provide additional texture within streets employing bitmac.</p> <p>In relation to historic materials, this is more an issue for re-development in existing centres/neighbourhoods of settlements and could be addressed in more detail in later guidance, should that be produced. However, a short paragraph relating to existing historic/vernacular materials is proposed to be inserted in Vol 2 chapter iii</p>	
43	<p>The guide must not become the rule book and should not be used to create ‘politically correct’ development. It needs to be recognised that true greatness can break the rules.</p>	<p>Noted. The design guide is a guidance document and does not limit the potential for innovation. Paras i/26-28 discuss the potential for contemporary, place led design approaches and iii/97- 103 also discuss the potential for contemporary and bespoke design approaches, But it should be borne in mind that this is geared to larger scale, volume developments</p> <p>It is proposed that an additional paragraph be added to highlight that the guidance should not be used as a rule book but as guidance to enable more creative,</p>	<p>Insert new paragraph after Vol 2 i/27</p> <p>“It is stressed that the Design Guide SPD should be used as guidance and not a design ‘rule book’ to enable more creative, place led design solutions. Design proposals that depart from this guidance need to be justified in design and place terms and must result in high quality and enduring developments that have their own strong sense of place. This provision shall not be used to justify ‘anywhere development’</p>

Issue	Issue raised during consultation	Officer Response	Modification made
		place led design solutions	
44	<p>Materials and detailing</p> <ul style="list-style-type: none"> • Only rich detailing palettes illustrated. • Only the most expensive design solutions have been illustrated. • No detailing illustrated from the last twenty-five years. • No examples of poor detailing that should be avoided. 	<p>Noted but disagree.</p> <p>The materials and detailing highlighted in Settlement character information in volume I (chapter ii) illustrate materials characteristic of the local vernacular for different parts of the Borough</p> <p>Materials are not specified in depth within volume 2 in relation to buildings as this should be informed by the design approach advocated in Volume 1 and drawing on the character area information set out in chapter iii.</p> <p>More specific information has been provided within volume 2 as part of the Street Design (chapter iii 89-94 and associated tables) and GI and Landscape Design (chapter iv 133-139 and associated tables) because these are important components of the public realm, the design of which needs to reinforce sense of place, and previously had often been overlooked or applied unsatisfactorily.</p> <p>As stated at action 20, the vast majority of developments from the recent past should not be used as precedents for new design which seeks to raise quality and create place led design solutions rather than bland 'anywhere' settlements (vol ii/35 and vol 2 i/25)</p> <p>Poor detailing is evident in many of the developments undertaken in the recent past and should already be fully understood by developers and designers. However, as this is a document for a varied audience, some examples could be included.</p>	<p>No action except consider the insertion of examples of poor detailing, subject to implications on layout of the document</p>

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45	There is no information to suggest what significance the palette has to the area e.g. what proportion of the properties existing in these character areas are made up from these colours. The approach is arbitrary and could easily have concluded a different colour mix. In some sections even the buildings illustrated do not use any of the colour palettes.	<p>Noted but disagree.</p> <p>To attempt to quantify the proportion of properties with these colour palettes is missing the point and overlooking the process for designers/developers strongly promoted with the Design Guide. The local vernacular materials, finishes and detailing evident within the character areas and particular settlements, reflected in the information provided, have been drawn out as a starting point for the process of more detailed assessment required by volume 1.</p>	No further action required
46	Scale and massing advice needs to be strengthened to ensure building heights are appropriate to their setting, including rebuilds	<p>Vol II ii 31 covers “Adding additional detail, including Creating Gateways, Legibility and Orientation and Massing, Roofscape and Skyline. This will adequately address the issue of building heights subject to additional paragraph advocated for issue 51 (see below)</p> <p>In relation to re-builds it is felt this is covered by the more general guidance and by changes advocated in relation to issue 47 below</p>	Please refer to response for issue 47(below)
47	I have not been able to find any reference to street enclosure ratios in the guide and within the landscape section, it would appear that very weak spatial enclosure for streets is being inadvertently advocated. It is a basic urban design principle that there is a relationship between the width of the street/ height of built form and character.	<p>Enclosure is mentioned in the document although the ratio of enclosure is not specifically discussedii 29 Density around primary areas of public realm intended as the foci of the site should be higher and involve the use of town houses and other buildings of stature to create enclosure, massing and vibrancy to the street scene.</p> <p>iii 41 Squares would be areas of public realm set into the streets and lanes within the heart of developments and fronted and enclosed by the homes which surround them, with corner buildings rotated to</p>	<p>Propose inserting enclosure ratios by adding to existing drawings, namely those in relation to street typology (Figs iii:04-08) and/or Landscape section (pp 76-78)</p> <p>Insert after para after ii/30</p> <p>“Consequently, the level of street enclosure will depend on the street type, the character and location of the site, with taller buildings defining the edges of wider streets and spaces and a more intimate scale for narrower, more informal streets.</p> <p>The edges of developments will reflect their context, either tying in</p>

Issue	Issue raised during consultation	Officer Response	Modification made
		<p>focus views onto the central space. Focal buildings in the form of header buildings should be located on main vistas into the spaces and pinch points created into the space to frame views, create greater enclosure and aid in slowing traffic speeds.</p> <p>In relation to the Landscape section it states: “v 16 Strict adherence to the above would result in a wide spacing of buildings lower densities and weakening street enclosure and so a balance needs to be struck.”</p> <p>Propose to include the use of street enclosure ratios (as per Design Compendium approach). This could be accomplished by adding to existing drawings, namely those in relation to street typology (Figs iii:04-08) and/or Landscape section (pp 76-78)</p>	<p>with the existing urban grain or, if adjacent to countryside, reflecting the informal character and a transition from a built to a landscape dominated character.”</p>
	Street design, parking and cycling		
48	Vol 2 chapter iii - Cycle parking/ storage should be addressed and more detail included in the checklist.	<p>The BfL questions are taken from BfL 12. There is no scope to add a further question but cycle parking is usually considered under Q 12.</p> <p>However, based on the suggested amendments, a question is proposed to be inserted into the checklist of chapter v re: provision for cyclists, including storage in the public realm and privately (suggest after 2nd question)</p> <p>A paragraph is also to be included in chapter v with link to 6Cs and Cambridge Design Guide for cycling provision</p>	<p>Insert additional question into check list on p 90.</p> <p>“Does the design properly consider provision for cyclists, including storage in the public realm and within homes?”</p> <p>Insert the following paragraph after v/10</p> <p>“Cycling provision should be considered from the outset, including provision of appropriate, secure cycle storage in public spaces and at people’s homes. The 6Cs and the Cambridge design guide provides useful guidance regarding appropriate provision”</p> <p>Insert link to 6Cs and the Cambridge Guide</p>
49	Encouraging future patterns of sustainable living is essential for a progressive document. What is	<p>The guide reflects the Council’s current parking strategy set out in the LPS and its approach to cycling. The Design Guide does not discuss car pooling but</p>	<p>Include para after ii/63</p> <p>“The Council will continue to seek patterns of development that</p>

