

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 the details of the consultation that has informed the preparation of this SPD.

SPDs provide guidance and advice to supplement the policies and proposals in the District Plan. SPDs do not have to go through the formal examination process, but consultation with stakeholders and the wider community is still a vital part of the preparation process. The scope of consultation and decision on who will be consulted will reflect the nature of the 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 into the SPD.

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.

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. This consultation statement sets out this 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.

3. The Statement of Community Involvement (SCI)

The SCI was adopted in 2022 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.

4. Design SPD Consultation Information

The draft SPD was published for consultation for four weeks between Tuesday 28 April and Tuesday 26 May 2026. Consultation was undertaken in accordance with the Town

and Country Planning (Local Planning) (England) Regulations 2012 and the Statement of Community Involvement. All consultation documents were available to view on the Cannock Chase Council website, at the Council's principal office (Civic Centre) and at the six District libraries. This included information about how to submit a representation.

Consultees on the Council's Consultation Database were consulted by email; or by post where no email address was provided. Representations could be emailed to planningpolicy@cannockchasedc.gov.uk, or posted to Planning Policy, Cannock Chase Council, Civic Centre, Beecroft Road, Cannock, Staffordshire, WS11 1BG.

5. Issues raised in the consultation

A total of 12 responses were received from approximately 1,300 consultees. Two representees raised no comments nor objections to the document, and two were supportive of the purpose and scope of the SPD. Ten responses provided comments on various aspects of the SPD seeking amendments.

Officers have considered all representations in full and made amendments where they are appropriate and add value to the SPD. In a number of cases, changes to the SPD have been made to add detail or clarity about a design principle or provide additional resources to ensure national guidance is followed.

A summary of the responses is set out in the schedule below. This table outlines the comments by respondents, the Council's response to these issues and any consequential changes to the SPD. If the text is to be deleted from the draft SPD it is shown ~~struck through~~. If new text is to be inserted it is shown underlined and in *italics*.

Rep ID Number	Respondent	Comment	CCDC Response
A0001	Natural England	No comment on SPD. Agreed with Council determination that no SEA required.	Noted.
A0002	Olumide Olutunde – 24 Carbon Ltd.	<p>Support is raised for the document particularly where it assists in delivering high-quality, sustainable development across Cannock Chase District.</p> <p>Support is raised for the overall objectives of the SPD and it is recommended that the SPD continues to recognise the important role of well-planned and well-design development at the edge of existing settlements. It is considered that the SPD should encourage comprehensive and landscape-led master planning and approaches that integrate new development sensitively with its surroundings, and gradual transitions in building form and density between urban and rural areas.</p> <p>The emphasis on landscape led design is strongly supported, it is considered that the SPD should promote development that respects the setting of valued landscapes and ensures that new development enhances visual quality and contributes positively to green infrastructure and biodiversity.</p> <p>It is considered important that the SPD retains sufficient flexibility to allow for site-specific, evidence-based design solutions. It is raised that whilst clear guidance is beneficial, overly prescriptive requirements may limit the ability to respond effectively to individual site opportunities and constraints. A principles-based approach is therefore encouraged.</p> <p>It is raised that it is important that the SPD supports deliverable and viable development. Design expectations should be proportionate and should not necessarily constrain development or impact viability. Overall, the SPD is supported in principle and represents a positive addition to planning framework for Cannock Chase District.</p>	<p>The overall support of the Design SPD is welcomed. The Design SPD is considered appropriate for all scales of development and whilst master planning is supported on larger developments it should be noted that the Design SPD is to be used for householder and small-scale developments also.</p> <p>The support for the landscape-led design approach is noted.</p> <p>It is considered that the SPD provides sufficient flexibility and guidance to support the Local Plan and bringing forward well-designed development within the District.</p> <p>It is considered that the Design SPD is proportionate to align with the design requirements of the Local Plan and the District and that approaches to design on a development and impact on viability are appropriate to be considered at the application stage not within the SPD.</p>
A0003	Staffordshire County Council	<p>Section 4 – Movement, Public Spaces and Uses</p> <ol style="list-style-type: none"> 1. Paragraph 4.2 please include the term wheeling. Ensures all forms of active travel are included. 2. Heading to Principle M1 should include Wheeling 3. Principle M1(a) amend to add 'Movement on foot or by bicycle should be made, as <i>if not more</i>, convenient as travelling by car.' 4. Principle M1(b) suggest after 'cycle links' the term 'where appropriate' is added as it is illegal for a cyclist to cycle along as public footpath. 5. Principle M1(c) use of the term 'short' is considered potentially misleading. 6. Principle M1(d) should include 'accessible and coherent' 7. Principle M1(e) should include reference to adherence to LTN1/20 8. Principle M1(h) public transport should be added to the list of wider infrastructure 9. Principle M1: The principle is seen to generally refer to provision as a means to get from point A to B. It is not considered to cover provision of walking and cycling as a means of activity. 10. Paragraph 4.6 should include buses in the final sentence. <p>Section 6</p>	<p>Section 4</p> <ol style="list-style-type: none"> 1. Proposed change supported. 2. Proposed change supported 3. Proposed change supported 4. Proposed change supported 5. Proposed change to wording: Walking routes should <i>be comprised of short segments</i>, overlooked by surrounding buildings[...] 6. Comment noted. A change has not been proposed as it is considered that this is covered in the wider context of the principle 7. Reference has been added to the supporting box to the principle 8. Proposed change supported 9. Comment noted. Whilst the SPD Principle M1 covers the use of walking and cycling as a means of alternative travel it does not restrict developments nor prevent them from providing leisure routes, the principle is considered flexible enough to enable such proposals to come forward whilst clauses (b) and (f) both encourage leisure uses via links to existing Public Rights of Way and use of the proposed routes for leisure purposes. As such a change is not considered necessary. 10. Proposed change to wording: These include areas for different users – cars, cyclists, <i>buses</i> and pedestrians [...]

