

## Space and Design Guidelines Supplementary Planning Document

### Consultation Statement – September 2015

#### Prepared under regulation 12(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012.

A 'call for ideas' for the Ipswich Space and Design Guidelines Supplementary Planning Document (SPD) was included in the December 2013 Local Plan Newsletter, which was circulated to everyone on the Local Plan mailing list and published on the Council's web site. The Local Plan mailing list consists of specific and general consultation bodies, and private individuals who have expressed an interest in Local Plan matters.

The call for ideas invited comment on the scope and content of the document prior to preparation commencing. Four responses were received from, Anglian Water, English Heritage, Ipswich Wildlife group and Suffolk County Council (comprising six internal departments of SCC in total). No responses were received from private individuals. The comments are reproduced in the table below together with the officer's response indicating how the points raised have been addressed through the SPD, if appropriate.

<b>Respondent</b>	<b>Summary of comment(s)</b>	<b>IBC Response</b>
Anglian Water	There are opportunities within open green space to create sustainable drainage systems, (SuDS), minimising flood risk in line with national policy (PPS25). We would like to see reference made to these synergies within these two documents.	The Draft SPD document includes specific reference to Sustainable Drainage Systems (SuDs), and relevant documents where necessary. The importance of SuDs is emphasised for the purposes of mitigating flood risk, and for the enhancement of visual amenity and biodiversity. IBC has an adopted Development and Flood Risk SPD already which references PPS25.
English Heritage	The NPPF recommends that new design is based on an understanding and evaluation of the defining characteristics of an area, respond to local character and history and reflect the	IBC has adopted an Urban Character Study for a large amount of the Ipswich area. This is made reference to in the draft text of the Space and Design Guidelines SPD as a means of

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	<p>identity of local surroundings. Planning policies should address the integration of new development into the natural, built and historic environment (paras 58 and 61).</p> <p>These principles apply both to new build and extensions to existing properties. We recommend that the spacing between buildings, their layout, scale, form and massing is carefully considered within the local context, and any heritage values associated with the place.</p>	<p>understanding character and design themes in a particular area. Spacing between buildings, layout, form, and massing are all detailed within the SPD.</p>
Ipswich Wildlife Group	<p>Requests that (i) The protection of existing trees and hedgerows and the planting of new ones wherever possible.</p> <p>(ii) Planning processes should include detailed surveys of areas adjacent to the particular site, so that change of use does not block green corridors and possible migration routes.</p> <p>(iii) The creation of wildlife habitats in any developments or public open spaces (e.g. swift bricks, open spaces for bats, sparrow boxes etc.). Any felled trees and shrubs could be made into habitat piles.</p> <p>(iv) Adoption of mitigation strategies are often suggested as an easy solution to wildlife and biodiversity issues. They seldom work and should only be</p>	<p>The Draft SPD seeks to emphasise the importance of landscape, planting and biodiversity within the specific content. Sections are dedicated to gardens - and their importance as wildlife habitats; and landscaping – and the contribution that can be made provided that it is part of the design process, rather than as an afterthought. Photographic examples of habitat features that can be incorporated into new dwellings are also provided.</p>

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	<p>considered after thorough research and monitoring. They should also be monitored for their effectiveness after implementation.</p>	
<p>Suffolk County Council</p>	<p>It is not wholly clear the direction which Ipswich Borough Council may wish to take with this SPD, but the County Council would wish to discuss the following matters as the SPD is produced. It is also worth considering the interrelationship between this future SPD and the 1993 Suffolk Design Guide, and whether it is worth revising the 1993 guidance as part of a new approach to design across the County.</p> <p>- Highways and Transport</p> <p>If the SPD covers the overall design of developments, including relating to parking, roads and paths, the County Council would wish to discuss guidance relating to its role as the Transport Authority. The objective should be to prioritise sustainable transport options, and create a high quality, low-maintenance environment.</p> <p>- Health and Wellbeing</p> <p>As noted above in relation to the Open Space SPD, opportunities to realise the priority outcomes of the Health and Wellbeing Strategy should be actively</p>	<p>The SPD does not seek to supersede the County Council 1993 Suffolk Design Guide. Suffolk County Council have been party to the drafting of the SPD in terms of highways and parking issues. Discussions of a more general matter regarding an updated design guide for the entire County have not been had.</p> <p>Suffolk County Council Highways have fed in directly to the draft SPD, having sat in on the project group, and been consulted at various stages of the process. The introduction of maximum parking standards have been discussed, however it is considered that a stand-alone SPD for these would be more appropriate.</p> <p>Lifetime Homes standards have now been incorporated into the Building regulations, however there is an opportunity to consider enhanced standards</p>

