

Swindon Residential Design Guide Draft SPD  
 Consultation Response Table.  
 14 June 2016

Consultee	no	Point	SBC Response	Changes Proposed
<b>1. English Heritage</b>	1	Congratulations on producing this. From my perspective there is little to add (a complement) although Building in Context <a href="http://www.building-in-context.org">www.building-in-context.org</a> might be a useful point of reference to perhaps encourage retaining what there is, as a starter.	Noted with thanks. Reference link included in Context & Character section.	No change.
<b>2. Civic Voice – Mr Donald Brunswick</b>	2a	This document is a sound response to the current housing requirements.	Noted with thanks.	No change.
	2b	Additional guidance would be useful for flat development over 3 stories, double-loaded corridors vs outlook and dense town centre sites	Agreed. There is arguably too much emphasis in Draft 1 on major greenfield residential sites with limited discussion on mixed use, higher density layouts and town centre residential typologies and forms. The revised document includes more illustrations of higher-density development and text amendments within the amenity chapter to assess amenity impact within higher density development such as within the town centre against BRE 209, "Site Layout Planning for Sunlight and Daylight."	Images revised throughout document and amenity standards (separation distances revised within the town centre).

	2c	Car parking requirements must be realistic as many households have 2 cars and many have vans.	Agreed. There is a potential conflict between ensuring there is sufficient car parking provided and ensuring the street scene /public realm is not dominated by parked vehicles. The guide expects the Council's car parking standards to be upheld but also allows for flexibility in this regard should adequate mitigation measures be agreed to reduce parking in the right location.	No change.
	2d	More adequate provision for bicycle parking should be made particularly in small units.	Noted. The standards for bicycle parking are maintained by the Transport Requirements for Development. This guide encourages better bicycle, refuse and recycling storage facilities in new developments in the Function chapter.	Illustration added-with accompanying text under utilities (page 54). Text added: "even for smaller units"
	2e	Integrated Children's Play examples should be shown.	Noted. This is a supplementary issue worthy of mention but this Guide does not seek to cover aspects of Green Infrastructure in great detail as that stems from separate policies and is to be covered in future guidance in due course.	A good quality play area has been included in the Quality of the Public Realm chapter under 'Public realm value'.
	2f	The use of illustrations need to be clearly understood - what are good examples and what are bad.	Agreed.	Changes throughout document have been made to ensure clarity of intended use of illustrations.
<b>3. Natural England</b>	3a	Urban Green spaces enable the movement of species and this connectivity is important for resilient ecosystems even at the smallest of scales. Green spaces and trees can also benefit the wider environment and population by providing defence against environmental risks such as heat extremes and flooding.	Noted.	Check text add to it including NPPF ref para 99 added. Sentence added: 2.7: <u>"Where features of natural and historic significance exist, they should be fully considered and opportunities realised to</u>

				<p><u>achieve net biodiversity gains.</u>”</p> <p>Addition of the word: ecosystems: “...secure opportunities for community integration, mitigation and proper resilience for historic assets and <u>ecosystems.</u>”</p> <p>Addition of the word ‘green’: 7.4 “<i>Multifunctional use of public realm can provide great benefits ...spaces and <u>green</u> corridors can provide.</i>”</p> <p>Addition of the word: ‘continuity’ to Para 7.5: “...<i>contribute to public space, habitat <u>continuity</u>, identity and amenity.</i>”</p>
	3b	GI and access to it should be incorporated into new development to improve public health and quality of life and reduce environmental inequalities. UGS provide varied ecosystems and contribute to coherent and resilient ecological networks	Agreed. References to the multifunctional benefits of GI have been strengthened in the text as necessary and mention of ecological benefits amplified.	See response to 3a above.
	3c	Opportunities to retrofit GI in urban areas through green roofs, roof gardens, green walls and new tree planting as well as verges along transport corridors.	Agreed. Such interventions are already encouraged through GI policies in the Local Plane.	No change.
	3d	Ground and surface water, soils and other natural resources should be protected.	This is largely covered at a high level within the Context & Character section as part of site analysis / constraints gathering required on all sites. It would be too difficult to be further detailed or more specific about in this guidance.	No change.

	3e	Biodiversity enhancements including bat and bird boxes.	This type of requirement would be more suited within a specific Green Infrastructure SPD.	No change.
	3f	Where viable trees should be of a species capable of growth to exceed building height to address landscape impact. Succession planting should also be considered.	Agreed. Text revised to address visual impact and tree planting for the longer term and improve landscape impact.	Text added: Para 2.12: <i>“In new development areas trees should be of a species capable of growth to exceed building height to address landscape impact and succession planting should be considered.”</i>
	3g	Impact of lighting on landscape and biodiversity.	Agreed. Paragraph NPPF 125 had been added to the document and sections updated on Safety and Security as well as within the Function Chapter. A balance on this issue (in some scenarios) has to be struck between the principles of safety, security and biodiversity	Text added: Para 2.11: <i>“New developments in rural areas may also be required to consider specific issues such as advanced native tree planting to address existing landscape character and the impact of lighting on dark skies.”</i>
<b>4. Landscape - Andrew Norris</b>	3h	The requirements for an SEA and HRA is outlined.	The requirements for an SEA (Strategic Environmental Assessment) and an HRA (Habitat Regulations Assessment) were undertaken for the Local Plan examination and are therefore not required for this document as it falls under the policies of the Local Plan.	No change.
	4a	Supports document. Well-reasoned, balanced, accessible and eminently achievable, well presented piece of work that SBC should be proud of.	Noted.	No change
<b>5. Waitrose - Michael Gray</b>	5a	Welcomes SPD and hopes it raises standard of housing design in Swindon.	Noted.	No change

	5b	Reference numbers should be added to text	Noted. All text is numbered in the final version.	General formatting throughout.
	5c	Pictures must be high resolution and text fonts consistent. Blue tick boxes confused.	Noted. Document layout has been rationalised and simplified where necessary to provide more clarity in final version. Blue boxes indicate key requirements to aid referencing as set out in the format section in the introduction.	General formatting throughout.
	5d	<b>Design Process</b> - the Council could express a preference for the same qualified professionals who design the scheme at planning to be involved in the technical design and construction stages.	Noted.	Text added to Paragraph 1.14: <i>“Good designers are custodians of their schemes and are used to leading projects in a collaborative and integrated way. <u>Retention of such professionals through the technical and construction stages is highly preferable to realise the vision in full.</u>”</i>
	5e	The SPD could perhaps include some idealised aspirations - Swindon’s ongoing problem is that development is focused upon transport infrastructure over humanist and cultural considerations.	Agreed.	Alternative aspirational images of high quality developments have been incorporated throughout the document.
	5f	The matrix should show the units of measure used for density of each category.	Agreed.	“du/ha” (dwelling units / hectare added to matrix.
	5g	The boulevard and mews typologies are rare in Swindon and perhaps should be excluded or re-defined.	Agreed.	‘Mews’ removed from ‘sub-urban’ category.
	5h	Figure 15 is a very bad example of an infill development, the use of horizontal elements between buildings with a vertical emphasis is contrary to the	Agreed.	Figure 15 replaced with new image.

		text.		
	5i	The Council could express a preference for high quality materials here, perhaps add something about local distinctiveness, character etc.	Agreed. The text already mentions good quality and local distinctiveness on p14: <i>"...use good quality, durable and complementary materials whose colours and textures match those prevalent in the immediate area."</i>	No change
	5j	There is reference to nine principles of design in a previous chapter but these are not apparent. Some commentary should be made on the need to synthesise all elements into a consistent, integrated approach.	Agreed. Greater emphasis on each Principle at the start of each section is included. The Principles are not mutually exclusive and this point is made already.	No change
	5k	Figures 29, 30 & 31 are very poor quality designs and should not be included.	Some images used are not of a very high quality and these images have been replaced barring figure 30 which is part of an award-winning development in Newhall, Harlow. Examples from Swindon are also used as much as possible.	Figures 29 & 31 have been replaced.
	5L	The Council could describe a preference for compliance with a minimum Secure by Design standard here.	There is no obligation through planning legislation to meet this standard but the SPD still encourages the consideration of the principles of secure by design and a link has been included to the secure by design documentation.	Link included, as per response to consultee 6.
	5m	Ginnels are best avoided because they create legal complexity.	Ginnels have proved to be a successful solution to ensure land efficiency and accessibility for terraced properties. The flying freehold is common in modern developments particularly in apartments and flats over garages. In	No change

	5n	The design of Poundbury 2 is based on rear courtyard car parking but includes dwellings within the space to provide security/surveillance. This is a legitimate and proven design option, rather than excluding such an approach, perhaps include images of successful courtyard parking.	<p>the case of ginnels, in most cases this is only a legal agreement between two properties and not multiple parties as with apartments.</p> <p>There are countless examples of poor quality rear courtyards in modern developments. The LPA recognises that complete exclusion of these is too rigid an approach and the wording in the SPD does not exclude rear courtyards. The illustrations provided clearly depict the negatives of rear courtyard parking and developers are discouraged to over-provide car parking through rear courtyard arrangements. The revised document includes a better example.</p>	A good example of a rear courtyard has been included under Mews building typologies at the end of the document.
	5o	The guidance should avoid emotive comments around viability and design, phrases about likely premiums from frontage views have no place in a design guide.	Viability is a legitimate consideration in planning (NPPF). In addition the NPPF considers sustainable development requires economic, social and environmental gains to be sought jointly. This is precisely the point being made here - investment in both built form and public realm results in better place making that has a positive social, environmental and economic gain.	No change
	5p	Pages 29 & 30 Whereas I am un-comfortable with any examples relating to cost vs design comparisons the illustrations should at least be graphically similar. The over-emphasis on regularity and gridiron planning should not preclude other types of development, which have their own advantages if well designed. The rating numbers should be of a comparable scale.	Noted. The emphasis on gridiron planning in this document does not preclude other layouts to be developed – especially in more rural areas where a different more organic layout approach would be more appropriate.	Illustration 2 on page 30 removed and illustration on page 29 moved to the new case study section at end of document.

