

by: Representation No

Filtered to show: (all of) Stage=P; Status=M; Document=Residential Design SPG

439 Newtown & Llanllwchaiarn Town Council

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
439.P2		04/09/2019	<input type="checkbox"/>	E	C	W	M		Summary: Support for acknowledgment of Place Plans and Local Work

Document:Residential Design SPG

Question Representation Texts

Question: Details

Representation Text: . The Town Council is heartened to see significant acknowledgement of Place Plans plus reference to local work here in Newtown including the Civic Society, in the latest SPGs for Conservation Areas & Residential Design Guide.

The Newtown & Llanllwchaiarn Place Plan will feature Character Appraisals for key areas identified within the town boundary including the Newtown Central & Penygloddfa Conservation Areas. The Place Plan is intended to be a "sister document" to the LDP, to be adopted by Powys County Council as SPG and will directly link into and enable the application of the Conservation Area & Residential Guide SPG.

For more detailed information on locally distinctive key characteristics please refer to Place Plans where they are available.

(Comments submitted by Zak Howard, Development Manager, Newtown & Llanllwchaiarn Town Council).

Council Response: Thank you for your feedback on the Residential Design SPG. As the Draft SPG states (para 15.31, 15.32) locally specific guidance will be important going forward and developers are expected to take account of updated and available character appraisal work. The Council looks forward to following the progress of the Newtown & Llanllwchaiarn Place Plan including the work undertaken on locally distinctive design.

Representations & Council Responses juxtaposed - consultation on Resid

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517 Montgomery Town Council

<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
517.P13		27/09/2019	<input type="checkbox"/>	E	C	W	M		Summary: No specific comment

Document:Residential Design SPG CA11

Question *Representation Texts*

Question: **Details**

Representation Text: . Although Montgomery Town Council do not have any comments on SPG, they would like to congratulate the team on their early engagement with the council and compliment the team on how thorough the document is.

Council Response: This support is noted. Thank you.

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525 Presteigne & Norton Town Council

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
525.P23		24/09/2019	<input type="checkbox"/>	E	C		M		Summary: Comments on Res Design SPG

Document:Residential Design SPG

Question Representation Texts

Question: Details

Representation Text: . Questions to be raised prior to TC meeting -

- Area Centre Appraisal for Presteigne - this was felt to be excessive for properties outside the conservation area
- P52 refers to sewage requirements and the feasibility of connecting to the mains sewer. No definition of 'feasible' in this context and in the event of there being no capacity in the short term for connection to the mains no guidance on whether a package sewage treatment plant could be considered as a temporary solution with connection to the mains to follow. In general it was felt that this needed to be clearer and have more detail.
- Provision of electric vehicle charging points - this is very much supported but needs action now!

Concern was also expressed at –
Compulsory requirement for chimney stacks – unnecessary, wasting land space and materials.

Two/three storey buildings to be main types: Bungalows needed, particularly for older people.

Dwellings generally no more than 3m from highway – does this not conflict with parking requirements for new build properties.

Appraisal precludes eco homes.

Generally –
Sustainable transport hierarchy but bus routes continue to be cut
Charge points to be included in the design of a development but none yet in PCCs own car parks.

Council Response: Thank you for your comments on the Draft Residential Design SPG.

As discussed, the Area Centre Appraisal for Presteigne is being carried forward from the UDP adopted guidance. Whilst the Council hopes to see updated guidance on local character/distinctiveness coming forward during the LDP lifetime it is likely that this will need to be community-led. In the interim the Council considers that this part of the detailed design guidance is appropriate to include for all of Presteigne (ie not just in Conservation Areas) as it is no more excessive or onerous than that currently in place (seeing the Council formally agreed to carry forward the UDP Residential Design Guide for Development Management decision-making until its replacement by LDP SPG). You will probably already appreciate that planning officers are able use their professional integrity to determine whether prescriptive standards are appropriate or not in the context of the new development proposal and already offer a degree of flexibility on detailed design issues at the site-specific level, e.g in agreeing a more contemporary mix of materials where it is appropriate in the setting. This flexibility is recognised in the SPG at appendix 4. point 11.

I hope the details set out in our email of 11 September addressed the issue of mains sewer connections and of electric charging points. It is important to recognise that the standards set in Supplementary Planning Guidance must only support LDP Policy and cannot bring in new/more stringent requirements that that set out in the Policy itself.