		<p>1. Principle N4: Sustainable Drainage Systems and Water Features should provide signposting to Lead Local Flood Authority guidance on Flood Risk and SuDS.</p> <p>Appendix A: Car Parking Standards</p> <ol style="list-style-type: none"> 1. Principle CP1(a) parking to the rear of a property especially in rear parking courts is unattractive to owners leading to parking on the street front. New homes are also not designed to be accessed via the rear. Stating parking must be provided to rear or side is too prescriptive, the principle should be for it to not dominate the frontage but allow flexibility in how this is achieved. 2. Principle CP1(b) unclear how the blue badge parking is to be attributed in planning to the curtilage of a private dwelling. Should this be for properties constructed to enhanced building regulations standards to be wheelchair accessible. 3. Principle CP1(h) feels like it needs more prevalence. Queried to whether, as this is a design guide, if this is the right place for such a statement and whether it is already included in the Local Plan. 4. Principle CP2(d) includes a typo and should read 12.8m instead of 128m. It is considered regardless that the measurement should be altered to 16.5m to cater for articulated lorries. 5. Principle CP3 note that the list order is incorrect. 6. Principle CP5 could be strengthened to highlight cycling as a priority transport mode and reference should be made to a commitment to meet national design standards (LTN1/20/ATE) requirements. 7. Principle CP6 it is considered this could be strengthened as it lacks clear alignment with wider planning, environmental and transport objectives; and does not fully reflect modern expectations around freight decarbonisation, integration, consolidation and place impacts. 	<p>Section 6</p> <ol style="list-style-type: none"> 1. Reference has been added to a supporting box for the principle. <p>Appendix A: Car Parking Standards</p> <ol style="list-style-type: none"> 1. Comment noted. The Council consider there is flexibility within the clause through the use of 'where appropriate'. Notwithstanding this, the Council propose additional wording to include: <u>Rear parking courts should not be supported unless appropriately designed including suitable rear access to the property, pathways, lighting and security measures.</u> 2. Comment noted. Proposed change to wording: An exception can be made for <u>dwelling built to M4(3) standards blue badge parking.</u> 3. The Council note the comment, however, consider that the order is appropriate given the context of the principle and that clause (h) is reinforcing that whilst appropriate to provide parking other measures should also be considered, as set out in Principle M1. It is proposed to add a link to the principle directing to Policy SO5.1 of the Local Plan. 4. Proposed change supported 5. Proposed change supported 6. Reference has been added to a supporting box for the principle. 7. Comment noted. The Council consider that this goes beyond the scope of the Design Guide SPD and could be considered in a future iteration of the Local Plan where it is more appropriate to reflect the wider context as set out in the response by SCC.
A0004	Canal & River Trust	<p>The Trust considers waterways are underrepresented and could make a greater contribution to the Design Guide.</p> <p>Section 2: Context and Identity</p> <ol style="list-style-type: none"> 1. Tables 2.4/2.5 (Movement & Land Use) suggest replacement of 'Public Rights of Way' with 'movement network' to reflect towpaths more accurately. 2. Table 2.7 (Open Space/Landscape) suggest the inclusion of 'open/green/blue spaces and that canals should be emphasised as defining features, not leftover edges influencing development layout. 3. Paragraph 4.7 define 'waterfront' explicitly to include canalside environments to ensure canals are treated as publicly accessible green-blue infrastructure and place-defining features 4. Include the use of towpaths within Principle M1 as appropriate <p>Section 6: Nature</p> <ol style="list-style-type: none"> 1. Canals are recognised nationally as blue infrastructure and important wildlife corridors, the SPD currently focuses mainly on green infrastructure it is considered that blue infrastructure should be included in Principle N1 and Paragraph 6.5 should be amended to reference <ul style="list-style-type: none"> • Habitat networks (including blue infrastructure) • Climate resilience 	<p>Comment noted.</p> <p>Section 2: Context and Identity</p> <ol style="list-style-type: none"> 1. Comment noted. A proposed change to include towpaths in the tables alongside Public Rights of Way. 2. Comment noted. A proposed change to amend Table 2.7 to reference blue spaces as well and open/green and to include canals in the list of Public Spaces within the table. 3. Proposed amendment to the wording: Waterfront – <u>includes canalside environments and</u> may host any of the above 4. Appropriate inclusion of towpath after public rights of way proposed. <p>Section 6: Nature</p> <ol style="list-style-type: none"> 1. Proposed changes to Principle N1 wording as follows: <ol style="list-style-type: none"> a. Development proposals should minimise fragmentation of habitats and increase linkages through 'green corridors', <u>existing blue infrastructure</u>, linear habitat features [...] d. Green <u>and Blue</u> Infrastructure components require appropriate [...]

