

**Design  
Supplementary Planning  
Document (SPD)  
Consultation Statement  
February 2016**

## DESIGN SUPPLEMENTARY PLANNING DOCUMENT (SPD) CONSULTATION STATEMENT

### **1. Introduction**

This statement is the 'Consultation Statement' for the Design SPD as required by the Town and Country Planning (Local Planning) (England) Regulations 2012. This statement sets out how the public and other stakeholders were consulted upon the SPD. This statement was issued alongside the draft SPD for consultation in June 2015 and has now been updated to reflect the consultation undertaken and accompany the adopted SPD.

### **2. Consultation regulations**

The SPD is produced in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. The relevant regulations relating to the consultation process are explained below.

Regulation 12: Regulation 12(a) requires the Council to produce a consultation statement before adoption of the SPD, this must set out who was consulted, a summary of the issues raised, and how these issues were incorporated in to the SPD. This statement is the 'Consultation Statement' for the adopted SPD as required by Regulation 12(a).

Regulation 12(b) requires the Council to publish the documents (including a 'consultation statement') for a minimum 4 week consultation, specify the date when responses should be received, and identify the address to which responses should be sent. The consultation statement that accompanied the draft SPD set out that information.

Regulation 13: Regulation 13 stipulates that any person may make representations about the SPD and that the representations must be made by the end of the consultation date referred to in Regulation 12. The consultation statement that accompanied the draft SPD set out that requirement.

Regulation 35: Regulation 12 states that when seeking representations on an SPD, documents must be made available in accordance with Regulation 35. This requires the Council to make documents available by taking the following steps:

- Make the document available at the principal office and other places within the area that the Council considers appropriate;
- Publish the document on the Council's website.

These measures were undertaken as part of the draft SPD consultation.

### **3. The Statement of Community Involvement (SCI)**

The SCI was adopted in 2014 and reflects the 2012 Regulations, set out above. It also specifies additional measures that the Council will undertake in consulting upon draft SPDs and these have been reflected in the consultation process for the Design SPD. As per the SCI, the Council has involved key stakeholders in the preparation of this draft SPD for consultation (as set out in the SPD).

### **4. Design SPD Consultation Information**

Consultation on the SPD is been carried out in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012. The draft SPD and Consultation Statement were made available for inspection by the public for a six week period between Friday 12<sup>th</sup> June 2015 to Friday 24<sup>th</sup> July 2015. Copies of the draft SPD and consultation statement (setting out how comments could be made) were available during normal office hours at the following locations:

- Cannock Chase Council principal offices at the Civic Centre, Beecroft Road, Cannock
- Public libraries at Cannock, Rugeley, Hednesford, Brereton, Norton Canes and Heath Hayes
- Council Area Office at Rugeley

Copies of the draft Design SPD and consultation statement were available to view on the Council's website at [www.cannockchasedc.gov.uk/planningpolicy](http://www.cannockchasedc.gov.uk/planningpolicy). Further information was available by contacting the Planning Policy team by email at [planningpolicy@cannockchasedc.gov.uk](mailto:planningpolicy@cannockchasedc.gov.uk) or by telephoning 01543 462621.

The following measures were undertaken to inform persons of the draft SPD consultation and document availability:

- Notification letters sent to all individuals/ organisations/ bodies that the Council consider will be affected or interested in the SPD, or may be involved in the delivery of the SPD (including Parish Councils, the County Council, key developers, business and local voluntary organisations)
- A Press Notice was posted in local papers.
- A press release was issued.
- The SPD and details of the consultation were posted on the Council's website.

The consultation statement accompanying the draft SPD set out that any person may make a representation on the SPD and that any such representations were to be received by 5pm on Friday 24<sup>th</sup> July 2015. It also set out that the Council would send a copy of the adoption statement to the author of any representation which specifically asks for notification of the adoption of the document.

## **5. Summary of issues raised and how incorporated into the SPD**

10 representations on the draft SPD were received from external parties, including Parish and Town Councils and statutory agencies, such as Historic England. In summary, the majority of representations were supportive, suggesting only relatively minor amendments and additional information to be referenced. Many of the requested changes have been taken forward in the adopted SPD.

A full schedule of representations received and the Council's response is set out in Table 1. This also details the amendments to the draft Design SPD.

The SPD overall has been updated to reflect that it is no longer draft and that the consultation has been undertaken. The overall format has been amended to enhance readability, including the re-ordering of some sections.

Between the draft SPD consultation and adoption of the SPD a number of national, and local policy and guidance changes have also given rise to a need for minor reviews of the draft SPD. These are detailed in Table 2.