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	<p>pursued. Dependent on the outcomes of the Government's Housing Standards review, it may be appropriate to consider local standards in relation to provision for older people. The County Council encourages the construction of dwellings to the Lifetime Homes standard, which makes it easier for older people to modify and therefore remain in their own homes for longer, as their mobility needs change.</p> <p>- Waste Management</p> <p>Whilst domestic waste collection is a Borough Council responsibility, given the County Council's role as the Waste Planning and Waste Disposal Authority, design measures which help encourage waste management in accordance with the waste hierarchy would be encouraged.</p> <p>- Fire Safety</p> <p>Whilst it is not normally possible to require the provision of automated sprinkler systems through the planning system, given that the fire safety of buildings is covered by the Building Regulations, the County Council supports a risk-based approach to provision of sprinklers. The SPD might usefully suggest the types and scale of development which</p>	<p>locally. This would be required as part of a formal planning policy rather than as part of this SPD.</p> <p>Part of the SPD requires that adequate access for maintenance purposes be designed in to schemes for new dwellings and that consideration be given to extensions for refuse and recycling services.</p> <p>IBC supports the use of automatic sprinkler systems, and standard informatives are used on developments for new dwellings.</p>

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	<p>present an increased fire risk, and so might be considered for either requiring or encouraging sprinkler provision. Design measures related to access arrangements should also consider access for emergency vehicles, along with hard standing and access to water for fire appliances.</p> <p>- Drainage</p> <p>The County Council encourages the provision of sustainable drainage systems (SuDS), and pending the implementation of certain provision of the 2010 Flood and Water Management Act, will take on responsibility for issuing drainage consents relating to certain developments. Our authorities will need to consider the extent to which this SPD considers surface water management and drainage, to aid better implementation of sustainable drainage principals and the 2010 Act.</p> <p>- Landscape/Townscape/Gardens and Open Space</p> <p>As with the comments on green infrastructure features in open space, above, townscape and landscape should be design considerations in new development. Ongoing management should be a consideration for the planning system; for example,</p>	<p>See Anglian Water comments. SuDs have been included as a specific part of the Draft SPD.</p> <p>See Ipswich Wildlife group comments. The Draft SPD includes sections on landscape, gardens, SUDs, biodiversity and sustainability.</p>

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	maintenance arrangements for, and access to, communal gardens.	
Private individuals		No responses have been received from members of the public as a result of the Call for Ideas.

Following approval of the consultation draft of the Space and Design Guidelines supplementary planning document at Executive on 16<sup>th</sup> June 2015, a six week consultation exercise was undertaken in accordance with the Statement of Community Involvement March 2014 and the Town and Country Planning (Local Planning) England Regulations 2012 (Regulations). This was undertaken alongside consultation on a further draft Supplementary Planning Document and a call for ideas on a five Supplementary Planning Documents, and details were circulated to everyone on the Local Plan mailing list, published on the Council's web site, emailed to those on the Ipswich Direct email service and publicised through a press release and via social media. The Local Plan mailing list consists of specific and general consultation bodies, and private individuals who have expressed an interest in Local Plan matters.

The consultation ran for six weeks between Monday 6<sup>th</sup> July and Monday 17<sup>th</sup> August 2015. The minimum four week consultation period prescribed by the Regulations was extended to six weeks because of an overlap with the school holiday period. The responses are reproduced in the table below together with an account of how these have been addressed in finalising the SPD.