Issue	Issue raised during consultation	Officer Response	Modification made
	the Council's position on reducing car ownership ? Car clubs/pooling and reducing on plot parking provision could radically change layouts.	<p>does reflect the Council's electric charging strategy</p> <p>It is proposed to include a section on car-pooling/clubs in the section on parking</p> <p>At present given the Council's parking standards it would not be possible to modify the guidance by significantly reducing on plot parking requirements. However, in certain locations/circumstances, the parking standards can be reduced with the agreement of Highways</p>	<p>encourage modes of transport other than the private motor car and would encourage innovative approaches to reduce the dedicated parking requirement within new development. Car pooling and clubs are potential ways to reduce car ownership but still provide access to a motor vehicle when required. Generally these are more effective in urban locations, with a more concentrated population."</p> <p>Amend first sentence of para ii/64 to read</p> <p>"However, it has to be acknowledged that Cheshire East is a largely rural Borough and therefore the freedom and accessibility derived from car ownership is both valued and often a necessity for its residents."</p>
50	Technical Specification It appears that there are no additional technical standards being brought forward regarding parking	<p>The technical standards are identified with the LPS. Highways have been involved in the preparation of the Design Guide SPD and have not raised this as an issue.</p> <p>There is potential however to provide more detailed technical standards as part of the SADPD</p>	<p>No further action required.</p> <p>The Council will consider whether more detailed technical standards are required in the SADPD</p>
51	There is far too much detail on car parking provision. Presumably this volume is not intended to be a 'Beginner's Guide to Urban Design', and yet car parking is covered in detail at a very elementary and unimaginative level.	<p>This advice runs from page 20-24 and includes a lot of graphic illustration of parking solutions. Car parking is considered a key issue that undermines many development proposals, and it is often handled very badly.</p> <p>The Councils position on minimum parking requirements means that more parking has to be accommodated to meet adopted standards and therefore the guidance is aimed at ensuring a balanced and varied approach to parking provision as identified in vol 2 para ii/65.</p>	No further action required

Issue	Issue raised during consultation	Officer Response	Modification made
		Para ii/68-69 explains that there should be a mix in parking solutions on every site to ensure proper integration and that refusal may be the outcome if this is not achieved.	
52	Distinction between footpath and cycleway is not clear enough within the document except at iii/36, referring to the rights of way information on the CEC website public rights of way; also definition of cycling facilities MfS refers to cycle tracks but Cycleway as used in the Design Guide is good too.	Noted	Check usage within the document and amend to cycleway as required
53	Street design – support the principles from MfS in paras iii/04-8 but suggest iii/07 the user hierarchy includes pedestrians ‘followed by cyclists’	Noted. amend to make reference to cyclists in the hierarchy.	Amend para iii/07: first bullet to: “Pedestrians followed by cyclists are now at the top of the street user hierarchy”
54	iii/37 – agree that width of paths should depend on nature of intended use but suggest a 3 metre minimum is specified, supported by an assessment of level of usage – refer to The Department for Transport’s Local Transport Note 1/12, Shared Use Routes for Pedestrians and Cyclists gives good guidance at 7.49, Table 7.6	The 3 metre minimum could lead to very urbanised layouts and therefore it is suggested that between 2 and 3 metres as advocated in the guide should be retained to provide flexibility, dependant on location and character. However could include that the width and design should be determined by an assessment of the level of use	Maintain iii/37 as minimum of 2-3 metres but include additional sentence at end: “The width and design should be determined by an assessment of the level of predicted use”

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55	In addition, it is suggested that schemes which have on street parking should have provision made for electric car charging.	<p>Noted. Whilst this is undoubtedly a very positive suggestion, it would amount to new policy as there is presently no requirement within saved Local Plans or the Local Plan Strategy. Furthermore highways do not presently have the mechanism to take on the adoption and management of the apparatus within streets.</p> <p>However, this could be considered for inclusion as part of the Site Allocations DPD.</p>	The Council will consider whether a policy should be included in the SADPD relating to electric vehicle charging, including on-street.
56	lii/38 – surface finishes – agree in general terms but leisure trails with clay surfaces can become damaged. Circumstances vary by location but preference for Bitmac with, potentially with unbound edges would be beneficial and enhance durability and comfort	<p>Noted. Bitmac footpaths are not suited to all locations, even with informal edges, but it will be suitable in certain contexts. Consequently it is included as an option in the list of materials under iii/38. Could include reference to bitmac with unbound edges as an alternative to self binding aggregates in areas of anticipated greater use.</p>	<p>Insert additional sentence at end of Vol 2 iii/38:</p> <p>“Bitmac with unbound edges may be appropriate as an alternative to self-binding or resin bound aggregates in areas of anticipated greater use and where it does not compromise the design and landscape quality of the proposal and where it is not proposed for adoption by the Local Authority”</p>
57	iii/55 – design speed for residential developments of 20mph is supported; Suggest not ruling out physical traffic calming – speed tables and sinusoidal speed humps not unpopular. Also suggest 20mph speed limit signing to encourage speed reduction in wider area.	<p>The Council’s approach is to design in 20mph without traffic calming in the form of raised features. This guidance relates to the design of new development and not more general guidance for the calming of existing streets (retrofitting).</p> <p>Good urban design should avoid the need for purpose designed speed reduction features such as speed cushions or bumps. Areas of raised shared surface to define squares, Mews and other nodal spaces, would be acceptable as part of the urban design strategy for creating a managed approach to the speed of vehicles and ensuring pedestrians and cyclists have priority.</p> <p>Include paragraph to cover the issue of raised features and 20mph signing.</p>	<p>Add sentence to paraiii/55:</p> <p>“In the unlikely event that the urban design of the scheme cannot ensure a 20mph design speed, then traffic calming features may be considered, provided that they can be satisfactorily integrated without detriment to the design quality of the proposed development. Signage promoting a 20 mph speed limit should be unnecessary. Highway signage specification is quite onerous to ensure the information being given is easily translatable to highway users. Adoptable highway signage must be in accordance with the Traffic Signs and Regulations and General Directions 2016 (TSRGD). However in residential developments, where it is required, signage should be designed as sensitively as possible so as not to detract from the aesthetic qualities of the development or to create visual clutter”.</p>