The Council acknowledges your concerns about compulsory requirements. The Council will therefore review the wording of the General Design Requirements set out at point 13. in Appendix 4 and also that in the Area Centre (Town) Appraisal for Presteigne to consider if changes should be made. However requiring adherence to certain standards enables the LPA to push for high (good) quality design in new builds. They are helpful in providing robust reasons for refusal in the cases of poor design. The Planning Officers can again apply their

Representations & Council Responses juxtaposed - consultation on Resid

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<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
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525.P23		24/09/2019	<input type="checkbox"/>	E	C		M		Summary: Comments on Res Design SPG
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judgement, at the case level, as to whether a relaxation in the standards in favour of alternative, yet still appropriate, good design is the right decision for that house or housing scheme in the given location. This flexibility also allows for the proper consideration of the merits of eco homes (which are likely to be of non-standard design) which is another concern your Council have raised.

Thank you again for taking the time to comment on the Draft Guide.

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1552 Douglas Hughes Architects Ltd

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
1552.P28		23/09/2019	<input type="checkbox"/>	E	O	W	M		Summary: Too Long, Too many appendices/cross references, not enough positive or good examples of residential design in Powys, Missed Opportunity for Aspirational & Flexible Guide

Document:Residential Design SPG

Question Representation Texts

Question: Details

Representation Text: . On the whole this is an earnest document which is well written and very clear. Nevertheless, I harbour great reservations about the number of appendices and cross references to what is particularly aged design guidance.

The guide is simply too long and does not include enough positive or good examples of recent relevant residential design from the county. As a guide, I was hoping for it to be more pictorial, as any attempt to cover design within the written words is very much open to multiple interpretations. It could have been more cogent and reflective of what is relevant when it comes to designing homes and housing in Powys. As the county's largest Architectural, Design and Planning Consultancy, we are well placed to evidence what works well in the county and what doesn't.

Powys, as a particularly large rural county, does not have a particular style. The guide uses an over reliance of advice in order to structure further development when there really is no critical mass of any particular house design in the county. Now, whilst this is a legacy of historical guidance, this particular guide could really have shaped the future of house and housing design in Powys on first principles by using strong visual examples of recently completed schemes, in order to establish the benchmark for future development. What is relevant now, obviously won't be relevant in the future but we can certainly lay the foundations.

Of particular interest to me, as well as my practice, is an over reliance on the focus of individual house design at the expense of placemaking. Now whilst I understand that this touched upon in terms of the character and town appraisals, these too are dated. I am alert to the fact that these, in the future, will be replaced by Place Plans but as there is no timescales to this the SPG in relation to residential design is likely to be sovereign. I would have preferred for town appraisals to have been updated, given that the examples cited are now 15 years old, and at the time were rather uninspiring. They do not really set the standard to which we should all be aspiring to when it comes to designing homes and housing within Powys.

The residential design guide could have stimulated a debate in relation to the rural fabric of Powys. I am heartened to see this phrase appearing within the guide but there is also continued reference to urban design quality as well as designing for a suburban context. I would argue that we have neither of these situations within Powys.

I refer to Clause 7.1.2 in which first reference is made to affordable and sustainable housing. This is a common theme and nationally based in its origins. Whilst reference is made elsewhere to the need for a housing mix and tenure to give variety to residential development in Powys one crucial clause which is stymieing this within the LDP is the use of generic densities to inform development. I specifically refer to Clause 15.1.9 in which this is used to reinforce this policy which appears in the LDP. You simply cannot provide and reinforce local distinctiveness when you have to adhere to restrictive numbers per hectare. In addition, I refer to Clause 15.2.9 where reference is made to proportions and layouts of historic buildings in the context of good design, but this is undone by slavish adherence to LDP policies upon housing density. We are experiencing as a practice a particularly negative influence of this policy upon housing development within the county. We are not attempting to side-step this issue and are aware of the fact that we need to make the best use of land resource but over-reliance on the use of housing densities is not having the impact that the Local Authority originally anticipated; far higher quality residential development in the county. The reappearance of densities within the guide is, I believe, not necessary.

The guide is far too long and repeats policies from national as well as local guidance which I do not see as being necessary. They simply need to be cross referenced and signposted with the guide. This is particularly important when the life spans of national and local guidance are not the same as the residential design guide.

