

Draft Residential Design Guidance

Schedule of Consultation Responses (22nd June 2012 to 31st August 2012)

ID	Full Name	Organisation	Sections	Comment	Response
<u>1</u>		Basildon Borough Council	General matters	<p>Thank you for inviting comments from Basildon Borough Council on Castle Point Borough Council's Draft Residential Design Guidance Supplementary Planning Document (SPD).</p> <p>I can confirm that, on this occasion, Basildon Borough Council as a neighbouring Local Planning Authority has no comments to make on the consultation document.</p>	No response required.
<u>2</u>	Elaine De Can	Canvey Island Town Council	<p>Policy Context RDG1, RDG2, RDG3, RDG4, RDG5, RDG6, RDG7, RDG8, RDG9, RDG10, RDG11, RDG12, RDG13, RDG14, RDG15, RDG16,</p> <p>General matters, Additional Issues, Sustainability Appraisal, Equality Impact Assessment</p>	<p>The Town Council support the adoption of these documents provided as a Supplementary Planning Document, in order to give high quality housing development in Castle Point. This Guidance Consultation will enable communities and individuals a chance to achieve their ambitions for the place where they live.</p> <p>As the Town Council have an involvement with the pre-planning stage of the Town Centre with reference to the environment, community, character, streets, parking, pedestrianisation, design and construction, members requested that consideration be made for the guidance to be used for all ongoing regeneration projects.</p> <p>Blocks of garages should no longer be considered and the depth of plots is an important influence on defining the character of an area and should not be seen in isolation from plot widths.</p> <p>The perception of space can also be diminished as the height of buildings increase, it is recommended that in order to achieve an appropriate setting and to ensure that the Town Centre flats, shops, business's and other property development do not detrimentally dominate the public street scene, flats or houses should be no taller than two storey's high.</p>	<p>The proposed guidance only relates to residential development, not commercial development. However the guidance can be used to assess proposals for residential development in such locations.</p> <p>The National Planning Policy Framework (NPPF) requires design policies to avoid unnecessary prescription or detail. Such policies should respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation. Setting a maximum threshold of 2 storeys in height in Canvey town centre, is not therefore considered to accord with the NPPF.</p>
<u>3</u>	Miss Jo Hardwick	Environment Agency	RDG9	<p>We are very pleased that this SPD includes a policy promoting water efficiency, although the majority of the supporting text does focus on energy.</p> <p>It would be useful to include measures which can be incorporated to incorporate water efficiency, both on a small scale and larger scale to cover the various scales of applications.</p> <p>We are also supportive of the intentions to improve energy efficiency and the use of renewable energy sources.</p>	<p>Insert new paragraph under 5.11.6 specific referring to rainwater harvesting, greywater recycling and Sustainable Urban Drainage Systems (SuDS).</p> <p>Add additional comments within remaining paragraphs specifically referring to water efficiency.</p>
<u>4</u>	Miss Jo Hardwick	Environment Agency	RDG11	<p>We are pleased that the supporting text for this policy acknowledges that the potential for ecological value of landscaping should be an important consideration for schemes and that landscape features have the capability to promote biodiversity. It would be useful if this was reiterated in the policy itself.</p>	<p>Insert 'of promoting biodiversity,' after 'climatic conditions' in 3rd paragraph of policy.</p>
<u>5</u>	Sue Bull	Anglian Water		<p>Thank you for the opportunity to comment on this document. However, on this occasion I have no comments to make.</p>	No response required

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<u>6</u>	Mr John Hills	Essex Police	Policy Context RDG2, RDG11, RDG12, RDG14, Additional Issues	<p>Thank you for the opportunity to make comment on the above document. Essex Police have a considerable interest in all issues around urban design and all new developments whether solely housing, retail, commercial, education, leisure or mixed use.</p> <p>Crime and the fear of crime are material considerations under planning and local authorities are reminded of Sec 17 Crime and Disorder Act which places a duty on them to consider crime and anti-social behaviour when carrying out any of their responsibilities.</p> <p>A sustainable development is not just a development that uses recyclable materials, saves natural resources and reduces waste. It can only be truly sustainable if it can reduce crime and maintain no or low levels of crime.