



Solihull
METROPOLITAN
BOROUGH COUNCIL



***SUPPLEMENTARY
PLANNING GUIDANCE***

**NEW HOUSING
IN CONTEXT**



November 2003



Preface

At its meeting of 17th March 2003, the Planning and Regulatory Committee approved a draft version of this document for Consultation. The consultation was carried out during the summer and the list of consultees is provided in Appendix 3.

The results of the consultation were reported back to the Planning and Regulatory Committee on 27th October 2003 where this supplementary planning guidance was approved for publication subject to referral to the Cabinet Member for Regeneration and community Development for formal approval of Policy. The document was then formally approved on 4th November 2003 and adopted on 12th November 2003.

Supplementary Planning Guidance

NEW HOUSING IN CONTEXT

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1 Introduction

- 1.1** Government policy, as laid down in PPG 12 (Development Plans), acknowledges the valuable role that supplementary planning guidance (SPG) can play in detailing and applying the policies and proposals in the Development Plan. SPG is a material consideration in the assessment of development proposals.
- 1.2** The quality of the residential environment is a fundamental factor in determining people's overall quality of life and the Council sees this SPG as being essential to the success of maintaining and enhancing the urban environment of Solihull whilst helping to achieve the Government's objectives.
- 1.3** This supplementary planning guidance has been produced to set down detailed guidance for decision making. Its purpose is to fill the gap between national policy, the strategic broad-brush approach of the Council's Development Plan, the Solihull UDP, and the determination of individual planning applications. This can be broken down into six clear objectives:
- To help achieve the Government's and the Council's development plan objectives of making the best and most efficient use of land and improving the quality and attractiveness of residential areas
 - To maintain and enhance the local distinctiveness, character and quality of Solihull's residential areas
 - To reject poor design and encourage good design and innovative thinking
 - To ensure a clear understanding of what is expected of developers/designers when submitting planning applications for housing development in residential areas
 - To ensure consistency in decision making and avoid planning delays
 - To improve the understanding between the public, the Council and developers/designers.
- 1.4** This guidance will provide more detailed information on how the Council intends to implement its housing and environment policies with respect to density and design and local distinctiveness. It will enable developers/designers to be aware of the Council's expectations at an early stage in the design process and provide greater certainty for all concerned in the way in which decisions on individual sites will be made.

2 Policy Framework

Planning Policy Guidance

Planning Policy Guidance Note 1 - General Policy and Principles (February 1997)

- 2.1 This guidance states that applicants for planning permission should be able to demonstrate how they have taken account of the need for good design in their development proposals and that they have done this with reference to relevant development plan policies and supplementary planning guidance. It urges Local Authorities to reject poor design and seek to promote or reinforce local distinctiveness.

Planning Policy Guidance Note 3 - Housing (PPG3) (March 2000)

- 2.2 This guidance sets out a radical new approach to planning for housing, which includes the need to provide development of the highest quality, focusing on previously developed land and creating more sustainable forms of development. Key Government objectives within the guidance are therefore making the best use of previously developed land, without compromising the quality of the environment, improving the quality and attractiveness of residential areas and rejecting poor design.

Better Places to Live - A companion guide to PPG3 (2001)

- 2.3 The purpose of the guide is to help deliver the new approach set out in PPG3. The guide aims to prompt greater attention to the principles of good urban design in residential environments and highlights examples of best practice in a wide range of areas.

Regional Guidance

Regional Planning Guidance for the West Midlands (RGP11) (1998)

- 2.4 RPG11 encourages high quality design and suggests authorities set out design policies in their development plans, which provide the basis for development control decisions. It confirms Government policy by promoting the best use of previously developed land and buildings without compromising the quality of the environment.

Draft Regional Planning Guidance for the West Midlands (RPG11) incorporating the Secretary of State's Proposed Changes (September 2003)

- 2.5 This guidance continues to strengthen the support for national policy on design and the efficient use of land, and the premise that this can be achieved without compromising the quality of the environment. Draft RPG encourages specific policies on the design of housing development and creating a high quality built environment.

Development Plan Context

Solihull Unitary Development Plan (UDP) (April 1997)

- 2.6 The UDP is the statutory land use plan for Solihull, which contains policy on the development of windfall sites (Policy H4) whereby planning permission will only be granted if the proposals pay due regard to the surrounding areas.

Solihull Unitary Development Plan (UDP) Review Revised Deposit (May 2003)

- 2.7 The Solihull UDP is currently under review and will update the adopted UDP. Policies have been included in the review, which relate to both strategic and windfall sites and deal specifically with housing density, design, the quality of development and the protection and enhancement of the local distinctiveness of the residential areas of Solihull. The policies and proposals have been prepared in the context of the Community Strategy and have taken full account of national and regional policy and guidance, in particular PPG3.
- 2.8 Proposal ENV2/1 - Preparation of Local Design Guidance, indicates that the Council will prepare design guidance for the protection and enhancement of the local distinctiveness of urban areas.
- 2.9 This SPG takes full account of, and is consistent with, Government guidance, in particular, the advice given in PPG3. This SPG is based on, and provides supplementary information to existing and emerging plan policies in the Council's adopted UDP and the UDP Review.

3 Local Distinctiveness

- 3.1 The redevelopment of existing buildings and the development of land in residential areas can provide an attractive punctuation and relief in an otherwise bland, monotonous and unremitting run of similar property. In other instances it can offend the unity and character of a locally distinctive street or neighbourhood and create problems for residents of the area.
- 3.2 There is, at present, no clarity or consistency in the interpretation of Government guidance at national and local level, which currently undermines the local decision making process. There is, therefore, the urgent need to set down detailed guidance for decision making to fill the gap between national policy, UDP policy and determining planning applications for housing development in residential areas. This is the intention of this SPG.
- 3.3 The Council will encourage densities of 30-50 dwellings per hectare in accordance with Government guidance, but not at the expense of the quality and local distinctiveness of the environment. Higher densities will only be considered in town centre locations or in areas well served by public transport.
- 3.4 In assessing the impact of housing development on a residential area the Council would wish to ensure that the local distinctiveness and character of the urban area is maintained, to make the most efficient use of land whilst allowing for high quality contemporary and innovative design.
- 3.5 To be able to carry this out in a consistent and transparent manner it is necessary to establish the qualities that define Solihull's character and distinctiveness and to define the process of judging how those qualities might be affected by development proposals.
- 3.6 However, each street has particular characteristics, which make it different and render any sweeping generalities inappropriate and ineffective.
- 3.7 A common feature is the steady rhythm of these streets with strong building lines, matching building plot widths, and repeated architectural motifs. This has created streets which have a pleasing homogeneity and which have a character or local distinctiveness that is worth maintaining when a new development is considered.
- 3.8 The landscape is also an important and integral element of local distinctiveness from the mature landscape setting of many of Solihull's settlements to the presence of uniform boundary treatments and key common features such as lawns and the occurrence and variety of trees and planting within gardens.
- 3.9 In many cases these streets do not warrant formal designation as conservation areas and it would not be possible to protect the individual buildings themselves for their own sake. However, it is both reasonable and desirable to ensure the overall character is maintained as those buildings are removed.

3 Local Distinctiveness

3.10 Therefore rather than one single generic character, there are a number of key characteristics which have been identified as being the most essential elements contributing to the character or local distinctiveness of a street or residential area within Solihull. These are:

- Plot Width
- Building Line Build Up
- Building Set Back
- Front Boundary
- Landscape Setting and Features
- Plot Format
- Parking
- Plot Access
- Building Format
- Key Dimensions
- Key Features
- Roofing Materials
- Wall Materials
- Window Format
- Typical Details

Appendix 1 provides an explanation and definition of these key characteristics.

4 Proposals for New Development

- 4.1** All new development in existing residential areas will be required to respect, maintain or enhance local distinctiveness and character. It should be noted that the characteristics of all elevations can be important in defining local distinctiveness, particularly those viewed from public areas.
- 4.2** All planning applications for housing will need to be accompanied by a detailed analysis of the context of the proposed new development which addresses each of the characteristics set out above.
- 4.3** The response of the proposed development to its context will need to be explained and justified. Any development compromising the quality of the environment will be resisted.
- 4.4** The demolition of existing buildings may result in the loss of the character and local distinctiveness of an area altogether, for example, the redevelopment of isolated buildings. In such cases the existing typology should normally be the guide. This also applies to sites where the neighbouring typology detracts from the character and local distinctiveness of the area. Case Study 2 provides an example of this.

5 Innovation and Contemporary Design

- 5.1 The methodology does not require proposals to be a copy or pastiche of existing styles and development. What it does require is for the developer/designer to show that the context of the proposal is understood and respected by the proposed development.
- 5.2 It allows scope for new styles and materials but only those which will complement their surroundings. It requires not uniformity but good manners towards its neighbours.
- 5.3 Development not in harmony with its context will exceptionally be allowed but only where it is of outstanding individual quality and where it is appropriately located. For example, where it provides a single punctuation in an otherwise uniform or bland street frontage extending beyond the normal street block size of 150 metres set out in the companion guide to PPG3 'Better Places to Live'.

6 Other Considerations

- 6.1 As well as assessing the proposed development against the key characteristics that contribute to the local distinctiveness of an area, the development's impact on amenity would need to be assessed along with car parking standards, access to the site and other relevant planning considerations.
- 6.2 In respect of amenity, consideration would need to be given to issues of noise disturbance, especially from parking areas; the potential for overlooking; overshadowing or oppressive development; lack of adequate privacy and inadequate distances between facing windows in a high density development.
- 6.3 Although more recent parking standards are more relaxed, in some circumstances high density development on small sites can lead to a lack of sufficient parking space with specific implications for congestion and highway safety.
- 6.4 More intensive development along a street can, in some instances, lead to a proliferation of access points detrimental to the safety and free flow of traffic along the road. This has to be assessed on a site by site basis.
- 6.5 However the following policies will also apply to proposals in residential areas:
 - There will be a presumption against the provision of substantial areas of car parking to the rear of properties adjacent to private gardens in order to prevent unreasonable detriment to the amenities of neighbours by reason of noise, disturbance and the emission of fumes.
 - Overlooking of rear gardens from living rooms or areas will be subject to the same controls that govern consideration of development with facing windows.
 - Guidelines for overlooking and privacy will be applied to separate dwellings within the proposed development as well as to its relationship with adjoining property.
- 6.6 There will be other material considerations and development constraints to be addressed as an integral part of the design process on a case-by-case basis, for example:
 - ensuring development is sustainable
 - protecting the amenity of both the new and neighbouring residents
 - conserving and encouraging bio-diversity
 - addressing highway safety and parking standards
 - preventing crime
 - ground conditions