	5q	Adaptability - Page 33 some references to Life Time Homes, Housing Quality Indicators, Eco Homes etc. would be helpful.	Such requirements must stem from the Local Plan and policies within it. Any detail on Life Time Home requirements and Eco Homes may be covered in future separate SPDs on such specialist subjects and delivered through Building Control.	No change
	5r	An extra 1 metre on the ground floor will not promote future use changes, the footprint, clear spans are more critical.	Agreed.	Reference to extra 1m height removed from document.
	5s	Page 34 Reference to the cliché phrase 'Kit of Parts' reduces design to a cut and paste exercise and to fundamentally miss-understand how good architecture is achieved.	Noted. The kit of parts in this document relates to the range of elements that make up the physical layout of a development. It should not as pointed out in this comment be considered a 'cut-and-paste' exercise. Instead by separating out some of these elements and assessing them on a development one can objectively see the issues with a development in how these parts relate (or don't relate) to each other to create a place. We don't focus on the creation of individual architecture with the kit of parts as they are used to assess how a layout is assembled primarily in the spaces between buildings and the spatial relationships concerned with urban design more generally.	No change.
	5t	<b>Orientation</b> - Page 37, Figure 60 is a not a good example, and does not illustrate the vista termination principle.	This illustration does not illustrate a vista termination, but rather an example of a building addressing a corner through its orientation.	No change
	5u	<b>Massing</b> - Page 39 Figure references are incorrect	Noted.	References amended.

	5v	<b>Page 40</b> - There is no reference to classical canons of proportion here. Figure 65 is a bland and poor building, but perhaps the guidance should primarily focus on successful designs.	Agreed. More positive images should be used throughout document. Classical canons of proportion can be interpreted as too theoretical, however they are a very good reference guide for use in responding to existing buildings and to the creation of new architecture especially in existing contexts.	Text revised in Para 4.29: (p44):to include the words: " <i>classical proportions.</i> "
	5w	<b>Detailing</b> - Page 43 Outer skin may be miss- construed as the outer wall of the cavity which would achieve the opposite effect, suggest that you change the description to read 'outer wall', you could also prescribe a minimum 100mm.	Agreed.	Paragraph 4.48. Word 'skin' replaced with 'wall'.
	5x	<b>Page 45</b> - Descriptions should mention a requirement for the appearance of self-supporting, The Council should give guidance on relative balcony sizes (amenity to flat size) (see Wandsworth Borough Council 10sqm minimum for a 2 bedroom flat).	Noted. The LPA cannot insist on enforcing the government's space standards without taking them through the Local Plan Process and assessing them through a viability appraisal in line with CIL charging.	No change.
	5y	Page 46 Poor detailing generally results from off-the-peg solutions usually in uPVC, the Council could express a preference for sustainable natural materials.	Noted. Text amended to include natural and local materials in securing local distinctiveness.	New wording added: Para 4.42: "... <i>characters prevail and schemes should reflect the naturally occurring materials and the general colour palette...</i> "
	5z	<b>Car Parking</b> - Page 51 The Council should define Heavy Standard Tree size, and an emphasis on indigenous species.	The size of trees to be planted is a matter for the detailed landscape design and is determined through discussion with the Council's Landscape Architecture Department. It is felt that specifying to that level of detail is too specific in this guide and potentially more suitable for future Green Infrastructure guidance.	No change.

	5aa	<b>Refuse</b> - LPA should stipulate requirement for covered refuse storage for larger residential developments and holding areas which are not part of the street. (See Westminster City guide)	Noted and agreed.	Text added to Refuse & Recycling Checklist: <i>“Communal storage should be housed in well-designed enclosures that complement the scheme.”</i>
	5bb	<b>Amenity</b> -Page 55 I believe the separation distances between the backs of houses described are excessive. These should be predicated upon the location (urban, sub-urban, rural etc.) For sub urban these should be 15 & 18m back to back, and rear to side: 8m. The problem with many of Swindon’s housing estates is that they lack density and therefore definition. Frontage to frontage relationships should also be defined.	The prescribed rear to rear separation distances need to allow more flexibility within more sustainably-located higher-density locations such as within the Compact Mixed-Use Core, where higher density arrangements are acceptable. Within the town centre area there is flexibility to reduce this distance as long as the other aspects of amenity are maintained as in set out in Chapter 6.	Text amended to read: <i>“Separation distances should be adhered to (in addition to the 45° rule), <u>for non-mixed-use developments outside the Urban Core</u>”.</i>
	5cc	<b>Space</b> -Whereas minimum standards for dwelling sizes are welcomed these remain small and would not comply with Housing Corporation requirements. The Council could express a preference for higher standards.	These are the Nationally Described Space Standards and are provided for reference. The LPA cannot adopt these or even higher standards without taking these through a local plan process.	No change
	5dd	<b>Public Realm</b> - Page 59 Figure 92 poor quality scheme example. Figure 96 single tree image does not demonstrate any special or public realm advantage.	The examples on this page illustrate good landscaped areas surrounded by good quality housing development. The single tree illustrates a heavy standard tree in a new development signifying an investment in the public realm. The revised document includes a few revised images including a play area as part of the public realm.	Illustrations revised on this page (p61) and through this section to strengthen the visual representation of good quality precedent.
	5ee	<b>Layout</b> - Page 62 smaller images are difficult to understand.	Noted. This section has been revised to provide better clarity throughout.	Images removed.

	5ff	<b>Mews</b> - Page 66 this is not a good example, where car parking becomes the centre-piece of the scheme, and road surface area is double backed to no advantage.	Noted.	The image has been removed.
	5gg	<b>General</b> - The statement gives no guidance, suggestions on signage, street fittings and fixtures which form an important part of any design.	Street signage is not controlled by the LPA. Street furniture is mentioned under public realm.	Text added: 7.2 <i>“The use of quality street furniture, materials and public art installations all contribute to the value of a place and help secure local identity. When these come together at places of community interaction such as retail hubs, schools and play spaces they can combine to great effect.”</i>
	5hh	There is no guidance regarding satellite dishes the Council could express a preference for communal aerial systems.	Satellite dishes are discussed in the detailing section where a preference for them not being visible from the public realm is expressed. The preference for cable and / or shared satellite received stations for communal schemes is also mentioned.	Text added to Servicing checklist: <i>“Satellite receiver stations should be considered on large schemes to avoid dishes on facades. (p49)</i>
	5ii	Although these notes are critical they pick-up on generally small points in a good document which is much welcomed.	Noted with thanks.	

6. <b>Bob Walton</b> <b>Police Architectural Liaison Officer</b>	6a	<b>Page 26 - Safety and Security.</b> The first paragraph makes reference to the principles of 'Secured by Design.' May I suggest that the following link to the 'Secured by Design' guide – <a href="http://www.securedbydesign.com/industry-advice-and-guides/">http://www.securedbydesign.com/industry-advice-and-guides/</a> is included under References on page 75.	Agreed.	Link added within main body of document in the Safety & Security section (page 22).
7. <b>Ed Tucker</b> <b>Architect</b>	7a	Well written and comprehensive.	Noted with thanks.	
	7b	Request that all major development proposals are encouraged to include 3D design information so they can be readily understood by planners and lay-people alike. This will enable the pre-app process to be more efficient. 3D software is readily available now and all respectable designers should be using it.	Agreed this should be encouraged within the text.	Text added to introduction: <i>“The quality of submissions is also a key factor in ensuring a scheme is fully understood. The use of tools such as 3D software and the inclusion of quality elevations, street scenes and 3D massing can assist in interpretation and in understanding the likely impact of a development.”</i>
	7c	I would also like to see more control exerted by the Council over detailing, as all too often this is left to builders and you end up with poorly proportioned windows, poor eaves detailing etc which then lets down an otherwise good concept design.	Agreed. The section on Detailing (Under Form) was specifically included for this reason.	Checklists for the various aspects of detailing have been included in this section to aid clarity.
	7d	Will there be a new SPD on Residential extensions too? I'd like to see an insistence on higher quality application drawings here too. Too many people think a plan drawn with a blunt pencil by an un-qualified “designer” will do!	There will be a revision of the existing Residential Extensions SPD to accord with Policy DE1. This will also go through the statutory consultation process.	No change