<b>Respondent</b>	<b>Comment</b>	<b>IBC Response</b>
Ipswich Buses	Supports this thorough document but make a number of comments which might assist the local authority in supporting public transport in the future.  Policy DM13(f) – a valid point is made regarding secure and lit cycle storage but it would be wise to include reference to direct and well lit walking routes to bus stops and the need to consider the location and frequency of bus stops, shelters and road crossing points where	Noted.  It is not possible to alter the wording of the policy though this SPD document. Generally development sites sit outside of highways boundaries where you

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	<p>development occurs. May be worth making developers aware of this specific point through this policy.</p> <p>Policy DM5(g) – the successful provision of bus routes depends upon expansion of the existing network to maximise the use of available resources (increasing the frequency of an existing route rather than creating a separate route with an hourly service). This means that the requirements of buses are rather different from other modes of transport which are oriented specifically towards the individual’s house. It would be helpful if this distinction could be made clearer in this guidance, perhaps simply emphasising that “buses need to be provided with a through route that connects logically to existing established bus corridors and for which an expansion of route can be logically achieved”. This is clearly the intention of the policy but this more explicit statement may carry greater weight in any discussion with developers.</p> <p>Policy DM30 and Guideline 4.24 – both reasonable density of development and parking standards are proposed to be determined by zone. The proximity to established public transport corridors should be a specific case stated in the policy where denser levels of settlement further from central Ipswich and/or maximum parking standards are appropriate. Development patterns in the Netherlands are worthy of consideration where star shaped developments occur clustered along public transport fingers. Taking a view on the proximity of public transport corridors to development may offer the</p>	<p>would expect consideration to be given as to the lighting of routes to bus stops. Policy DM17 states that proposals will be considered in terms of ‘availability of and access to public transport’.</p> <p>Again the point being made looks at the specifics of the adopted policy. The SPD is not the place to change the emphasis or wording of the said adopted policy.</p> <p>As above.</p>

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	<p>opportunity for denser levels of developer and less space dominated by car parking.</p> <p>4.39 Sustainability – this powerful and forward thinking strategy lacks a consideration of the transport context. Whilst harvesting of solar power is crucial, its impact on a household’s consumption is going to be less significant than the provision of a bus route close to the property which might result in fewer journeys or the decision or not to buy a second car. The layout of streets need to support the provision of a logical route for bus services as a priority in purely sustainability/energy terms.</p> <p>5.28/5.30 – dropped kerbs on bus routes have a significant impact and this should be recognised. Now bus services are wheelchair accessible, kerbs of 100-140mm are required at stopping points. It should therefore be made clear that dropped kerbs will not be permitted where they interfere with the optimum siting of the bus stop. It should also be made clear that bus stop clearway markings may cross dropped kerbs, as buses need to access the kerb to load and unload wheelchairs.</p> <p>These policies also omit any reference to the impact of car-dominated clutter on bus routes, causing them to operate more slowly, and therefore increasing their competitive disadvantage with the car, as a result of weaving between vehicles and making it difficult to pull up against the kerb to allow loading/unloading of wheelchairs.</p>	<p>The access to public transport is an important issue which is covered by adopted policy DM16 of the Core Strategy.</p> <p>Point noted and included in para 5.29 of the SPD.</p> <p>When planning permission is required, the Highways Authority provides detailed advice on highway safety matters prior to application being determined. Commercial reasons are not planning matters, and do not need including in the SPD.</p>