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58	iii/71 bollards – should be aware of the risk to cyclists and are often ineffective. Where required mark deflecting lines on the ground as per the example photo from Lancaster	Noted. Add sentence that bollards should be considered a last resort, should be visible and that deflection lines only where it does not compromise quality design.	At beginning of iii/71 amend first sentence to read: “Whilst bollards should be installed as last resort or where required for safety purposes, where required they can be creatively...” . Add further sentence at the end: “If bollards are to be used they should be of a material and colour/finish that makes them clearly visible to cyclists but only where it does not compromise the design quality of the development and to the approval of the Local Highway Authority.”
59	There is a dominance of suburban style layouts with car parking in front. Will this approach be accepted by Cheshire East Highways? There needs to be a move away from 1970s design standards.	Paras 11/68-9 state: “Cheshire East will expect to see a variety of the above solutions adopted on each and every site to ensure the car is properly integrated into the development. If one parking method is over employed and is detrimental to the design quality of the proposals, in particular frontage parking, the developer will risk refusal of the application”	No further action required
60	Whilst we agree with the principle of establishing hierarchy, however, we would like to raise the difficulty that we have experienced when seeking of roads and shared surfaces to be adopted by councils. The SPD seeks for block paved road surfaces, when often this will not	The issue of adoption is an matter to be considered by the Council’s highways team. However, there is a need to clarify locations where this palette may not be accepted for adoption within the design guide.	Insert new para after iii/87 “The only occasion that the Local Highway Authority would not accept block paving is where it is envisaged that proposed vehicle loading and/or heavy turning would detrimentally impact the condition of pavements and result in long term maintenance liability.. Serious maintenance problems can occur with the inclusion of cut sections on radii, around ironwork, over trench reinstatements and on change of vertical alignment. Appropriate thought must be

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	be adopted by authority's highways team. We suggest that close cooperation with the council's highways team is achieved throughout the process of adopting this SPD to ensure that whatever is suggested for future design by the LPA will be acceptable from a stopping distance and maintenance point of view for the highways team to allow for adoption of new roads.		<p>applied to the location and highway usage where block paving is proposed.</p> <p>The Development Management and technical highway teams will work closely to ensure layouts agreed at the planning stage are designed in accordance with this design guide in order to gain speedy technical approval and subsequent adoption."</p>
	Sustainability		
61	<p>2.3 Sustainability</p> <p>This section is not required as Cheshire East has existing adopted policies that deal with these factors. Equally these technical issues are dealt with during the Building Regulation process.</p>	<p>Noted but disagree. Whilst the local plan policies address sustainable design their intention is not to explain how this can be applied. That is the purpose of an SPD, hence inclusion within this residential design guide.</p> <p>The Building Regulations cover some of the issues, whilst this section embraces both passive and active sustainable design, incorporation of de-centralised energy, climate change adaptation and resilience and promotion of more sustainable lifestyles, much of which is not covered by the Building Regulations.</p>	No further action required
62	<p>Sustainable Development needs to make more reference to existing codes if it is to improve the quality of life</p> <p>Code for Sustainable homes no longer applies therefore the only guidance nationally on space</p>	<p>The Code for Sustainable Homes is no longer a mandatory requirement for all new development and therefore it cannot be required. Elements have been incorporated within the Building Regulations as explained in the Design Guide. However, the CfSH still exists as a non-statutory sustainability assessment method for new housing and it is appropriate to refer to it in this context as a voluntary rather than</p>	<p>Please refer to response to issue 2 (above).</p> <p>Insert reference to the Technical Housing Standards - Nationally Described Space Standard before proposed Lifetimes Homes insert</p> <p>"The Technical Housing Standards - Nationally Described Space Standard is a planning standard relating to the minimum space requirements for new housing. New housing should therefore</p>

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	standards for affordable housing is contained within the Nationally Defined Space standards. I note the design guidance does not make any reference to space standards in affordable housing. Some affordable housing should meet Lifetime Homes standards in particular bungalows	<p>mandatory element for demonstrating the sustainability of new housing, as with Passivhaus, another sustainability assessment method.</p> <p>The Technical housing standards – nationally described space standard is a national planning standard for space within dwellings and should be referenced in the Design Guide.</p>	<p>provide space at least in accordance with the standard or preferably exceed it to create liveable homes.”</p> <p>Amend criterion 7 in the checklist to:</p> <p>“Do the internal layouts of proposed homes offer adequate space within the dwelling to comply with the Technical Housing Standards - Nationally Described Space Standard and provide adequate ‘family space’ and storage?”</p>
63	The sustainability Checklist, if applied too strictly would be contrary to the NPPF	Noted. Propose to make minor changes to the wording of criteria 7 and 8 to improve the clarity and interpretation of the document	<p>Re-word criterion 7 and 8 to:</p> <p>Has active sustainability been adequately considered within the design of the buildings?</p> <p>Has the Passivhaus approach been adequately considered</p>
64	<p>Comprehensivity does not equal sustainability</p> <p>At iii 11 and iii 12 of Volume 1, the Guide asserts that where sites are in multiple ownerships planning applications can only be acceptable if a comprehensive masterplan is prepared by a single architect. This is contrary to national policy.</p> <p>When a site is in multiple ownerships, the key planning test is that each application meets its own needs without prejudicing the ability of the remaining sites to both meet their own needs and deliver the overall vision for</p>	<p>Noted. However, many of the problems encountered both at outline and detailed stages relate to the incompatibility of proposals where sites often abut one another and essentially form part of a larger development area. This has resulted in instances where they are poorly connected, the townscape relates quite poorly and they are in essence compromised by a lack of comprehensivity. The message from within the industry is that developers are reluctant to talk to one another without the framework provided by a comprehensive approach. This is borne out by some of the difficulties faced in the past on larger sites and where sites adjoin one another.</p> <p>By not pursuing a comprehensive approach (where that would be appropriate) runs the risk that</p>	<p>Minor rewording of vol 1 iii/11 and 12</p> <p>iii/11 “In either situation a comprehensive masterplan is strongly encouraged to...”</p> <p>Add sentence at end of iii/11 “Pursuing a comprehensive approach could help reduce delay arising from discordant individual proposals and reduce the risk of an individual application being refused because it does not comply with paragraph 64 of the NPPF (i.e. that it is of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions).</p> <p>iii/12 “Where multiple developers have interests in adjoining land then they are strongly encouraged to appoint...”</p>