</p> <p>A development that suffers high crime and anti-social behaviour will require many additional resources including, emergency services, maintenance vehicles, replacement materials, increased insurance cost, medical resources etc. Academic studies have proven crime has a carbon foot print and we must do all we can to avoid and reduce it where we can.</p> <p>Essex Police would therefore bring to your attention the lack of attention given to security and safety within this draft document.</p> <p>Safety and security, anti-social behaviour is only highlighted in sections 5.6.2., 5.12.5., 5.14.2, 5.15.4.</p> <p>Essex Police have highlighted just a sample of various sections within the draft document that lack detail or advice to consider.</p> <p><i>2.7 the guidance will give advice concerning:-</i> Here it list 16 headings, safety and security are not listed.</p> <p><i>4.3 National Planning Policy Framework (NPPF) One of the core land-use principles identified in the Framework is to always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.</i> High quality design must include physical security including the layout</p> <p><i>4.9 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> The character and quality of an area and the way it functions will be affected if design allows for crime and anti-social behaviour.</p> <p><i>4.12 Ease of Movement / Permeability - A place that is easy to get to and move through.</i> Permeability is important but care must be taken as excessive and unnecessary permeability can cause problems leading to rat runs and aid those escaping detection from their unlawful activity.</p> <p><i>5.1.3 All planning applications for residential development must clearly demonstrate how Government urban design objectives and aspects of development form, and the relevant policies contained within this document have been considered. This must be clearly set out in Design and Access Statements and/or planning statements and/or a planning rationale, which ever is appropriate, accompanying all planning applications.</i> Design & Access Statements (D&A) or other listed documents should include safety and security considerations as required by recent planning appeal decisions.</p>	<p>There is no separate heading for safety and security under paragraph 2.7, as it is considered that such matters can be addressed under all of the other headings listed.</p> <p>In reference to the comments made regarding section 4 of the document, this section is a review of the policy context at a national and local level. The wording is taken directly from these documents. Additional wording from paragraph 58 of the NPPF can be added to the end of paragraph 4.4 of the RDG document.</p> <p>In respect of paragraph 5.1.3 reference to safety and security is included within the Government objectives and policies. It is not therefore considered that a specific reference needs to be made in this paragraph.</p> <p>Additional words added at end of paragraph 5.4.8 to reflect comments received in respect of this paragraph.</p> <p>Additional line added to end of paragraph 5.13.6 to reflect comments received in respect of this paragraph.</p> <p>Paragraph 5.14.2 – added words ‘anti-social behaviour’ after car-related crime.</p> <p>Additional words added to end of paragraph 5.14.10 to reflect comments received in respect of this paragraph.</p> <p>Photo added under paragraph 5.14.11 to show a good example of courtyard parking with flat above garage (FOG).</p> <p>With regard to referring to Secured By Design within the RDG document, a new paragraph is added in Section 4 Policy Context explaining the Secured By Design Initiative.</p>

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				<p><i>5.4.8 It is also important to provide sufficient space to allow individual dwellings to have access to the rear of the property externally, in order to undertake maintenance to the dwelling, take receipt of deliveries, and potentially transport refuse and recycling. This is often seen as difficult to achieve, particularly for terraced properties, however careful design can achieve a suitable layout, as illustrated below. Current guidance suggests that a space of 1m is adequate to accommodate such activities</i></p> <p>The majority of burglaries occur at the rear of premises I would suggest this type of rear access should be avoided where ever possible. Where it is necessary the alleyways should be as short as possible, provide access to the least number of properties as possible and be gated at the communal entry point. Lighting to be considered and no more the one turning point allowed. In most cases of this type of rear access the path is flanked by 1.8mtr (6ft) solid fencing. Consideration should be given to one boundary treatment being 1.2 or 1.4mtr fencing with trellis topping to aid light and natural surveillance.</p> <p><i>5.13.3 Landscaping can be used to create a setting for a development or for amenity purposes. The scope of control of landscaping is best confined to the communal areas associated with flats, sheltered and nursing residential schemes, or the public realm associated with large scale residential schemes. Landscaping of individual dwellings is a matter of personal choice and may often be limited in nature given the constraints of some sites.