

Part 1: Issues Raised Through the Preferred Options Consultation

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
Introduction				
16.1	16.1.2	Statement is supported	Support noted and welcomed.	No amendment in response to this issue
16.2	16.1.3	Statement is supported The Environment Agency supports this paragraph.	Support noted and welcomed.	No amendment in response to this issue
16.2 Design Objectives				
16.3	16.2	Whilst the Plan does accommodate for disabled and elderly populations, this must be made clearer. In particular, there should be greater detail of design for elderly, wheelchair and disabled users in town centres, in particular Bishop's Stortford including dropped kerbs and level areas. Also, better facilities to reflect their needs, for example, wheelchair accessible toilets, electric scooters for hire, small buses for short journeys, RADAR keys.	The Council welcomes this comment and is keen to accommodate for the less mobile members of the community, particularly for the ageing population and those who may suffer from forms of dementia. This falls under the Design Objectives which state that any development proposal should be usable, in terms of accessibility and be socially inclusive. Any development proposal will be assessed against these criteria and efforts should be made at the time of the application to meet this objective. Paragraph 16.7.10 adequately deals with how the built environment should promote independent lifestyles in particular for those with restricted mobility. However, new words could be added to Part III of DES 1 to strengthen this approach.	Amendment to text (para 16.7.9 renumbered 16.7.19 and Policy DES 1 Part III renumbered DES3, Part IV) 16.7.19 bullet 8 Incorporating inclusive design features that benefit everyone in the community e.g <u>such as</u> play areas, <u>seating areas or rest places, and</u> Wi-Fi technology; and DES3, IV (a) Maximise legibility <u>and accessibility</u> of the public realm through the layout of buildings, landmarks, <u>use of colour</u> , landscaping, paving, high quality public art, street furniture and infrastructure including <u>clear and legible</u> signposting, <u>rest places and public toilets</u> , in a way that maintains uncluttered spaces and enabled easy navigation and movement through the space.
16.4	16.2.1	The Environment Agency support the design objectives.	Support noted and welcomed.	No amendment in response to this issue

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16.5	16.2.1 and 16.7.9 (now 16.7.19)	The Canal and River Trust support the design objectives. However, they request that water spaces should be recognised as public realm and integrated into the design rather than as a backdrop.	<p>Support noted and welcomed. Any development that is in proximity to water spaces should have a positive, integrated design appropriate to its setting. It is not just a matter of integrating water spaces into design, but also the management of such spaces and their contribution to sustainable drainage methods.</p> <p>Additional words should be added to bullet 10 in 16.2.1 and to paragraphs 16.7.2 and 16.7.9 (renumbered 16.7.19) to refer to waterscape as part of overall landscape considerations.</p> <p>The Bullet point 10 should also be expanded to make clear that private and public amenity space should be incorporated along with green infrastructure principles as river corridors and water features are key contributors to wider ecological networks. This is particularly relevant where waterways are integrated, due to Riparian Landownership responsibilities.</p>	<p>Amendment to text (para 16.2.1, 16.7.2 and 16.7.9 renumbered 16.7.19)</p> <p>16.2.1 Bullet 10 Incorporate <u>water management and sustainable urban drainage</u>, planting and landscaping into the overall design, including through the creation of adequate private <u>and public</u> amenity space <u>and green infrastructure</u>.</p> <p>16.7.2 Buildings and landscapes that demonstrate a distinct character and are aesthetically pleasing, contribute greatly to the success of a place. Many modern development schemes (especially schemes involving a number of dwellings) can be bland and generic. However, if a development scheme is based on a sensitive understanding of site and context, it can exhibit a distinct character and identity while also belonging to the wider locality. <u>For example, development in proximity to water spaces should respond to and incorporate the water space in the design to add to the character of development.</u> Therefore successful development should respond to locally distinctive patterns of development, building methods and detailing, landscape and history.</p> <p>16.7.19 Public realm refers to all publicly accessible open spaces and public and civic building facilities, publicly owned streets, pathways, <u>water spaces</u>, rights of way and parks.</p>
16.3 Sustainable Design				
16.6	16.3	New houses should meet Passivhaus standards and include solar panels, and grey water systems.	The Government has incorporated sustainability standards within Building Regulations; it is therefore not possible to require that new development is built to Passivhaus standards. However, the Building Research Establishment has recently introduced an equivalent to that which was lost in Building for Life.	<p>Amendment to text (new para. 16.3.6)</p> <p><u>16.3.6 The Building Research Establishment has established a new Home Quality Mark to replace Building for Life which</u></p>

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			<p>It aims to assist developers and customers by providing an independent assessment of the quality of a home scored by a star rating. The Home Quality Mark covers a wide range of topics including sustainable design and construction and is the new best practice being used in the industry beyond Building Regulations.</p> <p>Section 16.3 Sustainable Design is considered to adequately promote sustainable development through design by encouraging use of the Building Futures toolkit and best practice guidance. DES1 (renumbered DES3) states the expectations of using new technologies including zero or low carbon energy and water systems. It is considered that the current policy wording satisfies this.</p>	<p><u>was revoked in the National Standards review 2015. The Home Quality Mark is an independent assessment of the home's quality in terms of its contribution to the occupant's health and wellbeing, cost to maintain and energy efficiency for example. It is a voluntary standard which demonstrates that design and construction exceeds that required by Building Regulations and can be used as a tool when marketing and buying properties and may be used as a benchmark for proposals.</u></p> <p>New 'orange box'</p> <p><u>The Home Quality Mark guidance can be viewed at: www.homequalitymark.com/standard</u></p> <p>Amendment to text (para.16.4.1, bullet 3)</p> <p>...Applicants will be encouraged to use the Building Futures Sustainable Design Toolkit and <u>the Home Quality Mark</u> Building for Life-12 questions within their Design and Access Statements.</p>
16.7(a)	16.3.2	The reference to Building Futures online resource is welcomed.	Support noted and welcomed. However, there is a lot of information provided about the Building Futures Toolkit, some of which is superfluous and can therefore be removed.	<p>Amendment to text (para. 16.3.3)</p> <p>16.3.3 The Toolkit has been created to help those who prepare and assess development proposals in Hertfordshire to better understand the principles of sustainable design and consider how best they can be applied to a specific scheme and site. Using a virtual townscape, the Toolkit aims to provoke thought and inform decisions on the design and build of new development schemes in Hertfordshire. It does this by providing a simple framework of questions, best practice guidance and further information on sustainable design. The questions, guidance and information have been</p>