7 Development in Conservation Areas and in the Proximity of Listed Buildings

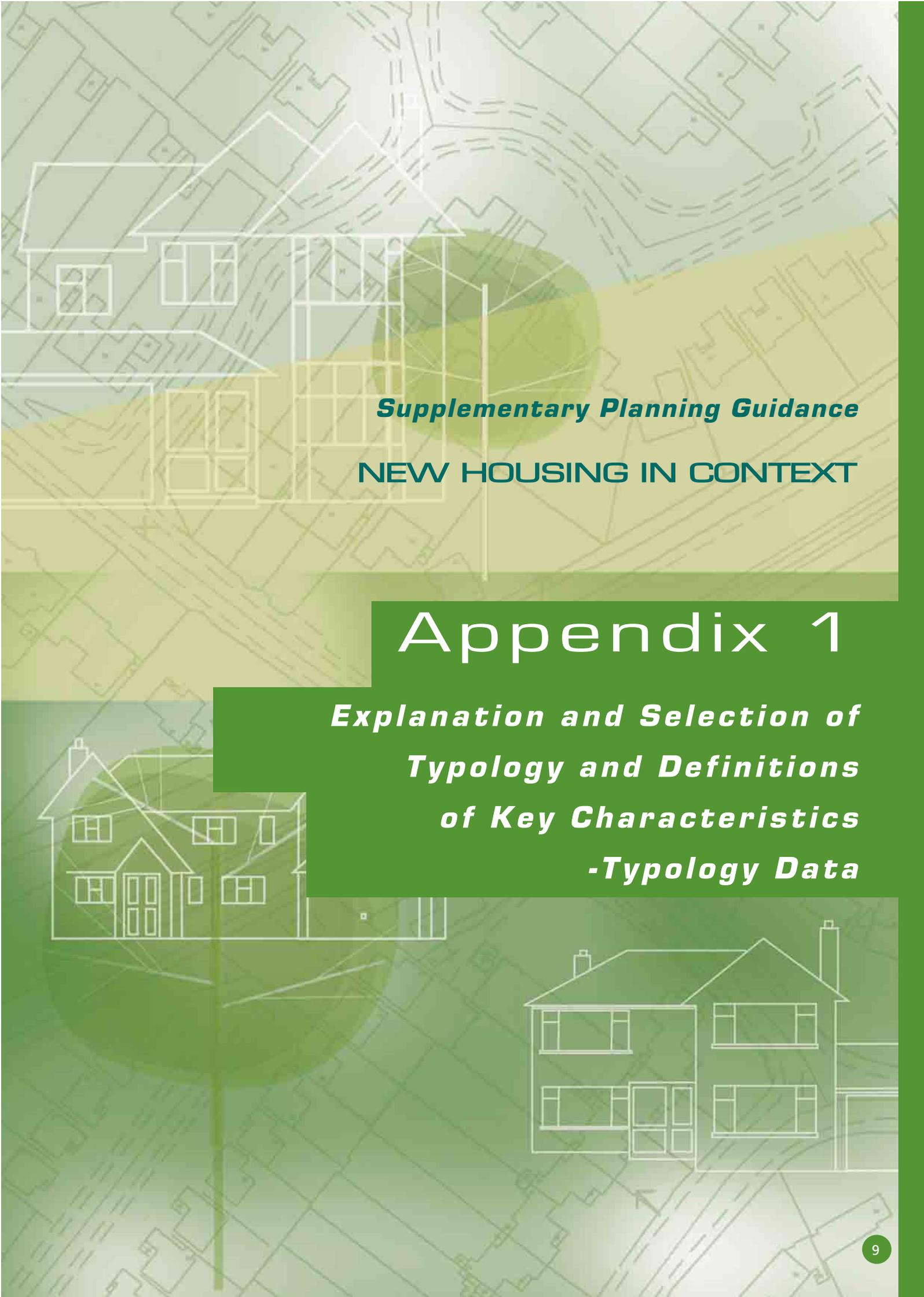
- 7.1 There is a statutory duty to pay special attention to preserving and enhancing the character and appearance of conservation areas and a requirement to regard the potential impact of development on the setting, or views into or out of conservation areas.
- 7.2 PPG15 establishes a presumption in favour of retaining buildings which make a positive contribution to the character or appearance of a Conservation Area.
- 7.3 Where a proposed development requires the demolition of an existing building, the developer will be required to prove that the existing building is not of individual merit, of particular prominence in a streetscape or of group value (i.e., that it does not make a positive contribution to the character and appearance of the Conservation Area).
- 7.4 The impact of the proposed development on the character and quality of the wider environment will also be an important consideration. It must maintain and enhance the character and appearance of the conservation area. Small-scale incremental change can be a particular problem, adversely affecting the character and appearance of Conservation Areas, so cumulative effects will be taken into account. Therefore the issues of the grain of the area and the selection of an appropriate typology will take on additional importance in and around Conservation Areas.
- 7.5 There is a statutory requirement to have regard to the setting of listed buildings. This will be a specific consideration not confined to works to the building or adjacent land, but also to proposals some distance away.

8 Methodology

- 8.1 The key characteristics or common elements which are essential to defining local distinctiveness and character and which have been identified in Section 3 and detailed in Appendix 1 provide the basis for producing the detailed analysis.
- 8.2 The detailed analysis will include:
- A data sheet noting the key characteristics for the area in which the proposed development is located.
 - An evaluation of the impact of the proposed development against each of the characteristics.
 - The developer/designer will then need to show how this data and its analysis has been used to inform the design of the submitted proposal.
- 8.3 These key characteristics can be applied to any group of dwellings, any street or any area. Corner sites will require special care. Advice on defining a typology is set out at the start of Appendix 1.
- 8.4 It is important to recognise that some of these key characteristics may adopt more significance to local distinctiveness than others, depending on location or street scene.
- 8.5 Examples of the key characteristics and guidelines, have been set out in four Solihull case studies in Appendix 2.

The application of this guidance is illustrated in Appendix 2 using worked examples. These examples focus purely on the urban design issues addressed in this SPG and do not attempt to address all material planning considerations or development constraints.

The examples are intended purely to prompt thinking on contextual urban design issues. They are indicative proposals, not design prescription.



Supplementary Planning Guidance
NEW HOUSING IN CONTEXT

Appendix 1

***Explanation and Selection of
Typology and Definitions
of Key Characteristics
-Typology Data***

Appendix 1

Explanation and Selection of a Typology and Definitions of Key Characteristics – Typology Data

Typology is the prevailing set of characteristics which are essential to local distinctiveness and character within areas.

When any new development is considered, it is important that it relates closely to the place in which it is built, and contributes to the overall street scene rather than detracting from it. With increasing pressure to redevelop houses as larger buildings, often of multiple-occupancy, there is an ever greater need to ensure that the new buildings do not dilute, overwhelm or even destroy the character of the street.



Each building and its associated landscape in a street contribute to the definition of the public space.

Variations in the scale of an elevation, in the plot width, landscape features or in the boundary treatment will all give the street a different feel.

Likewise, repetitive elements such as gables or chimneys can be very visible features, and if regularly repeated become a key defining feature of the street.

All of these characteristics combine to define a particular typology. Within this typology there will be some scope for minor variations and some will be less tightly defined than others, perhaps because some buildings have been modified over time. However, it is the prevailing set of characteristics which normally shape the new proposals.

Selecting a typology

When a site is redeveloped, it will not ultimately be compared with the buildings which have been replaced. Rather, the new building will be judged against its neighbours, and so it is these buildings which should normally form the basis of the typology study.

In the event that the typology is clearly different on each side of the site, a choice must be made between the two. In most cases it will be clear which one predominates along the street, and this should then be chosen. If there is no obvious prevailing typology, then either of the neighbouring ones or a combination may be chosen within certain constraints.

Top: Here there is a single typology along the street, giving a clear guide.

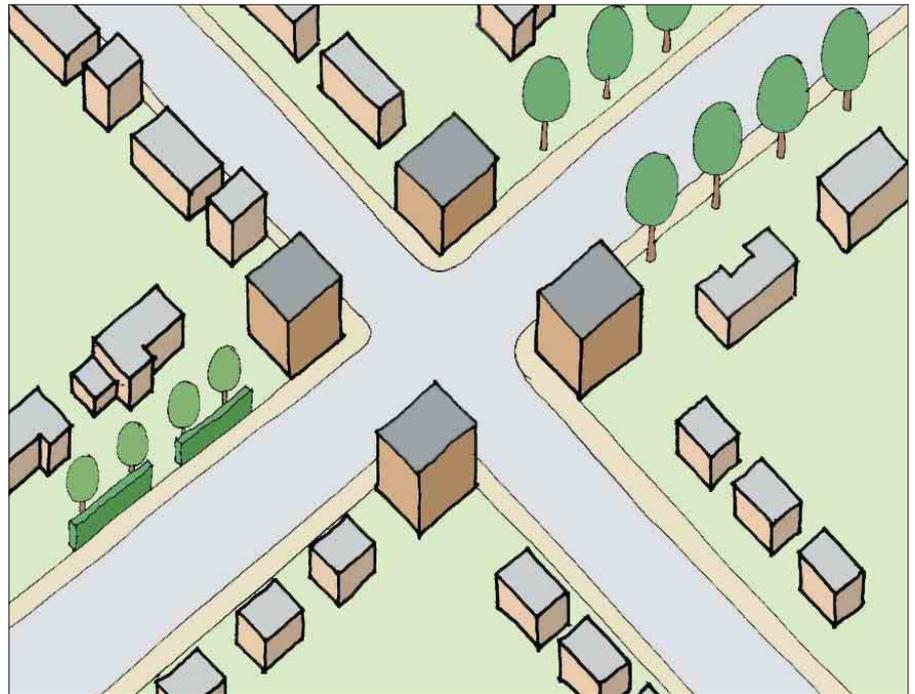
Middle: This site sits between two typologies which both occur over some length. Here, either of them would be suitable to be used for this site.

Bottom: Although this site sits between two typologies, one of them is by far the most predominant. In this instance, it should be used in favour of the minor one for the new proposals.



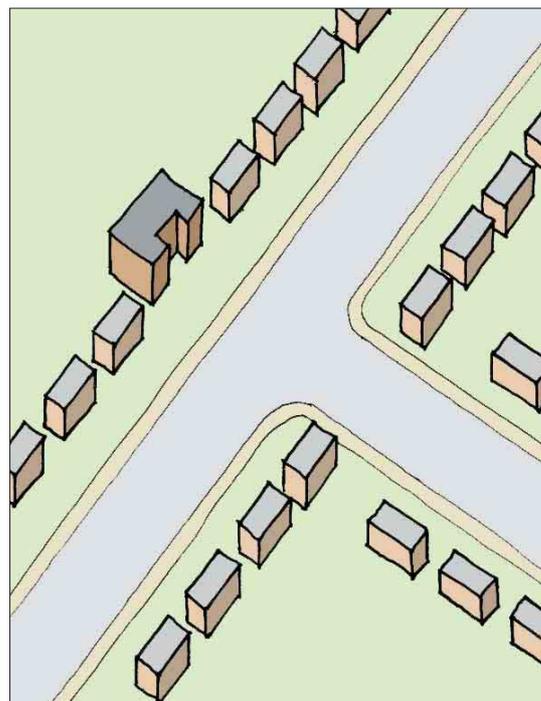
Appendix 1

Explanation and Selection of a Typology and Definitions of Key Characteristics – Typology Data



Corners and junctions typically provide a much more complex set of constraints than simple lengths of street, and will often require a more sophisticated approach. It may be that corner buildings sit at the junction of two very different typologies which cannot be reconciled in one design. It is also the case that corner sites are very often highly visible, and give the opportunity to create a strong landmark, building up richer urban character for the area as a whole.