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		Standards for parking provision are contained in the Suffolk Guidance for Parking and are now set as minimums rather than maximums in recognition of maximum standards not effectively reducing car ownership.
Anglian Water	<p>Are supportive of the inclusion of considering resilience to the effects of climate change and the reference to the use of sustainable drainage systems.</p> <p>Appendix V is noted (page 43) 'Tree type and sizes' and are pleased to see reference to and guidance for the correct type of planting for the proposed development.</p> <p>Sewers for Adoption 6th Edition has useful guide lines for planting adjacent to sewers. Briefly, low lying shrubs - no problems, larger hedge type bushes should be 3 metres distance from the pipe; Ash, Oak, Elm type trees 6 metre distance, and Poplar / willow type trees 12 metre distance.</p>	<p>Noted.</p> <p>Noted.</p> <p>Included into Appendix V.</p>
Office of Rail and Road	No comments to make.	Noted
Marine Management Organisation	No comments to make.	Noted
Westerfield Parish Council	No comments to make.	Noted
Theatre Trust	In order to protect community and cultural facilities such as music venues, theatres and pubs throughout the Borough, as required by Item 70 of the NPPF, new residential development must ensure that it does not impact on	The SPD seeks to influence the design and layout of small scale developments and householder extensions. It does not provide guidance

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	<p>the viability of these existing community and cultural facilities.</p> <p>In this regard, Item 123 of the NPPF and the Planning Practice Guidance on Noise make it clear that unreasonable restrictions should not be placed on existing businesses, such as noise abatement notices, because of new residents and new development occurring since they were established.</p> <p>Therefore it is recommend the SPD be strengthened to reflect Item 123 and to ensure that new residential development proposed near community or cultural facilities or businesses are designed with a range of noise mitigation measures and use appropriate building materials to avoid conflicts with adjoining uses.</p>	<p>on serving of notices or other enforcement matters. Policy DM26 states that development which could itself be significantly adversely affect by the conduct of established or potentially noisy uses will not be permitted.</p> <p>It is accepted that new residential properties must be appropriately located in terms of all adjacent land uses. An additional sentence has been added to paragraph 4.3.</p>
Historic England	<p>Support the production of this SPD and agree with the general design advice and best practice highlighted. With regard to the Historic Environment, it was previously advised that:</p> <p><i>'English Heritage wishes to ensure that an understanding of historic environment, including designated heritage assets and locally important assets, and the contribution that the historic environment makes to local character, are fully considered when the SPD is being prepared'.</i></p> <p>There is a concern that this is limited bespoke or tailored advice when it comes to space and design and the Historic Environment within the current draft. It is considered the guidance should highlight the contribution that the Historic Environment makes to the local</p>	<p>Noted.</p> <p>The Council has a number of specific policies which relate to the historic environment (CS4, DM8, and DM9), and has adopted Conservation Area Appraisals and</p>

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	<p>character of Ipswich, cover alterations to both designated and non-designated heritage assets and also discuss the impact new development can have on the setting of designated and non-designated heritage assets.</p> <p>It is advised that an individual section on the Historic Environment is included which highlights the special considerations likely to be linked with developing in or around a heritage asset. Alternatively, if it is not intended to go into such detail within this document, it is advised that a caveat is included which outlines that special circumstances may be apply to development which impact heritage assets and that further bespoke advise is sought from the Council's Conservation Officers.</p> <p>The guidance should highlight issues with parking and the Historic Environment. In addition it should highlight the cumulative negative impact of parking in front gardens of historic areas, for example, the negative impact of the removal of walls and paving over of front garden of terrace housing.</p> <p>A section on public realm should be included and highlight the benefits that a well-designed and accessible public realm can bring to a local area. Could highlight good examples of successful public realm spaces in Ipswich and also outline areas that would benefit from improvement. It should cover good and bad examples of street furniture, signs, lighting and security solutions, etc. it should highlight how sympathetically designed public realms can enhance the</p>	<p>Management Plans, and more recently an Urban Character Study, all of which are made reference to in the SPD.</p> <p>The IBC Conservation team has been party to all drafts of this document and are in support of the content.</p> <p>The issue of streets which become over dominated by cars is addressed at paragraph 5.30. The SPD seeks to advise applicants on how the character of streets can be protected.</p> <p>The SPD guidance looks to give advice and help for smaller infill, and redevelopment sites, rather than those which relate to largescale major applications which significantly affect the public realm, and thus issues of street furniture, signs and lighting. The Conservation Area</p>