Through working with all major developers and Housing Associations within the county, we have encountered clashes between UK, Welsh and Powys specific guidance. So, for example, the aspiration to have walkable neighbourhoods (Clause 15.1.7) is somewhat at odds with core tenets set down within CSS Parking Standards. Quite simply, within CSS there is no provision whatsoever for negotiation or removal of parking spaces even within town centres as recently pointed out by your Highways Department. Given that Powys has no cities, the only time that your Highways Department can grant dispensation from the parking within any town centre is in a city environment. You cross referenced CSS Parking Standards within 15.8.8

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and in doing so lock the residential design guide into a virtual circle of non-delivery given legislative restrictions.

Reference is also made within the RDG to ensuring that there is inclusiveness in accessibility with all of the potential developments. In our experience, where we have attempted to accommodate footpaths as well as subtle pedestrian links within our larger developments this has been somewhat at odds with core tenets set down within the cured by design legislation. You also reference this legislation within your guide. Again, I think the guide is trying to do far too much by linking in with other legislative guides that are at odds with each other. I believe that the residential design guide needs to be aspirational, flexible and offer a new vision for residential development in Powys.

The guide itself is rather hard to navigate and cross reference. So, for instance here, on page 100 you make reference to preferred materials and there is no reference to timber. This is one of our more energy efficient and low carbon materials and is indigenous to the majority of Powys. Its inclusion here is vital.

Reference is made to the need for all developments to be as energy efficient as is practical. The inclusion of chimney stacks as directed within your Appendix 4, is a retrograde step to this end. There is a reason that chimneys have gone out of fashion and that is because they are a direct route to considerable energy loss. Again, there are part of the guides that are at odds with each other.

Within Appendix 4 you also specify what roof pitches would be acceptable in the county. I do not see this as a positive step, especially in terms of some of our town centre developments. Lower pitches work equally as well as higher pitches and surely the main aim here is to make sure that whatever design comes forward compliments or enhances its environment. Specifying roof pitches does not give the designer flexibility to achieve this. I also find the reference to stone, slate or brick sills as being rather curious. Finally, I do not see the need to specify flemish brick bond in new developments within the guide. The cost of undertaking this construction is considerable and this is the time where there is very little housing delivery across the county as it is. The design guidance which prejudices this will only compound this problem further.

So, in summary, I was hoping the guide would have been a lot more ambitious and courageous in its vision for the county. I am concerned that it brings together too many aged guides which really did not work at the time and have served their purpose. I am more than happy to engage in this discussion further so that we can work together to produce a residential design guide which will make a planning process a lot more streamlined and ultimately for the delivery of houses of every shape and size across our county.

Council Response: Thank you for your comments on the Draft Residential Design SPG

Firstly, the Council is sorry to hear that the SPG does not meet expectations. The Council notes your thoughts that the Residential Design Guide needs to be aspirational, flexible and offer a new vision for residential development in Powys.

The main purpose of the SPG is to support Policy DM13 and enable appropriate decision-making. Through encouraging good design the Council wants to see better quality homes being built across the county. The Council considers that using, albeit somewhat dated, Model Guides as the Draft does, is appropriate given that these are still relevant, have not been withdrawn and are available from the Design Commission for Wales. The principles of good design are still valid. However, in response to your consultation feedback the Council is seeking an opinion and additional feedback from the DCFW on the content of the Draft SPG and in particular the use of cross-references to the Model Residential Design Guide.

It is considered that the 10 design objectives referenced in the Draft SPG coupled with consideration of the Building for Life (BfL) Wales principles are sufficiently flexible to support contemporary well-designed schemes and support successful place making. The potential of BfL appears to be well evidenced by the range of schemes and variety of housing types that have successfully received BfL accreditation (see case studies on line at: <http://www.builtforlifehomes.org/>).

This SPG supports Policy DM13, which is positive towards new development. The LPA do wish to see housing delivered in Powys. The Council does not share your view that the SPG is the right document to be "ambitious and courageous in its vision for the county". Instead, the Council is of the opinion that design and development professionals (architects, agents, housebuilding firms and developers) should themselves adapt to the design and place making culture change and bring forward fitting, ambitious and courageous schemes to shape the Powys of the future. The Council would in fact strongly encourage this, and the Draft SPG does not stymie this, provided the principles of good design and place making are applied.

The Council agrees that strong visual examples of recently completed local schemes would benefit the SPG. Unfortunately, this has not been possible so far due to resources but receiving additional ideas would be welcomed. Even at this stage, pictures could be inserted into the document. It is unfortunate that your comments/photos did not come forward during

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the Working Draft stage in June as this would have aided the preparation work. Receiving comments late in the day means that the optimal time for making significant changes has been missed.