In these instances, the buildings on a junction are more likely to relate to one another than to their immediate neighbours. They might also be larger than the other houses, and corner plots are often suited to flats or mixed-use schemes rather than a single house.



Top: Bold corner buildings can help to mediate between different typologies by providing a 'bookend' effect. They will often relate more closely to each other than to their immediate neighbours.

Bottom: Buildings which form the termination of a vista may be considered as special cases, provided that the argument for this is carefully reasoned, and the scheme promoted is of high quality.

Buildings which sit at the head of a junction may also be a case for breaking with the general run of the typology, where they can create a notable termination to the vista.

Schemes which fall into these categories will be judged on their individual merit, with the presumption being that a high standard of design and carefully reasoned assessment of the context is required to inform the design.

Appendix 1 *Typology Data*

Explanation and Selection of a Typology and Definitions of Key Characteristics – Typology Data

The analysis of the existing typologies will assist any developer/designer in identifying the key traits of the buildings and landscape which form their context. These can then be used as guidance for the new scheme. Typology data, together with a cross section showing the relationship of development proposals to the street, will form an important part of an application, and allow the designer to clearly demonstrate the integrity of their design.

The following elements are regarded as the core set of criteria which should be used to establish the characteristics of the typology. In some instances, such as corner plots, it may not be possible to apply this list fully. Others will require more detail if the typology has unique features, which need to be noted.

Typology Data

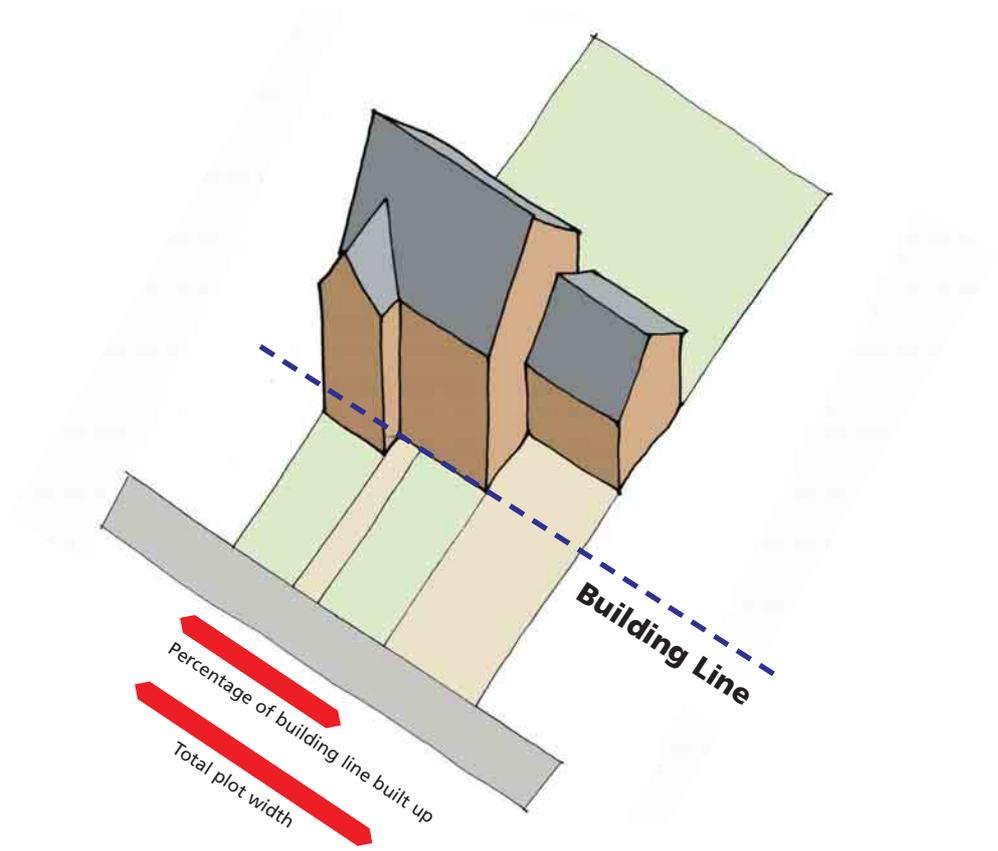
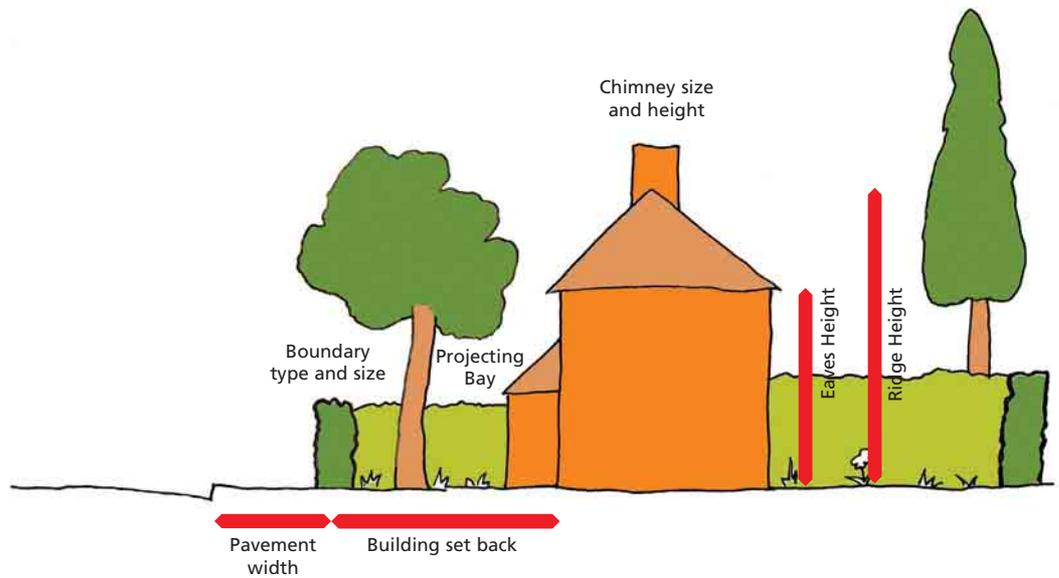
Plot Width	The typical width of each plot - note any significant variations.
Building Line	This is defined as the line on which the front of the main building volume stands, ignoring elements such as bays which project forward or garages/side extensions which may be set back.
Building Line Build Up	Describes the percentage of each plot width that is built up, ignoring any side extensions.
Building Set Back	Note the width of the pavement or verge, and the distance from the front boundary to the building line.
Front Boundary	Description of the boundary type, including height and construction, and noting any planting, including layout and species.
Landscape Setting And Features	Note main features and layouts which contribute to the landscape context, such as the occurrence and variety of trees and planting and common features, such as lawns and hedges.
Plot Format	Detached house, semi-detached house, terraced house, flats etc.
Parking	Pattern of hard standings and garages.
Plot Access	The location of vehicular and pedestrian access points in relation to plots and buildings.
Building Format	Patterns in the relationship between elements of buildings that make up their mass.
Key Dimensions	Eaves height, ridge height and roof pitch.
Key Features	Elements such as bays, dormers, repeated gables etc.
Roofing Materials	Details of ridge/bays/canopies etc.
Wall Materials	Note main materials used, e.g. brick, render etc.
Window Format	Specify if sliding sash, side or top hung, and any other key features.
Typical Details	Note key details such as window and door surrounds, arches, chimneys, etc.

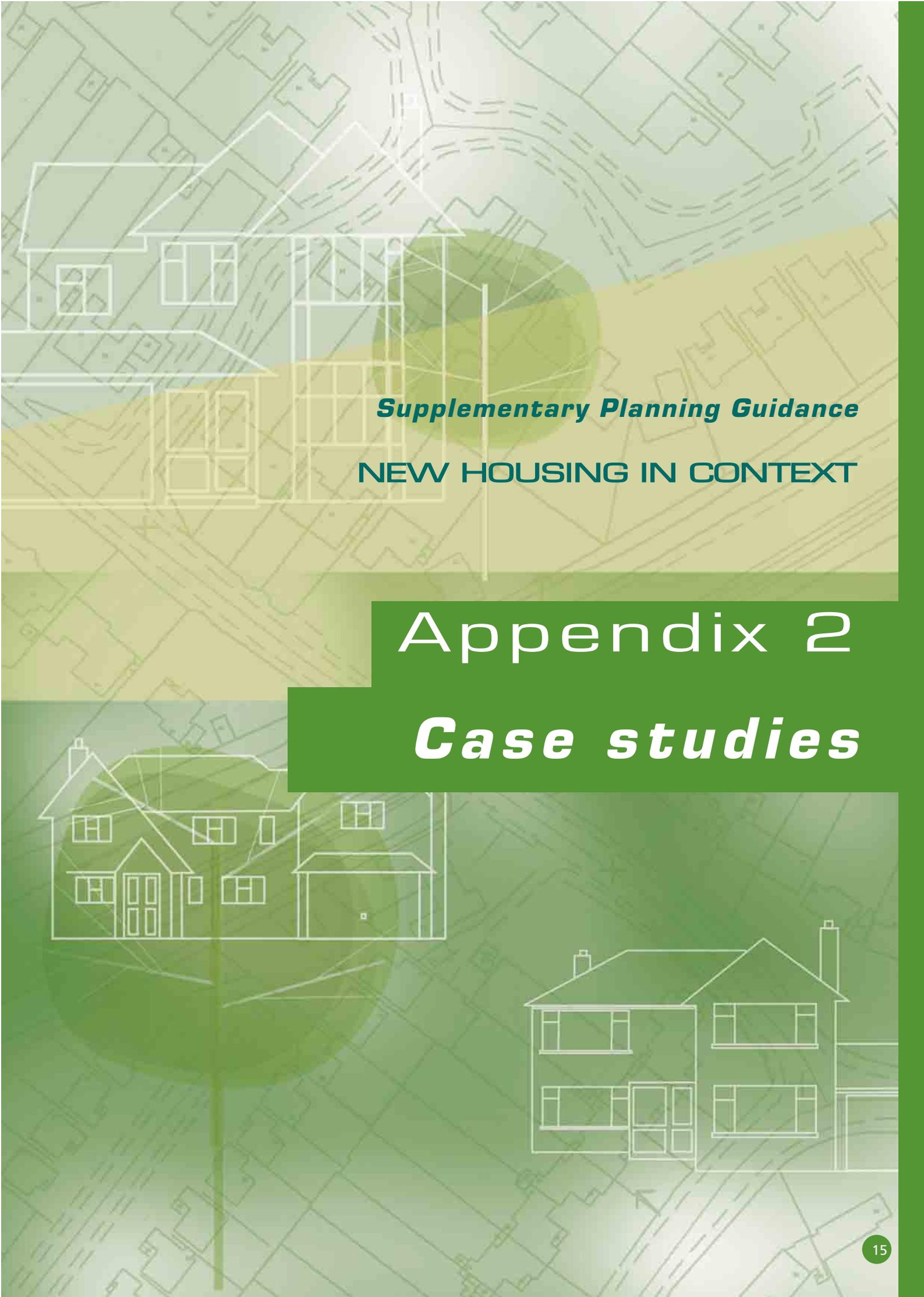
Appendix 1 *Street Section*

Explanation and Selection of a Typology and Definitions of Key Characteristics – Typology Data

Street Section

In order to properly analyse the existing typology, it will be necessary to prepare a section through the street. This will illustrate key elements of information such as boundary treatment, building set back, eaves height, ridge height and landscape features. A section through the proposal to the same scale will demonstrate how the designer has responded to the typology by allowing a direct comparison.