<b>8. Cllr Andrew Forman Inglesham Parish Council</b>	8a	Could you please confirm that the Document is based on the NPPF issued in March 2012, as indicated on page 1, as there is difficulty matching the cross references given. For example, NPPF para. 59 deals with design codes and not car parking as suggested on page 27. There appear to be a number of other inconsistencies of this nature.	Noted. The references within the document are based on the NPPF issued in 2012. There were a few inconsistencies with some of the NPPF references as identified within this comment and these have been corrected.	Discrepancies corrected.
<b>9. Planning Committee (11.8.2015)</b>	9a	Town Centre needs more emphasis, encouraging mixed use and improving night time economy.	Agreed. There is arguably too much emphasis in Draft 1 on major residential sites with limited discussion on mixed use, higher density layouts, and town centre residential typologies and forms. Although the emphasis of the document remains for development on greenfield land, the final version provides more imagery on higher-density development more appropriate to town centre context.	Different typologies more akin to higher density developments have been included to balance out the range of development examples.
	9b	Appreciated use of Swindon images such as the Railway Village.	Noted. Such images to remain and non-Swindon images to be replaced where possible. Some examples from elsewhere may also help particularly when illustrating innovative design solutions.	Use Swindon images that promote its heritage.
	9c	Figure 18 - HAB triangle development, was not popular among Members.	Noted.	The image has been removed and rather included within the backland section, and the scheme itself further discussed in the final chapter.
	9d	Queried Design Review Panel. Such matters must be clearer within the document.	Agreed.	The document has been updated accordingly with clearer explanation of design review.
	9e	Affordable Housing policy and other policies must be cross-referenced	Agreed.	Where necessary, the document refers to other

				relevant Local Plan Policies.
	9f	Make sure terms like Ginnel are in the Glossary	Noted.	Glossary updated.
	9g	Emphasis on green amenity space for residents is supported and should be further strengthened.	Noted. Support for the provision, accessibility and quality to green space provision is encouraged on new developments through this guide. The standards in terms of provision cannot be changed here as this is based on Open Space standards as set out in the Local Plan.	No change.
	9h	Ensure Backland section includes consideration of the rear of properties and the impact of public realm within what was a private space.	Agreed. The section on Backland development under Context and Character and the Amenity section specifically focus on the impact that new development has on existing and future amenity provision in respect of: overshadowing and privacy.	No change
	9i	Ensure that all the principles / requirements of the previous Backland and Infill SPD (under the 2011 Local Plan) are carried through into this document.	Noted. The requirements of the Backland and Infill SPD have been incorporated into the guidance, mostly within the Context & Character section.	
	9j	Need to make more of Public Art and encourage it.	Agreed. There is currently no detailed policy on this matter so it has to be achieved through encouragement.	Words “public art” added to 7.3
	9k	Questioned Lifetime Homes and Building for Life standards. Space standards also supported.	Lifetime Homes has been incorporated into the Housing Standards Review and in order to adopt the government’s Space Standards the LPA would need to do this through a local plan examination.	No change.

<b>10. Savills - on behalf of Thames Water</b>	9L	Text size in document was queried.	This was due to the reproduction in the Committee Report and not representative of the actual Draft 1 which is set at font size 12.	No change.
	10a	A key sustainability objective for the preparation of the Local Plan and supporting documents should be for new development to be coordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure - Paragraph 156 of the NPPF). Paragraph 162 of the NPPF relates to infrastructure.	The requirements for infrastructure delivery to enable residential development are not covered by Local Plan Policy DE1 and are outside of the scope of this guidance. See Local Plan Policy IN2.	No change.
	10b	Thames Water supports water conservation and the efficient use of water. Thames Water have a water efficiency website: <a href="http://www.thameswater.co.uk/waterwisely">www.thameswater.co.uk/waterwisely</a> The Policy / supporting text could make reference to this guidance. However, managing demand alone will not be sufficient meet increasing demand and Thames Water adopt the Government's twin-track approach of managing demand for water and, where necessary, developing new sources, as reflected in the latest Thames Water Water Resource Management Plan.	The Design Guide requires a collaborative approach to be taken on integrating site constraints with development aspirations at an early stage of the design process. Householder use of water is likely best controlled under Building Regulations. No change.	
	10c	Thames Water recognises the environmental and economic benefits of surface water source control, and encourages its appropriate application, where it is to the overall benefit of their customers. However, it should also be recognised that SuDS are not appropriate for use in all areas, for example areas with high ground water levels or clay soils which do not allow free drainage. SuDS also require regular maintenance to ensure their effectiveness. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at	Noted. The document under the SUDs section under Function does refer to all these potential positive aspects of SUDs.	No change.

	10d	<p>which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.</p> <p>SuDS not only help to mitigate flooding, they can also help to:</p> <ul style="list-style-type: none"> <li>• improve water quality</li> <li>• provide opportunities for water efficiency</li> <li>• provide enhanced landscape and visual features</li> <li>• support wildlife</li> <li>• and provide amenity and recreational benefits</li> </ul> <p>With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Design SPD: <i>“It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”</i></p>	<p>The section on SUDs is at a higher level and a more comprehensive document is to be produced on more detailed GI matters where this would be more appropriate.</p>	No change.
11. Housing Officer SBC	10e	<p>Thames Water recognises the environmental benefits of trees and encourages the planting of them. However, the indiscriminate planting of trees and shrubs can cause serious damage to underground infrastructure and consideration should be given to this in the selection of species and location of planting.</p>	Noted.	Paragraph 4.53 refers
	11a	<p>May I firstly say well done, it's a great document. It covers all the things I would like covered with regard to AH on developments i.e. rear access, parking, wheelie bin blight, meter boxes, etc. It clearly demonstrates that SBC are interested in creating good quality new spaces and that developments can't be governed purely by floor space – we have established clear rules and want good design.</p>	Noted with thanks.	Support

	11b	I only have the following few minor points:  On Page 50 - reference to 'large parking courts' – do you need to define what is considered to be large, to avoid argument?	Noted.	The current wording refers to the <u>overuse</u> of parking arrangements that dominate the environment. The word 'large' has been removed as it applies to all types of parking arrangements.
	11c	Page 51 - reference 'to most housing typologies' – I'm a bit concerned that this may be interpreted to mean excluding AH.	Agreed.	The text has been amended to make this clearer - it excludes apartments and terraces not AH.
	11d	Page 51 - reference to 'all detached and semi-detached houses must have on-plot parking' and 'parallel on-street parking is reserved for ...apartments and terraced properties'. Happy with the detached and semi bit but am concerned that AH will continue to be accommodated into apartments and terraces. Also does the parking advice conflict with the advice on p.67? I like the Fig 109 solution and shows that on-plot parking can be accommodated.	Text will added to encourage on plot parking for terraces.	
<b>12. Blunsdon Parish Council</b>	11e	P.52 - do you need to add advice about refuse, recycling etc. for terraced properties? It needs to be considered early on in the design and not an afterthought.	Agreed.	Text added to Refuse Recycling and Cycle Provision.
	12a	Blunsdon St Andrew Parish Council supports the proposals and suggestions within the draft Design Guide and would like to think that these would be enforced whenever applicable.	Noted with thanks.	
	13a	HE welcomes and supports the objectives of the SPD. They consider it will not detrimentally impact on the SRN. They like the external review process because it supports sustainable travel modes.	Noted with thanks.	
<b>13. Highways England</b>				Support

	13b	HE are committed to early engagement with any development with SBC also and look forward to it.	Noted with thanks.	Support
14. Wichelstowe Project Team	14a	Well done progressing document to this stage. It looks good and flows.	Noted with thanks.	Support
	14b	Page 2 para 3 - Not sure what the message is here. Surely the 'expectation' of quality doesn't cost anything so how is it a small price to pay. Should this instead be 'investing in quality is a small price to pay'?	Agreed.	The word " <i>expecting</i> " has been replaced by " <i>investing</i> ".
	14c	Page 5 - Not sure what the diagram is illustrating. It misses out the relationship between the Client and the design team and between the planning authority and stakeholders/public which are key elements described in the text.	Agreed.	Diagram amended to include wider relationships between LPA and Client and Design teams and also the Public through effective public consultation.
	14d	Page 6 - This is the first reference to a panel. For clarity suggest this is explained further or changed to 'The Design Review Panel'	Agreed.	Minor text modification made to read as: The Design Review Panel.
	14e	Page 10 Whilst all efforts should be made to incorporate existing elements it is not always possible or desirable. Suggest a caveat such as 'as far as possible' is added.	Agreed.	Minor text modification to include the words: ' <i>as far as possible</i> '.
	14f	Page 10 Point two in the tick box hasn't been addressed in the text.	Noted.	This point has been moved a couple pages forward in the Responding to Existing Character section to accompany relevant text.
	14g	Page 11 Under the building line category a number of boxes have 'none' as the response. Is this referring to there being no setback rather than there being no building line. This wasn't clear.	Noted.	The term " <i>frontage</i> " has been substituted in place of " <i>building line</i> " to be clear.

	14h	Page 11 - The continuity of form box is blank for Village / Small town core.	Noted.	Editing error has been amended.
	14i	Page 13 Some of the figures don't have accompanying narratives explaining what they show. In this case, is figure 15 being shown as a good or bad example of infill development?	Noted.	Narratives for each image have been added throughout document and fig15 has subsequently been replaced.
	14j	Is the LPA Design Review Panel the same as the Panel referred to on page 6. If so suggest the references are kept consistent.	Yes in a sense these are the same however the reference to 'Panel' in this instance refers to the subject of Design Review more generally.	No change.
	14k	Page 14 This reads quite negatively in terms of innovation. Can it be re-worded more positively as surely there are many occasions where challenging the established character would be encouraged. Rather than saying it will be scrutinised could developers be encouraged to undertake early consultation or something similar.	Noted.	The words "scrutinised" has been replaced by "referred"
	14L	Page 20 Makes reference to LLAPs. When we recently suggested including them at Wichelstowe I recall we were told that the Council does not deliver LLAPs.	In this instance the guide is referring to the distance from different types of play areas / facilities, not to who is delivering them.	No change.
	14m	Page 23 A comment such as the LPA will resist such proposals could be included here to strengthen the point.	Agreed.	Text added to end of this sentence to read: "...are generally hotspots for crime and will be resisted".
	14n	Page 24 Figure 32 remove.	Agreed.	Figure 32 removed as it was too small to illustrate the point already illustrated with the larger image.
	14o	Page 29 Queries the use of charts and scales.	Noted.	Charts and layout section moved to the last chapter on case studies.