**Table 1. Schedule of Representations Received and Amendments to SPD**

Name	Organisation	Section/ Paragraph	Comment	Council Response and SPD amendment (where applicable)
Ruth Hytch	AONB Unit	Page 4	<p>Congratulations on producing a comprehensive and practical document. It will be an important element in your suite of Planning documents which will all influence the environment and landscape of the AONB.</p> <p>The acknowledgment of AONB issues is welcomed and in particular the specific references in the Green Belt &amp; AONB and Equestrian sections. We suggest that in the list of Topic Specific Advice, on page 4 the AONB is set out under a separate header. On page 7 (NPPF) an early reference could be made to Paras. 115 – 117 of the Framework, albeit that some detail is given later in the topic specific advice.</p>	AONB linked with Green Belt retained as much of the guidance for rural part of District is common to both. Not considered appropriate to highlight AONB related paragraphs of NPPF in this general section.
		Green Belt and AONB Guidance	<p>As a general point, there is a need to emphasise the importance of protecting the setting of the AONB as well as the land within the designated area itself. This should be noted at various points in the document but in particular in the Green Belt and AONB section.</p> <p>In the Green Belt &amp; AONB section, on page 65, the overall approach and the detail included are supported. However, we would welcome the inclusion of the following text, based on the content of the NPPF and the provisions of the CRoW Act. <i>“The key issue in the AONB is to protect the landscape and beauty of the designated area and its setting, maintaining tranquillity and peace for users and residents and preserving openness with careful attention being paid to preserving the habitats and landscapes of the AONB.”</i></p>	<p>Reference added to emphasise importance of protecting setting of AONB.</p> <p>Text added to refer to protection of landscape and beauty of the AONB and its setting, maintaining tranquillity, peace and openness, with careful attention paid to preserving habitats and landscapes.</p>

			A second additional key issue might refer to the need to consider the impact of renewable energy (including wind turbines and bio-energy) and telecommunications installations especially carefully in terms of landscape intrusion. This will be as important in the setting as in the AONB itself.	Reference added to impact on local landscape of renewable energy and telecommunications development.
		Page 23	On page 23 on Biodiversity it would be helpful to cross reference to the Special Area of Conservation (SAC), albeit noting that any built development within or adjoining the SAC will be very limited and strictly controlled.	Not considered necessary to reference SAC here as development within or adjoining will be exceptional.
		Equestrian development section	The specific section on equestrian development recognises the considerable extent of this land use in the area and the need for control in order to protect the AONB and the green belt. This is welcomed and we agree with the details of the approach that is set out. However, we think that a cross reference to the (advisory) leaflet "Horse Sense in the AONB" produced by the AONB partnership in 2013 would be helpful in encouraging best practice. We also consider that a requirement should be included, in so far as it is possible through planning control, for applicants to demonstrate that the provision of stables etc. will not lead to over-grazing or, in the case of trekking, to pressure on bridleways, both of which can damage to AONB habitats and landscape. Finally on equestrian matters, I think there may be a typographic error on page 42 (6 <sup>th</sup> bullet point) and should be "Maneges" and not "Manages".	Agreed. Cross reference added to advisory leaflet to encourage best practice. Overgrazing and pressure of trekking added to list of key local issues and encouragement for supporting information on these matters added to design principles. Typo corrected.
		External Lighting section	The section on external lighting (pages 50 to 52) is welcomed but there should be a cross reference to the special landscape of the AONB.	Note added about special landscape of AONB.

		Mature Suburbs guidance	In the area specific guidance, the cross reference to the AONB in the Mature Suburbs section (pages 78 & 79) is welcomed and the principles for development are supported but additional references to the use of appropriate materials and careful consideration of scale would help to achieve AONB objectives further. Reference could also be made to the need to avoid the urbanisation of gardens, noting that control will be achieved through planning conditions, where appropriate. The identified areas, for example Etchinghill and Slitting Mill, are an important component of the AONB and its setting.	Additional references added to guidance to reinforce considerations including scale and materials and need to avoid urbanisation.
		Employment Sites in the Green Belt	Whilst acknowledging the economic importance of these sites, we welcome the specific guidance that is provided for specified employment areas, including Cannock Chase Enterprise Centre and Cannock Wood Industrial Estate. It is essential that development within these employment centres respects the AONB and its setting.	Noted.
Clerk to Parish Council	Brereton and Ravenhill Parish Council	Various	<p>Page 2, 3<sup>rd</sup> paragraph, “proposed” should read, “propose”.</p> <p>Page 3, 2<sup>nd</sup> complete paragraph, “Councils” should read “Council’s”.</p> <p>Page 5, 1<sup>st</sup> paragraph”, “Rugeley” should read “Rugeley and Brereton”.</p> <p>Page 36, under Local History Groups add “Brereton and Ravenhill Heritage Committee”.</p> <p>Page 39, add at end of line 2 “and conservation area”.</p> <p>Page 71, 4<sup>th</sup> complete indent, replace “vegetation” with “appropriate vegetation”.</p> <p>Page 83, 2<sup>nd</sup> complete paragraph, replace “planning decisions with “planning and conservation area decisions”.</p> <p>Page 84, 2<sup>nd</sup> indent, add, “notices in libraries and parish and other community halls”.</p> <p>Page 86, penultimate indent, replace “no viable use” with “no viable use or prospect of appropriate re-erection”.</p> <p>Page 91, 6<sup>th</sup> indent, replace “mmm” with “mm”.</p>	<p>Typos identified will be rectified in the final SPD.</p> <p>Minor amendments requested to also be included.</p>
		Page 5, 2 <sup>nd</sup> paragraph	Add “It should not contain unreasoned assertions.”	This reference is not clear. No change made.