Supplementary Planning Guidance
NEW HOUSING IN CONTEXT

Appendix 2

Case studies

Appendix 2 *Case Studies*

This Appendix presents information on how the methodology can be applied to different forms of housing in different contexts within Solihull. The four case studies identified within the residential areas of Solihull are not presented as examples to be copied but to stimulate thinking.

Each case study presents details of a redevelopment scheme, an assessment of the context, an evaluation of the proposal and an example of applying the design principles based on the key characteristics in the typology data.

The case studies are examples to illustrate how the principles of this SPG can be applied. They are not prescriptive or exhaustive and the solutions indicated do not take account of all material planning considerations and development constraints.

Case Studies

- 1. 339 - 347 Station Road, Dorridge**
- 2. 8 - 20 Whitefields Road, Solihull**
- 3. 37 - 39 Avenue Road, Dorridge**
- 4. 348 Station Road, Knowle**

Case Study 1 339-347 Station Road, Dorridge

Project Outline

Proposal to replace four semi-detached houses and 1 detached house with 24 flats in 4 blocks. Three of these face directly onto the street, whilst the other one is accessed from the car park.

The site sits between two different building typologies, one of which is a Church, and so is ruled out as suitable for housing. The other is a row of 2 storey Edwardian properties with some rooms on the second floor in the roof space. Despite variations in the details of the buildings, they establish a strong building line, with clearly continuous eaves and ridge line.



Above: A location plan with the site hatched in red and the building line clearly indicated as a blue dotted line.

Below: The existing semi detached buildings with their heavily planted front gardens.



Case Study 1 339-347 Station Road, Dorridge



Above: The neighbouring buildings used to establish the typology for the site

Typology Data

Plot Width	18m typical with minimum of 15m and maximum of 20m.
Building Line	Typically as indicated on the location plan.
Building Line Build Up	Typically approximately 60% of the building line is built up by the main building, with single storey garages and side extensions in addition.
Building Set Back	Typically 2.2m pavement with a 10.4m front garden which gives a total set back from the kerb of 12.6m.
Front Boundary	Typically a 2m hedge with additional trees.
Landscape Setting and Features	In addition to the strong hedge line on the boundary, trees and large shrubs are also common in front of the houses
Plot Format	Detached houses.
Parking	Garages to the side of properties, with some front drive parking.
Plot Access	Gateways opening directly onto the pavement at the front of the plot.
Building Format	Large detached houses, 2 storey with some rooms on the 2nd floor in the roof space. Building shape is a simple wide box, with the main ridge running parallel to the street.
Key Dimensions	Eaves height approx 5.4m. Ridge height approx 8.6m. Roof pitch approx 45 degrees
Key Features	Half timbered gable to the street - approx 4m wide. Substantial brick chimneys - typically over 2m tall with three pots. Single storey bays.
Roofing Materials	Dark brown/terracotta plain tiles with matching ridge.
Wall Materials	Bright terracotta smooth red brick with smooth sandstone quoins.
Window Format	Windows are vertically proportioned, with wider panels split into several vertical casements. Typical Edwardian pattern uses tall lower side hung casements with square top hung casement.
Typical Details	Stone quoins, lintels and cills, with more elaborate brick and stone detailing around the door, and a stone bay window. Some buildings use very pale cream bricks for details/quoins in place of stone.

Assessment of the proposal

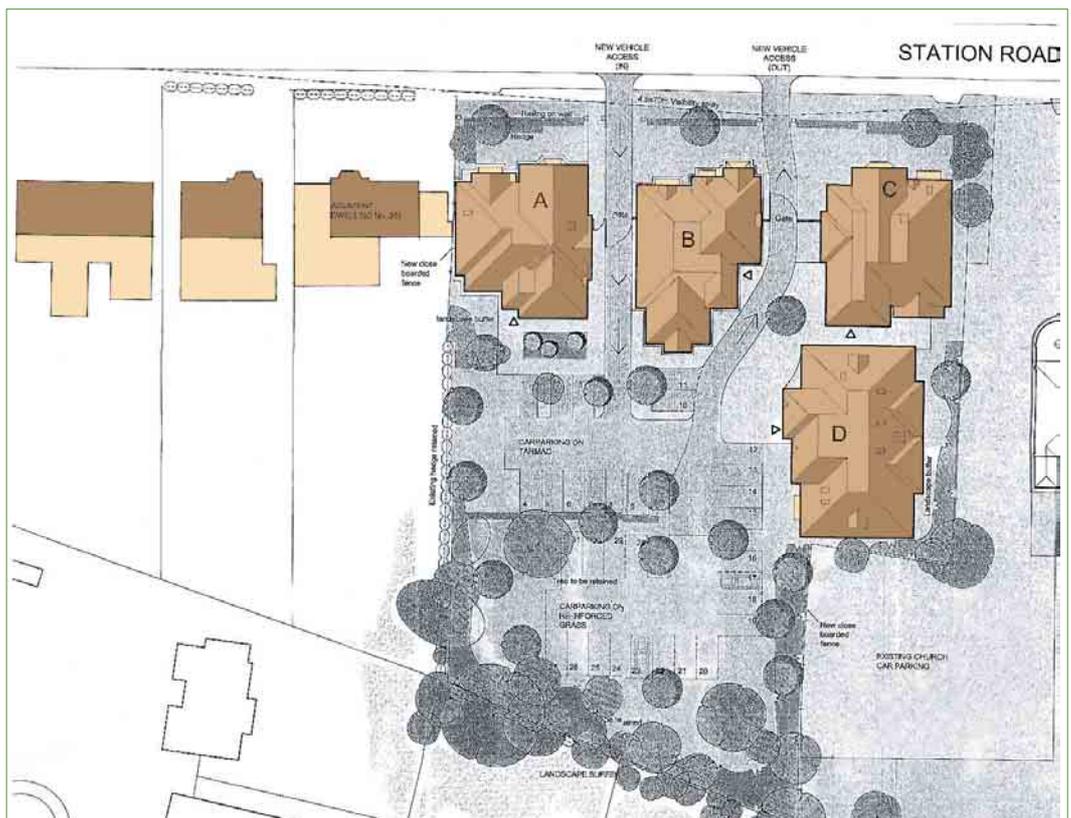
Whilst superficially acceptable from an architectural point of view, the proposal could be improved on a number of counts which would help it to relate more seamlessly with the neighbouring typology:

- The building line of the proposal only partly follows that already established by the neighbouring buildings. The buildings themselves are also heavily articulated, and much more complex than the adjacent typology. This further fragments the building line and dilutes the existing context.
- The front boundary treatment breaks substantially with the prevailing typology, and not only includes the provision of railings, but adds in a deep verge between the railings and the pavement. This does not occur elsewhere on the street and represents a major change to the public space. This change has largely been brought about by the switch from driveways serving each dwelling and only a few vehicles, to a large shared car park where many vehicle movements can be expected and where more rigorous visibility splays are required.

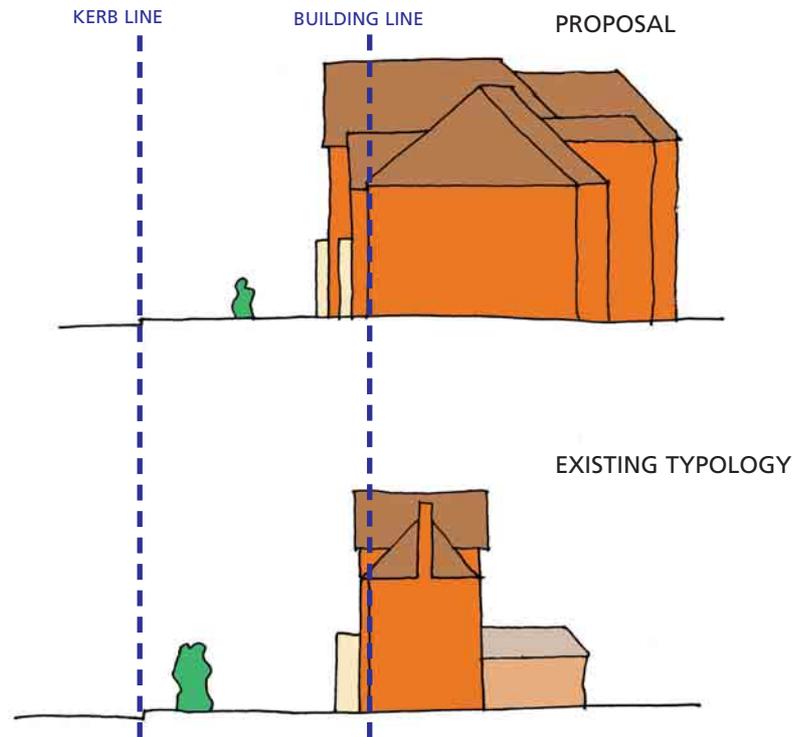


Above: The street elevation showing the proposed buildings in context.

Below: The plan for the proposed scheme. Note the large three storey block to the rear of the plot overlooking the church and car-park, and the large communal parking area which fills most of the site not used by buildings.



Assessment of the proposal



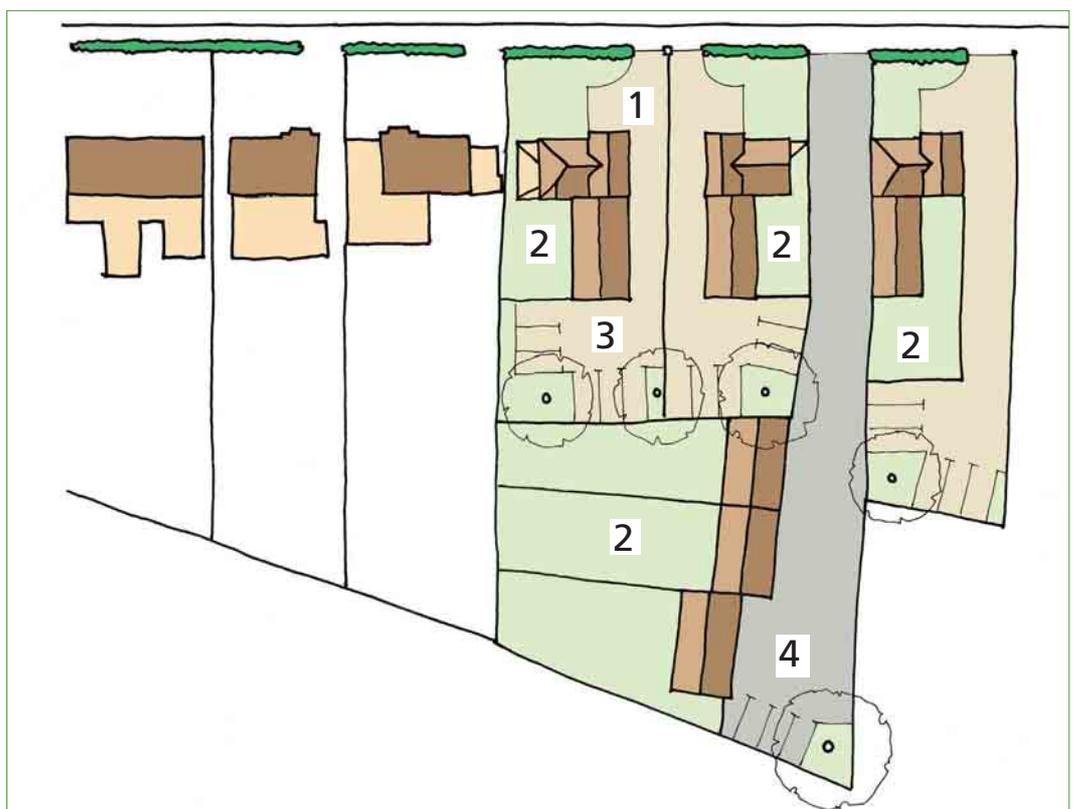
The sections above show a comparison between the proposal and the existing typology. The building line is established by the main body of the typology building rather than the projecting gable or bay, but the proposed scheme projects substantially forward of both. At the front boundary, the substantial hedge at the edge of the pavement has been replaced by railings and planting set back behind a verge. This greatly increases the level of visibility of the front gardens and removes privacy, it also significantly widens the street scene by allowing the buildings rather than the hedge to provide the primary visual enclosure.