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				tailored to the six broad types of development to ensure the Toolkit is proportionate and reflects the issues and opportunities typically faced by different types of development.
16.4 Planning Applications				
16.7(b)	16.4	It is suggested that reference to Building Futures could be strengthened by encouraging all proposals to submit a 'Sustainable Design Statement' and not just those required under national criteria, to explain how the placemaking and sustainable principles set out in the Development Plan have been implemented in the proposal by using the <i>Building Futures Sustainable Design Toolkit</i> .	Section 16.3 on 'Sustainable Design' and Paragraph 16.4.1 already directs applicants to provide clear evidence that design principles based on sustainable development objectives have been integrated into the proposal. Paragraph 16.4.1 third bullet could be expanded. This could also be expanded to explain what a Design and Access Statement is expected to achieve. Words are taken from the Design and Access Statement Guide.	Amendment to text (para 16.4.1) That where necessary, a Design and Access Statement has been completed and accompanies the application. <u>The Statement should make it clear how the proposal has integrated sustainable design principles into the scheme. The Statement should clearly justify the proposal by explaining how it will create safe, accessible, vibrant and sustainable development which respects its landscape setting and complies with British Standard 5837 (2012).</u> Applicants will be encouraged to use the Building Futures Sustainable Design Toolkit....
16.6 Design Reviews				
16.8	16.6	Section is welcomed. EHDC are encouraged to promote the use of Hertfordshire Design Review Panel in assessing development proposals before they are submitted and to assist the development management process and during the preparation of site specific documents. This could be achieved by setting a policy requirement for identified sites to undertake a design review process at an early stage. This would create a level of certainty within the planning and development management process for	The Council recognises the merits of the Design Review panel and at later development stages may utilise the panel when developing specific development strategies. Paragraph 16.6.3 outlines the types of proposals that are encouraged to use the Design Review. New text could be added to Part III of DES 1 (renumbered DES3, Part IV) as the Hertfordshire Design Review Panel is best placed to assess larger applications that will have an impact on the public realm.	Amendment to text (Policy DES1, Part III renumbered DES3, Part III) III. Development proposals which create new or have a significant impact on the public realm should: ... <u>(e) Engage the Hertfordshire Design Review Panel as part of the pre-application stage and throughout the Development Management process where appropriate.</u>

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		EHDC, developers and other stakeholders.		
16.7 Local Character and Amenity				
16.9	16.7.2	Density and mix of housing should reflect the character of the area.	Noted. There are a number of policies that support this statement. DES1 (renumbered DES3) identifies that development should promote local distinctiveness. DES3, Part I (a) also focuses on how any development should have regard to the character and the surrounding area.	No amendment in response to this issue
16.10	16.7.3	The Canal and River Trust support this paragraph	Support noted and welcomed.	No amendment in response to this issue
16.11	16.7.9 (now 16.7.19)	Legibility within the public realm should be maximised (to decrease the chance of Bartholomew Road/Trinity Street and Tanners Wharf occurring again.)	Comments noted. The section Major Developments is considered to deal with legibility within the public realm. 16.7.8 (renumbered 16.7.18) identifies the importance of any layout to be understandable, well-connected and inclusive. Importantly, the policy can only promote this as each application will be dealt with individually. New words could be added to paragraph 16.7.9 bullet point 4 (renumbered 16.7.19) to refer to legible signage.	Amendment to text (para 16.7.9 renumbered 16.7.19) <ul style="list-style-type: none"> Uncluttered and simplified street furniture, <u>which includes the provision of clear and legible signage where necessary;</u>
16.12	16.7.9 (now 16.7.19)	There should be a priority on sustainable modes of transport and a focus of the public realm around connections between modes of transport. Footpaths should be a cohesive network with safe places to access other forms of transport such as buses. The Policy does not deal adequately with priorities for walking and cycling networks to achieve healthy lifestyles.	It is considered that Chapter 17 Transport deals adequately with these issues. Chapter 18 Community Facilities Leisure and Recreation also incorporates these issues with a new section on Rights of Way. There are a number of references to walking and cycling and inclusive design in this chapter.	No amendment in response to this issue
16.13	16.7.9 (now 16.7.19)	Provision needs to be made for the movement of goods and materials.	It is considered that 16.7.5 identifies the urban design principles that adequately deal with the impact of any development upon its environment. It is not considered possible to create a specific policy for this due to the range of uses that the development may have. At the point of application,	Amendment to text (para. 16.7.5) 16.7.5 ...The layout and alignment of built form, plots and blocks should respect and be well integrated within the grain of the wider townscape <u>and have regard to the Manual for</u>

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			appropriate areas for the movement of goods and materials may be identified. Reference to the Manual for Streets could be useful here, including a new text box.	<p><u>Streets 2 (2010), which is a guidance document produced by the Chartered Institute for Highways and Transportation.</u></p> <p>New 'orange box' <u>The Manual for Streets 2 can be downloaded from the CIHT website at: http://www.ciht.org.uk</u></p>
16.14	16.7.9 (now 16.7.19)	The Plan should require developments to provide infrastructure that assists with sustainable design objectives such as cycle storage, EV charging points and disposal units for recycled materials.	<p>Comments noted. New words could be added to paragraph 16.7.9 (renumbered 16.7.19) on the public realm. Policy DES I, Part I (e) (renumbered DES3) outlines that all development proposals should make provision for the storage of bins and ancillary household equipment. Each development proposal at the point of application will consider the suitable siting of refuse.</p> <p>The Council supports and encourages sustainable modes of transport, it is therefore considered to be suitable for development to provide electric vehicle charging points or cycle storage where necessary. This ties in with changes to Chapter 23 Environmental Quality. Policy DES1 Part I(e) (renumbered DES3) should also refer to electric vehicle charging points.</p>	<p>Amendment to text (para. 16.7.9 renumbered 16.7.19 and DES1 renumbered DES3)</p> <ul style="list-style-type: none"> • <u>Careful design that prioritises and promotes walking;</u> • <u>Design that encourages cycling, including through the provision of safe and secure cycle storage;</u> • <u>Uncluttered and simplified street furniture which includes the provision of clear and legible signage where necessary, electric vehicle charging points and recycling facilities;</u> <p>Amendment to Policy DES3, Part I.</p> <p>(e) Make provision for the storage of bins and ancillary household equipment. Garages and driveways should be capable of accommodating family sized vehicles. <u>Dwelling design and layout should make provision for electric vehicle charging points in safe and accessible locations;</u></p>
16.15	16.7.9 (now 16.7.19)	Request a policy on minimising light pollution, which is becoming a greater issue.	There is already a policy within the Environmental Quality Chapter (Policy EQ3: Light Pollution). Words could be added to paragraph 16.7.9 (renumbered 16.7.19) to refer to preventing light pollution.	<p>Amendment to text (para. 16.7.9 renumbered 16.7.19)</p> <ul style="list-style-type: none"> • Lighting being integral to the design and not added at the end. <u>Lighting schemes should be designed to prevent light pollution.</u>