</i></p> <p><i>5.13.4 Consideration of the location of any landscaping is important. Soft landscaping is often provided in narrow strips and/or in areas with limited daylight/sunlight, which are not suitable environments for vegetation to thrive and survive. Furthermore the appropriateness of the growth habits of vegetation in certain locations, with regard to its immediate and eventual and/or long term impacts on its surroundings, is also an important consideration. For example fast growing shrubs would not be suitable in areas which are required to provide visibility splays, and evergreen trees would not be suitable in more confined areas where light may be limited or restricted.</i></p> <p>No issues with above other than adding that suitable defensible planting can be considered to aid security if used along boundary lines. Consideration to be given on types of planting that may over time require maintenance to prevent natural surveillance across open space, along footpaths or obstruct street, security or natural lighting.</p> <p><i>5.13.6 With regard to hard landscaping the impact on the public and private realm is also important. The location of furniture and public art succeeds when integrated into an area, rather than being an afterthought which may be seen as obtrusive or alien features, or which may act as an obstruction.</i></p> <p>No objection but would recommend: consideration as to surface treatments that deter/prevent, graffiti, skate boarding or other anti-social behaviour.</p> <p><i>5.14 Parking & Access</i></p> <p>Several issues arise within this section: The majority of car crime happens on street and in parking courts not in well lit, well laid out & managed car parks. Rear parking courts that have through routes for vehicles and several pedestrian access routes do and will suffer crime and anti-social behaviour.</p> <p><i>5.14.9 Various parking arrangements can be achieved to mitigate the impact of accommodating vehicles within plots. The simplest is to locate a garage or carport alongside the dwelling set back from the building lines, or underneath the upper storeys of a dwelling. Successful schemes appropriately integrate these elements with the new or existing dwelling, so as not to result in an alien or obtrusive feature. This approach also allows for the provision and/or retention of landscaping and boundary treatment.</i></p> <p>Agree totally with this statement.</p>	

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				<p><i>5.14.10 Covered parking such as under croft, basement or underground parking can be considered the optimum parking solution, particularly for developments within the urban area, as it enables flexibility over site layout and facilitates the creation of attractive and useful external spaces, and does not result in a car dominated public realm. However consideration should be given to the visual impact larger areas of under croft parking could have on the street scene, with long blank elevations screening the parking behind it.</i></p> <p>These issues can be dealt with by ensuring artistic treatments too or rather than bland elevations such as iron works or grilling that will enhance the environment and allow natural surveillance and light to and from the parking area. These could even be public works of art (sec 106 contributions)</p> <p><i>5.14.11 Communal parking in garage and parking courts has gained a bad reputation with regard to attracting crime and anti-social behaviour. This is frequently due to poor design, with limited or no natural surveillance, with the areas being isolated from dwellings, usually to the rear of properties.</i></p> <p>Agree, these could be addressed by having flats over garages (F.O.Gs), to increase footfall and natural surveillance and housing.</p> <p><i>5.16 Design Review</i></p> <p>Consider adding to this section reference to the Essex Police Architectural Liaison Service. Its Architectural Liaison Offices can advise on designing out crime using the principles of Crime Prevention through Environmental design and reference to the Association of Chief Police Officers (ACPO) Secured by Design initiative. www.securedbydesign.com . They are authorised to sign off Code for Sustainable Homes (CfSH) and BREEAM (Health & Wellbeing) document.</p> <p>Reference to the principles of Secured by Design could also be added where Castle Point Borough Council consider appropriate.</p> <p>Essex Police supports Castle Point Borough Council on its draft guidance document. Much of the document supports good design and is commended. Essex Police will continue to work with all parties involved in developments large and small to ensure sustainable, safe and secure places for people to live, work, play and visit.</p>	