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	the allocation as a whole.	<p>individual proposals will not comply with para 64 of the NPPF <i>“Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.”</i></p> <p>It can also lead to significant delay in trying to resolve the inherent problems often arising from individual development proposals poorly relating to one another and not delivering <i>“the overall vision for the allocation as a whole”</i></p> <p>Propose minor rewording and insertion in vol 1 iii/11 and 12</p>	
65	Facilities and services – needs to be a CEC method of calculating suitable distances to facilities; public transport - "good" access to public transport, needs to be clarified that 1 bus an hour and over a mile to a railway station does not constitute good access to public transport	Noted but disagree. Policy SD1 Sustainable Development Principles in the Local Plan Strategy includes a guide (table 9.1) containing the appropriate distances for access to services and amenities. The Design Guide will accord with this over arching Policy; therefore it does not need to contain this information.	No further action required
66	Introduce freedom to build more interesting housing where each house doesn't look very similar to its neighbour through schemes such as self build .	Noted. Self Build is mentioned in the Quality of life Chapter (para vi/24) but could be enhanced by adding that self build offers the opportunity to create distinctive and memorable buildings	<p>Minor addition to vol 2 para vi 24</p> <p>“self build also offers the opportunity to create distinctive and memorable buildings within developments, either as sites in their own right or as pockets or key building locations within larger development sites”</p>
	Quality of Life		
67	Add “traffic lights” to the Quality of Life Check list	Specific BfL criteria do not apply to this section of the Guide. It is largely a bringing together of all the issues within chapters i-v of volume 2 of the Guide.	Insert the following explanation at the beginning of volume 2 about applying the checklists and their purpose, as part of a wider explanation of the purpose of volume 2 and its status as one of the

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		<p>However, it is noted that some advice is required regarding the use purpose and use of the checklists at the beginning of volume 2</p>	<p>material considerations to be taken into consideration in the planning balance</p> <p>“Volume 2 of the Cheshire East Borough Design Guide provides the practical guidance to implement the best practice approach to design set out in chapter iii of Volume 1.</p> <p>It is broken down into 6 topic chapters for residential design. At the end of each is a checklist to assist users in reviewing development proposals, supported by case studies illustrating some of those particular design issues being implemented positively.</p> <p>The checklists are there to assist a design dialogue and to act as prompts through the design process. Their purpose is to also enable an assessment of the acceptability of proposals either informally at pre-application or as part of the consideration of a planning application.</p> <p>New developments may not be able to achieve positive outcomes for all of the criteria. However, designers are encouraged to minimise the number that cannot be adequately addressed. Certain of the criteria are deemed essential to delivering a high quality scheme and they are marked as M within the tick box. If a scheme does not perform well in relation to any of those essential criteria then it should be re-designed or refused permission</p> <p>An effective system that could be used is the red amber green system, as used in Building for Life 12. The aim would be to eliminate reds for all essential criteria and to minimise them generally, whilst maximising the number of greens. If amber is achieved for an essential criterion then the design should be revisited to seek to address that.</p> <p>Once the local, more detailed, checklist has been completed it should enable the user to determine whether red, amber or green</p>

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			<p>should be assigned to the Building for Life 12 criteria set out at the bottom of the page.</p> <p>The performance of the development in design terms will be one of the material considerations that will be weighed in the planning balance. However, the issue of design quality will carry considerable weight having regard to the requirements to achieve high quality design set out in the NPPF and the Local Plan”</p>
68	Within both the sustainable design and quality of life sections, there is little or no mention of challenging current development patterns which are encouraging car dependency and exacerbating both environmental and health problems.	Development patterns are determined by the Local Plan Policies. The Design Guide SPD does not allocate sites. However, the criteria set within various parts of the Design Guide SPD, including all chapters of Vol 2 should help in the assessment as to whether a proposed development is sustainable.	No further action required.
69	Section vi is concerned with quality of life Checklist . It is not clear whether any of these points are mandatory and what status the checklists have. This needs further explanation	Refer to issue 67	Please refer to Issue 67
70	Paragraph 123 of the NPPF requires that planning policies and decisions aim to avoid noise giving rise to significant adverse impacts on health and quality of life as a result of new development, and to mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development.	<p>Noted , However, all applications within the safeguarded area would be subject to consultation with the Airport and their comments would be material to consideration of those applications.</p> <p>As part of the health impact assessment process, consideration should be given to ensuring that residents are not exposed to noise and other forms of pollution.</p>	<p>Insert para after vi/26</p> <p>“As part of the health impact assessments, consideration should be given to ensuring that the design of new development does not expose residents to noise and other forms of pollution that would adversely impact upon their emotional and physical wellbeing.”</p>

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	Checklists		
71	Street Design Checklist: PAGE 52 – replace with the following: “Has lighting been properly considered to not only light the streets and spaces safely but is additional lighting required to highlight landmarks and points of interest”	Noted. Amend as suggested	Propose to amend street design checklist (page 52)– replace with the following: “Has lighting been properly considered to not only light the streets and spaces safely but is additional lighting required to highlight landmarks and points of interest”
72	Working with the grain of the place Checklist i/40-i/47: ‘Accessibility’: good balanced approach. would like to see cycling specifically mentioned along with public transport (criteria 3 and 4)	Noted. Reference to cycling should be added	Amend to include reference to cycling facilities in criteria 3 and 4 of Working with the Grain of the Place Checklist Criterion 3 “Is the site close to existing public transport and cycling facilities or does it propose to improve public transport access to the site and surrounding area” Criterion 4 “Does the development demonstrate good connectivity for all modes of transport including cycling and justify the location of these connections”
73	Urban design checklist – suggest additional question “Has the layout incorporated a variety of cycle parking solutions which are compliant with the guidance?”	Noted. However, suggest amend criterion 5 to incorporate cycle parking	Amend criterion 5 to read: “Does the layout create a logical, legible and permeable movement hierarchy ensuring good pedestrian and cycle access into the wider area and does it incorporate a variety of parking solutions”
74	Street design checklist – Does the development address BfL12? Cycle parking not specifically mentioned but possibly considered under Q12 external storage. Should be a separate question for cycle parking	BfL questions are set by BfL 12 and therefore they cannot be altered by this guide. Usually cycle parking is tackled under question 12 of BfL External storage and amenity. There is scope to specifically address this in the checklist of the sustainability section of the Guide - Chapter v. Suggest inserting new criteria/question at the end of	Insert additional question “Does the design properly consider provisions for cyclists, including parking/storage in the public realm and within homes?”