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16.16	16.7.9 (now 16.7.19)	The landscaping and wildlife should benefit the community; should support planting native species.	Noted. The Council encourages the planting of trees, grassed areas and flowers to benefit the community. It is considered that 16.7.9 (renumbered 16.7.19) adequately supports this requirement. The bullet point could be expanded to refer to different types of planting. The section on landscaping deals adequately with appropriate species. Further reference to native species in in the landscape and landscaping sections, merged from Chapter 20 now para. 16.7.11 and 16.7.12 (see below).	Amendment to text (para. 16.7.9 renumbered 16.7.19, bullet point 5) 5. Planting (trees, grassed areas, flowers, <u>formal, semi-formal and informal planting</u>);
16.17	16.7.11 (now 16.7.21)	Commitment to the Lifetime Home Standard and Lifetime Neighbourhoods is welcomed. Recognising that the built environment needs to be fully accessible and houses should accommodate for all parts of society.	Support noted and welcomed. However, Lifetime Homes have been revoked in the Housing Standards Review. The Housing Chapter deals with the type and mix of dwellings along with a requirement for accessible and adaptable homes.	Amendment to text (para. 16.7.11 renumbered 16.7.21 and Policy DES3) <u>16.7.21 Similarly, homes should be constructed to provide flexibility for occupants to adapt their living accommodation over time as their needs change. Policy HOU7 of the Housing Chapter sets out the Councils requirements for the construction of accessible and adaptable dwellings.</u> 'Lifetime Homes' are ordinary homes designed to add to the comfort and convenience of the home and supports the changing needs of individuals and families at different stages of life. Lifetime Homes are all about flexibility and adaptability; they are thoughtfully designed to create and encourage better living environments for everyone, enabling occupants to adapt their property according to their needs such as from raising small children to coping with illness or dealing with reduced mobility in later life. This enables occupants to stay within their home for longer and to maintain an independent lifestyle. Residential development should be built to achieve Lifetime Homes standards in accordance with Policy HOU1 (Type and Mix of Housing) and Policy HOU6 (Housing for Older and Vulnerable People). Decent room sizes will be expected in all residential developments, ensuring that the

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				<p>intended functions of each room can be satisfactorily achieved.</p> <p>Amendment to Policy DES3</p> <p>I (f) <u>All new residential developments should meet the requirements of Policy HOU7, and</u> <u>eEnsure all internal rooms are of an appropriate size and dimension so that the intended function of each room can be satisfactorily achieved. All dwellings shall be identified by their square metrage.</u></p>
Policy DES1 Local Character and Amenity (now <u>DES3 Design of Development</u> due to the merging of Chapter 16 Design and Chapter 20 Landscape)				
16.18	DES1 (now DES3)	Reflecting and promoting local distinctiveness is supported in principle, but the policy should also support appropriate design innovation to allow for appropriately designed development of its time and to avoid pastiche development of one kind.	Policy DES1 I (a) (renumbered DES3) requires that developments respect and improve upon the character of the site and the surrounding area subject to a range of considerations. The policy was deliberately worded to allow a flexible approach to design – respecting but not reflecting is the key point. Part I (d) refers specifically to encouraging high quality innovative design.	No amendment in response to this issue
16.19	DES1 (now DES3)	Wording should be stronger to ensure new development takes account of local architectural styles. Houses should be built to the best design achievable and reflect the intrinsic character of the area, not creating ‘rabbit hutch’ design and density.	This comment is noted. DES1 (renumbered DES3) outlines that any development is required to promote local distinctiveness which is strengthened by DES3 Part I (a). The current policy wording is considered to reflect this.	No amendment in response to this issue
16.20	DES1 (now DES3)	Driveways and garages should be of a suitable size and the Council should be more robust in its decision-making for such applications.	Comments noted. DES1 (renumbered DES3) Part I (e) deals with this issue.	No amendment in response to this issue
16.21	DES1 (now DES3)	DES1 criteria ‘d’ and ‘f’ need to be revisited following the Ministerial Statement concerning how standards for the sustainability and construction of new housing will be delivered via the Building	Paragraph 16.3.4 should be split and the part referring to Building Regulations should be updated to refer to the National Standards Review, 2015. The Government conducted a Housing Standards Review in 2015. This involved integrating some	<p>Amendment to text (new para. 16.3.5)</p> <p><u>16.3.5 The Government conducted a Housing Standards review in 2015, which integrated some voluntary standards into</u></p>

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		Regulations rather than the planning system.	<p>voluntary standards into Building Regulations in a bid to introduce consistency and cost savings for developers.</p> <p>The Council's aspirations are still to encourage developments to go beyond these new standards.</p>	<p><u>Building Regulations and created a suite of optional national housing standards that planning authorities can choose to include in local plans. Building Regulations change over time, while sustainable design and technology improves and becomes more viable as they become more established. East Herts Council aspires for all development to exceed national standards and Building Regulations where possible and developments will be expected to utilise the best available sustainable design and technology as possible.</u></p>
16.22	DES1 (now DES3)	An objection to increased urbanisation. Some suggestions are proposed to enhance the rural character, such as: increased tree planting, designation of rural fringe areas for woodland to provide boundaries, better landscaping within town centres, policies to reduce street furniture to 'de-urbanise' the towns, the expansion of conservation areas to preserve the character of the towns and provide people more power to protect their local environment.	Comments noted. The Council supports differentiating between rural and urban areas. It is considered that the section <i>Public Realm and Inclusive Design</i> refers to these comments and the current policy DES1 (renumbered DES3) wording supports the use of all of these.	No amendment in response to this issue
16.23	DES1 (now DES3)	The NPPF suggests that in rural areas, development should make use of redundant buildings or sites, specific design policies should be used which guide on scale, density, massing, height, landscape, layout and materials.	It is considered that DES1 (renumbered DES3) along with other policies in the Plan deal with this issue adequately. It is neither necessary nor appropriate for the Council to prescribe such matters as every case will be unique and therefore should be treated individually.	No amendment in response to this issue
16.24	DES1 (now DES3)	In principle the design criteria are supported, it is recommended that certain specific requirements such as zero and low carbon energy are supported by an evidence base and up-to-date viability testing. Recommended that any policy should not be an onerous burden upon development.	The Council supports sustainable design and the current policy wording supports this. It is important that this is not an onerous burden upon development, however the Council maintains it should be an integral part of housing design. Studies have found that over time the cost of such technologies have reduced and will continue to do so and that through changes to Building Regulations they become standard costs and not	No amendment in response to this issue