- The scheme successfully identifies and follows the typical plot width, however, the buildings which are then placed onto those plots are much wider, filling 80% rather than 60% of the building line.
- Although the eaves height and roof pitch of block A initially match the existing neighbouring building, this is not continued along the street, and the bulk of the roofs in particular continues to increase. What is also noticeable is that the gables facing the road vary in width and height, rather than maintaining the steady rhythm set up by the neighbouring plots.
- The scheme includes a substantial new building at the rear of one of the plots within the centre of the block, with the same scale and volume as the buildings facing the street. This creates a very dominating presence due to its visibility from the street and adjacent properties.

Example of redevelopment in the context of the neighbouring typology

The scheme below illustrates how the SPG can be applied, based on the previous typology study. This creates a total of 15 units in place of the original 5, with a mix of 12 flats and 3 houses. It differs from the original proposal on the following key points:

- It closely follows the basic form and scale of the neighbouring typology, respecting the eaves height and ridge height. Most importantly, it retains the plot widths, building line build-up and front boundary treatment.
- Additional volume is added in the form of wings to the rear of the buildings, where they are set back from the building line and do not interrupt the street scene, and through single storey side extensions, following the precedent of the garages in the existing typology.
- Gardens are provided for each building, and each has a small car-park in place of one large communal one which allows for the provision of lawns, planting and the retention of important landscape features to reflect and preserve the existing landscape character. This also impacts on the surrounding properties, while providing better security through more frequent use of a variety of areas on the site.
- To ensure that the entrance and access works effectively, a turning/passing area is included immediately inside the gateway.



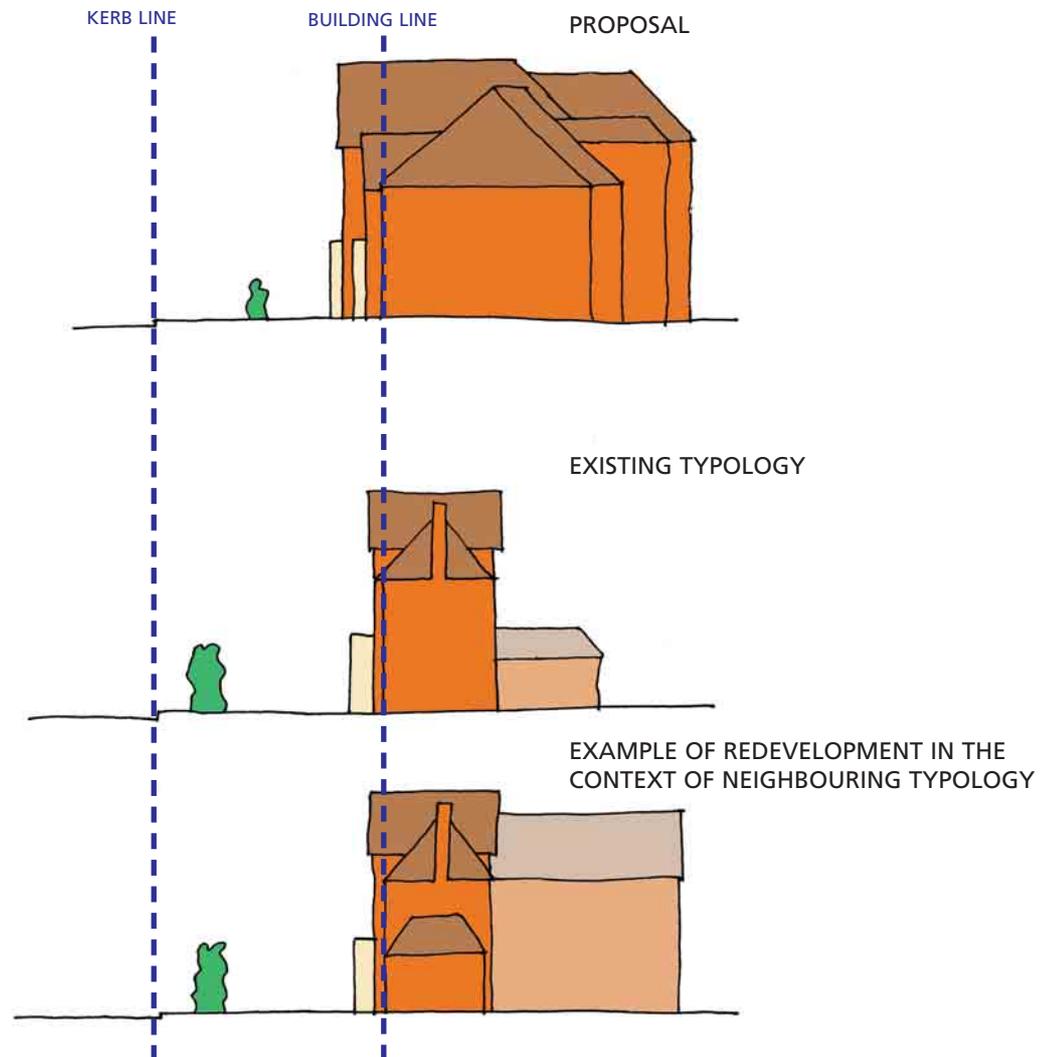
Above: The alternative scheme closely mimics the form of the existing typology, with additional building volume provided in buildings set well back from the building line.

Below: The plan for the alternative scheme.

1. Turning/passing area
2. Private garden
3. Parking for residents and visitors
4. Mews

Case Study 1 339-347 Station Road, Dorridge

Example of redevelopment in the context of the neighbouring typology



The sections above demonstrate how the additional accommodation is provided within the example, using a more modest scale of building based closely on the existing typology. Crucially, the new scheme uses a series of smaller entrances off the road which avoids the need to set the hedge line back to create the visibility splay.

- The use of separate car park entrances in place of one combined one ensures that each entrance is used with far less frequency. This permits greater flexibility in the application of visibility splays, ensuring that the front boundary can be better maintained, an important feature of the landscape character.
- The scheme uses low scale mews buildings to create additional accommodation within the plot. This avoids the need to place any substantial buildings against the boundaries at the rear of the property, significantly reducing the impact of the scheme on the neighbouring rear gardens and the church. It also ensures that the scheme contains a mix of housing types, including some family houses alongside the flats, as recommended in PPG3.
- The mews is entered between two of the buildings, and provides three houses with integral garages. Visitor and over-spill parking is provided off the turning area at the bottom of the mews.

Case Study 2 8 - 20 Whitefields Road, Solihull

Project Outline

Proposal to replace 9 houses, some detached and some semi-detached with over 70 flats in three storey blocks. The scheme features a limited amount of surface parking.

The site sits on a prominent corner junction, close to the centre of Solihull, and terminates the long vista of the approach to the town. In this case, it is the existing buildings that define the character and local distinctiveness of the area. The existing buildings are very suburban in character, being exclusively 2 storey buildings, with a mix of typical detached and semi-detached suburban houses with front drives, side garages and long gardens. These clearly define a building line on a steady curve, but not parallel to the road.



Above: The location plan with the site hatched in red and the building line clearly indicated as a blue dotted line.

Below: Two of the existing houses on the site, clearly showing both the architectural style and the front boundary treatment.



Case Study 2 8 - 20 Whitefields Road, Solihull



Above: Photographs of the existing buildings on the site. Note also the large existing block of trees and hedge on the junction. This forms a key part of the character of the site, and is easily recognised.

Typology Data

Plot Width	10m typical width with 12m maximum and 8m minimum.
Building Line	On a curve, not parallel to the road.
Building Line Build Up	Predominant format is for approx 90% of the building line to be built, with three plots at the southern end being 60% built up.
Building Set Back	Varies. 2.2m pavement is standard, but building set back varies from 8m to 18m (However the building line is a clearly identifiable curve).
Front Boundary	Varies, but typically includes a low retaining wall surmounted by hedgerow or planting.
Landscape Setting and Features	Front gardens feature predominantly raised lawns with shrub planting. Few trees in front gardens other than the group on the junction. Rear gardens are heavily planted with large lawns and hedge boundaries.
Plot Format	Detached houses.
Parking	Front drive with garages either to the side of the properties or built in. All properties have driveway parking, typically 30% of the front garden area.
Plot Access	Drives opening directly onto the pavement at the front of the plot.
Building Format	Modest detached and semi-detached 2 storey houses.
Key Dimensions	Eaves height approx 5m. Ridge height approx 7.5m. Roof pitch approx 45-50 degrees
Key Features	Many houses feature gables or dormers. They also frequently feature a low secondary roof over a porch/bay window/garage.
Roofing Materials	Dark brown/terracotta plain tiles with matching ridge.
Wall Materials	Predominantly white painted render with some red brickwork detailing.
Window format	Window format typically wide but subdivided into vertical panes. Side hung casements only.
Typical Details	Render with only occasional brick detailing such as an arch over window/diamond detail decoration on gable end. Brick chimneys common.

Assessment of the proposal

The proposal featured below represents a major shift away from the typology that exists on the site, and without doubt will change the character of the area significantly. The scheme is successful in bringing higher density development, but it does this at the expense of several fundamentals of good urban design practice:

- The building line, clearly established by the existing buildings, has been lost, both in its alignment and its character.
- The rhythm of the relatively narrow plot widths has been replaced by an undivided area of greenery surrounding large isolated blocks. This is at odds with the existing character.
- The buildings themselves owe little to the character of those they replace, being a storey taller, of considerably greater bulk, and of a style which can only be described as low rent and anonymous.
- If these larger buildings were being promoted on the basis that they would form a new landmark as the termination of the vista along the road they represent a very poor design. The primary view they will afford is of the gap between two buildings and an oblique view of one of the gable ends.