		<ul style="list-style-type: none"> • Accessible greenspace and urban greening <p>2. There is a typographical error in Principle N5 (B) referencing 'om-site' instead of 'on-site'</p> <p>Appendix C: Character Area Descriptions</p> <p>1. Reference to the Trent & Mersey Canal should be to 'Grand Trunk' instead of 'Grand Cross' as the 'Grand Cross' refers to the wider historic network linking major rivers and ports.</p>	<p>Proposed change to Paragraph 6.5 to incorporate reference: habitat networks <i>(including blue infrastructure)</i></p> <p>2. Correct typographical error.</p> <p>Appendix C: Character Area Descriptions</p> <p>1. The reference comment is noted, as the Council are re-adopting the Character Area Descriptions from the currently adopted Design SPD based on the appropriate evidence base amendments to Appendix C are not feasible at this time.</p>
A0005	The Coal Authority	No specific comments to make on this document.	Noted.
A0006	Historic England	<p>Welcome that the document highlights appropriate character areas, as well as a strong local distinctiveness and sense of place, both for conservation areas and other settlements.</p> <p>Note that although the document acknowledges the nationally significant designation of the Cannock Chase National Landscape and suggest that reference is made to the key assets and design management considerations highlighted in the AONB Management Plan and Historic Environment Strategy.</p> <p>Section 2: Context and Identity</p> <p>1. Consider that the document would benefit from a specific paragraph about conservation areas, and what entails in regulatory terms and the extra design considerations and the need for contextual/responsive design.</p> <p>Appendix C: Character Area Descriptions</p> <p>1. Consider that it would be useful to provide more detail regarding the history of the settlements and how the originated.</p>	<p>Support welcomed.</p> <p>The reference to the AONB Management Plan is noted, reference to this is made in the relevant aspects of the SPD and a link to the plan is providing in a supporting box. It is proposed to include the link to the Historic England Strategy in the same supporting box for reference to by applicants and officers.</p> <p>Section 2: Context and Identity</p> <p>1. It is proposed to add an additional paragraph in Section 2 beneath Paragraph 2.4 headed Conservation Areas with the following wording: <u><i>Cannock Chase contains eight Conservation Areas. Conservation Areas are areas of special architectural or historic interest. They do not just focus on the buildings, but also on the overall setting and character of the area, including trees, street furniture, street layout etc. they are a national designation, meaning that they are of national importance and not of just local importance. When proposing development in a conservation area this Design Guide SPD should be read in conjunction with the applicable Conservation Areas Management Plan and the guidance provided by Historic England (Good Practice for Design in the Historic Environment: Principles and Case Studies Historic England).</i></u></p> <p>Appendix C: Character Area Descriptions</p> <p>1. The reference comment is noted, as the Council are re-adopting the Character Area Descriptions from the currently adopted Design SPD based on the appropriate evidence base amendments to Appendix C are not feasible at this time.</p>
A0007	Tetra Tech obo Indurent	<p>General Comments</p> <p>It is acknowledged that the draft SPD is intended to support the adopted Local Plan by provided detailed design guidance and appropriately references national policy including the NPPF and National Design Guide. However, it is noted that the NPPF emphasises the importance of variety in design, which is not explicitly referenced in the draft document, and also requires effective engagement with applicants, which should be recognised within the guidance. The principles of good design identified in the SPD (inclusive, sustainable, adaptable development) are supported.</p>	<p>General Comments</p> <p>The comments are noted; it is considered that the introduction identifies that the SPD is to provide more detailed advice and guidance on Local Plan policies and that it should be read in conjunction with national and local policies. With regards to cross-referencing within the SPD, the approach taken is in line with the requests of the Inspector to remove significant signposting from the Local Plan, it is considered where appropriate that additional reference has been provided to the relevant Plan policies, however as the document does not form part of the Development Plan the onus sits that the Plan should be read and considered by an applicant and that the Plan policies sign post to the Local Design Guide.</p>

	<p>It is raised that it is considered that there is a lack of clarity regarding the status of the SPD. Noting that SPDs are material considerations only and do not form part of the development plan, it is considered that the draft SPD does not sufficiently clarify that it is guidance rather than policy and it is considered that it fails to emphasise that its role is to support interpretation of Local Plan policies, rather than create new requirements. It is also considered that there is insufficient cross-referencing to the relevant Local Plan policies.</p> <p>It is recommended that the document should be revised to clearly define its role, ensuring consistency with national policy and avoiding any implication that it introduces new policy obligations.</p> <p>Section 3: Built Form</p> <ol style="list-style-type: none"> Design Principles B1 and B2 it is considered that the principles are overly prescriptive and drafted in a manner resembling policy criteria and that this approach exceeds the appropriate scope of an SPD. It is recommended that the principles are reworded to ensure they provide guidance only, assist applicants in interpreting Local Plan policies, and are clearly identified as material considerations, not requirements. Principle B3 (Roof Design) similar concerns to above are considered to arise in this principle, particular concern is raised regarding green/living roofs where the wording could imply an expectation for all developments. It is considered that green roofs may not be considered appropriate in all commercial contexts and that the current drafting risks this guidance being applied rigidly in decision-making. It is recommended that the wording is amended to confirm that provision of green/living roofs is optional and context-dependent, to clarify that guidance should not be interpreted as a universal requirement. The respondent outlines alternative approaches to achieving sustainable development suggesting emphasis on: <ul style="list-style-type: none"> Enhanced building fabric and air tightness, Low-carbon HVAC systems Photovoltaic energy generation, and achievement of BREEAM 'Very Good' standards. <p>It is recommended that greater flexibility should be maintained to allow developers to adopt different sustainability solutions appropriate to the scheme.