There may be scope for your involvement in a set of Powys Place Making Guides to accompany the SPG and LDP, an idea which will be placed before the LDP Working Group. These could be more pictorial in content and include LPA specific case studies. Again, the Council would welcome your photographs/images and ideas on this so that they can be taken forward for further consideration. The Council may also need to approach other local agents/architects for similar case studies to provide a broader scope and balance. It would also help if you could alert the Council to other guides to demonstrate the format/type of aspirational document produced elsewhere that you inferred would be a more fitting model for Powys. In researching for this Draft SPG, the Council noted the wide range of guides being produced across Wales.

The Council acknowledges your comments that the SPG is too long. It does cover a lot of ground and this is partly due to nature of Policy DM13 which is a wide-ranging Design policy, and the need to update the context of the SPG in the light of the place making framework (embedded in PPW from 2018). It is noted that yours are the only consultation comments focussed on the length/detail of the work.

The Council notes your view that the SPG, as well as being far too long, repeats policies from national as well as local guidance. The Council will therefore review the content and assess whether it can contain more cross-references/signposting to avoid repetition.

The Council will consider and discuss whether the Town Appraisals are considered to be too outdated and whether they should therefore be removed from the Draft SPG, your comment being balanced against other consultee responses.

On your point about terminology and the reference to "urban design" / "suburban context" this is an industry term and not one intentionally being used to distinguish between a town and rural setting. Detailed site and context analysis, the foundation of good design, would soon identify the appropriate design references. It is of note that BfL even has a separate section to cover "using BfL 12 in more urban locations" as the guide was found to have a core focus on schemes between 25-50 homes to the hectare, such as those "typical of more suburban or rural locations".

The Council notes that you consider the appearance of densities to be unnecessary in the Residential Design SPG. The Council considers that reference to the density policy is appropriate. It is noted that other Authorities have taken a similar approach (e.g. Neath Port Talbot, 2017). The purpose of SPG is to support policies in the Plan. As the Plan includes a robust density policy (which was in fact deemed essential by the Independent Inspector at the LDP Examination) it is not deemed appropriate to exclude mention of it from a guide on housing design.

LDP Policy H4 provides for flexibility on density. For example, where an applicant can demonstrate that constraints, or important site features, or historic patterns/local character require development to adopt a lower density, developments below the specified target densities will be considered. This flexibility is set out in the Reasoned Justification of the LDP and does not need repeating in the Residential Design SPG.

On your other comments, it is not within the remit of an SPG to "streamline the planning process" (especially given the complexities and competing priorities that you point out) or address inconsistencies that may be found in the legislative regime. Neither should the SPG be a guide to "stimulate debate in relation to the rural fabric of Powys" – such debates can, and no doubt should be had, but perhaps not in the context of SPG preparation. There could be scope to produce a further document on rural design – it is noted that the BBNPA has a guide on enabling appropriate development in the countryside. This may not be officially an SPG for Powys due to the policies in the LDP but a similar publication could potentially be produced as a good practice guide if the Council feels that it is merited. Again, such an option will be considered by the Working Group to ascertain if there is a consensus on producing such a guide.

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4177 Natural England

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
4177.P3		16/09/2019	<input type="checkbox"/>	E	C	W	M		Summary: Consideration of Green Infrastructure, Biodiversity Enhancement, Landscape Enhancement, other Design Considerations (e.g. Lighting) and SEA/HRA

Document:Residential Design SPG

Question Representation Texts

Question: Details

Representation Text: . Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development

Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature.

BOLD TEXT: While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major effects on the natural environment, but may nonetheless have some effects. We therefore do not wish to provide specific comments, but advise you to consider the following issues: **END BOLD TEXT.**

Green Infrastructure

This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area.

The National Planning Policy Framework states that local planning authorities should 'take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; '. The Planning Practice Guidance on Green Infrastructure provides more detail on this.

Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities.

There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through:

- green roof systems and roof gardens;
- green walls to provide insulation or shading and cooling;
- new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity).

You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.

Further information on GI is include within The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "Good Practice Guidance for Green Infrastructure and Biodiversity".

Biodiversity enhancement

This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.

Landscape enhancement

The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and

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4177.P3		16/09/2019	<input type="checkbox"/>	E	C	W	M		Summary: Consideration of Green Infrastructure, Biodiversity Enhancement, Landscape Enhancement, other Design Considerations (e.g. Lighting) and SEA/HRA

associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might makes a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.