		Page 28, 2 <sup>nd</sup> paragraph	Add "However it is important to ensure that trees are not planted in such a way that, when mature, they will not have become overbearing to occupiers."	Agreed. However alternative wording added to illustrate same point included- "New planting should be designed using species and locations appropriate to the site of which it forms part, taking account of size and habit on maturity. Landscaping will be expected to be implemented and maintained in accordance with approved details."
		Page 32, 8 <sup>th</sup> indent	Add "The trees should be of species and in locations that will not result in a loss of residential amenity or damage to property when they are mature."	Agreed. However, alternative text added "Trees need space to grow if they are to fulfil their potential into the future and new buildings near to trees will be expected to allow for this."
		Page 33, 5 <sup>th</sup> and 6 <sup>th</sup> lines from the bottom	I doubt if the A5 corridor is "the only view of the District most people ever see" and suggest its deletion. Usage of the West Coast Main Line is very high and, despite it being marginally outside the district, most users, who unlike vehicles drivers are not restricted to the view more or less straight ahead, will see Rugeley Power Station and other parts of Rugeley and Brereton from it.	Agreed. Text deleted as requested.
		Page 35, 4 <sup>th</sup> paragraph, 1 <sup>st</sup> sentence	I suggest also mentioning "along and close to Roman and other historic roads".	Agreed. Alternative text added "along historic route ways."
		Page 44	Add at the end, "Where a takeaway would otherwise impose on residential amenity, an hours-of-use condition will be imposed."	This issue is outside remit of this Design SPD- it would instead be addressed by condition in accordance with Local Plan Policy CP3- no change proposed.

		Page 59	Add at the end of the paragraph on 'Flood Risk', "A major cause of local flooding has been blocked drains. It is important that drains are of a sufficient size for anticipated rainfall increases, easily accessible for maintenance and the removal of debris, and regularly cleared".	Noted. Reference to Sustainable Drainage Systems (SUDs) info added to this section. The specific drainage details of development and their management are subject to the approval of the adopting/maintenance authority (e.g. Severn Trent) and are therefore outside the remit of this Design SPD.
		Page 61	Add at end, "In locations within the Area of Outstanding Beauty and conservation areas that a not significantly visible from public viewpoints, the benefits of solar panels will often outweigh visual harm."	Noted, but it is felt this should be considered on a case by case basis. No change proposed.
		Page 70, 1 <sup>st</sup> indent	Please see my comment above in respect of Page 33, 5 <sup>th</sup> and 6 <sup>th</sup> lines from the bottom.	See corresponding comments above.
		Page 83, 2 <sup>nd</sup> complete paragraph	Replace "planning decisions with "planning and conservation area decisions".	Conservation Area Consents no longer exist. The reference to planning decisions is intended to be all encompassing. No change proposed.
		Trees and Landscape Guidance	BRPC's greatest concern relates to the section on 'Tree and Landscape Guidance'. This rightly lists the positive attributes of trees, but omits any mention of the problems that planting the wrong species in the wrong location can cause to residents' and other occupiers' amenity through overbearing and blocking light, to property whether public (e.g. roads and pavements) or private (e.g. homes) through root damage, to the users of roads and pavements through low overhanging branches and through falling. While welcoming mention of the positive aspect of trees, we consider that	Agreed. See comments above in respect of changes made to address this issue.