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			an additional expense. Building such design into development is more cost-effective than retrofitting.	
16.25	DES1 (now DES3)	Design should include rear access/storage for refuse.	It is considered that DES1 (Renumbered DES3) Part I (e) adequately deals with the storage of bins and ancillary household equipment. It is not always appropriate to create rear access where this can compromise security. Each case should be dealt with individually.	No amendment in response to this issue
16.26	DES1 (now DES3)	There should be minimum car parking per household.	The Council's approach to vehicle parking provision is set out in Policy TRA3 Vehicle Parking Provision. Para.17.4.3 of Chapter 17 Transport refers to the Vehicle Parking Standards SPD.	No amendment in response to this issue
16.27	DES1 (now DES3)	Developers should be required to incorporate underground parking facilities in all construction projects and housing development. This would ensure that development is more aesthetically pleasing.	Policy TRA3 Vehicle Parking Provision requires car parking to be integrated as a key element of design in development layouts to ensure good quality, safe, secure and attractive environments. The Council cannot however create policy requirements that are financially unviable. At the time of an application, appropriate parking will be identified to suit the development scheme.	No amendment in response to this issue
16.28	DES1 (now DES3)	Encouraging green spaces in towns should be encouraged. The Garden City heritage of Hertfordshire should be an inspiration. Green spaces are also good for mental health.	Agreed. The Council aims to enhance and encourage green spaces through DES1 Part III (b) (renumbered DES3 Part IV (b)) which aims to maximise opportunities for urban greening. The Council will work with the relevant partners to ensure that green spaces are included in new development and the public realm is improved by new development. The health and wellbeing benefits of open space, vegetation and landscaping are acknowledged in Policy CFLR8 (renumbered CFLR10).	No amendment in response to this issue
16.29	DES1 (now DES3)	Policy should support appropriate design innovation, with reference to Para 58 in the NPPF.	It is considered that the section <i>Innovation</i> adequately defines how design innovation can be integrated into new and existing housing. As well as promoting design that does not stifle innovation, originality or initiative. Therefore the current policy	No amendment in response to this issue

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			wording is considered to reflect this.	
16.30	DES1 (now DES3)	There should be sufficient access space for Fire and Rescue vehicles and refuse collections vehicles taking into account street parking needs.	Noted. Sufficient vehicular access is considered at the time of an application and all partners are consulted to ensure there is appropriate vehicular access.	No amendment in response to this issue
16.31	DES1 (now DES3)	<p>Whilst this section prescribes certain design principles and solutions to work in combination with site specific policies, when read in combination these policies do not translate the full range of placemaking and sustainable design principles.</p> <p>It is recommended that the policy is revised to focus on a core set of design principles that all development would adhere to and that piecemeal reference to design principles and solutions within the site specific policies is removed. This would present a clearer and more robust policy approach for developers to follow, requiring full and proper consideration of placemaking and sustainable design. For identified sites, the thematic policies would then be translated into the local context in a comprehensive fashion via a development brief/masterplan/SPD.</p> <p>Suggest revised principle list:</p> <ul style="list-style-type: none"> - Character (reflect local distinctiveness whilst not stifling innovation and the creation of distinct identities) - Continuity and enclosure of private and public spaces - High quality public realm and open space - Ease of movement (connectivity, accessibility and permeability of streets, routes, open space and 	<p>The Plan should be read as a whole but it would be of benefit to refer to the Design policies within each site allocation policy within the settlement chapters of the Plan and to refine the approach taken within site allocation policies.</p> <p>The principles referred to are standard approaches contained within guidance such as 'By Design'. Rather than repeat these principles out of context the policy seeks to frame this guidance within the issues that are of particular importance to the communities of East Herts in a language that is easier to understand.</p>	<p>Amendment to text (each site allocation in Part 1 of the Plan)</p> <p><u>Developments will be expected to be in accordance with the sustainable design principles as set out in Policy DES3.</u></p>

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		<p>blue/green infrastructure, in addition to policy TRA1)</p> <ul style="list-style-type: none"> - Legibility of places and spaces - Adaptability and resilience of buildings and spaces to change and future environmental risks - Diversity of uses and building types - Efficient use of land - Safe, healthy and inclusive buildings and spaces - Attractive and welcoming buildings and places - Protection of private and visual amenity - Sustainable use and management of materials and resources 		
16.32	DES1 (now DES3)	Policy supported, in reference to Great Munden Parish.	Support noted and welcomed.	No amendment in response to this issue
16.33	DES1 (now DES3)	<p>Stansted Airport Ltd comments that design policies should refer to the needs for Aerodrome Safeguarding which is subject to direction and procedure contained within Circular 01/2003. They consider that it is highly advantageous that in preparing a spatial plan, that a specific policy and supporting text references are made to address the need to safeguard the civil aerodrome.</p> <p>This can be done by a singular policy or can be woven into specific policies. STAL would be happy to discuss the details of such alterations with the Council; however at the very least, the following areas are in need of consideration:</p> <p>i. Buildings, structures, erections and works: any development that by virtue of its height would impact on the safe</p>	It is highly unlikely that any such form of development that would affect the issues set out by the airport would occur within East Herts. Where proposals would be deemed to affect the safe operation of the airport the Council would engage the expertise of the relevant stakeholders. It is not considered necessary to prepare a policy to deal with these issues. However, additional text could be added to Chapter 22 (renumbered 21) Climate Change, Policy CC3.	<p>Amendment to Chapter 21 Climate Change Policy CC3</p> <p>II. ...<u>(f) the safe operation of aerodromes.</u></p>