</p> 	<p>Notwithstanding this, to ensure that the purpose of the document and national policy requirements are clear additional wording is proposed in the following manner:</p> <p>Paragraph 1.1 add additional wording: This Design Guide is a Supplementary Planning Document (SPD) that supports the Cannock Chase Local Plan 2018 – 2040 and is intended to build upon and provide more detailed advice and guidance on the design policies set out in the adopted Plan. <u>Whilst not a Development Plan Document, the SPD forms an important part of the wider plan for the development of Cannock Chase and is, where relevant, a material consideration in the determination of planning applications.</u></p> <p>Paragraph 1.6 add additional wording: '[...] Design guides should provide a local framework for creating beautiful and distinctive places with a consistent and high-quality standard of design. <u>Their geographic coverage, level of detail and degree of prescription should be tailored to the circumstances and scale of change in each place, and should allow a suitable degree of variety.</u></p> <p>Section 3: Built Form</p> <ol style="list-style-type: none"> The comment is noted. The Council consider that the principles are appropriate and link to the relevant policies of the Local Plan. Policy SO1.2(a) states that 'Development proposals will demonstrate conformity to Local Plan Policies and the relevant Local Design Guide and will deliver a high quality of building design and layout which is: <ol style="list-style-type: none"> Visually attractive, as a result of good architecture, layout and landscaping Sympathetic to local character and heritage Able to accommodate an appropriate amount and mix of development Inclusive of green infrastructure, tree planting and other public space Supportive of local facilities and transport networks; and Safe inclusive and accessible.' <p>It is considered that in line with the purpose of the SPD the Building Design principles provides additional guidance on how to deliver the requirements of the Local Plan. Further to this, it is considered that the existing and proposed wording to the introduction is clear that the SPD is for guidance and is a material consideration and not requirements.</p> Comment noted. It is considered that the wording of the principle is appropriate and sets out what 'can' or 'should' be considered as well as 'encourages' consideration of renewable energy, as the SPD is guidance in its context the Council consider that the wording provides sufficient flexibility to roof design within a proposal. With regards to living roofs, the wording states that they 'should be considered' and provides some reasoning for why it may benefit the development to do so. As such it is not considered to form a universal requirement and remains within the remit of the SPD to provide advice and guidance. The alternative approaches are noted, though it is not clear in which context the respondent considers they should be included within the SPD. The Council consider that they could be considered to be too prescriptive to include these within the principles where the Local Plan policies on sustainable design (SO8.3) and low carbon
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A0008	Define Planning obo Bloor Homes Ltd	<p>Section 2: Context and Identity</p> <ol style="list-style-type: none"> Principle CI1: Site Context is recognised and its scope largely acceptable. It is considered that CI1(c) should make reference to the policy tests as set out in the NPPF so as to avoid any confusion as to how decision-makers should deal with applications for development that would impact on heritage assets and their setting; noting that the NPPF makes clear that applications should be approached dependent on level of harm and the benefits of the development. <p>Section 3: Built Form</p> <ol style="list-style-type: none"> It is noted that there are two principles referred to as Principle B1. Principle B1 (Density) outlines general guidance relating to development density and the locations where higher and lower densities may be appropriate, it is considered that the principle should refer to the densities outlined in the adopted Local Plan and a reference should be made to making efficient use of the land set out in the NPPF. Principle B1 (Building Design) (c) outlines that choice of materials should respond to a site's location and its scale. It is considered that a key factor that informs the choice of materials should be the surrounding context, it is not considered that its location (in so far as whether it is urban, suburban or rural) or the scale of the development 	<p>Section 2: Context and Identity</p> <ol style="list-style-type: none"> It is proposed to add additional wording to Principle CI1(c) : Consideration should also be given to the relevant Conservation Area Management Plans <u>and the policy tests as set out in Chapter 16 (Conserving and enhancing the historic environment) of the NPPF</u>. To provide further clarity to the principle. <p>Section 3: Built Form</p> <ol style="list-style-type: none"> A change is made to the referencing of the Principles in Section 3 to remove any duplicates. Comment Noted. Reference to Policy SO3.1 will be added to the principle, no further change is proposed to the principle as it is considered to reflect on site density i.e. more concentrated density of dwellings/apartments on sites and lower density larger plots on different sites/areas of sites where proposals are on significantly large parcels. It is considered that the comments should be in relation to Principle B4: Materials. It is considered that the urban, suburban or rural location of a proposed development links to its surrounding context and is an important consideration in the District, given the distinctive characteristics of the different areas. No changes made.