			there needs to be a clear recognition certain species cause particular problems and that a failure to assess what a tree will look when mature can be bad planning. We would be happy to show examples of problems caused by planting the wrong species in the wrong place. No doubt Staffordshire County Council in its local highways authority capacity can point to many locations where tree roots have damaged highways and where inappropriate planting has led to high cutting costs.	
Peter Harrison	Hednesford Town Council	General	The Neighbourhood Plan for Hednesford will build on the design supplementary planning guidance for Cannock Chase by making specific proposals for Hednesford; in particular the town centre by suggesting additional guidance relating to the rear of shop premises and service areas, street scene and open spaces, parking arrangements and protection and enhancement of historical features not only in the town but also at other locations in the Hednesford area	Noted. The SPD will refer to the potential for Neighbourhood Plans to complement the guidance contained in this document.
		Page 24/Large Commercial Buildings	It is assumed that the reference to “green roofs” and “green walls” means that they would be planted or turfed and not made of a green coloured material. It is considered that reflective materials might be appropriate for walls in some locations. However, the Town Council would not favour the wide coverage of large roofs with solar panels. Developers also need to consider the potential for disruption to communications as a result of the construction of a large commercial building e.g. interference with television reception	The references to green roofs and walls are referring to planted surfaces, not green coloured/materials. Comments regarding solar panels noted, however it should be borne in mind that many solar panel schemes are now permitted development- however larger schemes (perhaps those on a scale being referenced by the Town Council) may require planning permission and will therefore be considered against the design policy requirements of the Local Plan (Part 1) and this Design SPD.

				Should the town council wish to set specific design policies in relation to this issue it is something that could be considered via their Neighbourhood Plan. Comments on television reception noted however the SPD is intended to set out key principles for design; inevitably it is not exhaustive. It is considered that these instances of interference will be limited.
		Pages 46-49/Shopfronts	The proposals put forward are acceptable and it is intended that the Neighbourhood Plan for Hednesford would also include reference to the rear of shops/delivery areas and place a greater emphasis on restoration and preservation of historical features	Noted.
		Pages 73-76/Hednesford Town Centre Guidance	The specific reference to Hednesford Town Centre in the document is welcomed although design guidance for the wider Hednesford area will be addressed within the Neighbourhood Plan. The photograph on p73 could be updated to show the new Hedgeford Lodge. The 4 <sup>th</sup> bullet point in Aim of Guidance could be amended to include reference to the Museum of Cannock Chase and the public transport hub (railway station, bus and taxi services) and improved links between the traditional shopping centre in Market Street and the new Victoria and Chase Gateway shopping areas. The 5 <sup>th</sup> bullet point in Key features and character refers to Anglesey Lodge as a former hotel although until recently it was used as offices.	Noted. The SPD will be amended to reflect these observations.
Kezia Taylorson	Historic England	General comments	The introduction of paragraph numbers would be useful to help orient the document and for usability in the future.  We support the approach of character areas and the use of this evidence informing the preparation of the draft Design Guide SPD.	Noted.  Cross reference to Council's Validation document added

		<p>We support the step approach identified in section 4a and consider it important to notify applicants that there will be circumstances when a heritage assessment is required to supplement a planning application.</p> <p>Under the section on 'national guidance' it may be worthwhile to include the Good Practice Advice Notes, published in March 2015. Particularly Good Practice Advice Note 2: Managing significance in decision taking in the historic environment and Good Practice Advice Note 3: The setting of heritage assets.</p> <p>We support the reference to Heritage Champions within the document and request that 'English Heritage' is now replaced with 'Historic England' which is the new name for the organisation, since 1 April 2015.</p> <p>We support the inclusion of specific design related advice for the historic environment within section 4b, as well as shopfront design and signage and the inclusion of information relating to a Local List for Cannock Chase.</p>	<p>to Historic Environment section.</p> <p>Added references in Historic Environment section.</p> <p>Noted and corrected.</p> <p>Noted.</p>
	Development Management section	<p>Page 16, there may be other national design guidance per topic area that could usefully be included within this section, such as the Good Practice Advice Notes, though we accept that there does not need to be duplicate representation within the document.</p> <p>Under Local Design Guidance on page 16 it would be good to include a bullet point on the need for locally distinctive design that reflects the character of Cannock Chase, in terms of materials, layout, massing, form etc. and that by reflecting existing styles/types/vernacular this can engender a sense of place and local character.</p>	<p>This section relates to generic design guidance. These references added in Historic Environment section (see above)</p> <p>Text updated.</p>
	Historic Environment section	<p>Within this section, in the first paragraph, there is reference to specific types of heritage assets. It may be worthwhile to have an opening statement that refers to all heritage assets and then give</p>	<p>Noted and text updated.</p>