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		<p>operation of the aerodrome and its navigational aids(relevant to section 16);</p> <p>ii. Birdstrike: developments which likely to attract birds, including significant areas of landscaping, significant areas of water, nature reserves, or bird sanctuaries in any part of the district (relevant to sections 18, 19 & 20); and</p> <p>iii. Wind turbines and solar PV schemes: potential to cause potential impact on radar and safe operation of the aerodrome (particularly in relation to Policy CC3 Renewable and Low Carbon Energy).</p>		
16.8 Crime and Security				
16.34	DES2 (now DES4)	Developers should act on recommendations from Police and Fire and Rescue Service and be unable to use 'Secured by Design' if recommendations not acted upon.	Noted. Police and Fire and Rescue recommendations will be considered as part of any development proposal. Paragraph 16.8.2 also advises applicants to consult the Hertfordshire Constabulary Architectural Liaison Officer in order to reduce crime through design.	No amendment in response to this issue
16.35	DES2 (now DES4)	This policy should refer to minimising light pollution.	Part II of the policy could be expanded to cover the effective use of lighting.	<p>Amendment to text (Policy DES2 (renumbered DES4) Part II.)</p> <p>II. Security features should be designed in a sensitive manner which respects the overall character of the frontage and location, whilst maintaining an attractive street scene <u>and minimising light pollution.</u></p>
General				
16.36		There are loopholes that allow minor amendments to be made to a scheme once approved which changes the overall scheme, including affordability and mix.	This is an established process of Planning. The Council needs to have a robust approach to refusing such 'minor amendments' where they alter the scheme in this way. Unfortunately, the Government have now introduced a mechanism by	No amendment in response to this issue

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		These should be prevented.	which applicants can bypass the local planning authority to achieve these changes where issues of viability are concerned. The policy approach taken across the Plan is considered robust enough to guide the decision-taking of such applications.	
16.37		Roof pitches should be reduced in order to stop additional roof spaces being constructed, thus making houses bigger and unaffordable.	There is no control over the internal use of such spaces. Only where external alterations are necessary to facilitate this use can planning intervene. It is considered that this policy approach would not be suitable due to the considerations that are necessary for each planning application.	No amendment in response to this issue
16.38		Local food production should be included in local community.	The Council supports the use of land for local food production in local communities. This can be achieved in a number of ways; through the provision of private and public outdoor space and the innovative use of 'left-over' spaces in development schemes. Additional text could be added to section 16.7.9 (renumbered 16.7.19) on public realm and inclusive design to raise the profile of local space for food production.	Amendment to text (para. 16.7.9 (renumbered 16.7.19)) <ul style="list-style-type: none"> Green space for being retained, enhanced and integrated into the design of a development scheme, <u>which may include including the creation of space for local food production or community gardens. This can help to</u> it will reinforce the quality and character of a place, increase biodiversity and deliver a wide range of health and wellbeing benefits <u>as well as foster a sense of community;</u>
16.39		If building in a floodplain could houses be built on stilts?	Policy WAT1 in Chapter 22 deals with flood risk management, including flood resilient design.	No amendment in response to this issue
16.40		Land should be available for self-builders.	Noted. A new policy on Self-Build Homes will be inserted into Chapter 13 Housing at Policy HOU8.	Amendment to text (See Chapter 13 Housing)

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General				
20.1	20	Where site allocations are proposed, the requirements for landscaping, green space, local Green Infrastructure and SUDS are fully supported, and will provide useful 'hooks' upon which to secure considered landscape solutions within these schemes.	Support noted and welcomed	No amendment in response to this issue
20.1 Introduction				
20.2	20.2.1 (now 16.7.7)	East Herts remains one of the most rural areas of Hertfordshire, largely because of the undeveloped nature of the district and the largely farmed nature of its environment. There should be reference to this significant land use which affects the existing landscape character, whatever its biodiversity or other characteristics.	<p>Agreed. Additional paragraph added to raise the importance of the rural landscape.</p> <p>Hedgerows are also an important landscape feature as a remnant of field boundaries, many of which are also classified as ancient, thus benefiting from an extra level of protection.</p> <p>More detail on Landscape Character is referred to in para. 20.2.1 (renumbered 16.7.8), which should be expanded to ensure consistency with the Landscape Character SPD.</p> <p>Paragraph 16.7.8 should also be subdivided and reference to Landscape Assessments should be in a separate paragraph 16.7.9 (see below).</p>	<p>Amendment to text (new para 20.1.2 renumbered 16.7.7) and amendments to text (para 20.2.1 renumbered 16.7.8)</p> <p><u>20.1.1 16.7.7 The rural landscape is of great significance to the character of East Herts. The district has a rich landscape of open fields and parklands shaped by river valleys and arable plateaux. Woodland accounts for 9% of total land cover, half of which is classified as being ancient. Hedgerows are also an important feature throughout Hertfordshire, reflecting the historic enclosure of agricultural fields and defining land ownership boundaries. Many hedgerows throughout the district are classified as ancient hedgerows and are key elements of green corridors,</u></p>

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				<p><u>contributing towards wider ecological networks.</u></p> <p>20.2.116.7.8 There is a <u>are</u> diverse landscape character <u>areas</u> and settlement patterns in the district which are assessed in the Council's Landscape Character Assessment Supplementary Planning Document (September 2007). The document provides a structured evaluation of these landscapes, a landscape strategy and guidelines for <u>strengthening, reinforcing, improving, reconstructing,</u> conserving and enhancing <u>restoring</u> the character of each area. The document also provides a framework for assessing planning applications. Landscape and Visual Impact Assessments should be submitted with planning applications detailing how the proposal takes into account the Landscape Character Assessment SPD; preserving valuable landscapes through appropriate mitigation and enhancement.</p>
Landscape Character				
20.3	LAN1 (now DES1)	The Canal and River Trust supports this Policy.	Support noted and welcomed	No amendment in response to this issue

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20.4	LAN1 (now DES1)	Natural England supports this Policy, and welcomes the requirement for a Landscape and Visual Impact Assessment.	Support noted and welcomed	No amendment in response to this issue
20.5	LAN1 (now DES1)	LAN 1 Part I should specify the size of development for which LVIA is required. Blanket requirement on all applications is disproportionate. Suggest requirement is limited to major applications.	<p>Agreed that blanket requirement is disproportionate.</p> <p>Paragraph 20.2.1 (renumbered 16.7.9) should be divided to highlight the need for landscape assessments and should refer to the need for Landscape Sensitivity and Capacity Assessments as well as Landscape and Visual Impact Assessments as they cover two different types of assessment.</p> <p>Policy LAN1 (renumbered DES1) should also refer to Landscape Sensitivity and Capacity Assessments, with clarification as to when such an assessment will be required.</p>	<p>Amendment to text (para. 20.2.1 renumbered 16.7.9 and Policy LAN1 renumbered DES1)</p> <p><u>16.7.9</u> Landscape and Visual Impact Assessments should be submitted with planning applications detailing how the proposal takes into account the Landscape Character Assessment SPD; preserving valuable landscapes through appropriate mitigation and enhancement. <u>Landscape and Visual Impact Assessments and Landscape Sensitivity and Capacity Assessments should be submitted with planning applications where appropriate, detailing how these have informed the proposal, including mitigation where necessary.</u></p> <p>Amendment to Policy LAN1 DES1 Landscape Character</p> <p>I. Development proposals must demonstrate how they conserve, enhance or strengthen the character and distinctive features of the district's landscape. <u>For major applications, or applications where there is a potential adverse impact on landscape character, a</u> A <u>Landscape and Visual Impact Assessment</u> <u>and/or Landscape</u></p>