	14p	Page 38 What is meant by 'host dwelling' in this context.	Noted. Host dwelling is a recognised planning term relating to the 'main' or 'principle' dwelling, however this primarily refers to development proposals such as extensions which are covered in other guidance.	The word 'host' has been removed from the sentence.
	14q	Page 48 Sustainable drainage used in heading with SUDs in brackets where as it is sustainable <u>urban</u> drainage (SUDs) in the first paragraph.	Noted.	Text amended to ensure consistency of the use of this acronym.
	14r	Page 50 What is meant by failing? Does that mean it is not acceptable to the planning authority?	Noted.	Para 5.16: "... <u>fails in function terms and is therefore poor design. Car parking that dominates the frontage or street and results in no other private, defensible space or public realm, also fails.</u> "
	14s	Page 51 The text focusses on ensuring that careful thought is given to the parking solution making use of a range of on-plot and on-street solutions. This is in contrast to the tick box which includes mandatory requirements for detached and semi-detached properties (on-plot) and restrictions on when parallel parking can be used. Suggest that the tick boxes are softened to say that generally detached and semi-detached should have on-plot parking etc.	Noted. The term 'must' substituted by: 'should'.	Wording changed to: "All detached and semi-detached houses <u>should</u> have on-plot parking. Text about parallel on-street parking checklist point has been removed.
	14t	Page 51 Not clear on requirement here. Does this relate to every 10 on street parking spaces or every 10 in total? Are the trees to be included in the public realm or within gardens?	Noted.	This requirement has been removed from checklist text.
	14u	Page 52 Can a photo be added? Carry distances are referred to but not detailed whereas the requirements are included in later sections. Suggest they are added here for completeness.	Agreed.	Carry distance of 10m has been removed from the apartment section as the highway authority standards may change in future.

	14v	Page 60 Whilst we agree that developers should be required to demonstrate how land that is not put forward for adoption is managed we do not consider it appropriate to state that it is compulsory for all purchasers to be members. Whilst this is a likely solution there are other options.	Agreed.	Text amended to reflect this comment in the quality of public realm section.
	14w	Page 62 Plot is used both in the heading and in the kits of parts. Perhaps the heading should be house typology.	Agreed.	This section has been amended.
<b>15. Public Health SBC</b>	15a	The use of illustrations of good and bad practice is very useful. Nice to use examples from existing developments that are good such as the railway village.	Noted.	No change
	15b	Good design has a social, environmental and economic value but also a value to health & wellbeing?	Noted. This definition of good design stems from the NPPF. Good design does have a positive impact on health, and while this falls under the broad umbrella of 'social' it has an important role to play in improving public health. Noted.	Added text box to Range of context & character considerations figure (chapter 2): Social Context: "health & access to open space."
	15c	(p.6) Design review is encouraged for developments >10 houses – could this be stronger e.g. recommended?	It won't be possible to insist on all major development (over 10) going to design review as it may become too onerous a requirement, especially on sites where design guidance already exists. But on the other hand there may be a case to take a much smaller scheme should it impact on historically-important heritage for example.	Text added: "Not all schemes will be referred to the Design Review Panel but scale alone is not the defining reason for a referral; any scheme could be referred – the absence of a design code, brief or overarching masterplan or framework plan may also necessitate the need for Design Review as well as those schemes that potentially impact upon Heritage assets."

	15d	Good to balance the character and context – could resident well-being be part of the context?	Noted.	A new box: “Social Context” inserted into the ‘Range of context and character considerations’ diagram. The subtitles include: cultural & community factors, security & perception, health & access to open space, and demographics and housing. Most of these relate strongly in one way or another to resident well-being as part of the existing context.
	15e	(p.8) recognition of the impact of nature of individual well-being and promoting health via the natural and built environment.	The section discusses the need to address the existing features of the existing natural, built and historic environment, and in that particular paragraph is not discussing the individual merits of what each of those are capable of, but rather that they are properly accommodated for (spatially) within new development proposals.	No change
	15f	(p.9) is there a role to acknowledge how all these features and characteristics contribute to a sense of community and that design can facilitate or impede community structure, engagement and reduce isolation?	The understanding of the existing social structure is important in understanding the needs of the community and how new development can contribute towards this. The link to Social Health to include a deeper understanding of the existing community has been added.	New box (social context) included which addresses this point.
	15g	(p.15) Support the backland development focus including seeking advice of the CPDA.	Noted	No change
	15h	(p.17) good to encourage the idea of a vision for a site with a holistic approach to liveability.	Noted	No change

	15i	(p.18) all positive – but perhaps needs to acknowledge the need not to continue a piecemeal approach in areas that have been designed this way in the past and working with existing residents to develop a forward vision for their area that can shape future design decisions.	Agree.	Refer to the Design Process Diagram (Collaborative Design Process) which reads: <i>‘early engagement with statutory consultees, the public and key stakeholders helps to bring together local knowledge and wider expertise on all aspects of the development.’</i>
	15j	(p.19) support the rectilinear block formation but encourage thought about car parking to maintain an open inclusive playable street.	Noted.	NO change
	15k	(p.20) absolutely support walkable neighbourhoods and those that encourage cycling.	Noted	No change
	15L	(p.21) important to consider safety and designing out crime when considering connectivity. Good line of sight assists this.	Noted.	Text added: <i>“maintain a good line of sight”</i>
	15m	Useful to add LEAP, LLAP and NEAP to list of acronyms.	These acronyms have been added to the glossary.	
	15n	Recognise value of green space: People who live within a 10 minutes’ walk of a local open space are twice as likely to achieve the recommended levels of healthy walking compared with those whose local open space is further away. Access to green space and to nature has been shown to have particular benefits for people with dementia, including better mood, memory and communication and improved concentration.	Noted. Paragraph will be added to include these benefits.	Linkages added throughout document – Introduction, Accessibility, Quality of the Public Realm.
	15o	(p.24) support the use of landmarks and public art (particularly chosen / designed by the local community) as this promotes a sense of community	Noted.	No change.

	15p	and also is good for people with poorer cognition who use landmarks to check where they are. This also needs to take into account the needs of people with sight impairment though.  Recognition that frailer people tend to look down when they walk so streetscapes need to take this into account.	Noted. This relates to the quality of detailing and landscaping within the public realm (chapter 7).	No change.
	15q	(p.29) support the density and layout proposed – but this needs to be linked to good sound proofing and appropriate privacy.	Noted.	This example has been moved to a case study section at the end of the document. Soundproofing is a building control issue, but valid point nevertheless.
	15r	Although the guide includes advice about clarity between public and private space some examples e.g. fig 58, fig 105 confuses this?	Noted. Fig105 is of a Mews Street which typically adopt shared surfaces which purposefully join traditional thresholds between road and pavement.	Fig 58 removed. Captions included on all images to add clarity.
	15s	(p.45) support the approach with balcony – they must be useable as a way of providing outside space and not decorative. Value in encouraging south facing balconies where possible.	Noted.	Text amended to read: <i>“...balconies need to be designed to be functional <u>and not just decorative</u>, in order to be used and appreciated by their occupiers.”</i>
	15t	(p.51) recognise the need for adequate width to make bus access viable on main roads in developments and link to the recommended walking distance to a bus stop which will define required routes.	This is generally covered in paragraph 5.20 (preventing conflict between quality and functionality...) The specific width requirements for bus routes are mostly a consideration for the Highway Authority in line with the Transport Requirements for Development (TRFD). The recommended walking distance to	No change.

			a bus stop is covered in Accessibility (600m).	
15u	(p.58) "places that promote healthier lifestyles and a strong community spirit"	Noted.		Text added to sentence: "...and places that promote healthier lifestyles <u>and a strong community spirit.</u> "
15v	(p.59) Really value the importance of good quality public realm, green space and community areas which benefit mental and physical health, encourage intergenerational mixing and provide definition for communities and a central hub for community events.	Noted.		Added text: "...ecological, physical and mental health benefits that such well-designed spaces and green infrastructure corridors can provide for communities."  Sentence added: "Good quality public realm also provides place for intergenerational mixing and a central hub for community events."
15w	(p.60) Could include strong guidance on children's play areas – good line of sight, central to housing, safe and accessible – and encouragement of outside adult gyms in developments to encourage participation from all members of the community.	Agree that new play areas should where possible be designed as central focus points within development proposals. They should be attractive and functional and form an inherent part of the wider development proposed. The guidance in this document does not go into any more detail than the location, safety and legibility of layout design and new play areas form part of those aspects being assessed on layout designs.		No change.
15x	(p.65) as well as balconies roof terraces could be encouraged to promote access to outside space.	Noted.		