		<p>detail about specifics as the paragraph develops.</p> <p>We support the links to the character area profiles which will give more detail on the specific character of each area. We consider it might need a stronger reference so that potential applicants recognise that they need to refer to these character area descriptions and apply the specific information, by area.</p> <p>Consider referring to heritage assets to provide the technical link with the NPPF, even if later in the document you refer to 'historic buildings' or other terms that people may be more familiar with.</p> <p>Paragraph beginning 'high quality design' also need to ensure that this relates to new development within the setting of heritage assets and is also relevant wider than the built historic environment.</p> <p>Can you provide any further detail about what a heritage statement may need to include? About how it should assess the significance of a heritage asset and how that significance may be affected by proposed development. Information relating to Landscape Visual Impact Assessment and photomontages may also be useful inclusions within a heritage statement, where appropriate. Is the need for a heritage statement contained within policy in the Local Plan? We are very supportive of the approach of requesting heritage statements to accompany planning applications.</p> <p>Paragraph relating to archaeology; ensure that it is reflective of rural archaeology and not just the urban environment. There is the possibility of unknown archaeology being of national importance.</p> <p>We consider that applicants should consult the Historic Environment Record and where the potential for archaeology exists then archaeological assessment should be undertaken, by a qualified professional. This should be included within a policy in the Local Plan. The text states that information is available from SCC and CCDC, acronyms are not always helpful and it would be easier if there were information regarding archaeological assessment</p>	<p>Noted and text updated.</p> <p>Noted and text updated.</p> <p>Noted and text updated.</p> <p>Noted and text updated with cross reference to Validation Document. Need for Heritage Statement not included within Local Plan policy but set out in Validation Document.</p> <p>Noted, text updated.</p> <p>This is included within Local Plan policy CP15 and the Validation Document. Comment about acronyms and reference to multiple documents noted. The intention is to keep the</p>
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		<p>contained within this document, rather than a potential applicant needing to read this design guide SPD and then still refer to other documents for the information.</p> <p>The organisation English Heritage has now split into two new organisations and so we consider that you should replace the English Heritage website information with the two following websites. English Heritage Trust - <a href="http://www.english-heritage.org.uk/">http://www.english-heritage.org.uk/</a> Historic England - <a href="http://www.historicengland.org.uk/">http://www.historicengland.org.uk/</a> Amend 'English Heritage Publications' to 'Historic England Publications'</p> <p>Add in 'Seeing the History in the View' and the three Good Practice Advice Notes published March 2015, though these reflect the historic environment sector and not only Historic England.</p> <p>Where 'Advice is available from CCDC' it is possible to cite where this advice may be, i.e. from a case officer, conservation officer, particular section of a website, to provide clarity for a future applicant and ensure that it is clear how to access the relevant material.</p> <p>Within the Conservation Area section, the NPPF states that new development has the opportunity to 'better reveal the significance of conservation areas' is it possible to include a reference to this.</p>	<p>Design SPD coverage to design matters only to keep it a usable size and not duplicate coverage in other Council documents.</p> <p>Noted and text updated including additional references.</p> <p>Noted and text updated.</p> <p>Noted and text updated.</p>
	Shopfronts and Signage Guidance	<p>Under the shopfronts and signage section, amend the national publications relating to 'English Heritage' to refer to 'Historic England'. Would it be beneficial to have a specific section on shopfronts and signage relating to the historic environment? We recognise that the historic environment is referenced within this section; however, it may be clearer if the requirements and expectations for shopfront and signage design within the historic environment is set out within a sub-section of this.</p>	<p>Noted and text updated.</p> <p>Noted however as many of the District's shops are in historic town centres, reference to appropriate requirements and expectations run through the existing Shopfronts and Signs section and are felt to be adequate.</p>

		External Lighting Guidance	External lighting may have an impact on the significance and setting of heritage assets and it is worth including a reference that states that lighting will have to be sensitive to the historic environment.	Noted and text updated.
		Local List	We support the section on the Local List and commend the Council for producing this information and protecting locally important assets. Where there is reference to 'English Heritage' please amend to 'Historic England'. Ensure that the Local List criteria used within the SPD reflects the advice within the Local List guidance, link enclosed. I appreciate this still refers to English Heritage but the titles are due to be updated shortly. Historic England advice on preparing Local Lists - <a href="http://historicengland.org.uk/images-books/publications/good-practice-local-heritage-listing/">http://historicengland.org.uk/images-books/publications/good-practice-local-heritage-listing/</a>	Noted and text updated. Criteria are based on the HE Good Practice Guidance as already referenced.
Philip Sharpe	Inland Waterways Association	General comment	IWA responded to an informal consultation on the Design SPD & Characterisation Study in 2010-11 and now welcomes the publication of the Draft document. Good design of canalside buildings and other developments can enhance the canal corridors, protect the Conservation Area status, and help sustain the canals tourism and economic regeneration potential.	Noted
		Appendix A	In your Summary of the previous consultation at Annex 3 Consultation Comments and at Annex 4 Updates Required in response to IWA's comments you say that a reference to the role of the canal within the Western Rugeley Character Area will be added. However, this has not yet been done.	Reference to role of Canal added.
		Local List	IWA welcomes the proposed creation of a Local List of heritage assets and will consider nominating appropriate canal related structures in due course.	Noted
Tim Jones	Resident	Various	Replicates comments received from Brereton and Ravenhill Parish Council- see comments and Council responses above.	See above.