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				<p><u>Sensitivity and Capacity Assessment</u> should be provided to ensure that impacts, mitigation and enhancement opportunities are appropriately addressed.</p> <p>II. In exceptional circumstances, where damage to landscape character is unavoidable and justified by other material considerations, appropriate mitigation measures will be sought.</p> <p>III. Where an area is identified in the Council’s <u>latest</u> Landscape Character Assessment <u>SPD</u> this will be used to inform consideration of development proposals.</p>
20.6	LAN1 (now DES1)	Part III- The entire District is covered by Landscape Character Assessments so this statement is inappropriately worded. Suggested rewording - “the relevant Landscape Character Assessment will be used to assess proposals”.	Not agreed. The LCA does not cover the towns and therefore the current policy wording is considered acceptable.	No amendment in response to this issue
20.7	LAN1 (now DES1)	Policy is weak in the linkage to the Landscape Character Assessments. Part I merely states ‘Development proposals must demonstrate how they conserve, enhance or strengthen the character and distinctive features of the district’s landscape’ without reference to LCAs.	Policy should be read as a whole. There is clear reference to LCAs in Part III of the Policy.	No amendment in response to this issue
20.8	LAN1 (now DES1)	Policy LAN1 should explicitly reference the key characteristics and strategy and guidelines for managing change and require development proposals to do so.	Policy LAN1 clearly requires reference to the relevant LCA where appropriate. This would include all aspects of the LCA including location, landscape character, key characteristics, distinctive features, physical influences, historic and cultural influences,	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
			visual and sensory perception, accessibility, community views, and strategy and guidelines for managing change.	
20.9	LAN1 (now DES1)	LAN1 paragraph III could follow the lead of policy HA4 paragraph 1 (e) and be rewritten as "Conform to any 'Landscape Character Assessments' prepared by the District Council, safeguard the Key Characteristics of the area, and comply with the 'Strategy and Guidelines for Managing Change' for the area".	The current Policy wording is considered appropriate. Policy LAN1 clearly requires reference to the relevant LCA where appropriate. This would include all aspects of the LCA including location, landscape character, key characteristics, distinctive features, physical influences, historic and cultural influences, visual and sensory perception, accessibility, community views, and strategy and guidelines for managing change.	No amendment in response to this issue
20.10	LAN1 (now DES1)	Policies LAN1 and HA4 are not linked in the draft Plan although the clear intention of the NPPF is that the designation of heritage assets is linked to Landscape Character (NPPF sections 169 and 170).	Where relevant the Landscape Character Assessment is used to inform the Conservation Area Appraisals.	No amendment in response to this issue
20.11	LAN1 (now DES1)	Conservation Area Assessments must ultimately and explicitly be linked to LCA's; they should be updated to reference each other.	Where relevant the Landscape Character Assessment is used to inform the Conservation Area Appraisals.	No amendment in response to this issue
20.12	LAN1 (now DES1)	'Setting' is mentioned in several places in section 21 and policy HA4 but is not defined. NPPG definition (para 013) should be included to make clearer how development may impact upon setting of heritage asset and be assessed.	The definition of 'setting of a historic asset' is set out in the glossary. See also comments on Chapter 21. Heritage Assets.	No amendment in response to this issue
20.13	LAN1 (now DES1)	Support for purpose of policy – if a Landscape and Visual Impact Assessment (LIVA) is required to justify development then it must follow that it should inform the scale of any Green Belt release in the first place. The	High level assessments have been undertaken to inform the District Plan. More detailed assessments will occur as and when proposals evolve.	No amendment in response to this issue

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
		Council should undertake a LVIA on the land adjacent to Great Innings North of Watton-at-Stone. This should not be left to the Parish Council as part of neighbourhood plan.		
Landscaping				
20.14	20.3 (now 16.7.8)	Recent changes at a golf club in the district have damaged the landscape. Strengthened wording could prevent this happening this again.	Policies LAN1 and LAN2 (renumbered DES1 and DES2) provide a strong basis for the consideration of landscape, including where appropriate the requirement for a Landscape and Visual Impact Assessment.	No amendment in response to this issue
20.15	20.3.2 (now 16.7.11)	With particular reference to rivers and their associated buffer zones only native species should be planted. The Environment Agency also requests the addition of a reference to the management of invasive species.	Agreed. Amendment to the text of paragraph 20.3.2 (renumbered 16.7.11) is required, with additional reference to invasive species. If the Council is aware of any invasive species in the determination of an application a directive would be attached to any permission to inform the applicant.	Amendment to text (para 20.3.2 renumbered 16.7.11) <u>16.7.11</u> The Council will not permit schemes that result in the net loss of landscape features of visual and biodiversity value, and all opportunities for new planting and habitat creation should be fully explored. In exceptional circumstances, where development would result in the loss of landscape features, appropriate compensatory planting or habitat creation will be sought. Certain plants will be more suited to the physical conditions of the site and to the local landscape character than others. As a general rule locally native species are preferable. <u>Native species should be used where appropriate, particularly along rivers and their associated buffer zones paying particular attention to the avoidance of invasive species.</u>

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
20.16	20.3.2 (now 16.7.11)	HCC supports this paragraph, including protecting landscape feature of biodiversity value and use of locally native species.	Support noted and welcomed	No amendment in response to this issue
20.17	20.3.3 (now 16.7.12)	HCC and others support this paragraph, including the recognition of trees and hedgerows in providing a range of beneficial functions.	Support noted and welcomed. Sometimes it could be deemed necessary, where it is essential to maintain the character of the locality, that replacement planting is of mature trees/hedgerows and not saplings. In addition, it is important that replacement planting is successful and monitored to ensure that if any plants die that they are replaced accordingly. (See also Issue 20.15 above)	<p>Amendment to text (para. 20.3.2 renumbered 16.7.11)</p> <p><u>16.7.11</u> The Council will not permit schemes that result in the net loss of landscape features of visual and biodiversity value, and all opportunities for new planting and habitat creation should be fully explored. In exceptional circumstances, where development would result in the loss of landscape features, appropriate compensatory planting or habitat creation will be sought. Certain plants will be more suited to the physical conditions of the site and to the local landscape character than others. As a general rule locally native species are preferable. Along rivers and their associated buffer zones, only native species should be planted.</p> <p><u>Replacement planting should consist of mature plants and species that have been carefully chosen based on their suitability for the conditions of the site and the local landscape character. Native species should be used where appropriate, particularly along rivers and their associated buffer zones, paying particular attention to the avoidance of invasive species. It is</u></p>