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	<p>Historic Environment and how a well-managed Historic Environment can significantly contribute to the local character and distinctiveness of a particular public plan.</p> <p>At Appendix 5 it is advised that this section outlines the need to gain consent if works to trees protected by a TPO or within a Conservation Area are proposed.</p>	<p>Appraisals which have been adopted do set out specific policies for each conservation area. Many of the points raised are for items of street furniture which are within the public highway and generally beyond the control of the planning department, however a Shopfront Design Guide SPD is currently being drafted for public consultation, which does cover signage.</p> <p>Contact details of the planning team have been included at Appendix V.</p>
Woodland Trust	<p>4.6 Trees can occupy a substantial part of a development site and because of their potential size can have a major influence on the planning and use of the site. Existing or planted trees of good quality and value can greatly enhance new development, however, <u>some</u> trees can <u>when incorrectly planted or maintained</u> also be a constraint.</p> <p>4.7 - Layouts sited poorly in relation to retained trees, or the retention or planting of an inappropriate size or species may be resented by future occupiers and no amount of protection will ensure their retention and survival. To avoid such problems careful planning and expert advice is required from the outset. <u>It is critical that planting methods are considered carefully in tandem with location.</u></p> <p>4.22 - There is a direct correlation</p>	<p>Revised wording included at paragraph 4.7.</p> <p>A large amount of the SPD document is given over to the impact of landscaping on the amenity of the area and ensuring the correct species are planted in the correct place. Paragraphs 4.55 – 4.70 are considered to cover the point raised.</p> <p>The point raised is</p>

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	<p>between what is provided to a tree and landscaping below ground and the result seen above ground, therefore suitable soil volumes should be provided to trees and landscaping. Wherever possible, the planting of trees and landscape in groups with shared soil space is encouraged. They can then spread out happily amongst themselves and benefit from additional soil volume. One common method is the use of continuous trench planting and this is a very good way of providing adequate volume. Available soil volume must be a considered in any landscape or tree planting scheme. <u>Shared service trenches and flexible paving solutions are also important upfront considerations.</u></p>	<p>covered under 'Shared Service Ducts' Paragraph 4.52.</p>
<p>SCC Archaeological Service</p>	<p>It would be worth taking the opportunity to flag up that archaeology may be a consideration in planning a project, particularly in the historic core. There may be requirements for archaeological remains to be incorporated into designs to allow preservation <i>in situ</i> or for provision to be made for mitigation/investigation.</p>	<p>Included as extra paragraph (4.9) in Site Appraisal section.</p>
<p>Suffolk Wildlife Trust</p>	<p>We support the principle of this SPD and the inclusion of biodiversity features in the design of new developments. In particular we support the intentions of paragraphs 4.36; 4.37; 4.38; 4.53 and 4.66 of the draft SPD.</p>	<p>Noted.</p>
<p>RSPB</p>	<p>The RSPB recommend the following Biodiversity Requirements of the Exeter Residential Design Guide Supplementary Planning Document.</p> <p>The RSPB welcomes the various</p>	<p>It is unclear whether the RSPB are making reference to the Ipswich SPD or one from Exeter.</p> <p>Noted.</p>

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	<p>biodiversity measures outlined in the draft SPD in particular the reference to Swift bricks in paragraph 4.38. Correctly installed Swift bricks will also be used by house sparrows, bats and hibernating butterflies and moths.</p> <p>In order for such guidance to work, it is of the <b>utmost importance</b> that the siting and positioning of swift bricks is carried out in consultation with a suitably qualified ecologist. We would recommend that an additional appendix is provided within the SPD that adopts the most up to date guidance.</p> <p>Section 9.29 of the Exeter "Guide" refers to ongoing maintenance and the Exeter CC Planners interpret this as a long term Landscape and Ecological Management Plan incorporating all the features set out in Appendix 2 of the Exeter "Guide" which we fully support. Where new communities are being created, we often recommend a Landscape and Ecological Management Plan should be made a condition of consents if granted. This meets ideally with your aspirations for the long-term plans for the scheme.</p> <p>Included in the above should be steps to protect and enhance biodiversity during the construction phase by retaining and planting trees, hedgerows and creating significant green spaces and wildlife corridors within the development to provide foraging opportunities and</p>	<p>Noted. Under normal circumstances landscaping plans and installation of habitat features such as the siting of swift bricks would be undertaken in consultation with the appropriate ecologist - be that a member of the Arboriculture and Countryside team or Suffolk Wildlife Trust.</p> <p>Again the comment is not direct at the IBC SPD. However a great deal of the content in the SPD is given over to landscape and the enhancement of biodiversity, and the document has been drafted with the help of the Arboriculture and Countryside team who have had significant input.</p> <p>Planning conditions would ordinarily be utilised in such circumstances, however the SPD guidance does outline the expectations for development.</p>