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		the checklist	
75	Volume 2 is targeted at larger developments, particularly when completing the ' checklists '. Whilst potentially helpful to prompt discussions with the council, they must be applied with a degree of flexibility rather than being rigidly adhered to. For example, the Sustainable Design Checklist contains questions that could be used to resist smaller scale development in the rural area. If rigidly applied, this checklist is contrary to the requirements of the NPPF and PPG which require some rural development to ensure the future sustainability of rural services such as schools, local shops, cultural venues, public houses etc.	<p>Noted. However, it should be stressed that this is a design guide and that design is one of a number of material considerations in the planning assessment.</p> <p>Issue 67 highlights need for clarity on use of the checklists. It is proposed that this be provided at the beginning of volume 2. This could also incorporate an explanation of the design guide status as one of the material considerations in the planning assessment for an application.</p>	Please refer to response to issue 67(above)
76	The Town Council is concerned that the restriction on staff to the use of ' Checklists ' featured through Part 2 of the Guide would be inappropriate and fail to take into account all factors that should be considered by Planning Officers in reaching a decision.	<p>Noted refer to response in relation to issue 67</p> <p>Training is proposed for Cheshire East Staff and Councillors</p>	<p>Please refer to response to issue 67 (above)</p> <p>Package of training to not just cover design but also the use of the Guide weighed against other material considerations.</p>

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77	Design Review panels, who make recommendations with material planning weight, are directed to only use BfL12 as their framework (section iii 48, Volume 1, page 69). Most sections of the Design Guide aren't covered by BfL12 so don't have to be reviewed. Hope that the Design Review panel will look at the other checklists in preparing their report and attach material weight to them. We, as parish councils, can use the same checklists and independent support in coming up with comments/objections and perhaps contradicting the DRP report. This would have the same weight in planning terms as other Parish Council comments, however not the same weight as the Design Review panel's report.	<p>Noted but section iii 48, Volume 1, page 69) <i>"The Design Review Panel will use the Bfl 12 Questions as the framework for the design review process"</i></p> <p>This does not preclude the use of Design Codes or reference to other checklists and material issues as deemed appropriate.</p> <p>Design review comments will be treated as a material consideration as would comments from consultees including Parish and Town Councils.</p> <p>The final approach to design review will be agreed and ratified by the design review panel at its inception.</p>	No further action required
78	Good to include reference to the Building for Life standards, but it is ambiguous if this will become a legal requirement of the application process (i.e. references throughout to 'should', not 'must', be used). Consider strengthening/clarifying, as if not legally required through policy, it may be ignored. Good to include reference to the	<p>Noted please refer to response in relation to issue 69</p> <p>It is noted that the information relating to when design codes are required needs to be clarified (see response in relation to issues 8-12 It is a useful and noteworthy comment that Design Coding can speed the design and development process up with consequent benefits for the delivery of new development.</p>	<p>Actions as for issues 8-12 and 69 (above)</p> <p>Insert the following as new para after vol 1 iii/32</p> <p>"One of the practical benefits of Design Coding, if undertaken appropriately, is that it can speed up the design and development process with consequent benefits for the delivery of new development"</p>

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	need for design codes on larger schemes, but it is vague how these will be managed or more importantly enforced by CEC. Codes can also be a useful way of speeding up the application process and again further detail should be provided.		
	Lighting		
79	<p>Lighting Typical Residential Issues PAGE 9 - i/46 - not CEH policy to light alleyways, however any consideration for lighting alleyways or footpaths must be agreed with the Authority's street lighting Dept, prior to design submission.</p> <p>ii) Technical Design Considerations PAGE 42 – Lighting - iii 63 – 68 – replace with the following:</p> <p><i>Lighting can provide many benefits and in some areas can help reduce crime and increase the perception of safety. Amenity lighting can enhance areas and increase the 'feel good factor'.</i></p> <p><i>Cheshire East Highways is actively seeking to reduce the impact street lighting has on the environment. Installing energy-efficient and sustainable</i></p>	Noted amend as suggested	<p>Amend as follows:</p> <p>volume 1 i/46 "...addition of lighting to the alleyway (subject to agreement with CEC Street lighting) may..."</p> <p>Amend iii/63-68 as suggested but also make reference to the Bat Conservation Trust's lighting guidelines and insert link to document if possible</p> <p>"Lighting can provide many benefits and in some areas can help reduce crime and increase the perception of safety. Amenity lighting can enhance areas and increase the 'feel good factor'.</p> <p>Cheshire East Highways is actively seeking to reduce the impact street lighting has on the environment. Installing energy-efficient and sustainable equipment is a vital part of this process. Street lighting design shall support the aims of the Council's Sustainable Strategy which include:</p> <ul style="list-style-type: none"> • Reduction in Energy Consumption • Thriving Economy • Sustainable Environment, • Reduction of primary energy consumption and increasing the share of renewable energies • Carbon free energy supply

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	<p>equipment is a vital part of this process.</p> <p>Street lighting design shall support the aims of the Council's Sustainable Strategy which include:</p> <ul style="list-style-type: none"> • Reduction in Energy Consumption • Thriving Economy • Sustainable Environment, • Reduction of primary energy consumption and increasing the share of renewable energies • Carbon free energy supply • Safe communities • Health and wellbeing • Cohesive and Strong Communities • Highway safety for road users <p>All submitted lighting designs shall be in compliance with the following current reports;</p> <ul style="list-style-type: none"> • BS5489 - Code of practice for the design of road lighting • Cheshire East Highways Street Lighting policy and specifications • 6C's Specification • Well Lit Highways • ILP Technical Reports • Bats and environmental impact assessment • Conservation (Natural Habitats) Regulations • Climate Change Act • BS EN 13201-1 European Standard for the design of street lighting on the public Highway. <p>The Lighting design shall be sympathetic to the environment, without causing light pollution onto residential properties, using the most up to date lighting equipment, appropriate to the location, Conservation areas and dark skies locations need to be considered.</p> <p>Cheshire East Highways is committed to reducing CO2. Reduction will be achieved through the introduction of LED lighting, dimming, trimming of burning hours and de-illumination of equipment where possible.</p> <p>At present the availability and reliability of solar, wind or other renewable energy equipment is in its infancy. Trials of solar powered equipment, in particular, have identified areas of improvement required to make it both energy and cost effective. The Council recognises the importance of the promotion and improvement in this area."</p>		<ul style="list-style-type: none"> • Safe communities • Health and wellbeing • Cohesive and Strong Communities • Highway safety for road users <p>All submitted lighting designs shall be in compliance with the following current reports;</p> <ul style="list-style-type: none"> • BS5489 - Code of practice for the design of road lighting • Cheshire East Highways Street Lighting policy and specifications • 6C's Specification • Well Lit Highways • ILP Technical Reports • Bats and environmental impact assessment • Conservation (Natural Habitats) Regulations • Climate Change Act • BS EN 13201-1 European Standard for the design of street lighting on the public Highway. <p>The Lighting design shall be sympathetic to the environment, without causing light pollution onto residential properties, using the most up to date lighting equipment, appropriate to the location, Conservation areas and dark skies locations need to be considered.</p> <p>Cheshire East Highways is committed to reducing CO2. Reduction will be achieved through the introduction of LED lighting, dimming, trimming of burning hours and de-illumination of equipment where possible.</p> <p>At present the availability and reliability of solar, wind or other renewable energy equipment is in its infancy. Trials of solar powered equipment, in particular, have identified areas of improvement required to make it both energy and cost effective. The Council recognises the importance of the promotion and improvement in this area."</p>