Issue Number	Policy/ Paragraph	Issue	Officer Response	Proposed Amendment
				<u>important that such planting schemes are monitored over time and action is taken to ensure agreed landscaping plans are fulfilled.</u>
20.18	20.3.6 (now 20.3.6)	The Environment Agency supports this paragraph.	Support noted and welcomed	No amendment in response to this issue
20.19	LAN2 (Now DES2)	The Environment Agency supports this Policy.	Support noted and welcomed	No amendment in response to this issue
20.20	LAN2 (Now DES2)	Natural England supports this Policy, and welcomes the reference to habitat creation.	Support noted and welcomed	No amendment in response to this issue
20.21	LAN2 (Now DES2)	Landscape design proposals should form part of the full planning application and not be delegated to a reserve matter. Landscape schemes should be promoted/encouraged to provide maximum wildlife value.	<p>With an outline application landscaping can be a reserved matter, and it would then be considered by a reserved matter application. With a full planning application details of landscaping may be considered in the determination of the application or via a condition attached to a permission.</p> <p>Policy LAN2 requires proposals to demonstrate how they will retain, protect and enhance existing landscape features which are of amenity and /or biodiversity value.</p>	No amendment in response to this issue
20.22	LAN2 (Now DES2)	Policy should include wording that prevents the loss of front gardens and boundary features for the purpose of parking which has detrimental effect on the public realm, ecology and availability of on-street parking. Support retention of existing features unless in exceptional circumstances.	Not agreed. In many cases planning permission is not required for the hard surfacing of front gardens or the removal of boundary features.	No amendment in response to this issue

Part 2: Other Proposed Amendments

Policy/ Paragraph	Issue	Proposed Amendment
	Amendment to Chapter title to reflect the consolidation of Chapter 16 on Design and Chapter 20 on Landscape	Chapter 16 Design <u>and Landscape</u>
16.2 Design Objectives		
16.2.1	Where health and wellbeing is referenced, this should be good health and wellbeing.	Amendment to text (para.16.2.1. bullet 8) 8. Encourage <u>good</u> health and well-being;
16.2.1	There needs to be an early reference to the British Standard recommendations for managing trees in relation to development, demolition and construction.	Amendment to text (para. 16.2.1, new bullet 11) <u>11. Incorporate the good practice recommendations of British Standard 5837 (2012): Trees in relation to design, demolition and construction; and</u>
16.2.1	There is a need for an early reference to the need to undertake landscape sensitivity and capacity assessments and landscape and visual impact assessments when planning new developments.	Amendment to text (para. 16.2.1, new bullet 12) <u>12. Incorporate appropriate Landscape Sensitivity and Capacity Assessments and Landscape and Visual Impact Assessments in the consideration of location and design of new development.</u>
16.3 Sustainable Design		
16.3.1	A rewording of the text for clarification.	Amendment to text (para. 16.3.1) 16.3.1 There are many industry examples, toolkits, guidance documents and best practice available that provide sources of information on <u>specific aspects on sustainable design</u> how to design developments in the most sustainable way.
16.3.4	Clarification to the text is required, including the removal of reference to Building Regulations.	Amendment to text (para. 16.3.4) Users of the Toolkit can choose <u>from any</u> one of the six development types to navigate a wealth of sustainable design guidance on issues such as climate change, water, materials and safety. It should be noted that some of these measures exceed those required by Building Regulations. As Building Regulations also change over time as standards and technology improves, applicants should therefore seek to employ the best available approach to sustainable design and technology.
16.3.5	All local standards such as Building for Life, Lifetime Homes and Code for Sustainable Homes have been replaced by a suite of national standards that cover	Amendment to text (para. 16.3.5 and 16.3.6) 16.3.5 — Building for Life 12 is a nationally recognised scheme for appraising the overall design of development. The appraisal consists of 12 questions. A well designed scheme will perform well

Policy/ Paragraph	Issue	Proposed Amendment
	accessibility, energy efficiency, water efficiency, security and internal space standards. Building for Life 12 reference should therefore be removed.	<p>against all 12 of the questions and the performance will be determined using a traffic light system of green, amber and red. The questions are available for use by anyone who has an interest in new homes and neighbourhoods; from developers to community groups to local authorities. Developers achieving 12 green lights within the appraisal can apply for 'Built for Life' accreditation which can be used to market the site.</p> <p>16.3.6 Appraisals should ideally be undertaken throughout all stages of the development process, guiding design related discussions with the local community, local authority and other stakeholders. Through this process, all parties should understand what needs to be done in local circumstances to achieve as many 'green' lights as possible, minimise 'ambers' and avoid 'reds'. Any 'ambers' and 'reds' should be identified early so that a suitable design solution can be found where possible.</p> <p>Building for Life guidance can be viewed at: www.designcouncil.org.uk</p>
16.4 Planning Applications		
16.4.1	While para. 16.3.6 was originally in the context of Building for Life 12, the principles of undertaking relevant assessments and community engagement are still sound and should be retained and placed in the context of planning applications.	<p>Amendment to text (new para. 16.4.1)</p> <p>16.4.1 <u>Development proposals can often be controversial, therefore it is important that appropriate appraisals are undertaken to inform the site planning, layout and design process, and that local communities and stakeholders are engaged throughout.</u> The District Council expects a high standard of design in new development...</p>
16.4.1	Bullet two should refer to landscape architects and drainage engineers being involved as well as traditional architects.	<p>Amendment to text (para. 16.4.1, bullet 2)</p> <p>2... It is essential that skilled architects, <u>landscape architects and drainage engineers</u> are involved in the early stages of any development proposal, to ensure that the potential of any site can be maximised;</p>
16.5 Design Codes		
16.5.3	It is necessary to refer to the changing policy landscape where design criteria may be provided in the form of Neighbourhood Plans, and where still relevant, Parish Design Guides.	<p>Amendment to text (new para. 17.5.3)</p> <p><u>16.5.3 Where applicable, other forms of design guidance such as Neighbourhood Plans and Parish Design Guides may also be applied.</u></p>