Mr T Pearson	Landor Society	General comment	<p>Having read the information supplied on-line I find it to be very readable and easily understood. The proposals as set out seem to be most comprehensive and should improve and inform planning applications.</p> <p>It is gratifying to see that the Local Planning Authority is taking into account the historic heritage of its towns. Rugeley has many features which would merit such considerations in future planning proposals.</p>	Noted.
		Local List	The Landor Society will be pleased to contribute to a Local List of historic sites and buildings within Rugeley. This is being prepared and will be forwarded when required.	List nominations received and will be actioned following adoption of SPD/Local List procedure.
Antony Muller	Natural England	Overall	Natural England welcomes the Council's draft Design SPD. We set out our advice on those matters covered in the document that are within our remit.	Noted.
		Character Area Descriptions	<p>We acknowledge the Council's approach with regard to the use of 'Character Area Descriptions' feeding into a District Design Profile. You may find the National Character Area (NCA) description for NCA 67 - Cannock Chase to Cank Wood the council's area of value: <a href="https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles#ncas-in-west-midlands">https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making/national-character-area-profiles#ncas-in-west-midlands</a></p> <p>The NCA profile includes the following 'Statements of Environmental Opportunity' (SEO) against which the Council may wish to cross refer the content of the SPD:</p> <p><b>SEO 1:</b> Expand lowland heathland to increase habitat connectivity, improve resilience to climate change and improve water quality.</p> <p><b>SEO 2:</b> Manage, enhance and expand the network of green infrastructure, such as woodlands, restored mining sites, parklands and canal routes, to increase biodiversity, access and recreational use and increase understanding of the area's rich industrial heritage, particularly geodiversity.</p> <p><b>SEO 3:</b> Conserve and enhance the essential character of this varied landscape, which includes the Cannock Chase Area of Outstanding</p>	Noted. The NCA document has been reviewed and additions made to the 'Biodiversity Enhancement' section of the Design SPD to reflect the NCA objectives.

			Natural Beauty, the Forest of Mercia and the urban conurbation of the Black Country, to maintain food and timber production where possible; enhance landscape, sense of place and tranquillity; and increase resilience to climate change.	
		Page 8/Local Policy	We have not checked the draft Design SPD against the detailed policies in the Cannock Chase AONB management plan but advise that you take account of the AONB unit's advice in order to achieve a good degree of 'fit' between the AONB management plan and the emerging SPD.	Noted. The Council regularly consults the AONB Unit on relevant planning applications and makes reference to the AONB Management Plan within Local Plan Policy CP14 and the 'Green Belt and AONB' section of the Design SPD. The content of the Management Plan has been taken into consideration in the preparation of this SPD. Comments from the AONB unit on the Design SPD will be taken into account.
		Design Principles/ General Principles/Pre-application advice	We note the SPD's coverage regarding pre-application discussions. Natural England has recently introduced a revised approach to the delivery of non-statutory advice, summarised below. We ask that the Council makes prospective applicants aware of this service if and when proposals may impact upon those themes within our remit. <b>Discretionary Advice Service</b> Natural England has introduced Discretionary Advice Service (DAS) so that we can work with applicants, developers, consultants to take appropriate account of environmental considerations at an early stage of the process in order to improve the quality of applications before they are submitted. We believe this will save our customers time and money in the long term, whilst also securing good outcomes for the natural environment. For more information on DAS please see our website at <a href="https://www.gov.uk/discretionary-advice-service-get-advice-on-planning-proposals-affecting-the-natural-environment-in-england">https://www.gov.uk/discretionary-advice-service-get-advice-on-planning-proposals-affecting-the-natural-environment-in-england</a>	Noted. Reference will be made to this service within the Design SPD.

	Design Principles/ General Principles	The council has the opportunity to streamline its approach to this subject through use of our <b>SSSI Impact Risk Zones (IRZ)</b> dataset: The Town and Country Planning (Development Management Procedure) (England) Order 2015, which came into force on 15 April 2015, removed the requirement to consult Natural England on notified consultation zones within 2 km of a Site of Special Scientific Interest (Schedule 5, v (ii) of the 2010 DMPO). The requirement to consult Natural England on “ <i>Development in or likely to affect a Site of Special Scientific Interest</i> ” remains in place (Schedule 4, w). Natural England’s <b>SSSI Impact Risk Zones</b> are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments <i>likely to affect a SSSI</i> . The dataset and user guidance can be accessed from the gov.uk website.	Noted. Info to be passed to the Council’s development control team.
	General Principles/Key points from early local feedback	<p>We note and welcome the positive feedback from local people regarding greenspace and wildlife:</p> <ul style="list-style-type: none"> <li>• <i>historic buildings and green spaces proved the most popular features of local areas</i></li> <li>• <i>to improve their area most people favoured more trees and greenery with new development that reflected existing character</i></li> <li>• <i>a preference for hedges and green planting around boundaries rather than walls and fences</i></li> <li>• <i>quality and quantity of green space was popular, with many people being willing to pay more for these features</i></li> </ul> <p>The draft SPD further develops the adopted local plan policies – in particular ‘CP 12 Biodiversity and geodiversity’ and ‘CP14 Landscape character and Cannock Chase AONB’ - in order to foster development that reflects the residents’ stated preferences.</p>	Noted.
	General Principles/	The Council is a member of the Cannock Chase SAC Partnership. The partners recently revised the associated mitigation regime and	Noted. The Council’s Validation document will be