		There is increasing evidence of the value of vitamin D particularly as people get older and encouraging access to outside space either in private (via gardens, balconies, roof terraces or roof gardens) and in the public realm is very important.		
Phil Sheldrake Conservation Officer Royal Society for the Protection of Birds	16a	We only found a limited reference to your obligations to protect and enhance biodiversity under the NERC Act 2006 supported by the NPPF.	The design guide supports policy DE1 (Design Quality) and the obligations for GI are to be addressed by a Green Infrastructure SPD to support the Swindon Borough Policies in this regard.	No change.
	16b	The Exeter Residential Design Guide SPD is referred to as an exemplar of good practice in the latter and we have attached an Extract of the Biodiversity Requirements which are summarised on page 58.	Noted.	No change.
	16c	Swift bricks – good for birds could include in more developments.	Noted. The detailed aspects of biodiversity enhancement through new development will be covered within future guidance on Green Infrastructure.	No change.
	16d	Design SUDS for better biodiversity.	Noted. The use of SUDs to encourage better biodiversity is appreciated and mentioned in the SuDs section (under Function), and is balanced against the other requirements in order to achieve multi-functionality (Biodiversity – Amenity – Water Quality – Water Quantity and Flood Risk). It is important that these elements remain in balance and not overwhelmed by only one.	No change.

Wroughton Parish Council	17a	Wroughton Parish Council welcomes the proposed design guide which we believe is a big improvement on its predecessor.	Noted with thanks.	
	17b	The design guide benefits from not being too prescriptive and so encourages good design without limiting creativity or innovation.	Noted	
	17c	We are pleased that it recognises that different solutions are required for rural and semi-rural areas to those for urban areas, and believe that this will benefit the Parish of Wroughton.	Noted	
	17d	We also welcome the desire to improve passive energy efficiency through the appropriate orientation of dwellings.	Noted.	
	17e	We support sustainability and would encourage more emphasis on tackling climate change and water conservation within the Design Guide.	Water conservation within the home is covered within Building Regulations and outside of the scope of this document. Water retention on site is encouraged through sustainable drainage systems so that water run-off is slowed down in order to reduce flooding, to improve its quality and to encourage biodiversity.	No change.
	17f	The emphasis on accessibility for all, which will encourage independent living is welcome.	Noted.	No change.
	17g	We also support the importance placed on permeability of new developments but we are concerned that the examples of layout emphasise the use of land for Public Open Space at the expense of gardens. We believe that adequate garden space is essential for families.	Permeability – Noted. The example layout has been moved to the end of the document as a local case study and some positives and negatives have been drawn out as a comparison.	No change.

	17h	How is the guide going to consider the inclusion of cycleways within new development. (Comment made at public lecture series – rising to the challenge - Swindon Borough Council – good design during consultation).	This is covered in the connectivity section.	No change.
Chiseldon Parish Council	18a	No comments		
South Marston Parish Council	19a	SMPC have agreed that the guide is an extremely useful document and it was met with approval. They support its production and hope that it is accepted into legislation quickly.	Noted with thanks.	
Persimmon Homes	20a	It is the view of Persimmon Homes that it would be inappropriate to introduce a Design Guide on a Borough-wide scale. This means urban regeneration projects, urban extensions and development at rural settlements will have to comply with the same design requirements. We are especially concerned due to the prescriptive design requirements proposed which will stifle response to local context as well as potentially undermine site efficiency, deliverability, marketability and viability. In Persimmon Homes' experience and indeed as alluded to in national policy and guidance, Design Guides are most appropriate and usually used at a site or neighbourhood specific scale, are particularly effective on complex larger schemes in multiple ownership. Design Codes are often required for allocated sites under the associated site specific policies or through conditions attributed to the Decision Notice. These interface with the masterplans which are either generated through policy requirements for such developments as residential urban extensions or as are approved through large scale planning applications. This approach is wholly logical and has been welcomed by Persimmon Homes as part of their interaction with	<p>This document does not constitute a design code. Design codes are good mechanisms to enable/ implement large scale developments.</p> <p>The design requirements of the guide in chapter 2 (Context and Character) specifically set out the need for each development to respond to the existing characteristics of the local area in order to build on existing character. This is key to ensuring an appropriate approach for any site whether it be in a rural-countryside setting or an inner-urban context.</p> <p>The requirements are not 'absolute' in the wording and in most cases there is flexibility for other design approaches to be considered.</p> <p>The word 'must' has been revised to 'throughout the document. This is in response to ensure there is the opportunity for flexibility where an alternative design approach is</p>	Changes have been made throughout the document to address the concerns raised.

		<p>various Local Planning Authorities. This approach enables strategic policy requirements (including design quality) to be compiled with on site-specific basis whilst responding to site context.</p> <p>NPPG states that "to promote speed of implementation, avoid stifling responsible innovation and provide flexibility, design codes should wherever possible avoid overly prescriptive detail and encourage sense of place and variety (unless local circumstances can clearly justify a different approach)". It is the view of Persimmon Homes that the draft SPD does not align with this objective and local circumstances do not justify a different approach.</p>	<p>proposed that may be equally good / better in design layout terms.</p> <p>It is the view of officers that the majority of housing layout schemes for major development proposals in Swindon are of a mediocre / poor quality and generally fail to address the challenge set out by government of improving standards of design.</p> <p>Improving design quality across the Borough needs to be addressed through a number of mechanisms, one of those is the application of local plan policy and its detail which is fleshed out through this supplementary planning document. For the most part, the requirements relate to very rudimentary housing layout design principles and practice that the majority of well-considered housing layouts would satisfactorily address. The NPPF sets a very high agenda for Design, appreciating its impact on wider issues such as health, economy, inclusiveness, social inclusion and environmental gain. The Swindon Residential Design Guide has been written in line with the National Planning Policy Framework together with the Swindon Borough Local Plan with the driver of improvement of design quality at its core.</p> <p>To only promote and encourage 'sense of place' and 'variety' through</p>	
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			a design guide will unfortunately not create any 'step-change' as there is no clear mechanism in place to be able to refuse poor quality proposals. The previous Swindon Design Guide was very positive and aspirational about Swindon's past and future in both its imagery and text, but established no formal set of policy-based criteria in order to guide or assess development layouts by.	
	20b	P20 Accessibility. Whilst we agree with a number of the high level principles in the document, the Draft design guide also proposes extremely prescriptive qualitative and quantitative design requirements which persimmon Homes believe are unjustified, untested and the subject of no dialogue with the development industry but will have huge implications for the developers of housing sites in the Swindon Borough Council area.	<p>All the principles of this document are already adopted policy in the Local Plan. We respond to the individual points raised.</p> <p>The NPPF does not prescribe the detailed requirement or criteria to achieve walkable neighbourhoods. The wording in the draft guide is clear that these criteria are illustrative of good practice and these illustrative distances are evidenced as good practice for liveable, healthy neighbourhoods. These criteria are complementary to the objectives of the NPPF.</p> <p>Reference to Hugh Barton, Shaping Neighbourhoods, p 121-122. Reference to Marmot review and CABE, Urban Design Compendium and Public Health justification.</p>	
	20c	P21-22. Connectivity & Permeability. Whilst it is agreed that internal permeability and connectivity are important within a development, stating that layouts which do not directly connect to surrounding developments will not be accepted is naïve. Whilst	Noted. 'must' is replaced with 'should' to allow some flexibility for difficult sites in sustainable locations.	Text amended: "Developments should integrate with adjacent environments via safe, clear, direct and attractive routes."

		on the majority of developments connectivity will be pursued, ransom demands and legal restrictions can on occasion make this unachievable. In this instance, this section of the draft design guide prescribes that such development will not be acceptable; potentially restricting housing in what otherwise may be a beneficial and sustainable location. This does not accord with the principles of the NPPF which has a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.		
	20d (i)	P26 – Safety & Security. This section stipulates that the use of private, poorly surveyed rear pathways will not be acceptable and instead ginnels should be incorporated to provide pedestrian access to the side/ rear of dwellings. This is impractical as it causes legal maintenance complexities associated with what is commonly termed a 'flying freehold'. Under paragraph 154 of the NPPF, Local plans should be aspirational but realistic. This unrealistic requirement should be removed.	<p>Officers appreciate that flying freehold arrangements may add further requirements for some lenders which may be mitigated through insurance. This has to be balanced with the benefits ginnel arrangements can bring to a layout (security and layout efficiency). Ginnels have been successfully used in recent developments in Swindon and officers disagree with the removal of such an option from the guidance.</p> <p>The document does not stipulate ginnels as the one and only option for rear access, but rather encourages it as a good layout design option.</p> <p>The text has been amended to emphasise the issue where a lack of security is proposed and prohibits 'unsecured' rear or side pathways instead.</p>	<p>Text amended: Paragraph 3.40: "Unsecured, narrow, rear shared pathways..."</p> <p>Checklist: "Poorly surveyed, protracted and unsecured side and rear pathways will not be acceptable."</p>
	20d (ii)	P31-32 (Energy Efficiency) Persimmon Homes work hard to achieve energy efficiency levels which far	Noted. Wording has been revised by replacing 'must' with 'should' instead.	Wording: Energy Efficiency Checklist:

		exceed those required under building regulations and this is seen through the application of a fabric first approach, reducing emissions and making homes more energy efficient through the construction methods and materials used. The drafting of this section means that development must demonstrate passive solar design; this would mean that a highly efficient layout which means high levels of energy efficiency through ways other than passive solar energy would be deemed unacceptable.		“Development should demonstrate passive solar design.”
	20e	P33 (Adaptability and Space) The adaptability section requires that the buildings along key routes must allow for an extra 1m in ground floor height along key routes to accommodate future conversion opportunities. This has not been tested for viability and relates to the construction and internal layout of new dwellings. The inclusion of this requirement will lead to material wastage on site and whilst the majority of the document is geared towards sustainability in line with the principles of the NPPF, this is not a sustainable approach to designing schemes.	Agree.	The 1m extra height along ground floor requirement has been removed from the document.
	20f	<p>P43 - Whilst Persimmon Homes welcome guidance on principles relating to detailing of buildings on future developments, elements of this section have not been given due attention to the practical and technical impacts they would have on developers.</p> <p>This section is dictatorial and too prescriptive. As an example the requirement for meter boxes to be fitted to side and rear elevations does not account for the practical ease of access for utility providers, the innovative and varied design of such boxes to mitigate the aesthetic impact or the practicalities of their location in relation to the standard house types the majority of house builders set up as standard in order to increase build efficiency. It stifles innovative</p>	<p>The reason for this detailing section is because when detailing is poorly implemented it can negatively impact on the design quality quite significantly. This involves boundary treatments, balconies, building detailing, etc.</p> <p>Instances with the wording ‘must’ have been replaced with ‘should’ and the various aspects of detailing have been listed in helpful guidance checklists.</p>	Wording ‘must’ replaced with ‘should’.