Z	John Scott		RDG2, RDG6, RDG7, RDG9, RDG12, RDG13	<p>It's good to see some thoughts regarding the ecological aspects of planning. Can some consideration be given to the following very general points?</p> <p>1) Wherever possible buildings should be sited to enable the capture of solar radiation for PV or hot water systems, even if not installed during construction. However the installation of such systems should be positively encouraged.</p> <p>2) New buildings should include water storage for collecting rain or grey water. The incremental cost of the storage tank at the building stage would be small and bring lifetime benefit in the reduction of potable water usage. A benefit to the homeowner and brownie points for the Councils eco strategy.</p> <p>3) Access and parking issues are a high concern especially when ingress and egress to a location is required by council waste disposal trucks (and of course emergency services). Tight bends, narrow roads, poor visibility coupled with inadequate parking contribute to existing issues. Council trucks inevitably mount pavements and complete difficult manoeuvres to get the task completed. Damage to pavements and kerb stones is all too evident (plus waste discharged</p>	<p>Policy RDG 9 of the document refers to layout and orientation of dwellings in order to achieve opportunities for solar gain.</p> <p>Insert new paragraph under 5.11.6 specific referring to rainwater harvesting, greywater recycling and SuDS.</p> <p>Add additional comments within remaining paragraphs specifically referring to water efficiency.</p> <p>With regard to point 3) these matters are addressed in Section 5.14 relating to parking and access. An additional paragraph has been added to the end of Policy RDG12:</p> <p>'For all forms of residential development access, servicing and turning facilities need to be catered for</p>

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				<p>across the highway).</p> <p>4) Dwellings should not be sited in such a manner that 'closed and locked communities' are constructed. Public areas should be open, accessible and easily viewable to all local residents. The consequences of failure are obvious ... increased vandalism, haphazard parking, poor access, substance abuse, risks to small children etc etc</p>	<p>in a safe and convenient manner for all users, including pedestrians and motorists, and should be sensitively sited in respect of residential amenity.'</p>
8	Mr Roy Lewis	Essex County Council	<p>Policy Context</p> <p>RDG1, RDG3, RDG5, RDG9, RDG10, RDG11, RDG12, RDG13</p> <p>General matters</p>	<p>General Comments</p> <p>The preparation of new Residential Design Guidance for Castle Point is welcomed and supported. It is noted that the new Residential Design Guidance is to replace the existing Appendix 12 of the Castle Point Borough Council Adopted Local Plan 1998. It will also form part of the New Castle Point Local Plan as that document passes through its consultation processes. The new Guidance should assist the provision of high quality design, layout and sustainability of residential areas and contribute to improved quality of life throughout the Borough.</p> <p>However, there is a lack of clarity on the relationship of the new Design Guidance to the Urban Places Supplement, which the Borough Council has adopted as a Supplementary Planning Document. As the new Design Guidance progresses towards adoption the Borough Council should satisfy itself that the new Guidance and the Urban Places Supplement will complement each other.</p> <p>Further, the Borough Council should have regard to the relationship of its new Design guidance to the Essex Design Guide. This is because the Essex Design Guide, together with the Urban Places Supplement, underpins Highways and Transport Development Management policies and Parking Standards adopted by Essex County Council, in exercise of its statutory responsibilities as the local highways authority. In the best interests of clarity of advice and recommendations on development proposals consideration should be given to addressing any uncertainty or conflict with adopted highways and transport policies before the Guidance is adopted.</p> <p>The County Council would be pleased to discuss and work with the Borough Council to ensure that the various policies applied to meet the separate but related statutory duties of each authority may continue to operate in a consistent and coordinated manner.</p> <p>The Borough Council is welcome to consult the extensive image library on urban design features held by Essex Place Services, which may provide additional and/or replacement images to better illustrate the new Guidance.</p> <p>In detail, the County Council's comments relate to matters concerning urban design, parking and access, and sustainable drainage systems (SuDS).