Right: The proposed site layout. Note the irregularity of the building line to the street and the lack of definition of public and private space.

Case Study 2 8 - 20 Whitefields Road, Solihull

Assessment of the proposal

- It is concerning that the site has such small parking provision. Whilst this can be justified by the application of PPG13, the scheme simply does not reflect the reality that these flats are likely to be occupied by car owners, and as a result, will have an in-built problem of on-street parking close to a busy junction.
- Although there is a significant amount of the site area retained as green space, it does not properly form any kind of practical amenity space for the residents, and is merely landscaping as a visual amenity, rather than an attempt to preserve the exiting landscape character of the area. This also has the effect of eroding the natural delineation between public and private space to the detriment of both.
- The character of the front boundary is not clear from the plan submitted, but from the lack of planting indicated it would be fair to conclude that little or none is intended. This has the effect of opening up the street scene, which was formerly defined by hedges and retaining walls.

Right: Sample elevations of buildings on the main street frontage in the proposed scheme juxtaposed with a photograph of the existing building in the same setting. The differences in scale, rhythm, materials and details are plain, and highlight how unsympathetic the scheme is.



Example of redevelopment in the context of the existing typology

The scheme illustrated below contains 54 flats with varying combinations of setting, amenity space and parking. A significant difference is that all the dwellings do have either a parking or garage space.

- The proposal comprises a group of buildings facing the street in the same manner as the existing buildings, with two rear mews courts connected by a pedestrian link.
- The scheme is entirely 2 storey, in keeping with the existing buildings on the site. The buildings facing the street would typically contain 2 flats.
- Garage spaces are provided on the ground floor of some of the mews buildings, serving both the mews flats and some of those which face the street.
- The mews is designed to be an adoptable space, well overlooked by habitable rooms. The careful use of lighting and planting enables this to fit the role of the 'home-zone' promoted in "By Design" and other best practice guidelines.
- The front boundary treatment can be retained and improved, including the low retaining wall. The small block of trees and old hedgerow which formed the termination of the vista has been maintained as a key feature.

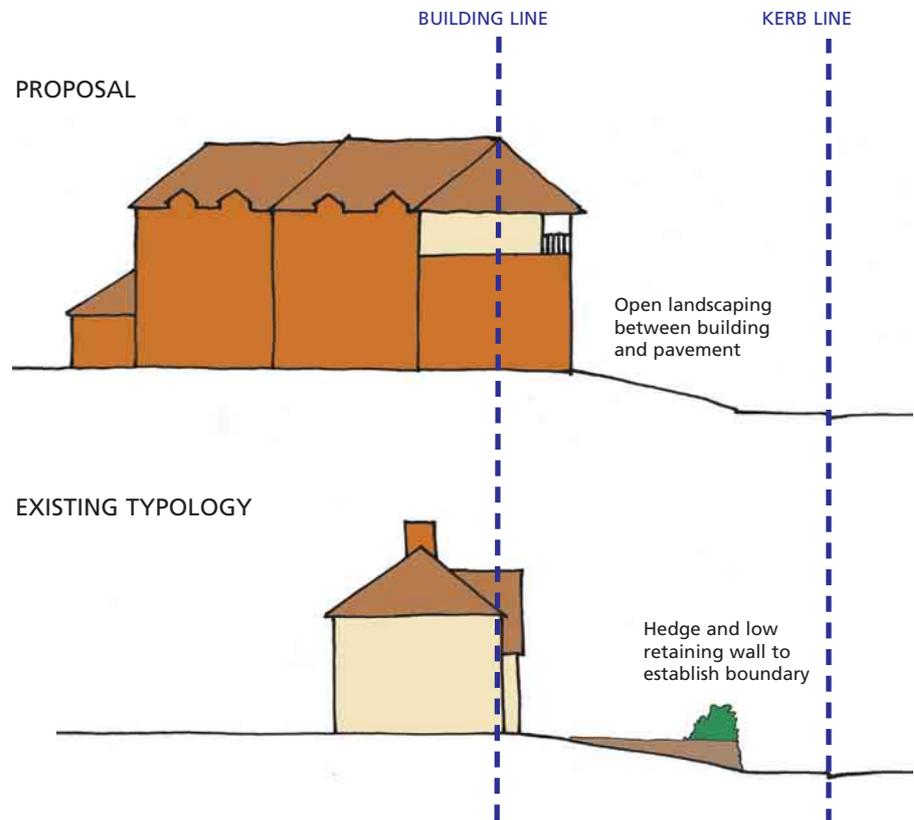


Right: The alternative scheme uses a combination of flats facing the street and a new mews development within the block. Some flats have private gardens, whilst others have access to shared gardens.

1. Mews
2. Enclosed garden
3. Parking for residents and visitors
4. Private front garden
5. Retained planting
6. Shared garden

Case Study 2 8 - 20 Whitefields Road, Solihull

Example of redevelopment in the context of the existing typology



The sections above provide a comparison between the proposed scheme and the existing buildings, with section lines taken at the same point on the site.

Whilst clearly bulkier than the existing building, the proposed scheme also pushes further forward of the building line, giving it much greater prominence. The omission of the low retaining wall and planting diminishes the distinction between public and private space, and almost gives the appearance of the public space flowing right up to the front wall of the building.

A further point is the absence of chimneys on the proposed scheme, a significant point given that these buildings will be seen in silhouette at the end of the road.

Case Study 3 37 - 39 Avenue Road, Dorridge

Project Outline

This is a proposal to replace 2 detached houses with a three-storey block of flats, modelled on the neighbouring Edwardian semi-detached houses.

This site sits on a street, which contains a wide variety of different typologies, and includes two examples of poor urban development in the two cul-de-sacs to either side of this site. The Edwardian semis present the ideal model for subdivision into flats, being large buildings with distinctive character.



Above: The location plan with the site hatched in red and the building line clearly indicated as a blue dotted line.

Below: The neighbouring Edwardian semi-detached houses taken as the typology to be used for this site.

Case Study 3 37 - 39 Avenue Road, Dorridge



Top and middle: Neighbouring buildings, demonstrating the clear building line and strong boundary treatment immediately around the site.

Bottom: One of the two existing houses to be replaced.

Typology Data

Plot Width	15m typical.
Building Line	Varies, but the neighbouring Edwardian semis form the predominant typology on which the proposal will be based.
Building Line Build up	Approximately 50% of the building line is built up with full height buildings.
Building Set Back	2.5m pavement with a 14m front garden giving a total dimension of 16.5.
Front Boundary	Defined by hedges and/or individual shrubs.
Landscape Setting and Features	Mature landscape setting, comprising densely planted large trees, hedges and lawns to the front and rear of buildings and neat shrub planting.
Plot Format	Modest detached houses and large historic properties.
Parking	Garages to the side of properties, with some front drive parking.
Plot Access	Gateways opening directly onto the pavement at the front of the plot.
Building Format	3 storey semi-detached houses.
Key Dimensions	Eaves height approx 6.5m. Ridge height approx 9m. Roof pitch approx 40 degrees.
Key Features	Repeated small dormers and blind gables facing the street with half hip. Steeply pitched timber porches and bay windows on the ground floor. Substantial brick chimneys.
Roofing Materials	Slates with terracotta ridge tiles and lead detailing to hips.
Wall Materials	Bright terracotta smooth red brick with smooth sandstone detailing.
Window Format	Vertical sash windows to main body of the building with small side-hung casements to the dormer windows.
Typical Details	Elaborate stone and brick detailing around the windows. Steeply pitched timber porch, with elaborate pierce-work painted white. White timber bay windows with curved head to the top sashes.

Assessment of the proposal

This scheme represents a fairly sophisticated attempt to design something in tune with the neighbouring typology. However, because it is a partial copy of the original building, the following differences are more notable:

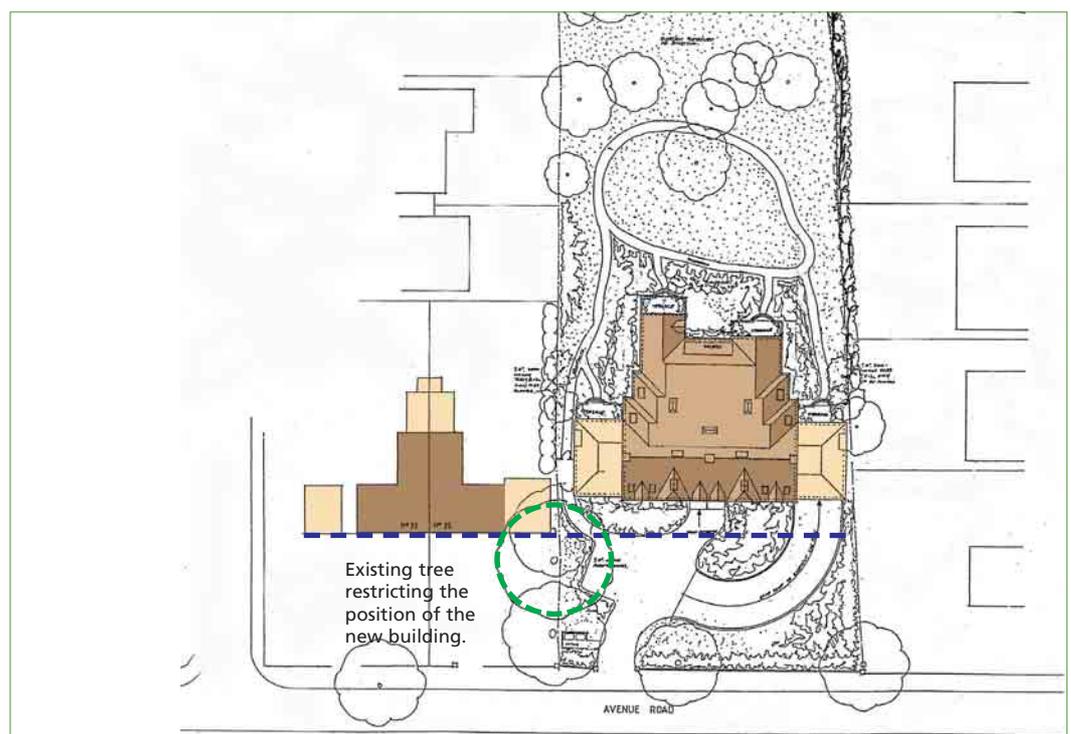
The basic format of the building has been followed, but the height has been reduced giving the building a 'squashed' appearance.

- The roof has been lowered in relation to the top floor windows. This changes the character of the eaves, and will introduce additional down-pipes which will break the elevation. These have not been shown on the drawing.
- As the block is served by a single staircase, the doors have been moved to the centre of the building elevation and two bay windows omitted.



Right: The plan and elevation for the proposed scheme.

Note the set-back from the building line established by the neighbouring properties, the sweeping drive down to the basement car-park and the overall depth of the building.