		design and its implications are the terraced homes will not be possible on schemes. There are also technical issues surrounding the location of flues and vents which have not been considered. It is not accepted or good practice to have flues or vents located on side elevations which often vent onto adjacent property ownership.		
	20g	The draft design guide seeks the use of chimneys as 'heat-stack ventilation'. It should be recognised that the incorporation of working chimneys into modern residential properties can pose significant cost implications. The requirements of pressure testing of dwellings and modern construction techniques including the use of timber frame make the inclusion of working chimneys cost prohibited.	The document does not dictate the provision of chimneys on new housing, but that where proposed, they form integral parts of a building, not false add-ons. Options for chimney features could include heat-stack ventilation or as traditional or contemporary flues where appropriate.	No change.
	20h	This is far more evidently the case with the section which relates to space. This prescribes to internal space standards and as such is in clear contradiction to the government stance set out above. Including space standards within this SPD will affect choice in the market, reduce choice to consumers and will have a detrimental impact on the affordability of homes.  These 2 sections should be removed.	Noted. The standards in table 1 have not yet been adopted by the LPA however are included as good guidance on internal space standards for good future practice in all new housing. The wording is amended to be clear about this point.	Text revised to read: "While the standards in table 1 have no material planning weight, they have been repeated here for ease of reference as it is the LPA's intention to use them as a guide until such time as they are adopted and brought forward in line with the requirements as set out by the Government's Technical Housing Standards (March 2015)."
	20i	P50-51 This section of the document is too prescriptive and does not allow flexibility for changing contexts. The wording stipulates that grouped parking must include 1m breaks for tree planting and pedestrian access every 5 parking bays and that for every 10 car parking spaces 1 tree must be provided. Trees are not the only landscaping feature which can	The wording here is not intended to be a one-size fits all approach, but rather that car parking does not compromise the quality of the urban environment.	Change: paragraph 5.21: "Communal parking areas (5+cars), should include space for soft landscaping..." The requirement to include 1 tree per 10 spaces has been removed.

		be incorporated into a scheme to create a break in the parking within a streetscene. The best feature to be used for this break will vary dependent on the site context and the design of the overall scheme.		
	20j	P54 – Amenity - It is the view of Persimmon Homes that this section is one of the most concerning elements of the draft design guide in terms of being overly prescriptive. It also runs in contradiction to many of the principles the rest of the document is trying to achieve. For instance, the back to back distances given and the requirement to meet the BRE 45 degree rule for a minimum of 12 metres does not take into account the differing expected densities and urban grain for areas of the Borough set out at the start of the document or the section relating to layout efficiency. The requirements of this section are overly onerous and far exceed that ever required by Code for Sustainable Homes.	Agreed that some of the wording is prescriptive and this has been amended throughout. The requirements for back to back distances and the 45 degree rule remain as they always have for many years; however a level of flexibility is introduced for the core urban area where high density development is appropriate. In these areas the BRE calculations to address impacts on amenity such as overshadowing, overbearing and privacy.	
	20k	Viability Testing - To deliver sustainable development there needs to be a balance of social, environmental and economic roles. Sites in lesser market areas cannot always achieve an environment of the highest quality and viability needs to be a key consideration. This testing must be undertaken as part of the formal plan-making process and subject to Examination in Public (EiP).	Agreed on the need for a balance between the 3 pillars of sustainable development as defined by the NPPF; however the purpose of this design guidance for Swindon does not aim to achieve the highest quality, it aims to simply deliver good design of a high quality. Considerations of layout design are proven to be more viable for development as the use of land is generally very efficient when these principles are applied. While Swindon currently has lower land values than its neighbouring areas, the need to achieve good quality is even more important in policymaking as it is in everybody's interest over the long-term. This design guidance hangs off Local Plan Policy which has already	

			undergone examination. The only aspect of viability which needs further testing are the space standards and these would need to be done in conjunction with CIL viability testing to assess their potential impact on viability across the Borough.	
	20L	The additional financial burdens identified in the draft Design Guide have not been tested cumulatively with all other requirements of the recently adopted Swindon Borough Local Plan 2026 and impact upon delivery is not known. It is for this very reason that the NPPF makes it clear that SPD's should not be used to add unnecessarily to the financial burdens on development.	<p>While viability is a key consideration it has to be balanced against the social and environmental elements of development also. The NPPF also states that: Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.</p> <p>The NPPF core planning principles also states that one should always seek to secure high quality and a good standard of amenity for all existing and future occupants of land and buildings.</p> <p>We appreciate that there should be some flexibility introduced in relevant sections of the guide in order to relate to higher densities such as the town centre.</p> <p>Overall the policy and its accompanying guidance aspire to achieving a consistent balance between function, amenity and quality of place.</p>	
	20m	Clearly the SPD proposes requirements which will add to developer burden and should only be introduced via the local plan process. Persimmon	General good quality design in buildings and residential development layouts should not constitute a burden	No change.

		Homes wish to stress that the proposed requirements cannot be sought without evidence gathering, policy formulation, viability testing and ultimately EIP. If the proposed requirements are to be sought, this should have been done as part of the Local Plan evidence base and tested at examination.	on viability, it should be the 'norm' in setting out our new places and communities for Swindon in both new and existing areas. Design guidance in Supplementary Planning Document format does not require examination by an inspector; the policies underpinning this guidance have already undergone examination and the guidance follows on naturally from these policies. See paragraph 208 of the inspector's report for reference.	
Hannick Homes	21a	P6: Design Review: The draft Design Guide includes a recommendation that most development over 10 units should engage in Design Review. The draft Design Guide does not make clear how this process will operate for smaller sized developments. Whilst Hannick Homes appreciates and agrees with the need for good design, the means by which design quality is appraised needs to be proportionate to the scale of development being planned Hannick Homes is of the view that in most cases the level of appraisal required for ++\smaller scale and less significant projects should be achievable as part of the formal pre-planning advice service (i.e. input via the urban design officer's response).	Noted.	Text amended to include the words: "as appropriate." Also the following paragraph has been added:  "Not all schemes will be referred to the Design Review Panel but scale alone is not the defining reason for a referral; any scheme could be referred - the absence of a design code, brief or overarching masterplan or framework plan may also necessitate the need for Design Review as well as those schemes that potentially impact on historic assets."
	21b	P16 (Site assembly & Backland) Backland development typically requires the cooperation of a number of landowners and therefore, in some instances, it may not be possible to bring forward the comprehensive development of a large area of opportunity. Piecemeal development of such areas	As worded, the document seeks that backland sites in complicated ownership scenarios still take a long-term view in their layout design so that if developing only part of a future larger development site, a comprehensive	No change.

		should be permitted if each parcel of land is designed to allow any further land to come forward at a future date. As currently worded, the Design Guide seems to suggest that this approach would be unacceptable.	scheme can be realised. This is in the interest of securing principles such as connectivity, permeability and response to character over the long term.	
	21c	P20 Accessibility Criteria. The accessibility distances outlined on page 20 are referred to as recommended distances and Hannick Homes assumes they will be treated as such. For a variety of reasons, not all developments will be able to meet all of these criteria and we assume Swindon Borough Council would not use this as a reason for refusal. This should be further clarified in the Design Guide.	The role of the accessibility criteria are defined in paragraph 3.9.	
	21d	P25 Inclusivity – affordable housing. The design Guide appears to discourage the clustering of non-market/affordable housing within mixed tenure schemes. However, the clustering of affordable housing, as opposed to 'pepper potting', is usually preferred by Registered Providers, primarily for ease of management. Hannick Homes is of the view that guidance on the provision of affordable housing should be omitted from the Design Guide and, as is the case with most other LPA's, it should be provided within a separate Affordable Housing SPD or similar document.	Noted.	Text amended to say: "The LPA prefers groups of no more than 10-15 affordable units together in a row or clustered across both sides of a street." Further guidance on affordable housing and the type and tenure of housing required is provided in SBC's Housing Strategy.
	21e	P26 - 27 - When designing new development it is important to also take into account the needs and preference of future occupiers. From our 37 years' experience of building houses in the Borough and beyond, we have that purchasers of houses have a strong preference for access to back gardens to be provided via rear pathways. There are many examples within the Borough where this form of access functions satisfactorily. There should be clearer recognition within the Design Guide that, where designed appropriately, such access arrangements - including for terraced properties -	The document does not stipulate ginnels as the one and only option for rear access, but rather encourages it as a good layout design option. The text has been amended to emphasise the issue where a lack of security is proposed and prohibits 'unsecured' rear or side pathways instead.	Text amended: Paragraph 3.40: "Unsecured, narrow, rear shared pathways..."  Checklist: "Poorly surveyed, protracted and unsecured side and rear pathways will not be acceptable."