Policy/ Paragraph	Issue	Proposed Amendment
16.6 Design Reviews		
16.6.2	16.6.2 should be updated to reflect that the Panel is now established and is no longer funded by the County Council.	<p>Amendment to text (para. 16.7.2)</p> <p>16.6.2 The new Hertfordshire Design Review Panel, funded by Hertfordshire County Council, has been set up to help planners, developers and designers realise the full potential of development schemes. It is a new addition to the Building Futures Initiative and provides <u>providing</u> a resource to support the delivery of high quality, sustainable design for those bringing forward development proposals.</p>
16.7 Local Character and Amenity		
16.7.2	Text amended to read better.	<p>Amendment to text (para. 16.7.2)</p> <p>16.7.2<u>Some</u> Many modern development <u>proposals</u>, schemes (especially schemes involving a number of dwellings) can be bland and generic. However, if a development scheme <u>proposal</u> is based on a sensitive understanding of site and context, it can exhibit a distinct character and identity while also belonging to the wider locality. For example, development in proximity to water spaces should respond to and incorporate the water space in the design to add to the character of development. Therefore successful development should respond to locally distinctive patterns of development, building methods and detailing, landscape and history.</p>
16.7.3	This section is an opportunity to refer to Landscape and Visual Impact Assessments when understanding the impact of development proposals on important views, vistas and skylines.	<p>Amendment to text (para. 16.7.3, bullet 1)</p> <p>1. Avoid obscuring important views, vistas and skylines <u>as established through a Landscape and Visual Impact Assessment;</u></p>
16.7.3	This section should refer to the guidelines for managing change in the Landscape Character Appraisal Supplementary Planning Document	<p>Amendment to text (para. 16.7.3, new bullet 5)</p> <p><u>5. Have regard to the recommendations for managing change within a landscape as set out in the Landscape Character Assessment Supplementary Planning Document (2007).</u></p>
16.7.10	This paragraph should refer to the requirement for Design and Access Statements	<p>Amendment to text (para. 16.7.10)</p> <p>17.7.10 Landscape issues must be regarded as an integral part of the development process. Careful and early consideration of design issues and the provision of adequate landscape information can help to avoid delays at a later stage. In assessing the landscape implications of planning applications the site context, proposed layout, future uses and maintenance all need to be taken into account <u>and detailed in a Design and Access Statement.</u></p>

Policy/ Paragraph	Issue	Proposed Amendment
16.7.13	Paragraph 16.7.13 has been amended as the Council does not offer guidance on schemes. Such guidance should be sought from the guidance in British Standard 5837 (2012).	<p>Amendment to text (para. 16.7.13)</p> <p><u>16.7.13 Advice on existing trees and hedgerows, and new planting can be provided by relevant Council officers. Advice on existing trees and hedgerows, new planting and arboricultural constraints can be found in British Standard 5837 (2012), compliance with which is required where there are trees on or around the site.</u></p>
16.7.15	Paragraph 16.7.15 should make reference to SUDS and multifunctional green infrastructure.	<p><u>16.7.15</u> The Council welcomes landscape design which incorporates principles of sustainability such as use of local materials, low energy consumption for construction and maintenance, local recycling of water through surfaces which increase the permeability of the ground <u>(such as SUDS or multifunctional green infrastructure)</u>, and good pedestrian/cycle links and facilities to reduce car use.</p>
	Policy LAN2 Landscaping should be renumbered Policy DES2 Landscaping	<p>Amendment to text</p> <p>Policy LAN2 renumbered <u>Policy DES2 Landscaping</u></p>
16.7.18	This paragraph should be consistent with the wording in the Design and Access Statement Guide.	<p>Amendment to text (para. 16.7.18)</p> <p>It is also important that layouts are configured in such a way that they are easy to understand, are <u>vibrant</u>, well-connected, inclusive, feel safe, and have clearly defined public and private spaces.</p>
16.7.18	The Government withdrew a series of guidance documents in March 2014, replacing it with the National Planning Practice Guidance which has little in the way of specific design guidance. By Design was withdrawn, yet it is still used by professionals and contains a wealth of specific design guidance and best practice. It is considered worthy of inclusion in the preamble text.	<p>Amendment to text (para. 16.7.18)</p> <p>It is also important that layouts are configured in such a way that they are easy to understand, are <u>vibrant</u>, well-connected, inclusive, feel safe, and have clearly defined public and private spaces. <u>While the Government's previous guidance 'By Design: Urban Design in the Planning System' was withdrawn in March 2014, the principles within the guidance are still relevant and provide a good framework for creating attractive and sustainable developments.</u></p>
16.7.19	Consideration should be given to the impact of security gates.	<p>Amendment to text (para. 16.7.19, bullet 9)</p> <p>9. ... Private and public space should be considered in the process of designing buildings and places. This prevents non-specific, unused and anti-social spaces being created. <u>The impact of any security gates on the character and appearance and on social cohesion will be considered on a case by case basis.</u></p>
	Policy DES1 Local Character and Amenity becomes DES3 Design of Development.	<p>Amendment to text</p> <p>Policy DES1 Local Character and Amenity <u>DES3 Design of Development</u></p>

Policy/ Paragraph	Issue	Proposed Amendment
Policy DES3	This policy needs to include elements of the current similar Local Plan Policy ENV1.	Amendment to text (Policy DES3, Part 1. (c)) (c) Avoid significant detrimental impacts on the amenities of <u>occupiers of</u> neighbouring properties and land, <u>and ensure that their environments are not harmed by noise and disturbance or by inadequate daylight, privacy or overshadowing;</u>
Policy DES3	Requires a change in wording to be more effective.	Amendment to text (Policy DES3, Part I. (d)) (d) Embrace <u>Encourage</u> high quality innovative design....
16.8 Crime and Security		
	Policy DES2 Crime and Security is renumbered Policy DES4 Crime and Security	Amendment to text (Policy DES4) Policy DES2 <u>DES4</u> Crime and Security
16.9 Advertisements and Signs		
	Policy DES3 Advertisements and Signs is renumbered Policy DES5 Advertisements and Signs	Amendment to text (Policy DES4) Policy DES3 <u>DES5</u> Advertisements and Signs
Policy DES5	The ordering of this policy should be akin to other policies, where the positive approach is listed first. Also, that there is no need to refer to both the position and the siting, just the siting of an advert or sign.	Amendment to text (Policy DES5) I. <u>The number, size, siting, illumination, design, colour and materials of advertisements or signs, displayed on or close to a building, must respect the character and appearance of the environment, and the design, scale, features, function and setting of the building.</u> Consent will not be given for advertisements that are harmful to amenity or public safety. II. The number, size, position, siting, illumination, design, colour and materials of advertisements, displayed on or close to a building, must respect the character and appearance of the environment, and the design, scale, features, function and setting of the building. <u>Consent will not be given for advertisements that are harmful to amenity or public safety.</u> III. The display of advertisements of an inappropriate size, position, siting, illumination, design, colour and materials, will not be permitted.