Case Study 3 37 - 39 Avenue Road, Dorridge

Assessment of the proposal

- The building includes underground parking, which in itself is a noteworthy move. However, a large sweeping ramp is included in the front garden to descend to this. A straight ramp from the street would have less impact on the front garden, allowing most of it to remain as landscaped space, it would also be easier to negotiate.
- The scheme is effective in matching the low side wings on the existing typology which house garages. The use of the roof space to provide small terraces screened from the street is an intelligent touch and demonstrates how existing forms can be re-interpreted without greatly affecting the street scene.
- To provide a greater floor area and hence a greater number of flats, the depth of the building has been increased substantially. This gives a visual bulk to the block which will be very apparent from the street as it will prevent oblique views between the blocks. The increased building depth also gives rise to issues of overlooking, as habitable rooms on upper levels are significantly closer to the surrounding gardens than would be the case with a shallow building depth.

In this example the ability of the designer to place the building on the same building line as the neighbouring typology has been precluded by the presence of an existing mature tree. Whilst from a building design point of view there may be a strong case for removing the tree to facilitate the correct positioning of the building, mature trees such as this make a significant contribution towards the existing landscape character of the area. In cases such as this, further information is required, perhaps including a report on the age, species and health of the tree. This will allow the designers and planners to make an informed decision as to where the priority should lie.

Right: A larger scale juxtaposition of the existing building and the proposed neighbouring building demonstrates both the superficial effectiveness of the scheme and the flaws in the quality of the overall design and the detailing



Applying the Housing in Context Methodology

The proposal to develop this site was agreed on appeal, and is a sophisticated attempt to match the neighbouring typology, resulting in a proposal which does, generally, respect the character and local distinctiveness of the area.

There is therefore little to be gained from producing an example demonstrating how the guidance could have been applied to the site. It should however be noted that the application of this guidance would have resulted in improvements as detailed in the assessment.

Case Study 4 348 Station Road, Knowle

Project Outline

Proposal to replace a detached house with a larger 3-storey block of 5 flats. The existing building is set back from the road and partially screened by planting.

Being a corner site, this proposal relates more closely to other buildings on the junction rather than to its immediate neighbours. This strategy, which creates a 'bookend' effect is helpful in creating a sense of place to the junction, it also allows a more intensive development to be accommodated without diluting the character of the main lengths of street to either side. The proposed site plan shows the full extent of the new development on the opposite side of the road.



Above: The location plan with the site hatched in red. The building line is shown as a blue dotted line, and clearly demonstrates that the existing building already breaks with the prevailing building line along Station Road.

Below: The site viewed from the south-eastern corner of the junction, with the existing building clearly visible from the road.



Case Study 4 348 Station Road, Knowle



Above: Photographs of building immediately around the site and on the junction. They demonstrate the predominantly three storey character in the immediate area.

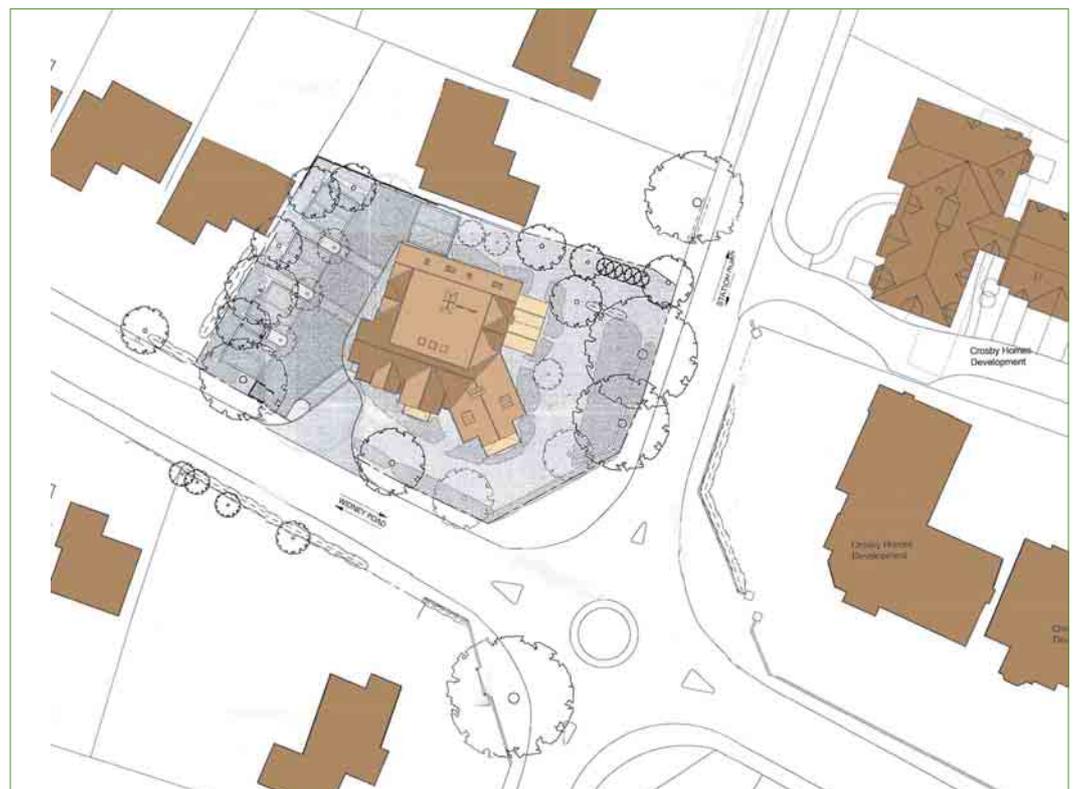
Typology Data

Plot Width	Corner plots facing junction – sizes vary.
Building Line	Due to the corner location there are two building lines, as indicated on the diagram.
Building Line Build up	Approximately 60% of the building line is built up with full height buildings.
Building Set Back	Pavement width generally around 2m, with a 10m front garden between the building and junction.
Front Boundary	Low wall with substantial hedge and intermittent tree planting.
Landscape Setting and Features	Landscape and trees in particular are a dominant feature. Curtilage to the front of plots typically contains shrubs/hedge in addition to lawn and some hard standing. Large, heavily planted rear gardens with lawns and hedge and tree boundaries.
Plot Format	Detached houses with very large properties on corner sites.
Parking	Some garage parking, but mainly in open courts away from the junction.
Plot Access	Pedestrian gateways opening directly onto the pavement at the front of the plot. Car parking access set away from junction for safety reasons.
Building Format	Substantial three storey buildings, either houses or flats.
Key Dimensions	Eaves height approx 7.5m. Ridge height approx 10m. Roof pitch approx 40 degrees.
Key Features	Dormers/gables common. One building includes elevational orientation towards the junction. Older buildings have substantial chimneys.
Roofing Materials	Mixed, but includes slates and plain tiles.
Wall Materials	Warm terracotta brick with rendered panels – some of these have timbering.
Window Format	Vertically proportioned casement windows with square top light to each panel.
Typical Details	Window heads are typically executed in brick, although the more modern building uses a poor soldier course detail. Brick chimneys are common.

Assessment of the proposal

The scheme proposes a very bulky block, which sits centrally on the site, and extends in bays and projections in a number of different directions. It is an attempt to bring more intensive development into the area in line with PPG3, but could be improved:

- The design has clearly tried to address the need for some presence on the roundabout, whilst at the same time trying to observe the existing building lines. This has created an ungainly shape which is not particularly successful in either case.
- The scheme makes poor use of the land in providing amenity space for the residents, despite being on a relatively large site.
- Parking is over-provided under PPG13, and is very close to existing boundaries with rear gardens. This will cause unnecessary disturbance to existing residents.



Above: The East Elevation of the proposed scheme. The wing of building on the left of this image is the one projecting towards the junction.

Below: The proposed site layout. Note how the car-parking completely fills the whole width of the plot behind the building.

Case Study 4 348 Station Road, Knowle

Assessment of the proposal



This shows an axonometric view of the proposed scheme, showing how the volume of the building relates to the junction and to its neighbours. Note the bulk of the building, and its central position on the site. This attempt to observe both the building line of the neighbouring plots and relate to the junction does not successfully achieve either aim, and the result is a large, overly complex building. Note also how the large car park wraps around the rear of the building and adjoins the neighbouring gardens.

- Because the scheme is so square and set back from the road, it is particularly hard to avoid overlooking the neighbouring gardens from upper levels.
- The access to the parking area is very open, and affords views into it from the building curtilage. The existing boundary is typically well defined by planting and maintains a sense of enclosure to the street. The character of the street would be better maintained if continued with the use of new hedges and gates.
- Although the scheme makes an attempt to address the roundabout, the gable does little to address the public space in front of it. To do this more effectively, it needs to be much wider, and sit parallel to the boundary.
- The existing buildings which sit on the other two developed corners of the junction both have accesses from the roundabout. These are pedestrian only, but they help to confirm the importance of the junction as a public space, and this would be further reinforced by an entrance to the new building.

The proposal was refused planning permission and was later dismissed on appeal. The Inspector gave three key reasons for dismissal:

- The proposal would contrast strongly with the predominantly two-storey character of this sector of the cross-roads.
- The height and massing would not make a satisfactory transition between the scale of development to the south and west and that in the northern sector.
- The north elevation would appear dominant and oppressive when viewed in relation to no. 346, due to its height and depth.

The Inspector's reasons for dismissal will be a material consideration in any future proposals for the redevelopment of this site.

Example of Redevelopment for a landmark building

The example below illustrates the need for a landmark building on the junction and is based on the following principles:

- The building addresses the roundabout first and foremost, and makes no attempt to balance this against the building lines given by the neighbouring plots. This avoids the uncomfortable arrangement of having two conflicting building elements.
- The proposal comprises a 3-storey element close to the roundabout, with 2-storey side wings. It presents a bold gable to the junction, making it a clear landmark, and ensuring that it addresses the open space of the cricket pitch beyond.
- It sits parallel to the existing boundary, and presents a pedestrian entrance to the public space. This responds to the existing entrances on the other corners of the junction, and emphasises the importance of the roundabout as public space. It is not necessary for this entrance to serve every flat in the development to be effective at an urban design level.
- 8 parking spaces are included for the 5 flats, giving an average of just over 1.5 per dwelling, in line with PPG3.
- The reduction in parking provision and the change in the position of the building allows for parking to be accommodated without it being close to the rear gardens of the other properties.



Right: The alternative scheme uses a simpler arrangement of buildings, and faces onto the junction. In doing this, it creates a better relationship with the neighbouring buildings, and reinforces the importance of the public space.

1. Front gate access
2. Enclosed garden
3. Gated parking for residents and visitors

Case Study 4 348 Station Road, Knowle



By orienting the building towards the junction, it creates a good relationship with the public space. This is further reinforced by the inclusion of a gateway leading to the front of the building. Moving the building forward on the plot creates a better relationship with the neighbouring buildings and increases the amount of private garden available to the residents.

The prominent position on the roundabout calls for a bold building to act as a landmark. There are many ways to achieve this other than the one illustrated, perhaps incorporating a tower or similar feature.