For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.

Other design considerations

The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 180).

Strategic Environmental Assessment/Habitats Regulations Assessment

A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.

Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.

Council Response: Thank you for submitting comments on the Draft Residential Design SPG. We note the issues of green infrastructure, biodiversity enhancement, landscape enhancement and other design principles (eg lighting). The Local Development Plan and its Guidance has to be drawn up under the national planning framework which is different to that in England. For example we have Planning Policy Wales (PPW) supported by Technical Advice Notes rather than the NPPF. We expect to see a national development plan for Wales (the National Development Framework) by September 2020. Obviously a lot of the strategic issues, particularly in looking after the natural environment, are common to both planning systems.

In respect of the subject areas you specifically mention, the Powys LDP has separate SPG for both Biodiversity and Landscape. We are also producing an Open Space SPG and a Land Drainage SPG. The Authority does not yet have a strategic Green Infrastructure Assessment (or a bespoke LDP policy on it). However we are strongly encouraging developers to address green infrastructure issues (see para 15.82) especially as they are recognised in PPWs National Sustainable Placemaking Outcomes. There is mention of green infrastructure in several places in the Draft Residential Design Guide (eg see 7.3.3.4 and 15.52, 15.81) and the topic is also included in the Biodiversity and Geodiversity SPG.

The Council agrees that this SPG could make reference to biodiversity enhancement alongside encouraging biodiversity resilience. The Council will look to revise para 7.3.3.2 accordingly. The Council are unlikely to set prescriptive measures (such as a ratio of one nest/roost box per residential unit) but each case will be decided on it merits and the advice of various stakeholders taken into account (eg the feedback from our ecologist at the site specific level). It is also of note that the Draft NDF currently under consultation includes a strategic policy for biodiversity enhancement and ecosystem resilience.

In terms of landscape enhancement, the Council has produced a Landscape SPG to support Objective 13 and Policy DM4 of the LDP and uses LANDMAP as it's strategic evidence base.

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5880 Severn Trent Water and Hafren Dyfrdwy

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5880.P1		19/09/2019	<input type="checkbox"/>	E	C	W	M		Summary: Encourage the use of SuDS and Surface Water Separation, Encourage Water Efficient Fittings to reduce Water Consumption

Document:Residential Design SPG

Question Representation Texts

Question: Details

Representation Text: . In relation to - 13. IT DEMONSTRATES A SUSTAINABLE AND EFFICIENT USE OF RESOURCES BY INCLUDING MEASURES TO ACHIEVE...

We encourage the use of SuDS in new developments to manage surface water as well as surface water separation from the combined sewerage system wherever possible on brownfield developments.

With regards to water consumption - We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of a property rather than focus on the overall consumption. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations. We recommend that in all cases you consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.
- Hand wash basin taps with low flow rates of 4 litres or less.
- Water butts for external use in properties with gardens.

To further encourage developers to act sustainably Hafren Dyfrdwy currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less.

We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.

Council Response: Thank you for your comments on the Draft Residential Design Guide.

The document did not include very much on water efficiency so your feedback is helpful. The Council is proposing to add text to follow 15.126 to cover the points you have raised.

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6348 Dwr Cymru Welsh Water

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
6348.P1		04/09/2019	<input type="checkbox"/>	E	S	W	M		Summary: Support for use of Policy DM1 (Planning Obligations) in Certain Circumstances

Document:Residential Design SPG

Question Representation Texts

Question: Details

Representation Text: . DM13 (12.)

5.110 We support the SPG stating that the Council may use policy DM1 (Planning Obligations) to secure essential infrastructure to serve proposed sites in certain circumstances.

It is unlikely that all of the required infrastructure improvements identified by Welsh Water during the LDP preparation will receive funding through the AMP process. Where shortfalls in our AMP funding occurs and there is no capacity in the Wastewater Treatment Works to accommodate new growth, developers can fund improvements themselves, secured via Section 106 of the Town and Country Planning Act 1990.

Council Response: Thank you for your comments in respect of DM13 (12) in the Residential Design Guide and for the clarification that developers can fund improvements themselves if there is shortfall in AMP funding for required infrastructure works to accommodate new growth.