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	<ul style="list-style-type: none"> • <i>ILP Technical Reports</i> • <i>Bats and environmental impact assessment</i> • <i>Conservation (Natural Habitats) Regulations</i> • <i>Climate Change Act</i> • <i>BS EN 13201-1 European Standard for the design of street lighting on the public Highway.</i> <p><i>The Lighting design shall be sympathetic to the environment, without causing light pollution onto residential properties, using the most up to date lighting equipment, appropriate to the location, Conservation areas and dark skies locations need to be considered.</i></p> <p><i>Cheshire East Highways is committed to reducing CO2. Reduction will be achieved through the introduction of LED lighting, dimming, trimming of burning hours and de-illumination of equipment where possible.</i></p> <p><i>At present the availability and reliability of solar, wind or other renewable energy equipment is in its infancy. Trials of solar powered equipment, in particular, have identified areas of improvement required to make it</i></p>		<p>Amend vol 2 iii/83 to the following:</p> <p>“Commuted sums may be required to cover maintenance of such items as highway structures, noise fencing, traffic signals and non-standard street lighting, including Heritage, passive safe, architectural etc, any equipment that is not part of Cheshire East Highways specification, where they are to be adopted as part of a publicly maintained highway.”</p> <p>Amend criterion 12 of chapter iii checklist as follows:</p> <p>Has lighting been properly considered to not only light the streets and spaces safely but is additional lighting required to highlight landmarks and points of interest:</p>

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	<p><i>both energy and cost effective. The Council recognises the importance of the promotion and improvement in this area.</i></p> <p>iii) Specification & Adoption PAGE 43 iii/83 – replace with the following: <i>Commuted sums may be required to cover maintenance of such items as highway structures, noise fencing, traffic signals and non-standard street lighting, including Heritage, passive safe, architectural etc, any equipment that is not part of Cheshire East Highways specification, where they are to be adopted as part of a publicly maintained highway.</i></p> <p>iv) Street Design Checklist: PAGE 52 – replace criterion 12 with the following: <i>Has lighting been properly considered to not only light the streets and spaces safely but is additional lighting required to highlight landmarks and points of interest:</i></p>		
80	ix) NPPF includes a number of design principles which including impacts of lighting on landscape and biodiversity	This is specifically addressed under sub heading – ‘Lighting’ at iii/63-68	No further action required

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	Green Infrastructure		
81	<p>Green infrastructure (GI) - SPD could consider making provision for GI within development. NPPF specifies that LPAs should plan positively for GI. Multiple benefits of GI – ecological, managing flooding and heat and health and quality of life</p> <p>Arrangements for ongoing maintenance of green infrastructure and landscape design should be made a condition of development</p>	<p>Green Infrastructure is a key thread running through the document. It is a theme mentioned in most sections of volume 2 but in particular chapter ii Urban Design : Creating the Structure (ii/02-04 and Green and Blue Infrastructure (part of Developing the Parameters Masterplan) ii/11-15, and more comprehensively, chapter iv GI and Landscape Design with specific advice on: GI with sections addressing, promoting biodiversity, Green Corridors, Recreation and Health and Blue Infrastructure. GI is also set out in the context of sustainable design, chapter v, with specific reference to urban shading and adapting to climate change (v/52-4) and in vi Quality of Life Open spaces and Green Spaces vi/11-12</p> <p>There is a significant section on landscape management in the Design Guide at vol 2 v/14-28. The final criterion of the GI and Landscape Design checklist comprises a question about adequate provision for maintenance and management.</p>	No further action required
82	Further GI information in the Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "Good Practice Guidance for Green Infrastructure and Biodiversity"	Noted	Add links to Design Guide for Sustainable Communities and Good Practice Guidance for Green Infrastructure and Biodiversity after those already included after Vol 2 para iv/05
83	Opportunities to retrofit GI in Urban areas (Green roof/wall systems, tree planting and land management) should be encouraged	<p>Noted. These issues are partly covered in Chapter iv but the inclusion of green roofs and gardens could be reinforced by more specific inclusion in chapter iv</p> <p>Alternative management of land is covered in chapter</p>	<p>Insert the following sentence after Vol 2 iv/70</p> <p>"Green roofs/walls and roof gardens also provide a means to reduce surface water run-off and to manage run off rates in a more naturalised way. They particularly lend themselves to urban</p>

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		iv.	locations of higher density, but may also be suited to other locations”
84	Consider incorporation of features to enhance biodiversity such as the level of bat roost/bird box provision as per the Exeter Design Guide SPD or other measures.	Noted. There is the potential to include requirements in respect to bats and nesting birds in discussion with the CEC ecologist There are sections in chapters iv and v relating to ecology and means to enhance biodiversity where this could be appended.	<p>Insert sentence after vol 2 iv/15</p> <p>“Bats and nesting Birds</p> <p>New development should also aim to secure ecological enhancement by providing nesting/roosting opportunities for bats and nesting birds. This should take the form of integrated opportunities within buildings (such as roosting/nesting within part of the roof space). Features for nesting house sparrow and swifts being particularly important and so should be prioritised. Measures should also be included as part of the landscape design through selection of appropriate tree and hedgerow species and supplemented by tree mounted or free standing roosting and nesting boxes (depending on the species be provided for). Provision should be informed by a trained ecologist in discussion with the Council’s Nature Conservation Officers. Small scale developments (up to 10 units) would be expected to make a proportional contribution. Larger scale developments should provide features for nesting birds and roosting bats on 30% of consented units. The Exeter Residential Design Guide provides useful guidance”</p> <p>https://exeter.gov.uk/planning-services/planning-policy/supplementary-planning-documents/residential-design-guide-spd/</p>
85	Could consideration please be given to the inclusion within the planning process of a ‘ green space factor ’? Happy to provide further details (or simply ask Southampton City Council who	<p>Noted. The “Green Space Factor” is a scoring system used on development sites aimed at encouraging the maximum achievement of permeable surfaces which can support GI, developed by Southampton University.</p> <p>To apply the GSF would have to be set out in policy in</p>	<p>Include the following reference to GSF after vol 2 iv/124</p> <p>“The “Green Space Factor” (GSF), developed by Southampton University is a scoring system used on development sites aimed at encouraging the maximum achievement of permeable surfaces which can support GI. Whilst use of this tool isn’t mandatory within</p>