	Validation of planning applications	<p>we therefore advise that the Council reviews the relevant text in the planning validation document accordingly.</p> <p>Draft validation doc (2013) states as follows:</p> <p><i>The following information should be submitted to assess the impact of new development on the Cannock Chase Special Area of Conservation –</i></p> <ul style="list-style-type: none"> <li>• <i>Assessment of Local Open Space</i></li> <li>• <i>Alternative development sited in the area; and</i></li> <li>• <i>Statement of alternatives to the Cannock Chase Visitor Experience.</i></li> </ul> <p><i>Assessments should show how the impact of their proposals will be mitigated taking into account the recommended components set out in the Mitigation report (Recommendations Box 14 page 51 )</i></p> <p>As this is out of date now we advise you to contact your Cannock chase SAC Partnership representatives Angela Grove and John Heminsley or get in touch with me if you wish to discuss.</p>	reviewed accordingly to reflect all updated guidance.
	Development Management Guidance	<p>We welcome the following parts of the SPD for their treatment of biodiversity interests:</p> <p><b>Key design principles for residential sites – gardens - Biodiversity benefits...</b> <i>should be incorporated in conjunction with any development e.g. native planting and ponds, green roofs, sustainable urban drainage systems (SUDS), bird and bat boxes and connections to the local green infrastructure network via gardens, hedgerows and grass verges.</i></p>	Noted.
	Biodiversity Enhancement	<p><b>Key Design Principles for Commercial Sites - External lighting...</b> <i>schemes should be designed to ensure security but avoid lightspill and maintain dark skies (see External Lighting guidance)</i></p> <p><b>Key Design Principles</b></p> <ul style="list-style-type: none"> <li>• <i>Increase <b>connectivity</b>/permeability of landscape to allow wildlife movement through urban areas (e.g. retain, supplement and reinstate hedgerows and green links between larger open spaces and the countryside).</i></li> <li>• <i>Hawks Green - case study of habitat enhancement &amp; creation as part of a wider development proposal.</i></li> </ul>	

		Trees and Landscape Guidance	<p>We welcome: <b>Key landscape design principles for residential sites</b></p> <ul style="list-style-type: none"> <li>• the establishment of clear ‘first principles’ i.e. the need to look at landscape context first.</li> <li>• <i>‘Commercial and communal landscape schemes will require production of a suitable management plan as well as a maintenance plan’</i> – We advise that related funding and/or the establishment of a management body will be needed to safeguard a viable extent of greenspace and/or habitat together with suitable access for livestock and machinery/equipment etc</li> <li>• <i>‘Large footprint commercial buildings would benefit from green or gravel roofs’</i> – Such design solutions offer biodiversity and landscape benefits as well as potential technical advantages e.g. in relation to energy conservation.</li> </ul>	Noted. Second bullet point added to text under ‘Key Design Principles’.
		Climate change and Sustainable Development	<p>The following publications may be of value in further developing the SPD:</p> <p>TCPA et al publication Climate Change Adaptation by Design  NE publication - Climate Change and Biodiversity Adaptation – The Role of the Spatial Planning System</p>	Noted. These documents will be taken into consideration further.
Rebecca Mason	Rugeley Town Council	Overall	<p>The Planning Committee wishes to support and endorse the letter sent to you by Mr T. A. Jones on the 21 August 2015, in regards to the Draft Design Planning Document (April 2015).  They feel the points raised are valid especially the issue of tree planting.</p>	Noted. See above responses to Brereton and Ravenhill Parish Council.
Sarah Alves	Staffordshire County Council (Highways)	Page 7	<p>It would be helpful to include something which explains that sustainable material choices must be made to ensure that the Authority are not left at risk of any future maintenance liability. We sometimes find that developers will use a very unusual high specification material which when it comes to replacing due to defects, it costs the Authority considerably more to replace these types of materials which puts pressure on the ever-decreasing revenue budget.</p>	Noted. However, this section is providing a summary of national planning policy. Sentence added to ‘Key Public Realm Design Principles’ (within Trees and Landscape Guidance) to identify that durable and maintainable