	<p>is significant in defining material choice or the scale of the development. It is therefore suggested that Requirement C is amended accordingly.</p> <ol style="list-style-type: none"> 4. Principle B1(e) Building Design supports architectural creativity and innovation, including by exploring use of modern and contemporary design. It is suggested that the requirement is more specific to define when such design would be appropriate; that being where there is no strong historic character, or no dominant local typology or characteristics. 5. Principle B1(g) Building Design states that 'development proposals should relate to their neighbouring buildings, 'stepping up' or gradually increasing from one height to another and should not inappropriately dominate the street scene. It is raised that the intention of the requirement is understood but that there may be some circumstances where it is testament to good design for the building line to 'step up' for a single house (or handful of houses) before stepping back down, such as to terminate key vistas, mark key corners, or define the primary street within a development. That should be considered acceptable so long as the relationship of the house(s) with nearby houses has been considered. It is proposed that B1(g) should be re-drafted to read: Development proposals should <u>complement and be respectful of</u> neighbouring buildings and not inappropriately dominate the scene. <u>Where an increase of scale is appropriate, buildings should step or gradually increase from one height to another.</u> 6. Principle B4 is recognised and its scope is considered largely acceptable. It is considered that B4(h) could be read as elevating the status of the Green Belt, in terms of its landscape and visual sensitivity, to the same level as the National Landscape (NL). Whilst the application NPPF Para 190 often results in a higher design bar being applied to proposals for major development in the NL, there is no national policy requirement for a different or elevated design approach within the Green Belt. Proposals for development in the Green Belt/ on a site that has been removed from the Green Belt would be subject to the other national and local planning policy/guidance that require developments to respond to their context. <p>Section 4: Movement, Public Spaces and Uses</p> <ol style="list-style-type: none"> 1. Principle M1 it is considered minor amendments are required to the principle to ensure that it is clearly written and unambiguous in line with NPPF para 16d, and that the requirements are appropriate: <ol style="list-style-type: none"> i. M1(a) should be amended to make clear that it is in relation to short/medium distance journeys. ii. M1(b) the intention of the requirement is understood, it is considered that it should make clear that developments can only seek to link to existing public rights of way "<u>where that is feasible</u>" and that cycle connections should only be provided to public bridleways. iii. M1(c) states that walking routes should be overlooked by surrounding buildings, it is noted that some peripheral footpaths may not be able to facilitate overlooking from buildings; and indeed that may not be appropriate from a design perspective, in such circumstances it would be considered sufficient and appropriate for them to be overlooked by regularly used open 	<ol style="list-style-type: none"> 4. The comment is noted; however, the Council consider it would be too prescriptive to define where such design would be appropriate and that is for a matter for the applicant to address for consideration at the application stage taking into consideration National and Local Policy and the wider context of the design guide SPD. 5. Proposed change is supported. It is considered that the proposed changes do not alter the context of the existing text but provide greater clarity in the approach to be taken the proposed amendment is as follows: 'Development proposals should <u>complement and be respectful of</u> relate to their neighbouring buildings, 'stepping up' or gradually increasing from one height to another and should not inappropriately dominate the street scene. <u>Where an increase of scale is appropriate, buildings should step or gradually increase from one height to another.</u> 6. The comments are noted, as the District is 60% Green Belt it is considered that a higher design bar is appropriate to protect the visual sensitivity of the landscape and setting of the Green Belt, further to this the entirety of the National Landscape (with the exceptions of the two villages sited within it) is within the Green Belt as such it is considered that the approach to materials should be consistent across both the Green Belt and the National Landscape. <p>Section 4: Movement, Public Spaces and Uses.</p> <ol style="list-style-type: none"> 1. Comment noted: <ol style="list-style-type: none"> i. M1(a) the proposed change is noted and the principle will be amended accordingly. ii. M1(b) the comment is noted, a change is proposed to the principle in line with Staffordshire County Council comments, no further change is considered necessary. iii. M1(c) the comment is noted. A change to the use of 'short' has been made in line with the County Council comments and no further change to this element is proposed. The Recommendation with regards to the overlooking is noted alongside the aspects of being 'well-lit', Policy SO8.5 considers light pollution
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		<p>spaces. It is also noted that routes should be “well-lit” but it is considered that there will be circumstances where fully lighting areas is not appropriate for example from an ecological or landscape and visual perspective. It is also considered that it is more appropriate for routes that are “direct and convenient” than short. Proposed wording changes are suggested: ‘walking routes should be <u>direct and convenient</u>, overlooked by surrounding buildings <u>or regularly used open spaces</u>, <u>appropriately lit</u> and not situated between blank frontages.</p> <p>iv. M1(d) the intention of the principle is recognised, but it is considered that the SPD should not entirely discourage the provision of routes adjacent to roads, as they often reflect desire lines and constitute direct and deliverable pedestrian and cycle facilities. Rather the focus should be on ensuring that any such routes are safe, convenient and attractive.</p> <p>v. M1(e) it is suggested that reference is made to the Highway Authority’s latest Local Highways Design Guide/Residential Design Guide, which would ensure that the SPD is future-proofed should there be a shift in national and local policy and guidance on best practice in the coming years.</p> <p>2. Principle P2(a) seeks the provision of well-lit public spaces in the interest of course paramount, our response to Principle M1 outlines that other factors should also be balanced.</p> <p>3. Principle P2(f) a minor amendment is suggested to make clear that buildings should be designed so that windows or doors may not be able to front all open spaces; such as where two sides of the building are bounded by an open space.</p> <p>Section 5: Homes and Buildings</p> <p>1. Principle HB1(e) the intention is recognised and could perhaps be clarified and strengthened by stating that “Main entrances to buildings should be located in the main public thoroughfare with active frontages on elevations that abut public realm areas.”</p> <p>2. Principle HB1(j) it is considered that as currently written the principle is not in accordance with NPPF para 16d, as it does not define what a “substantial difference in levels” is such that a greater separation of distance is required. In that regard it is noted that there is a specific point at which change in levels becomes unacceptable, as the impacts will be dependent on how proposals have considered light, changes in levels, boundaries and privacy. It is raised that the SPD does not outline which a 30m separation distance is suggested it is considered that a more flexible approach could be taken for example outline a maximum level at which the standard 21m offset is appropriate and then require an additional offset of X metres is provided for every Y meters that the change in levels is above the figures, unless an applicant can demonstrate a different approach. It is considered that would provide much greater clarity and facilitate design solutions that respond to the specific characteristics of a site; which accords with the general principles of local and national policy and guidance in relation to design.</p>	<p>and public lighting sign-posting to the policy is proposed with the following wording changes: Walking routes should be short, overlooked by surrounding buildings <u>or regularly used open spaces</u>, well-lit (<u>Policy SO8.5(a(v))</u>) and not situated between blank frontages.</p> <p>iv. Principle M1(d) the comment is noted; however, no change is proposed as the Council consider the use of ‘where possible’ does not dissuade from justification being provided regarding desire lines etc. as part of a development proposal but rather wishes to encourage alternative uses being provided where possible.</p> <p>v. Principle M1(e) the comment is noted, some amendments have been made in line with County Council comments, however, at the time of writing SCC were in the process of updating their own Design Guides a reference box has been included beneath the principle advising that County Council guidance should be considered as part of any development proposal, it is considered this future-proofs the SPD for any future documentation or guidance the County Council produces.</p> <p>2. The comment is noted; it is proposed a similar approach to M1 is taken and that reference to Policy SO8.5(a(v)) is made at the end of the principle to connect the principle to the relevant Local Plan policy.</p> <p>3. The comment is noted an amendment is proposed to alter the wording to ‘windows and <u>or</u> doors [...]’ to reflect that buildings may only have windows on one side of a building.</p> <p>Section 5: Homes and Buildings</p> <p>1. The proposed changes are considered appropriate to some degree, as such similar wording amendments are proposed: <u>‘Main e</u>Entrances to buildings <u>dwelling</u>s should face the road to provide active frontages <u>on elevations that abut public realm areas</u>, with pedestrians and cyclists considered prior to motorists.</p> <p>2. The comments are noted. The use of ‘substantial’ has been determined to align with the approach to policy wording of the NPPF and enables flexibility as the difference in levels can alter dependent on the location of the development within the District and it should be considered on an individual basis to whether the height difference is substantial enough to have a detrimental impact on neighbouring properties. The use of 30ms has been determined by the consideration of the separation distance that would be considered appropriate when looking at 3storey dwellings to ensure the harm from the upper floor is not substantially detrimental on neighbouring properties. No changes are proposed.</p>
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3. Principle HB1(k) it is suggested that additional flexibility is provided to reflect that smaller garden depths are acceptable in some instances, where the amenity of residents will not be adversely effected. For example, the use of slightly shorter garden lengths may be appropriate when seeking to deliver a higher density, where that is appropriate. It is also considered that it should be updated to reflect that it does not relate to apartments. The following changes are proposed: **“For new houses (excluding apartments), a minimum garden depth of 10.5metres should be provided unless a reduced garden depth is justified from a design perspective.”**
4. Principle HB3 it is considered that the application of minimum garden sizes will directly impact plot coverage and the site capacity that can be achieved across the District, which will in turn have financial implications. It is raised that garden sizes are not specified in the adopted Local Plan which is considered the appropriate forum for such matters, and that the introduction of garden sizes that are particularly large could mean for example that development within allocation sites does not achieve the capacity that the recently adopted Local Plan assumed. Notwithstanding that, if the Council continues to introduce minimum garden sizes through the SPD it is considered that the requirement for 3-bed dwellings to have gardens of a minimum size of 65sqm appears high. Bloor’s standard 3bed houses typically have a plot width of c. 5m which would require a garden depth of 13m (as opposed to the 10.5m) to meet the garden size standard. It is considered that this would amongst other matters have financial implications and would be considered to conflict with planning policy. It is considered that the SPD should not introduce garden size standards but if they do that it should be changed to 3-bed units being set at c. 50-55sqm.