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7093 Natural Resources Wales

Rep'n/Para/Policy	AccessnNo	DateLodgd	Late?	Source	Type	Mode	Status	Status Modified	Summary
7093.P1		18/09/2019	<input type="checkbox"/>	E	C	W	M		Summary: Support for some sections plus comments

Document:Residential Design SPG

Question Representation Texts

Question: Details

Representation Text: . We have the following comments on the document:

7.3.3.2 We support the need to design for biodiversity resilience. In addition, reference to enhancement could also be included.

7.3.3.4/5 We welcome the reference to Green Infrastructure in these sections. We recommend the production of a Green Infrastructure Supplementary Planning Guidance (SPG). Within this the strategic network should be considered, as well as individual site proposals and guidance on what should be included with planning applications and in Green Infrastructure Plans.

A good example is the Monmouthshire Green Infrastructure SPG. This includes work on ecological connectivity, catchment management, recreational corridors and routes, greenspaces and open access areas. The approach should ensure that Green Infrastructure and place making is included in a strategic way rather than in individual ad-hoc proposals

We support the recognition of the importance of early consideration on relevant issues to “ensure that the resultant scheme is able to address opportunities and constraints in the most practical, timely, appropriate and cost-effective manner.” Preapplication advice from the Authority and other statutory bodies such as ourselves, should reduce requirements to incorporate design changes later in the application process.

Table 3: Typical Supporting Information for a Planning Application

We consider this useful to inform developers of the range of supporting information that could be required. Preliminary Risk Assessments (with regard contaminated land) could also be included as this issue does not feature elsewhere.

15.111 We support the references made to non-mains foul drainage and to the advice in Circular 008/2018 that discussions should take place with the Council (planning authority), Natural Resources Wales and the sewerage undertaker. We always recommend twin tracking of permit applications with planning applications to avoid delays.

Council Response: Thank you for submitting comments on the Draft Residential Design SPG.

Please note that the Powys LDP has separate SPG for both Biodiversity and Landscape. We are also producing an Open Space SPG and a Land Drainage SPG which are likely to be of interest to you.

The Council agrees that this SPG could make reference to biodiversity enhancement alongside encouraging biodiversity resilience. The Council will look to revise para 7.3.3.2 accordingly.

The Authority does not yet have a strategic Green Infrastructure Assessment (or a bespoke LDP policy on it). Because there is no LDP Green Infrastructure Policy it would not be appropriate to produce SPG on the topic. However we are strongly encouraging developers to address green infrastructure issues (see para 15.82) especially as they are recognised in PPWs National Sustainable Placemaking Outcomes. There is mention of green infrastructure in several places in the Draft Residential Design Guide (eg see 7.3.3.4 and 15.52, 15.81) and the topic is also included in the Biodiversity and Geodiversity SPG. The Council is also aware that the Draft national development plan (NDF) currently under consultation includes a strategic policy for biodiversity enhancement and ecosystem resilience which has a focus on green infrastructure and ecological networks. The Council is likely to move forward with a strategic Green Infrastructure Assessment when the LDP reaches its review stage. Thank you for the suggestion that we research the Green Infrastructure SPG produced by Monmouthshire, this is useful.

Thank you for the support to the wording in 7.3.4.3.

Representations & Council Responses juxtaposed - consultation on Resid

Powys County Council Local Development Plan

by: Representation No

Filtered to show: (all of) Stage=P; Status=M; Document=Residential Design SPG

<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
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7093.P1		18/09/2019	<input type="checkbox"/>	E	C	W	M		Summary: Support for some sections plus comments
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The Council agrees that Table 3 could include reference to Preliminary Risk Assessments (with regard to contaminated land) and agrees to add this to the list of typical supporting information.

Thank you for your support to paras 15.111 to 15.113.

Representations & Council Responses juxtaposed - consultation on Resid

by: Representation No

Filtered to show: (all of) Stage=P; Status=M; Document=Residential Design SPG

7095 Canal & River Trust

<i>Rep'n/Para/Policy</i>	<i>AccessnNo</i>	<i>DateLodgd</i>	<i>Late?</i>	<i>Source</i>	<i>Type</i>	<i>Mode</i>	<i>Status</i>	<i>Status Modified</i>	<i>Summary</i>
7095.P12		20/09/2019	<input type="checkbox"/>	E	C	W	M		Summary: No Comment

Document:Residential Design SPG

Question *Representation Texts*

Question: **Details**

Representation Text: . Thank you for consulting the Canal & River Trust on the Residential Design Guide SPG. The trust have no comments to make at this time.

Council Response: Thank you to the Canal and River Trust for confirming that you have no comments to make on the Draft Residential Design SPG.