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	have successfully integrated it into their application process) as without, few developers will incorporate (why would they?).	the SADPD. Consider inclusion of information in the Design Guide and possibly insert link	Cheshire East at the present time, developers are encouraged to consider using it to help maximise the quantity of permeable surfaces that can support GI within designs”
86	<p>Vital that all levels of planning policy recognises and supports canals, rivers and docks as a cross-cutting policy theme; and acknowledges the diverse roles which they perform including:</p> <ul style="list-style-type: none"> • being a form of strategic and local infrastructure performing multiple functions (including sustainable transport, open space and green infrastructure, land drainage and water supply as well as flood <p>More acknowledgement that waterways can contribute to Sustainability</p>	<p>Noted. However, there are specific references to canals included in Vol 1 within the sample settlements,</p> <p>There is scope to further reference tow paths and canals as an important aspect of green and blue infrastructure in Vol 2.</p> <p>Future design guidance could include specific guidance for waterside development (as this may also be relevant to nonresidential development</p>	<p>Amend section title to “Footpaths/Cycleways and Tow Paths” (vol 2 p 38)</p> <p>Insert paragraph after Vol 2 iii/39</p> <p>“Given the historic character of canals and associated structures, a sensitive approach to design and materiality is required. Where towpaths are required to be implemented or enhanced, this shall be in accordance with the design specification required by the Canals and Rivers Trust.”</p> <p>Insert after iv/71</p> <p>“Canals and Rivers</p> <p>Canals and rivers are important components of the Borough’s blue infrastructure and heritage and can contribute to sustainability. New development should maximise the waterside potential of sites that adjoin waterways, including the improvement of pedestrian and cycle access to canal towpaths and the wider footpath and rights of way network”</p>
87	Whilst we are fully supportive of improving design standards across the industry, this should be done incrementally and appropriately, and not through trying to enforce an overly prescriptive residential design guide which could stall	<p>The Design Guide, seeks to aid discussion and to promote practice that looks “holistically” at design and development.</p> <p>It is considered that the guide does not include overly prescriptive advice and is set out in a way to assist developers to design better proposals and to assist in the timely delivery of development.</p>	No further action required

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	development in Cheshire East. This requires the inclusion of Abnormal costs, including those associated with treatment for contaminated sites or listed buildings, or historic costs associated with brownfield, phased or complex sites; infrastructure costs, which might include roads, sustainable drainage systems, and other green infrastructure .	<p>To seek to raise standards ‘incrementally and appropriately’ would not address some of the fundamental issues that are undermining delivering better designed developments in Cheshire East.</p> <p>The provision of Green Infrastructure, provision of sustainable drainage and safeguarding heritage assets should not be seen as abnormal costs. To do so would be contrary to the provisions of the NPPF, which expressly states that these should be planned for positively.</p> <p>As stated above, this document is guidance to support policies in the Local Plan and will be one of the material considerations against which planning applications will be assessed</p>	
88	Developers are required to design new developments in accordance with Manchester Airport’s safeguarding criteria, including Green Infrastructure	See above in relation issue 81 (above)	As for issue 81 (above)
89	Ecology consider incorporation of features to enhance biodiversity such as the level of bat roost/bird box provision as per the Exeter Design Guide SPD or other measures	Refer to response in relation to issue 84 (above)	As for issue 84 (above)
90	SPD could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.	These issues are covered in chapter iv but could be bolstered in relation to agricultural land, air quality and water quality	<p>Insert additional para after v/13</p> <p>“Protection of natural resources</p> <p>Spatial sustainable design should also seek to safeguard, where possible, air quality, ground and surface water and the best and</p>

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			most versatile agricultural land.”
91	<p>Appropriate to seek, where viable, trees are of a species capable of exceeding building height and provision for succession planting.</p> <p>A better design solution for new housing developments next to woodlands would be to have the following cross section: Existing Woodland - Landscaped buffer zone (of a minimum size so that it protects root protection zones)</p>	<p>This is addressed in relation to soft landscape in chapter iv) but succession planting is not specifically covered, neither is veteran trees, ancient woodland or ancient hedgerow</p> <p>Paragraph could be inserted in vol 2 chapter iv</p> <p>Consider including cross section showing buffer zone for existing woodland</p>	<p>include paragraph after vol 2 iv/115</p> <p>“Veteran trees, ancient woodland and ancient hedgerows are particularly sensitive and important natural landscape features and adverse impacts should be avoided, both upon the natural assets themselves and their settings. As identified in volume 1 chapter iii, A Best Practice Design Approach, features of this kind should be considered as assets rather than constraints with the potential to raise the quality of the scheme and to ground the development in its context. Where appropriate succession planting for veteran trees and ancient woodland and appropriate buffering of the assets should be secured, including root protection in accordance with BS 5837 (2012) as part of the design strategy for the proposal.</p> <p>It is important that adequate space is provided for large trees within developments, particularly those sites proposed on the countryside edge of existing settlements. Mature canopies that rise above roof tops are fundamental to achieving a more verdant landscape character and more varied and softened roofscapes”.</p> <p>Amend para iv/117 to:</p> <p>“When the new development will have an interface with the open countryside and areas of woodland, the development should be outward facing and not screened from the wider countryside. The layout should also include sufficient landscape between the development and woodland to provide a landscaped setting for the natural assets.”</p> <p>e*SCAPE to source a suitable cross section to replace one of the 3 photos on vol 2 p 67”.</p>