</p> <p>Urban Design</p> <p>At the detailed level the draft Guidance is very comprehensive. However, the document lacks discussion of the principles of site planning, including such matters as layout, the relationship between buildings and spaces, townscape, landscape structure, enclosure, connectivity of routes and green space, mix of uses etc. The text should be amended to make clear that development should follow the principles of good urban design practice - as referred to in the Policy Context section of the document or in other documents that may be adopted by the Council as Supplementary Planning Documents.</p> <p>The following comments relate to detail within the text of the document,</p>	<p>In respect of the Urban Place Supplement (UPS), the Council adoption statement states that the Council will consider the guidance in the UPS to be applicable when an application is for a site within or adjacent to a town centre. An additional paragraph as been added to section 3 of the RDG to clarify this position.</p> <p>This guidance should be read in conjunction with the Adopted Essex County Council's Urban Place Supplement (UPS) when considering applications for new development for sites within or adjacent to a town centre and producing design rationales, particularly for larger schemes.</p> <p>This Authority did not adopt the Essex Design Guide. The design vernacular promoted within the Essex Design Guide is not appropriate to this Borough. This Authority is seeking to provide a residential design guidance which seeks high quality design, but also reflects the character of the Borough. The current car parking standards are referred to within the proposed document, with the flexibility to build in revised / amended / new standards if / when they may come into force.</p> <p>With regard to the general comments made under Urban Design, Section 4 of the document deals with Policy Context and sets out a number of documents which provide guidance on the overall principles of urban design. These are further referenced at the start of section 5 of the document, where paragraph 5.1.3 states that 'All planning applications for residential development must clearly demonstrate how Government urban design objectives and aspects of development form, and the relevant policies contained in the document have been considered. This must be clearly set out in Design and Access Statements and/or planning statements and/or a planning rationale, which ever is appropriate, accompanying all planning applications.' Reference can be made at the end of this paragraph to include consideration of future / revised SPD's.</p> <p>Title of Essex County Council Department updated in</p>

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				<ul style="list-style-type: none"> Paragraph 4.24 (page 8) - 'Essex County Council Built Environment' should be replaced by 'Essex County Council Place Services'. Paragraph 5.3.6 (page 12) - the final sentence would be better expressed as, 'Within existing built up areas it is important to consider the surrounding context in order to ensure the impact of new development on adjoining neighbours .is minimised.' Paragraph 5.5.6 (page 18) - it should be made clear that the following image of the 'strong staggered building line' is not appropriate. The Essex Design Guide does not advocate the saw tooth arrangement and this 'T square planning' should not be encouraged. Further, the image of the 'Strong building line with 'interest' elements' is also set out of context. The Essex Design Guide states that ancillary accommodation in front of the house damages its relationship to the street. The approach of providing substantial elements of single storey accommodation in front of the main façade should not be supported. Both images should be removed from the text to ensure clarity of the preferred approach. Paragraph 5.7.4 (page 24) - the second sentence would benefit from insertion of the words 'which overlooks the private amenity area of a neighbouring property' so that it reads: '...in a side wall or roof slope of a dwelling which overlooks the private amenity area of a neighbouring property must be obscured glazing' Section 5.12 (pages 42 and 43) - it would be preferable if the section included a steer to appropriate materials for boundary treatment by inclusion of additional text, such as, 'Boundary edges to the public realm which enclose curtilages should preferably be walled or hedged. Railings or open type fencing such as picket fencing may also be appropriate depending on the prevailing or proposed character of the area.' Paragraph 5.13.2 (page 44) - the ticked image with reference to good landscape design could be improved by better examples. In this design, the narrow strip of grass does not enhance the entrance to the driveway and is vulnerable to overrun of vehicles, which would reduce quality further over time. Section 5.15 (pages 51 to 53) - purpose built bin stores at the front of properties can be quite detrimental to the townscape, although pairing bin stores behind garden walls can minimise the impact on the public realm. It would be helpful if this Section included reference to some alternative locations or means of accommodating the bins within a layout such as in rear gardens with rear access (an appropriate image is set out in the attached document). <p>Parking and Access</p> <p>It would be preferable if Section 5.14 (Parking and Access) began with reference to the current Parking Standards: Design and Good Practice; Sept 2009 (or any revised edition that supersedes this). It is these Standards which will be applied by County Council, in its statutory role as local highway authority, when considering development proposals. The Standards outline the amount of parking required at different types of residential development. Reference to the Standards in the new Design Guidance for Castle Point would set the scene for the advice contained in Section 5.14 and also guide developers to the relevant policy document.