Section 6: Nature

1. Principle N1(f) it is considered that the requirement goes above and beyond the requirements of the NPPF, which outlines Golden Rules for the development of land that has been removed from the Green Belt.
2. Principle N4(d) the intention of the principle is recognised but it is considered that it should specify that it relates only to significant watercourses, as it would not be proportionate to provide such a significant offset from a minor stream or alike, and that would result in a number of developments failing to achieve an efficient use of land as required by NPPF paragraph 129.

3. It is considered that the 10.5metre garden depth is appropriate in consideration of the required 21metre separation distance as set out in HB1(i). It is not considered that greater flexibility is required as the depth is considered to ensure appropriate residential amenity space is provided to new dwellings, and proposed differences to this can be justified through the planning application process where the SPD is a material consideration. It is considered that provision of clarity that the requirement applies to houses and not apartments is appropriate, the following amendment is proposed:
‘For new dwellings (excluding apartments) aA minimum garden depth of 10.5metres should be provided.
4. The comment is noted. It is considered that the inclusion of the garden sizes within the SPD aligns with the current adopted 2016 design SPD that would remain in place if the proposed SPD were not to be adopted, it should also be noted that the garden sizes have not changed from those in the adopted 2016 version, as such it is considered that any allocations within the Local Plan would have taken in to consideration the adopted SPD in lieu of the proposed SPD as that would be the material consideration at the time of submission. Policy SO3.3 (a) identifies that ‘Sufficient external amenity space or private gardens should also be provided’ it is considered in line with the nature of the SPD that it provides further guidance on what the Council consider to be ‘sufficient’ in this instance, further to this Policy SO1.3(a) states that ‘development proposals will demonstrate conformity to Local Plan Policies and the relevant Local Design Guide and will deliver a high quality of building design and layout which is [...]’ further to this SO1.3(c) for major development proposals sets out that ‘The Design and Access Statement will set out how the proposal will align with the relevant Local Design Guide and the requirements of other relevant Local Plan Policies’. It is considered that the Policies provide sufficient flexibility for further detail to be provided within the SPD, notwithstanding this as it states ‘relevant’ Local Design Guide this would mean the Design Guide at the time of determination of the application. The concerns with regards to Bloor Homes standard house-types and the potential implications on application sites is noted, however, the Council consider that the application of minimum garden sizes within the SPD is not outside of its remit and whilst a material consideration, it is for the applicant to justify any proposed changes to this at the point of submission.

Section 6: Nature

1. It is considered that the principle aligns with Policy SO7.7(d) of the Local Plan which has been assessed at examination, a proposed change to the principal is proposed to highlight the linkage with the Local Plan policy. With regards to the Golden Rules these apply with regards to major housing proposals and not other proposals that require the release of land. Paragraph 159 of the NPPF considers improvements to green spaces as part of the Golden Rules and it is considered that Policy SO7.7 and the principle set out the locally specific standards to be considered alongside the national standards set by Natural England.
2. The comment is noted and the following amendments are proposed to Principle N4(d) *‘Development should provide a naturalised buffer to watercourses, proportionate to their scale and ecological value. For main rivers and more significant watercourses, a minimum 10-15m undeveloped, naturalised buffer (measured from the top of the bank) should be provided any watercourse. Wider buffers (15-20m) may be required for priority habitats, ecological corridors or sites with sensitive riparian features. For*