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	SuDS		
92	<p>The section on SuDS needs to be expanded.</p> <p>There is no indication if SuDS will be adopted and I can't imagine Cheshire East Council will be prepared to do so. Who is to maintain SuDS and the quality open spaces advocated by the guide? Yes, there is a section on management of open space, but its not clear if developers will be required to provide and/or fund maintenance or how this may be legally enforced. This issue is far more complicated than indicated, particularly if housing is sold freehold and it is assumed the local authority will maintain.</p>	<p>Policy SE 13 Flood Risk Water Management in the LPS 4. <i>All developments, including changes to existing buildings, seeks improvements to the current surface water drainage network and be designed to manage surface water. This should include appropriate sustainable drainage systems (SuDS) and Green Infrastructure to store, convey and treat surface water prior to discharge with the aim of achieving a reduction in the existing runoff rate, but must not result in an increase in runoff</i></p> <p>Also refer to response to issue 93 (below)</p>	Please refer to response for issue 93 (below)
93	<p>Comment on the reference on page 43 to the potential adoption of SUDS. Was valid when government was considering the formation of a SUDS Approving Body (SAB), but that will not now be implemented and the Lead Local Flood authority (LLFA) is a statutory consultee in the planning process.</p> <p>ii) Remove reference to adopting SUDS on page 43 (iii 84). The Council/LLFA will not adopt SUDS in the absence of the SAB.</p>	<p>This is clarified in paras iv/62-64</p> <p>Comment noted in relation to bullet 5 of para iii/84</p> <p>A SuDS Manual is in preparation and this will clarify the situation with regards to adoption</p>	<p>Amend bullet 5 of para iii/84 to:</p> <p>“sustainable drainage systems (SuDS), for example flow attenuation devices, swales and storage areas that are located within the adoptable area and that convey, control or store highway surface water”</p> <p>A SuDS Manual is being prepared by the Council which will further clarify the situation with regards to SuDs adoption</p>

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94	There is a strong reluctance from Cheshire East Highways to adopt SUDs features and as such this element of the design guide is worthless unless these systems are accepted by the adopting authority.	Response as for issue 93 (above)	Please refer to response for issue 93 (above)
	Other issues with document layout/ length and content		
95	Fully endorse the intentions of the Design Guide, it is a comprehensive step by step approach, but lengthy. A summary document published to raise public awareness would be of value	<p>Noted</p> <p>The document was designed to be used electronically and will be accessible in high res PDF format. This will enable users to key word search through the document and to navigate more effectively, particularly with the Guidance in 2 volumes.</p> <p>Consider production of summary document and also overarching edit of the Design Guide.</p>	No further action required
96	Comments on pagination, use of Roman numerals causing confusion. Suggest Arabic and decimal paragraph numbering. The five character areas in volume 1 are not separately numbered – would be useful to separate into individual chapters. Contents of vol II lacks sub headings of vol 1.	Noted, however it was felt it was helpful to split the guide into 2 volumes because of the size of document and also to facilitate volume 1 applying to possible future guidance for other forms of development that would be in a further volume. There is logic therefore in having 2 volumes. It will also allow volume 2 to be more easily cross-referenced against volume 1, both electronically or in paper form (i.e. by having the 2 volumes open side by side)	No further action required
97	Text is somewhat opaque and overly uses planning and technical language. The glossary is not easily legible and does not	<p>Noted. However, the document is written for a mixed audience and therefore it has to balance between technical and non-technical information</p> <p>Final version to be a high Res PDF</p>	<p>Proofing of the glossary against the SPD terminology to be undertaken</p> <p>Replace first sentence of Vol 1 ii/05 with:</p>

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	<p>include all terminology set out in the Design guide e.g. pastiche.</p> <p>Page 14. Para 05. This should be reworded along the lines of 'one of the characteristics that modern development often lacks is the capacity to invoke an emotional response'. For 'bare' read 'bear'.</p>	<p>In relation to 'Chocolate Box' design, comment noted but the guide is not intended to define a particular architectural style but, to ensure good design is secured that it achieves a strong sense of place and is of an enduring quality.</p> <p>Rewording of Page Vol 1 ii/05 could be reworded as suggested</p>	<p>"One of the characteristics that modern development often lacks is the capacity to invoke a positive emotional response."</p>
98	<p>Figure ii:31 is helpful but the unreadable key obscures part of it. The Density grid [Figure ii:32] is of very marginal use. A larger Figure ii:31 with coloured sections for densities and a clear key would have been more useful. The illustration of the War Memorial Cottages would have been better as a photograph.</p>	<p>Noted References to photos and illustrations to be made clear and references made to their purpose.</p> <p>Noted re: the key to figure ii:31. Clarity of keys on different diagrams to be checked</p> <p>In relation to density grids, noted but disagree. See comments in relation to issue 18</p>	<p>Please refer to response for issue 17 (above)</p> <p>References to photos and illustrations to be made clear and references made to their purpose.</p> <p>Clarity of keys on different diagrams to be reviewed as required</p>
99	<p>Naming product suppliers</p>	<p>Noted but, these materials/manufacturers have been assessed and accepted for adoption purposes by the Highway Authority, as part of the preparation of the Design Guide.</p> <p>There are footnotes in all tables which states "or similar approved" which means that other manufacturers/products comparable to those given as examples in the Design Guide may be acceptable,</p>	<p>No further action required</p>

Issue	Issue raised during consultation	Officer Response	Modification made
		subject to assessment for adoptability by the Highway Authority Consider whether further clarification is required .	
Issue	Issue Raised Following Consultation	Officer response	Modification Made
1	Access to good natural light and outlook within dwellings. Currently the Design Guide is silent on this	Noted. This can be added in conjunction with changes proposed above in relation to issue 2 SA Recommendation 1	Insert new paragraph after vol 2 vi/19: “Homes should be designed to provide sufficient natural light and an outlook from a window(s) for habitable rooms. This is especially important in accommodation utilising roofspaces
2	Spacing between dwellings	Spacing between dwellings should be managed to limit ‘zero plotting’ t ensure adequate spacing between dwellings and to prevent cramming	Insert para after vol2 ii/30: “In areas of lower density characterised by semi-detached and detached dwellings, adequate separation should be provided between dwellings both for amenity and townscape reasons, whilst in higher density areas, buildings should be terraced rather than leaving inadequate spacing between properties. Consequently the practice of ‘zero plotting’ shall be strongly discouraged in new housing layouts.
3	Street lighting requirements eroding approved landscape proposals, particularly through the omission of street trees	Street lighting requirements should not erode previously approved layouts. This is particularly crucial when the design Guide is strongly advocating street trees in Avenues as part of the guide’s street hierarchy. To avoid this, earlier consideration of street lighting is necessary alongside the development of strategic landscape design for streets and spaces.	Insert para after vol 2 iii/68: “At a very early stage in the development of design proposals for a scheme, the lighting and highway infrastructure design should be developed alongside the strategic landscape principles, in order to prevent strategically important landscape proposals being severely eroded at a later date by the prioritising of lighting or other highway infrastructure within the detailed design.”