</p> <p>The text of Section 5.14, and of Policy RDG 12, makes no reference to cycle or motorcycle parking. This should be remedied in order to ensure consistency to the County Council's Parking Standards which provide guidance for all types of vehicle parking, not just cars. To highlight the broad scope of the Parking Standards the local highway authority would wish to see the new Residential Design Guidance include examples of high quality cycle and motorcycle parking suitable for different residential developments.</p> <p>Specifically in relation to provision of cycle and motorcycle parking the new Design Guidance should identify the following principles,</p> <ul style="list-style-type: none"> Be secured and covered Conveniently located adjacent to building entrances 	<p>paragraph 4.24.</p> <p>In respect of paragraph 5.5.6 examples of the staggered building line referred to can be found in this Borough and often provide articulation and interest to a streetscape. The proposed policy provides guidance on how to achieve high quality design to front projections. This Authority did not adopt the Essex Design Guide. This Authority is seeking to provide a residential design guidance which seeks high quality design, but also reflects the character of the Borough in appropriate circumstances.</p> <p>The words provided in paragraph 5.7.4 are taken direct from Class A of Part 1 of The Town and Country Planning (General Permitted Development) (Amendment) (No.2) (England) Order 2008. Consider it more appropriate to add the following words at the end of the paragraph 'This is particularly important when such windows can afford views of private areas of neighbouring properties.'</p> <p>In respect of Section 5.12 it is considered that the specification of materials could be construed as too prescriptive, contrary to the provisions of the NPPF. Furthermore each case should be considered on its individual merits, taking into account the prevailing character of an area, or the overall concept of a scheme layout for larger developments.</p> <p>A new picture has been inserted under paragraph 5.13.2 as suggested.</p> <p>With regard to Section 5.15 reference is made to the provision of integrated and free standing refuse and recycling facilities. No specific locations are referred to in order to allow flexibility in positioning around a dwelling, reflective of the nature of the development and its location. The policy contains guidance on the design criteria for such facilities to ensure they are not detrimental to the dwelling or surrounding area.</p> <p>In respect of reference to current car parking standards within Section 5.14 the following wording is added to the end of paragraph 5.14.4 'The appropriate level of parking for the various types of residential development is set out in the adopted car parking standards.' Using these words allows for subsequent amendments or revision to parking standards to still be considered as part of this guidance.</p>

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				<ul style="list-style-type: none"> • Enjoy good natural observation • Be easily accessed from roads and/or cycle routes • Be well lit; and • Be located so it does not obstruct pedestrian and cycle routes <p>Examples of good practice for cycle parking can be found in the Parking Standards document referred to above or at, http://www.camcycle.org.uk/resources/cycleparking/guidance/cycleparking.pdf</p> <p>In Paragraph 5.14.14 (page 49) specific reference should be made to the Essex County Council: Development Management Policies - February 2011 (or any revised edition that supersedes this) and the document should be added to the References listed at the end of the draft Guidance. Further, Paragraph 5.14.14 should make clear that the Essex Design Guide and Urban Place Supplement are the relevant design guidance applicable to the local highway authority's requirements for access arrangements in residential and mixed use developments. These references should be carried forward into Policy RDG 12 so that development proposals may be prepared in line with the applicable guidance.