		<p>Appendix A: Car Parking Guidance</p> <ol style="list-style-type: none"> Principle CP1(a) and CP1b are considered overly prescriptive and is considered to demonstrate that the Council only support a few solutions to the integration of parking. It is raised that there are some cases where frontage parking is required and appropriate from a design perspective, such as where developers are seeking to create a strong building line to define specific character areas, respond to primary routes etc.. It is considered that CP1(b) would limit applicants' ability to put forward innovative design solutions. It is considered that CP1(a) and CP1(b) should be deleted. <p>Appendix C: Norton Canes Character Area</p> <ol style="list-style-type: none"> The Key Local Design Principles for the Norton Canes area are largely acceptable. It is raised that Bullet Point 2 does not outline a suggested net-density that is considered to be appropriate for development in this locale. It is considered to align with para 16d of the NPPF the SPD should outline a specific range of densities that is considered appropriate. 	<p><u>smaller watercourses (e.g. ordinary watercourses, ditches or ephemeral channels), a reduced buffer may be appropriate; however, bBuffers should not fall below 6m unless justified by site-specific constraints and supported by ecological assessment.</u> would not be appropriate.</p> <p>Appendix A: Car Parking Guidance</p> <ol style="list-style-type: none"> Comment noted. A few minor changes have been proposed in response to County Council comments, however it is considered that both principles are required to ensure appropriate parking is provided within developments. Notwithstanding this, innovative solutions diverting from the Guidance of the SPD can still be submitted and will be assessed on their merit at the application stage. The principles will be retained. <p>Appendix C: Norton Canes Character Area</p> <ol style="list-style-type: none"> The reference comment is noted, as the Council are re-adopting the Character Area Descriptions from the currently adopted Design SPD based on the appropriate evidence base amendments to Appendix C are not feasible at this time. Further to this, the appropriate densities are set out in Policy SO3.1 of the Local Plan and further guidance is provided in Section 3.0: Built Form of the SPD.
A0009	Staffordshire County Council – Lead Local Flood Authority	<ol style="list-style-type: none"> The LLFA recommends reference to the latest national guidance on Sustainable Drainage Systems. Whilst canals are identified, the LLFA recommends that rivers and ordinary watercourses are also included within character area profiles and mapping as key landscape features. 	<ol style="list-style-type: none"> A proposed change is recommended following general Staffordshire County Council comments to reflect this. The reference comment is noted, as the Council are re-adopting the Character Area Descriptions from the currently adopted Design SPD based on the appropriate evidence base amendments to Appendix C are not feasible at this time.
A0010	Swifts Local Network: Swifts & Planning Group	<p>Section 6: Nature</p> <ol style="list-style-type: none"> Principle N3(a) and N1(c) reference to next features/swift bricks is welcomed. Principle N3(a) typo at the start 'next' for next Principle N3(a) it is requested that after 'features' wording is included to state "such as swift bricks" to provide clarity between N1(c) and N3(a). Request Appendix B be reference in N1 or N3 and provide an updated link for the leaflets page on swift boxes. It is requested that key text from NPPG and Natural Environment 2025 paragraph 017, which specifically requires at least one swift brick per dwelling on average is included, as well as highlighting other areas of guidance available. 	<ol style="list-style-type: none"> Support welcomed. Typo to be corrected. Proposed change made to the following: '[...] species appropriate nest and roost features <i>(such as swift bricks)</i>.' Appendix B is referenced is paragraph 6.5. The update to the link in Appendix B will be made. A supporting reference box will be included with a link to the relevant guidance will be included.
A0011	Cllr. D Mawle	<p>Section 3: Built Form</p> <p>Principle B3 Roof Design in regard to solar panels. It is considered that all new build properties should have mandatory solar panels and battery storage to help residents gain help with their energy costs. This would set a standard to other councils and make CCDC a trail blazer in residential renewable energy and its widespread use.</p>	<p>Section 3: Built Form</p> <p>The comment is noted, however a mandatory target would go beyond the requirements as set out in national policy which a Local Plan and in turn SPD are not able to do. The SPD encourages the integration of renewable energy alongside the policies within the Local Plan setting our requirements for Sustainable Design, at this time anything further would require changes at a national level.</p>
A0012	Deloitte obo Church Commissioners of England	<p>The respondent supports the preparation of the draft Design Guide SPD and its overarching objectives to promote high-quality contextually responsive design.</p> <p>General Comments</p>	<p>Support is welcomed.</p> <p>General Comments</p>