				materials should be considered.
		Page 11/National Guidance	Could you include the Design Manual for Roads and Bridges (DMRB) please? Even though the Manual for Streets is based mainly on the DMRB, it is not as extensive and the DMRB provides more technical information in terms of construction types which developers need to be made aware of.	Agreed. Reference to be made to this manual.
		Page 13/Design and Access Statements	The main issues which come up are access issues but also suitable parking provision. It may be helpful to include this within the paragraph as it can result in a highway refusal if inadequate parking provision is proposed.	Agreed. Reference added to car parking provision.
		Page 18-19-Detailed Design	It would be useful for the developer to utilise our Staffordshire Residential Design Guide. Link is below. This is a more accurate local design guide. May also be of use to include the information for SUDS here also? <a href="http://www.staffordshire.gov.uk/transport/staffshighways/abouthighways/highwayscontrol/ResidentialDesignGuide.aspx">http://www.staffordshire.gov.uk/transport/staffshighways/abouthighways/highwayscontrol/ResidentialDesignGuide.aspx</a>	Noted. The intention is for this Guide to be superseded by the Design SPD. Text added to SPD to reflect that the for the District's purposes it is considered superseded but that County highways may still utilise elements of it in their advice to applicants.
		Page 18-19	There's a bullet point about commercial parking but not general parking provision i.e. adequate number of spaces provided for a development i.e. need more parking provision for a 4 bed house as opposed to a 1 bed flat etc. This is something Highways have to consider as if there is inadequate parking provision, the additional vehicles park on the highway and cause safety concerns and risk to the public. I know that this is mentioned below under the heading 'car parking' so perhaps the Commercial Parking bullet point should be moved to sit under this heading instead?	Agreed. References added to the relevant section to make clearer the requirements for car parking provision.
		Page 18-19	It would also be useful at this detailed design point if the developer knows exactly what parts of the development they wish to put forward for adoption to the Authority and to discuss maintenance	Agreed. Text added to 2 <sup>nd</sup> paragraph under 'Development Management

			regimes for areas that will not be put forward for adoption.	Guidance' to reflect need to liaise with adoption authorities at early stage.
		Page 18-19	Inclusion of adequate highway drainage design is also very important.	Agreed. Reference added.
		Page 45/Shop fronts and signage	It may be useful to mention that the signage erected will have to be reviewed by the highway department. We would consider (this list is not extensive) the size, weight and associated fixings to ensure it will not fall on to the highway, the luminance level (using guidance from the Institute of Lighting Engineers Guidance – which I know is mentioned on page 50) and also the head room from the bottom of the sign to ground level to ensure there would be no risk of passers by colliding with the signage. We would also consider the whether the signage is preventing visibility or distraction for drivers.	Agreed. References added to highways considerations.
		General	Having read through the information I would also request information be included regarding the submission of Transport Assessments and Transport Statements with planning applications. Large Developments must provide us with a Transport Assessment for us to analyse the impact of the development on the local network and to work with the developer to develop plans to mitigate these impacts.	Noted. The section on 'Validation of planning applications' refers to the need for applicants to reference the Council's Validation Document to ensure they are submitting the required information with planning applications. This document refers to the need for Transport Statements and Assessments. A reference has been added to this paragraph in the Design SPD to flag Transport Assessments as an example of the documentation potentially required.

**Table 2. Other key amendments**

Amendment	Reason
Addition of Preface	To emphasise the importance of the Design SPD
Addition of pictures and diagrams throughout the SPD	To add readability of the document and make it more user friendly
Text revisions to Planning Policy Context to reflect changes to national housing standards and local policy updates as a result	To reflect changes in national and local policy
Addition of 'Key SPD Sections' to Figure 2	To add readability of the document and make it more user friendly
Development Management Guidance- addition of Gypsy and Traveller section to provide local guidance on the development of these sites	To provide local guidance in light of the revocation of national guidance.
Biodiversity Enhancement Guidance- addition of text to topic summary	To provide more information on the coverage of this topic, in line with the other guidance sections.
Climate Change and Sustainable Construction Guidance- revisions to reflect changes to national housing standards (particularly the revocation of the Code for Sustainable Homes standard) and to incorporate references to other issues within Policy CP16 to enhance guidance e.g. minerals issues.	To reflect changes in national policy and to better reflect local planning policy issues
Appendix B- revision of guidance on standards for extensions	To reflect national legislative changes to permitted development rights
Deletion of Appendix E- incorporated into revised Climate Change section	To add readability of the document and reflect up to date evidence base information available