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	shelter for invertebrate and vertebrate species.	
<p>Planning Officer (Policy), SCC Economy, Skills and Environment Directorate (draft response)</p>	<p>Repeated the comments of the SCC Archaeological Service.</p> <p>The Borough Council may consider that this document is intended to focus on specific technical design issues such as scale, massing and orientation, but this document may be an opportunity to consider health and wellbeing as a design consideration.</p> <p>Paragraph 4.44 references Lifetime Homes and the Borough Council's approach to the changes emanating from the Housing Standards Review. This section could be extended to consider other design matters related to the objectives of the Joint Suffolk Health and Wellbeing Strategy, such as:</p> <ul style="list-style-type: none"> <li>- How the design of homes, and the integration of new and expanded homes into, the wider built environment can support accessibility and legibility for an ageing population and increasing incidence of physical and cognitive impairments.</li> <li>- How good design can support better mental health and increased physical activity.</li> </ul> <p>In respect of parking and front gardens, the draft SPD helpfully notes that there is a balance to be struck between the operation of the highway network and wider design considerations.</p> <p>It is worth considering that powers to prevent new accesses on to the</p>	<p>Noted</p> <p>Reference included at Paragraph 4.47.</p> <p>Noted</p> <p>The SPD gives guidance about design for</p>

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	<p>highway, particularly onto unclassified roads, are limited. There will always be an amount of front garden 'lost' to car parking over time.</p> <p>It would be helpful if the SPD could help shape thinking around these changes with a statement along the lines of, 'on main roads access manoeuvres to parking spaces are expected to be perpendicular to the kerb line' or, better still, that parking spaces are to be perpendicular to the highway (and in order for them to be so they need to be 5m minimum frontage depth). Transport officers would be pleased to discuss this further.</p>	<p>householders, whether planning permission is required or whether operations can be undertaken under permitted development. Suffolk County Council has its own guidance on Parking adopted in 2014, which IBC has adopted, and made reference to in this SPD (Paragraph 4.25-4.30)</p>
<p>Natural England</p>	<p><b>Green Infrastructure</b></p> <p>This type of SPD should, where possible, provide a clear focus in relation to Green Infrastructure (GI) provision. Where possible such provision should be incorporated into new development.</p> <p>The NPPF states that local planning authorities should plan '<i>positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure</i>'. Urban green space allows species to move around within, and between, towns and the countryside. Even small patches of habitat can benefit movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. The NPPF recognises the contribution GI can make to the challenges posed by a changing</p>	<p>The SPD goes to lengths to incorporate issues relating to green infrastructure throughout the document. IBC is in the process of drafting and adopting a specific Open Space SPD, which covers green infrastructure provision throughout the Borough. A link to the Natural England Green Infrastructure Guidance has been included at Appendix V.</p>