	<p>The respondent raises that design principles must be balanced against viability and that overly prescriptive or onerous requirements could restrict delivery of housing and employment, contrary to the NPPF. It is considered that the SPD should explicitly reference viability considerations in line with PPG.</p> <p>It is considered that whilst respecting local character is supported that the SPD should encourage innovation in design, materials and construction, support adoption of new technologies and support creative responses to sustainability challenges.</p> <p>The respondent considers that effective design outcomes require early and ongoing engagement between the Council, developers and stakeholders and that the SPD should promote a collaborative approach to design coding and implementation.</p> <p>It is considered that the SPD uses directive language that could be interpreted as mandatory and that the SPD should clearly state that it provides guidance rather than policy, to be applied flexibly.</p> <p>It is considered that a review mechanism for periodic review should be included to ensure the SPD remains up-to-date, responsive to technological and market changes and aligned with best practice.</p> <p>Section 2: Context and Identity</p> <ol style="list-style-type: none"> 1. The respondent supports context-led design and protection of local character; however it is considered that the SPD should allow flexible interpretation of character areas (particularly for sites spanning multiple areas), clarify that character guidance is informative, not prescriptive and support high-quality design that departs from established character where justified. It is raised that limited guidance is provided on how to reconcile overlapping character area requirements and that the SPD should allow for blended design responses rather than strict compliance with multiple sets. 2. The emphasis on landscape sensitivity including the importance of local views and landscape context, and roof coverings for larger buildings is supported, it is raised however that the SPD should avoid restricting contemporary architectural solutions, ensure larger buildings can adopt modern design where appropriately integrated, and apply guidance in line with national policy supporting innovation. 3. The SPD introduces extensive site appraisal requirements it is considered these should be proportionate to the scale and stage of development and not create additional burdens beyond national requirements. <p>Section 3: Built Form</p> <ol style="list-style-type: none"> 1. Principle B1(Density) the respondent supports efficient use of land and raises concerns that the SPD may unduly favour lower densities, particularly at edge of settlements. It is recommended that density requirements remain flexible and context-driven, that higher densities be supported where well-designed and supported and that the SPD aligns with the NPPF emphasis on optimising land use. 	<p>The comment is noted, it is considered that the principles are guidance and advice to the Local Plan Policies which have been viability assessed and that there is flexibility with the application of the SPD for justification to be provided at the application stage. Further to this the recent NPPF Consultation (anticipated publication July 2026) changes the approach to site viability.</p> <p>It is considered that the SPD does not dissuade innovative design and approaches and Policy SO8.3 (Sustainable Design) sets out clear considerations on these aspects.</p> <p>The approach is recognised and the Council offer pre-application services to discuss design approaches at an early stage, it is considered that the Design Guide SPD is a separate document to site-specific design coding and implementation.</p> <p>The Comment is note, whilst it is not considered that the language could be interpreted as mandatory, amendments have been proposed in response to the comments in A0007 and it is considered this also addresses this matter.</p> <p>The comment is noted; the SPD supports the Local Plan Policies and as such a review of the SPD would be appropriate to align with any review of the Local Plan. It is considered that where there are any significant changes to best practice etc. these would be taken into effect when applying the design guide to applications.</p> <p>Section 2: Context and Identity</p> <ol style="list-style-type: none"> 1. The comments are noted, however it is considered that the Character Areas Guidance in Appendix C offer information regarding the areas and key design principles to consider it is not considered prescriptive nor a requirement and is there to ensure that development reflects the local context. In consideration of sites overlapping character areas it is considered that a reasonable approach would be taken when considering the different character attributes and that any proposal would reflect the immediate surrounding context. 2. It is not considered that the SPD restricts contemporary or innovative solutions from being proposed. 3. As set out in Paragraph 2.11 the site appraisal element is highlighted as a useful appraisal tool, it is not a requirement for a submission to use the appraisal tool, it is there to help provide guidance for applicants particularly those that may not be relying on professionals for their submission. <p>Section 3: Built Form</p> <ol style="list-style-type: none"> 1. The comments are noted, the density requirements for the District are set out in Policy SO3.1 of the Plan. The wording in B1 is considered to reflect on site density i.e. more concentrated density of dwellings/apartments on sites and lower density larger plots on different sites/areas of sites where proposals are on significantly large parcels. The
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	<p>2. Principle B4 (Materials) it is considered that the SPD should avoid promoting overly traditional design approaches, or restricting modern, sustainable design solutions. It is recommended that the guidance should instead focus on design quality and performance, encourage durable high-quality materials, and allow flexibility to reflect site conditions and technological change.</p> <p>Section 5: Homes and Buildings</p> <p>1. It is raised that the SPD introduces numerical standards for separation distances and garden sizes, it is considered that these should be clearly framed as guidelines rather than absolute requirements. Flexibility should be retained where site-specific design solutions can deliver acceptable amenity outcomes, particularly on constrained or edge-of-settlement sites.</p> <p>Section 6: Nature</p> <p>1. The respondent supports the emphasis on green infrastructure, biodiversity and multi-functional design features. It is recommended that the requirements for Biodiversity Net-Gain and SuDS are proportionate, flexible (on-site, off site or credits) and aligned with statutory requirements. It is considered that the SPD should avoid introducing additional or duplicative burdens that could impact viability.</p> <p>Section 4: Movement, Public Spaces and Uses</p> <p>1. It is considered that the SPD should promote well-connected and accessible public spaces and movement networks that prioritise active travel. It is raised that design guidance should focus on creating safe, attractive and functional environments that encourage walking and cycling without imposing excessive infrastructure costs that could impact scheme viability.</p> <p>Section 5: Homes and Buildings</p> <p>1. It is raised that whilst supporting the transition to net-zero carbon that the SPD should encourage practical and deliverable energy efficiency measures and the integration of renewable energy solutions that are viable for residential development and that the focus should be on achieving good performance through a range of appropriate technologies and design approaches. It is considered that the SPD should also acknowledge that the viability of certain technologies can vary significantly based on site specifics and market conditions, advocating for a flexible approach that allows developers to choose the</p>	<p>SPD does not unduly favour lower or higher densities; it is considered that in particular with regards to edge of settlement developments that these will abut or be within the Green Belt and/or abut the National Landscape where there are high levels of sensitivity to landscape and setting to be take into consideration. Notwithstanding this, the requirement set out in SO3.2 should be considered and there is flexibility to the approach of on-site density/distribution.</p> <p>2. The comment is noted. The principle considers the reflection of materials on the character of the setting and the surrounding context, it is not considered to remove flexibility for innovative design or materials to reflect the site-specific context.</p> <p>Section 5: Homes and Buildings</p> <p>1. The remit of the SPD is advice and guidance for the Local Plan Policies. Policy SO3.3 (a) identifies that 'Sufficient external amenity space or private gardens should also be provided' it is considered in line with the nature of the SPD that it provides further guidance on what the Council consider to be 'sufficient' in this instance, further to this Policy SO1.3(a) states that 'development proposals will demonstrate conformity to Local Plan Policies and the relevant Local Design Guide and will deliver a high quality of building design and layout which is [...] further to this SO1.3(c) for major development proposals sets out that 'The Design and Access Statement will set out how the proposal will align with the relevant Local Design Guide and the requirements of other relevant Local Plan Policies'. It is considered that the Policies provide sufficient flexibility for further detail to be provided within the SPD, notwithstanding this as it states 'relevant' Local Design Guide this would mean the Design Guide at the time of determination of the application. The Council consider that the application of minimum garden sizes within the SPD is not outside of its remit and whilst a material consideration, it is for the applicant to justify any proposed changes to this at the point of submission.</p> <p>Section 6: Nature</p> <p>1. It is considered that the Biodiversity Net Gain (BNG) and SuDS requirements are in line with the Local Plan policies and in turn statutory requirements, it is considered that the SPD does not introduce any additional burdens that have not been considered through the Local Plan examination in particular with regards to BNG.</p> <p>Section 4: Movement, Public Spaces and Uses</p> <p>1. The concern with regards to potential infrastructure costs impacting on viability is noted, however, it is considered that the Design Guide is there to support policy requirements and ensure a high-quality of development is provided within the District. It is considered that viability concerns and alternative approaches can be provided at the application stage for consideration, whilst ensuring that a high standard is maintained.</p> <p>Section 5: Homes and Buildings</p> <p>1. The comments are noted. The SPD is to support the Local Plan which considers Low Carbon development in line with the NPPF (Sept 2023) against which it was assessed, it is considered that the relevant policies within the Local Plan provide greater detail on these elements and as such the SPD does not go into as significant detail but does encourage consideration of renewable energy solutions and sustainable design considerations. The consideration of viability is noted however as the SPD is guidance and advice to the Local Plan policies and does not provide</p>
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		<p>most appropriate and effective solutions.</p> <p>Conclusion The respondent raises that whilst the aims of the SPD are supported, it is essential that the document is applied as flexible, outcome-focused guidance and that greater clarity is required to ensure that its principles do not operate as prescriptive requirements that could constrain design innovation, viability or deliverability. It is considered that a successful SPD will be one that champions good quality design and sustainability, whilst remaining flexible, outcome focused and fully cognisant of the need to ensure the viability and deliverability of development in Cannock Chase.</p>	<p>anything significantly prescriptive beyond that set out in the Local Plan it is considered that it has been sufficiently viability checked through the examination process.</p> <p>Conclusion The support for the SPD is welcomed. The comments on the principles being guidance and not prescriptive requirements is noted; it is considered that this has been addressed through the comments on the introduction section above. It is considered that the SPD provides a structure to support the Local Plan on provision of high-quality development within the District.</p>
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