		can be acceptable.		
	21f	P33 (Adaptability and Space) – same point made by Persimmon Homes.	<p>Refer to text in draft version p.57 (4th paragraph) 'These standards are repeated here for ease of reference as it is the LPAs intention to use them as a guide until such time that they are adopted and brought forward in line with the requirements as set out by the governments technical housing standards march 2015'.</p> <p>The document clearly states that these minimum floor areas are used as a guide only and therefore not enforceable.</p>	
	21g	<p>P51 - Much of this guidance is overly prescriptive, and thus restrictive, and will not permit site specific design responses which, in some cases, may necessitate slightly different parking arrangements. For example, on constrained sites, some rear courtyard parking may be appropriate or, in other cases, it may not be possible to provide on-plot parking for some semi-detached properties. Through good design, there may be other ways of providing parking which is acceptable.</p>	Noted.	<p>The revised document now states under the Function section: "this section sets out general principles relating to the provision of parking for new housing. Other solutions may be more appropriate in historic parts of the Borough or where a defining local characteristic requires it. All parking arrangements not detailed in this SPD will require further negotiation and agreement with the LPA and the Local Highway Authority (LHA). In all cases developments will be expected to meet the Council's current parking standards."</p> <p>See also section under Mews Building Typologies which provides further guidance on</p>

				courtyards.
	21h	P57 - Space Standards. The Design Guide should make it clear that the space standards presented in Table 1 have no material planning weight. Minimum Space standards can only be specified by LPAs if they are introduced through policies within the adopted Local Plan, and robust justification in terms of need and viability must be provided to a Local Plan Inspector to permit their inclusion. The adopted Swindon Local Plan does not have such a policy.	Noted. The standards in table 1 have not yet been adopted by the LPA however are included as good guidance on internal space standard for good future practice in all new housing. The wording is amended to be clear about this point.	Text revised to read: "While the standards in table 1 have no material planning weight, they have been repeated here for ease of reference as it is the LPA's intention to use them as a guide until such time as they are adopted and brought forward in line with the requirements as set out by the Government's Technical Housing Standards (March 2015)."
	21i	Conclusion – summary: Although Hannick Homes agrees with what the Design Guide is seeking to achieve (i.e. high standards of design and sustainable development), and appreciates the time and effort put in by officers to prepare the draft Design Guide, our primary concern is that the current draft is far too prescriptive and does not allow the flexibility advocated by national planning policy and guidance. Design should be an iterative process capable of incorporating site specific solutions. As currently drafted, the Design Guide does not permit this. For example, for small backland and infill sites, which by their nature can be highly constrained, a less	Noted. Same comment made above as to respondent number 20.	

		prescriptive approach to design may be required. Without this ability, such sites, which are often in highly sustainable locations, may never be developed or may need to be designed to a lower density than required. It is our view that SBC should be trying to promote backland development given that it is typically located within sustainable areas relatively close to existing facilities and services. This form of windfall development also makes a valuable contribution to meeting the Borough's housing requirement.		
Tetlow King	22a	Our comments are not intended to be exhaustive, however we seek to set out our principle points of concern which relate to the level of prescription referred to in the draft Residential Design Guide SPD, an approach that is not justified through the parent Policy DE1 of the Local Plan, nor through the NPPF or its supporting Planning Practice Guidance.	The design SPD is directly written in line with Policy DE1 and expands on each of the principles of the policy. Design SPDs are required by their nature to expand on overarching policies with more detail; for example assessing amenity impacts. This was supported by the inspector in his report for the SBLP 2026 examination. It has been noted that some of the document is written in a very prescriptive manner and this has been addressed through changes to the text, more explanations of the illustrations / images and general more clarity overall in the revised document. Due to consultation responses, some aspects which were found to be too onerous have subsequently removed, and other aspects have been revised through text changes to allow more flexibility in requirements.	Changes made throughout document to improve flexibility and remove certain aspects found to have the potential to be too onerous.
David Lock	23a	An SPD should not include a level of prescription that stymies proposals from reaching appropriate master planning and design conclusions as to how best to achieve sustainable development in the	Point taken, same point as with Consultee no. 20, 21 and 22. (above)	Changes made throughout document to improve flexibility and remove certain aspects found to have the potential to

		<p>round, as advocated by the NPPF. Indeed para 59 of the Framework emphasis that 'design policies should avoid unnecessary prescription or detail and should concentrate on guiding (our emphasis) the overall scale, density, massing, height, landscape, layout materials and access of new development in relation to neighbouring buildings and the local area more generally (our emphasis).</p> <p>To support our comments we set out a number of examples of where the draft SPD applies a level of prescription that is onerous and does not easily allow good design to flourish. It is important to note that we do not consider that it is necessary to identify each case where the draft wording is overly prescriptive; it is a general point and therefore is relevant to the document as a whole, and as such, general regard should be had to this issue, to ensure that the SPD accords with the principles enshrined in the NPPF and further amplified in the PPG.</p>	.	be too onerous.
	23b	<p>P6 Design Review. The requirement (at page 6) for proposals of 10 or more dwellings to undertake a design review is unreasonable. Paragraph 62 of the NPPF states that only "when appropriate" should "major projects" be referred for a national design review. It is unreasonable for an SPD to provide a higher level of prescription above that required at a national level. Furthermore Swindon Local Plan, at paragraph 4.27, reference the design review process by appropriately acknowledging the advice contained within the NPPF. This is sufficient.</p>	Similar comment as previous (Ref 21a)	See Response no: 21a.
	23c	<p>P20 Accessibility. Accessibility - Sites that perform poorly (against what criteria?) or would not provide good access to essential facilities (what are considered essential?) are not acceptable p.20.</p>	Same response made as to respondent no:20 and 21.	
	23d	<p>P21 – (Concern over level of prescription) "Emphasis that development layouts "must" provide strong safe</p>	Same response as for 20c.	See Response no. 20c

		and direct connections to adjoining areas."		
	23e	P26 Safety & Security. Use of ginnels prioritised to provide rear access to properties, over other acceptable design responses.	Same response as for response 21e.	See Response no. 21e.
	23f	P31 – Energy Efficiency. Prioritisation of east-west orientation of dwellings that have natural southerly aspect to either front or rear of dwelling.	Same response as for 20d(ii).	See Response no. 20d(ii).
	23g	P33 – Adaptability and Space – same comments as comment references 20h and 21h.	Noted.	Adaptability - the 1m extra height requirement has been removed.  Space Standards – same response as 20h and 21h. Standards (March 2015)."
	23h	P36 - Orientation - changes in levels along a terraced streetscene must be accommodated in party wall and not ridgeline.	This comment probably refers to 'Siting' not orientation. The document does not dictate this approach as the only option and the wording uses terms such as: "usually better to create a level change at the party wall between dwellings, and not within the area of the dwelling itself." This is general good practice referred to in the document as guidance.	No change.
	23i	P42-44 - Detailing - utility meters, boxes, satellite dishes cannot be placed directly on principal elevation of a dwelling p.44 NB many of the elements described in this section are permitted development; railings must be mounted on plinths p.42; windows overhanging the public realm must have minimum of 300 private margin to accommodate overhang p.43.	While some of these detailed elements are technically outside of planning requirements especially the positioning of utility meter boxes; the guidance set out illustrates good practice. Unsightly, poorly detailed elements of a building can have a marked negative impact on the quality of a development. This guidance strives to avoid this wherever possible.	
	23j	P51 - Car parking - rear parking courts must be avoided: all detached and semi-detached houses must have on plot parking; and 1 tree must be	Noted.	The wording has been amended to read: "Other solutions may be more

		provided for every 5 parking bays.		appropriate in historic parts of the Borough or where a defining local characteristic requires it. All parking arrangements not detailed in this SPD will require further negotiation and agreement with the LPA and the Local Highway Authority (LHA). In all cases developments will be expected to meet the Council's current parking standards."  See also Mews Building Typology section at end of the document which provides guidance on courtyards.
	23k	P57 – Space. Space - application of minimum space standards, inappropriately predicts the Government's adopted space standards p.57.	Noted.	Same comments as 20h and 21h.
	23L	P65 Apartment Buildings. Apartment Buildings – “each apartment must be dual aspect; and must include 10 sqm minimum outdoor private space.”	Noted.	This sentence is replaced with: “A usable area of 10sqm is suggested per apartment, but this should be greater for larger units that may attract families.”
	23M	Conclusion - PPG states that Supplementary planning documents should be prepared only where necessary and in line with Para 153 of the NPPF (reference ID: 12-028-20140306). Para 153 of the NPPF states that "supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development".	The wording of the guide is set out to promote and establish good quality design for residential development in line with the NPPF and the local plan more specifically. This document is designed in order to help applicants make successful applications which are required by national and local government policy to be of a high quality design. Good design in the	