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	<p>climate.</p> <p>Greener neighbourhoods and improved access to nature may also improve public health and quality of life and reduce environmental inequalities. Urban green spaces will provide varied ecosystem services and will contribute to coherent and resilient ecological networks.</p> <p>Natural England has developed a GI signposting document, which may be of assistance; it includes detail in relation to GI provision.</p> <p>It is important to emphasise the multi-functional benefits of GI to biodiversity, amenity, recreation and health and wellbeing and the need to consider GI in urban design and demonstrate how GI and green and open spaces could link to the wider GI network and interlink with access, the landscape and biodiversity. There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through:</p> <ul style="list-style-type: none"> <li>• green roof systems and roof gardens;</li> <li>• green walls to provide insulation or shading and cooling;</li> <li>• new tree planting or altering the management of land associated with transport corridors (e.g. management of verges to enhance biodiversity).</li> </ul> <p>The protection of natural resources, including air quality, ground and surface water and soils needs to be considered in all urban design plans.</p>	

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	<p><b>Biodiversity enhancements</b>  This SPD should encourage the taking of opportunities to incorporate features which are beneficial to wildlife into final proposals for development. The Council may wish to consider whether it is appropriate to provide guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) that a ratio of one nest/roost box per residential unit is considered appropriate. This is in accordance with Paragraph 118 of the National Planning Policy Framework. Additionally, we would draw your attention to Section 40 of the Natural Environment and Rural Communities Act (2006) and section 43 of the same Act.</p> <p><b>Landscape enhancement</b>  This SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider new development and ensure that it makes a positive contribution in terms of design, form and location, to the character and functions of the landscape and avoids any unacceptable impacts. For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do,</p>	<p>As above</p> <p>As above</p>

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	<p>and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.</p> <p><b>Other design considerations</b> The SPD should consider the impact of lighting on landscape and biodiversity. We advise that this is a topic that should be covered by any design related SPD.</p>	<p>Topic included in Paragraph 4.56</p>
<p>Northern Fringe Protection Group</p>	<p>Fully support the document and feel it provides a useful guidance for planning applicants. However, it is not clear what type of development the SPD refers to and without clear definition the SPD risks being undermined and open to interpretation.</p> <p>The primary purpose is to provide detailed guidance for anyone intending to develop their property or to develop land within the boundaries or their property, or develop small infill or backland sites. The scale of 'develop land within the boundaries of their property' is completely undefined and need not relate to just small-scale development. The type of development is also unclear e.g. is just residential development envisaged? In a similar way 'small infill or backland sites' has no defined upper limit.</p> <p>The SPD does not require developments to adhere to NPPF paragraphs 32 and 36 nor Local Plan Policy DM15. This could be misleading since DM15 is a requirement not just for large development but also quite small developments. The SPD needs to either define the scale of the proposed</p>	<p>Paragraph 1.4 explains the types of development which the SPD relates to.</p> <p>Paragraph 1.4 details what the primary purpose of the SPD. Clarification has been added as to how larger developments would be considered.</p> <p>The SPD is intended as a document to guide the design of development. The Core Strategy is still the development Plan and under section 38(6) of the Planning and Compulsory Purchase Act 2004, and</p>

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	<p>developments to be 9 dwellings or less etc. or insert DM15 on page 8. In the case of the latter it is recommended paragraphs 32 and 36 of the NPPF be inserted in page 5 and the SPD refer to, or append information on the Ipswich Air Quality Management Areas.</p> <p>Paragraph 1.2, which states 'All new homes will be required to be zero carbon from 2016' is at variance with the statement from George Osborne on 10th July 2015 <i>'The government does not intend to proceed with the zero carbon Allowable Solutions carbon offsetting scheme, or the proposed 2016 increase in on-site energy efficiency standards, ...'</i>. The guidance in the SPD needs to indicate the intended change to government policy and what sustainability standards will be acceptable. In addition to Paragraph 1.2, Paragraph 4.4 should also be amended.</p>	<p>paragraph 14 of the NPPF applications must be in accordance with the plan. The SPD is not intended to cover matters of transport assessment, but to give guidance on the impacts of design on development.</p> <p>Reference to zero carbon homes has been deleted but the Council's policy DM1 remains in force and is being applied in a manner consistent with the provisions of the March 2015 Planning Update Ministerial Statement.</p>
Marine Management Organisation	No comments	Noted
Office of Rail and Road	No comments	Noted
Westerfield Parish Council	No comments	Noted