</p> <p>In respect of Policy RDG12 (Parking & Access),</p> <ul style="list-style-type: none"> • the final sentence of paragraph 4 refers specifically to 'current adopted car parking standards'. This reference should be amended to 'Parking Standards: Design and Good Practice, 2009 (or any revised edition that supersedes this)'. • the Policy should include specific reference to cycle and motorcycle parking, advice on which is also included in the Parking Standards document referenced above. • the Policy should also include reference to access issues. It is suggested that this could be done by transferring part of the supporting text into a new additional paragraph for Policy RDG 12 which would read, 'Access, servicing and turning facilities within sites need to be catered for in a safe and convenient manner for all users, including pedestrians and motorists, for all forms of residential development. Furthermore these are facilities best sited sensitively in respect of residential amenity.' • In the tenth paragraph of the Policy, the inappropriateness of integral garage doors /car ports on narrow fronted units should be referenced. Such an arrangement can result in ground floor elevations being just an entrance door and a garage door/hole for cars which limits natural surveillance of the public realm and damages the scale of the elevation. It is suggested that the following text be added to the policy, 'Permission will be refused where integral garage doors/ space for cars dominate the ground floor frontage of the dwelling house.' <p>Sustainable Drainage Systems (SuDS) Section 5.11 (pages 39 to 41) deals with 'Energy & Water Efficiency & Renewable Energy' and states that "the reduction of energy consumption and increased energy and water efficiency are important considerations in any new development". However, neither in this Section nor anywhere else in the document is there any mention or discussion of surface water management, water harvesting/recycling or sustainable drainage systems (SuDS). To correct this omission new additional text should be inserted into Section 5.11 in support of further policy guidance that should be added within Policy RDG 9 to deal with Water Resources and Sustainable Drainage.</p> <p>The additional material relating to water resources and sustainable drainage should include the following principles,</p> <ul style="list-style-type: none"> • Protection of water resources - minimising the pollution impact of development on groundwater, watercourses and rivers. • Reduction of surface water flood risk - provision of sustainable drainage systems (SuDS), including rainwater harvesting, grey-water recycling etc. • Enhancement of amenity and environment - by providing SuDS solutions which promote 	<p>With regard to no reference within the section or policy to cycle or motorcycle parking within Section 5.14, it is considered that changes can be made to indicate that references to parking covers cars, motorcycles and cycles, as the guidance proposed is equally relevant to motorcycles and cycles, as it is to cars.</p> <p>The Essex County Council Development Management policies have now been referenced in Section 6 of the RDG. It is not considered that reference to other authorities specific policies in the document / policies themselves allows for amendments or revisions of such policies within the lifetime of the RDG.</p> <p>The last sentence of paragraph 4 of RDG12 has not been amended as requested as per comment made in respect of paragraph 5.14.4.</p> <p>Specific reference to motorcycle and cycle parking is not considered necessary in RDG12, as the guidance proposed is equally relevant to motorcycles and cycles, as it is to cars.</p> <p>Policy RDG12 now addresses the omission on access etc, with the following paragraph added at the end: 'For all forms of residential development access, servicing and turning facilities need to be catered for in a safe and convenient manner for all users, including pedestrians and motorists, and should be sensitively sited in respect of residential amenity.'</p> <p>With reference to the comments made against paragraph 12 of RDG12, such forms of development may be appropriate in certain circumstances, such as designing dwellings in respect of flood risk. Such properties may need to be raised, with only entrance and parking provided at ground level in order to ensure habitable areas of a dwelling do not flood. It is not therefore considered that the suggested additional text is appropriate in the context of this Borough.</p> <p>Comments relating to the reference to SuDS and water harvesting/recycling have been dealt with in response to the comments received from the Environment Agency. It has also been referred to in the landscaping section (5.13) & RDG 11 policy.</p>

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				<p>habitats for wildlife and opportunities for biodiversity enrichment.</p> <p>The draft Guidance should also make reference to,</p> <ul style="list-style-type: none"> the Flood and Water Management Act 2012, the CIRIA SuDS Manual (C697), Essex County Council (draft) Sustainable Drainage Systems - Design & Adoption Guide July 2012. 	