			<p>planning system is a core requirement and should not be seen as an unnecessary burden by developers.</p> <p>The document has undergone some revision to the wording (where appropriate, and in line with useful comments made throughout the consultation process) in order to refine the wording, make certain aspects clearer, improve the imagery and examples, and to also introduce a level of flexibility where certain requirements were too prescriptive.</p>	
Colin McEwen	24a	Generally a good and helpful document.	Noted with thanks.	
	24b	Lack of clarity as to the obligation on developers to supply a Design Code or similar.	<p>This document does not set out these requirements. The Swindon Borough Local Plan (SBLP 2026) sets out a the requirements for design codes where appropriate:</p> <p>See policy SD3(b) (Managing Development).</p> <p>See paragraph 3.35</p> <p>See paragraph 4.30 and See also paragraph 4.5: in particular: "...It is expected that Design Codes will be produced for all major development proposals on large or complex sites where land is in multiple ownership, multiple developers are involved or where development phasing is proposed...."</p>	No change.
	24c	Public Realm Maintenance: The Management Company model may be at odds with the Parish Council and Precept model, which may be simpler and preferable. The conflict will become more	The arrangements of management companies, future Borough to Parish Council or even Private management contracts and arrangements are outside	No change.

		marked as PCs are obliged to take on an increased responsibility from the Borough.	of the scope of this SPD. However the need to establish early on what and how the management arrangements are to be set up for the long term is emphasised in the document under public realm quality as this is key to ensuring quality public realm over long periods of time.	
Swindon Civic Voice	25a	The use of “must” makes it overly prescriptive with us.	Noted.	The word must has in most instances now been replaced in most instances with ‘should’.
	25b	It is not always clear whether the photographs are illustrating good or bad practice – often both. A comment could sometimes be helpful. The guide requires more good advice on parking. More advice is needed on secure and convenient bicycle storage.	Agreed. Some of the illustrations were not always clear about intention. The revised document makes this much clearer.	Examples have been added to the detailing section under Form on secure and convenient bicycle storage is expected, and examples of solid structures built for bicycle, refuse and recycling.
	25c	Request that Policy DE1 SBLP be defined within the second paragraph.	Acronyms used throughout are set out in a glossary of terms at the end of the document.	No change.
	25d	Request amendment to bullet point 2: ‘to achieve high standards of design and construction’	Noted.	
	25e	Request to amend bullet point 3 to ‘to enable successful applications	Noted.	Wording amended to ‘enable’. (1.4)
	25f	It is suggested to move the ‘Design Team’ paragraph up to above ‘Local Authority’.	Noted. Diagram amended to include this change.	
	25g	Request to correct the final sentence within the Design Team paragraph to ‘Good designers are custodians of their schemes and lead projects in a collaborative and integrated `way.”	Noted.	Paragraph 1.14: amended to read as suggested.
	25h	It is suggested that two paragraphs are Included Applicants’ and ‘SBC’	Noted.	
	25i	A comment raised in response to the success of design review in Swindon - which ones in particular?	There have been a number of design reviews in Swindon for key sites such as the Corn Exchange in developing the Planning Brief for this important	No change.

			site. Another example are the current works on the Chain Test House which improved the design considerations quite significantly through design review.	
	25j	The word 'very' before positive role should be taken out.	Noted.	
	25k	Request that final sentence be rephrased to read; More information on design review is available from the Planning Department.	Noted.	
	25L	-Who are the Design Review Panel? And who appoints these?  -What are their qualifications? -What is the purpose for the inclusion of this image on P.6?	Please see introduction where this has been explained in more detail.	
	25m	P.7 - It is suggested to include policy DE1 definition here.	Local Plan Policy should not unnecessarily be repeated in the text of an SPD.	No change.
	25n	Request that place making has been mentioned too late in this paragraph and should be more prioritised by moving this to the beginning of this page.	Noted.	
	25o	The 1st sentence should include the social element, not just built and historic environment.	Noted.	
	25p	It is advised that another bullet point be included <ul style="list-style-type: none"> <li>• Social and use context: Present (especially) / Future intent.</li> </ul>	Noted.	
	25q	Wonderful choice of image on P7.	Noted.	No change.
	25r	After the words 'inherited assets that' the word 'require' should be replaced with deserve.	Noted.	
	25s	The natural environment paragraph suggests separation of the hedgerows, river corridors, water courses from the protected species and habitats...	Noted.	
	25t	It is suggested that a heading 'Social' should be included before the sentence begins with 'Existing site conditions'...	Noted	
	25u	It is suggested that the final sentence be corrected to	Noted.	

		read: "This is particularly true of the successful retention of existing mature trees and hedgerows – succession planning for existing vegetation, that provide immediate impact and sense of place to any neighbourhood whether old or new."		
	25v	P.9 The diagram on this page is praised, however it is suggested that it include a box of principles for 'social'.	Agreed.	Social Context considerations box added with the following sub-headings: cultural & community factors, security and perception, health and access to open space, demographics and housing.
	25w	P.11 The diagram, column under 'Compact Mixed Use Core' – Density should be changed to 50+ /unit	The density already reads as 50+, the density measurement has been amended to read as: du/ha. (dwelling units per hectare).	No change.
	25x	P.15 The example of the triangular site is not favored. It is suggested that this image be removed and that a proper evaluation is undertaken for this site. It is suggested that this scheme provides for more of a gated community.	Noted.	Fig p15 replaced and the triangle site moved to the end of the document as a case study.
	25y	P18 It is suggested that the final sentence be finished with 'of which the residents can be proud.'	Agreed.	Minor text change.
	25z	P31 Orientation of dwellings, final sentence requests the inclusion of the word 'artificial' before the words 'heating period'.	Agreed.	Word 'artificial' added to text.
	25aa	P61 - Community needs to be linked to a place. There are a lack of these types of uses: 'People' in a place – Butcher, Baker, candlestick maker, Internet entrepreneur. (image of this type of community), with more images needed to illustrate different types of public realm in Swindon.	Noted. Further work on characterisation of the different places across Swindon is needed, but it is felt that this will form part of another piece of future work.	No change.
Barratt Homes	26a	P10 - Constraints and opportunities should extend beyond the application boundary. Document does not say to what extent. This could prove difficult in some instances as we cannot survey 3rd party land.	Noted.	
	26b	P11/12 - We appreciate this section is an	Noted.	Text added to fig 7: 'Strong,

		assessment of the context and existing character however with current car parking standards it will be almost impossible to reflect some of these characteristics if that is required. The Urban characteristic on pg 11 suggests densities of 45-55dph with 'continuous form, few breaks'. This would be difficult to reflect with current car parking standards, and will lead to car parking courts everywhere.		continuity of Form, Few Breaks for Compact, Mixed-Use, and Regular continuity of form, few breaks for Urban.
	26c	P26-27 - We suggest that semi-detached dwellings/small terraces with car parking to the side or front of the dwellings may be the only option to satisfy this criteria. We cannot propose ginnels as they are likely to access rear courtyard parking, a solution the design guide suggests to be avoided or limited, and where just proposed as an access to rear gardens this becomes unviable. We believe that limiting the options for accommodating car parking, together with avoiding car parking that is 'poorly associated with the host dwelling' will have an impact on the variety of character areas that can be achieved. We suggest more flexibility is required to enable more creative places. Note, the car parking section on page 50 does suggest other solutions may be possible.	Ginnels are not an 'absolute' requirement of the guide. Other options are ofcourse possible. The guidance sets out the benefits of using ginnels to housing layout design, and the dis-benefits of circuitous rear accessways to properties that are sometimes proposed.	No change.
	26d	P28-29 - discusses grouping similar typologies. This will have a detrimental effect on the scheme as we wish to provide variety to the street scene with interesting roofscape, streets and spaces. Commercially, groupings of the same typology will restrict the sales rate to the detriment of the viability.	This is not an absolute requirement in the wording of the document. There are many cases of very good quality, award-winning schemes over recent years that use the grouping of similar house typologies to create a strong sense of place along a street or space. This has also worked very well historically - consider periods such as the Victorian, Georgian, Arts and Crafts movement, Garden City movement, Inter-war housing etc.	No change

	26e	P32 - 'development must demonstrate passive solar design'. We masterplan and detail design all of our schemes with this in mind.	Noted.	No change
	26f	P33 - increased floor to ceiling heights along main routes and nodes is not practicable, as there will be a need for variations to types due to staircasing issues, for something that is extremely unlikely to happen	Agreed.	This requirement / guidance has been removed from the document.
	26g	P41 / 46 - we disagree with the comment 'railings should be mounted on plinths' as we have many examples of where railings on their own have worked very well.	It generally is good practice to mount railings onto a plinth. There are very limited scenarios where railings work without plinths such as in front of hedges.	No change.
	26h	P44 - service media off the front of the buildings in particular. This is unachievable without severely limiting the house type design, as kitchens have to go on the back to flue the boiler. Vents will need to go to the front in most cases – longer runs of vents require larger fans, and are a long term issue for the homeowner, and meter boxes are unavoidable, but we agree that we can deal with them as sensitively as possible.	Noted.	No change.
	26i	P54 - Review of garage roof configurations should reduce this concern.	Noted.	
	26j	P57 – NSS (National Space Standards) we have been advised by officers that SBC are not adopting the NSS and will just use it as guidance for where there are dramatic discrepancies between sizes.	Noted.	No change
	26k	P57 - NSS - built in internal storage areas (same as above)	Noted.	No change
	26L	P65 - Apartment external amenity area balconies are expensive, and requiring 10sq.m is unachievable.	Noted.	This has been amended to be more flexible and can be provided within shared outdoor space.