9	Janet Nuttall	Natural England		<p>Natural England has no substantive comments to make on this document; however, as a suggestion we would recommend that open space is referred to as Green Infrastructure (GI).</p> <p>GI is a term used to refer to the living network of green spaces, water and other environmental features in both urban and rural areas. It is often used in an urban context to cover benefits provided by trees, parks, gardens, road verges, allotments, cemeteries, woodlands, rivers and wetlands.</p> <p>GI is also relevant in a rural context, where it might refer to the use of farmland, woodland, wetlands or other natural features to provide services such as flood protection, carbon storage or water purification.</p> <p>Green infrastructure maintains critical ecological links between town and country. GI can also support biodiversity and the functioning of natural systems such as rivers and flood plains and help reduce the negative impacts of climate change. We note that biodiversity and landscape are referenced in the document; GI incorporates and provides benefits for both of these and we would recommend that the document refers to the multi-functional benefits of GI, including landscape, biodiversity, SUDS, flood management, amenity, food production, mitigating the effects of climate change etc.</p> <p>Natural England believes that GI should be an integral part of the creation of sustainable communities. In line with the NPPF requirements for GI it should be protected and enhanced as part of development wherever possible. GI should form the framework for the wider development.</p> <p>One important function of GI is the provision of new opportunities for access to open space. Natural England's 'standards for accessible natural greenspace' (ANGSt) provides a set of benchmarks, which should be used to ensure new and existing housing has access to nature. More information can be found on Natural England's publication, 'Nature <i>Nearby, Accessible Greenspace Guidance</i> ' (March 2010), available on our website , publication reference NE265.</p> <p>The CABI Space Guidance ' <i>Start with the Park</i> ' (2005) outlines the importance of planning around green spaces, with consideration being given to the context of local landscape character and contribution to the wider GI network</p> <p>A critical issue for the successful delivery of GI is the availability of funding to enable delivery of long-term management.</p>	<p>An additional paragraph has been added under Section 5.13 (Landscaping) referring to the importance of Green Infrastructure, as follows:</p> <p>'Furthermore landscaping forms part of the green infrastructure network which provides multi-functional benefits.'</p>
	Drop-in session / Forum	General		Does the document address energy efficiency.	Section 5.11 specifically deals with energy and water efficiency and the policy requires the design of all development to incorporate measures for achieving high levels of energy and water efficiency.
	Drop-in session / Forum	General		Generally support RDG, as it would solve a lot of problems currently encountered. Removes a lot of rigid rules.	No response required.

ID	Full Name	Organisation	Sections	Comment	Response
	Drop-in session / Forum		5.11.12	Will document require Code for Sustainable Homes Level 3.	The proposed policy refers to construction following nationally agreed principles for sustainable dwellings in order to take account of revisions/amendments/changes in such policy or guidance within the lifetime of the RDG.
	Drop-in session / Forum		5.12	How will document address the difference between public and private space, particularly in open plan estates. How will boundary treatment be considered.	The supporting text and proposed policy identify the importance of clearly defining public and private space, including within open plan estates, and identifies methods and measures to achieve this. The supporting text and proposed policy sets out how boundary treatment should be provided.
	Drop-in session / Forum		5.14	Will permeable parking be considered.	Additional sentence to bottom of paragraph 5.14.14 'The incorporation of Sustainable Urban Drainage Systems (SuDS) as part of the design can ensure that water efficiency and suitable surface water drainage can be achieved.' Additional sentence to the end of the one form bottom paragraph of the policy 'Parking provision should seek to incorporate SuDS in appropriate circumstances.'
	Drop-in session / Forum		5.8	Previously had issues with providing amenity space on corner plots. Document appears to address this.	Supporting text and proposed policy clearly indicate that where development would result in a beneficial impact on the layout, less amenity space may be considered appropriate, supported by a robust design rationale.
	Drop-in session / Forum		5.7	Is 9.1m window distance going.	Having had further consideration of the impact and flexibility of the proposed policy, amendments have been made to both the supporting text and the policy. The threshold is to be set at 9m (1 st floor), 15m (2nd floor) & 18m (3 rd floor and above), reflective of the current policy in place, but with the flexibility to reduce this figure in individual circumstances.