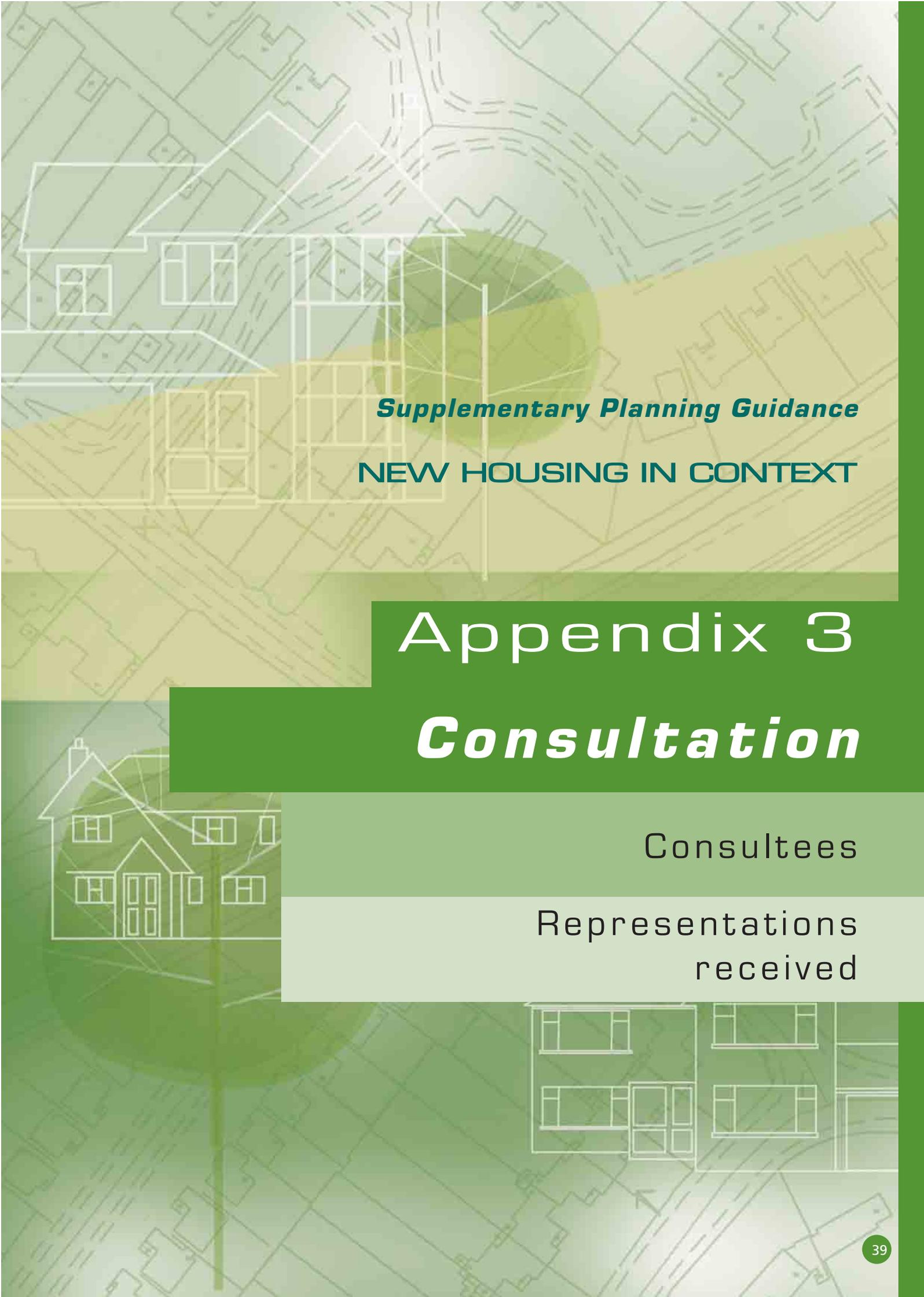
- Whilst the main elevation facing the junction has a bold gable, the rear elevation has a hipped roof, reducing its impact on the neighbouring properties.
- Because of the building's 45 degree angle on the plot, most of the windows will face away from existing rear gardens, with only the upper levels on the rear gable requiring careful handling.
- Piers and gates are used with the hedge to define the extent of public space, to give privacy, and to enhance security.
- The adjustment in the position of the building and the reduction in the number of parking spaces allows for a greater part of the site to be provided as communal garden space for the residents. This provides a better relationship between the site and neighbouring rear gardens.

Conclusion

The case studies have provided worked examples of how the design principles of this SPG can be applied to achieve solutions that respect their surroundings and result in contextual development. The aim is not to stifle innovative design or enforce pastiche.

In the majority of cases there will be other material considerations and development constraints that will need to be addressed and will influence design solutions.

There will never be a single solution. The aim of this SPG is to ensure that the key elements of local distinctiveness and character are responded to in development proposals.



Supplementary Planning Guidance
NEW HOUSING IN CONTEXT

Appendix 3
Consultation

Consultees

Representations
received

Residents Organisations

Berkswell Society
Balsall Common and Village Residents Association
Balsall Common Residents Action Group
Bentley Heath Residents Association
Billsmore Green Residents Association
Burton Green Residents Association
Catherine-de-Barnes Residents Association
Cheswick Green Residents Association
Dickens Heath Residents Association
Dickens Heath Village Residents Association
Dorridge and District Residents Association
Hampton-in-Arden Society
Harwood Grove Residents Association
Hatchford Brook Residents Association
Hockley Heath Residents Association
Knowle Society
Marston Green Residents Association
Olton Residents Association
Shirley Residents Association
Solihull Ratepayers Association
Solihull Residents Association
Tidbury Green Residents Association
Triangle Residents Association
Wells Green and Lyndon Residents Association
White House Residents Association
Windfall Watch

Residents

Mrs W Abbotts
Mr B Austin
Mr Boxall
Mrs J Brawn
J W Brown
Mr P Byrne
Mrs A Clark
Mr R Cobb
Mr A Coleman
Mr & Mrs Courts
R Field
Mrs Fogarty
Mr A J Harper
Mr P Hensel
Mr Hughes
Mr Jackson
Ms L Kennedy
Mr P Manton
Mrs J Morton
Mr G Nall
Mr R Nallamilly
T Osborne
J Palmer
Mr R Price
Mr P Reid
Mr Rogers
Mrs Salloway
Mr P Scott

Ms J Shearman
Mr J Smith
Mrs Stanier
Mr H Warrilow

Councillors

Councillor H J Allen
Councillor K L Allsopp
Councillor D S Bell
Councillor J D Blake
Councillor J S Bramham
Councillor I B Chamberlain
Councillor D J Cornock
Councillor M P Corser
Councillor I Courts
Councillor Mrs H M Cox
Councillor G A Craig
Councillor N Davis
Councillor S G Davis
Councillor R C F Draycott
Councillor Dr D W Evans
Councillor J Gandy
Councillor Mrs S Gomm
Councillor K Harrop
Councillor K L Hawkins
Councillor H R Hendry
Councillor A F Hill
Councillor I M Hillas
Councillor P C M Hogarth
Councillor O M Hogg
Councillor Mrs D E Holl-Allen
Councillor Mrs B J Kellie
Councillor J H Kimberley
Councillor L W P Kyles
Councillor Dr P M Lea
Councillor A M Mackiewicz
Councillor A W Martin
Councillor K I Meeson
Councillor A S Montgomerie
Councillor J Moore
Councillor F A Nash
Councillor Mrs F A Oakes
Councillor Mrs S Pittaway
Councillor J W Potts
Councillor S Reeve
Councillor B Reeves
Councillor J G Reeve
Councillor G E Richards
Councillor J P Ryan
Councillor R K Sleigh
Councillor N J Stephens
Councillor N J Watts
Councillor J Wild
Councillor Mrs K Y Wild
Councillor J A Windmill
Councillor N A Worley
Councillor Mrs R P Worsley

Appendix 3 *List of Consultees*

Parish Councils

Balsall Parish Council
Barston Parish Council
Berkswell Parish Council
Bickenhill Parish Council
Castle Bromwich Parish Council
Chelmsley Wood Town Council
Fordbridge Town Council
Hampton-in-Arden Parish Council
Hockley Heath Parish Council
Kingshurst Parish Council
Meriden Parish Council
Smiths Wood Parish Council

Developers/Consultants

Architectural Design Solutions
Barteak Developments
Barton Wilmore Planning Partnership
Beazer Strategic Land
Bigwood Associates
Bovis Homes
Bromford Housing Group
Bryant Homes Ltd.
CB Hillier Parker
Chase and Partners
Chesterton Planning and Economics
Davis Planning Partnership
David Wilson Homes
DTZ Piedad Consulting
Fry Housing Trust
GVA Grimley
Harris Lamb Planning Consultancy
Holmes Antill
Laing Homes Ltd
M Swanick (Attwood House High Street
Birmingham)
MB Associates
McCarthy & Stone
Miller Homes
Nathaniel Lichfield & Partners
Oakmoor Estates
Oldfield King Planning
Redrow Homes
RPS
Smith Stuart Reynolds
Stansgate Planning Consultants
Stoneleigh Planning Partnership
Stonham Housing Association Ltd.
The House Builders Federation Midland Region
Tweedale Planning
Tyler Parkes Partnership
Wall James and Davis
Warwickshire Rural Housing Association
Westbury Homes
Wimpeys

Local Authorities

Birmingham City Council
Bromsgrove District Council
Coventry City Council
Dudley Metropolitan Borough Council
North Warwickshire Borough Council
Nuneaton and Bedworth Borough Council
Rugby Borough Council
Sandwell Metropolitan Borough Council
Shropshire County Council
Staffordshire County Council
Stratford on Avon District Council
Tamworth Borough Council
Walsall Metropolitan Borough Council
Warwick District Council
Warwickshire County Council
Wolverhampton Metropolitan Borough Council
Worcestershire County Council

MPs/MEPs

Caroline Spelman MP
John Taylor MP
Malcolm Harbour MEP

Government Organisations and other Action Groups

Advantage West Midlands
Age Concern
Ancient Monuments Society
Birmingham and Solihull Learning and Skills Council
Birmingham Heartlands and Solihull NHS Trust
Commission for Ancient Architecture and the Built Environment
CPRE
English Heritage
English Nature
Environment Agency – Upper Trent Area
Friends of the Earth
Government Office for the West Midlands
Highways Agency
Housing Corporation
Midlands Architecture Design Environment Society for the Protection of Ancient Buildings
Solihull Business Partnership
Solihull Primary Care Trust
The Georgian Society
Victorian Society
Warwickshire Rural Community Council
Architectural Design Solutions
Warwickshire Wildlife Trust
West Midlands Police
West Midlands Local Government Association

Residents Organisations

Dorrige and District Residents Association
Ballsall Common Village Residents Association
Solihull Residents Association
The Knolwe Society

Residents

Mr M Pheasey
Mr & Mrs Fowler
Ms J Shearman
Mr J Smith
Mr R Price
Mr & Mrs Brawn
Mr & Mrs Abbotts
S E Flavell
Mr & Mrs Jacques
K H Hohenkerk
Mr P Reid

Councillors

Councillor I Courts

Parish Councils

Castle Bromwich Parish Council
Berkswell Parish Council

Developers/Consultants

Martyn Bramich Associates
Tetlow King Planning
CgMs Consulting
Fellows Burt Dalton & Associates Ltd.
Barton Willmore Planning
The Tyler-Parkes Partnership
Countrywide Homes Ltd.
RPS Planning Transport and Environment

MPs

John Taylor MP

Government Departments and other Action Groups

Ancient Monuments Society
CABE
CPRE
English Heritage
Highways Agency

Appendix 3 *Representations received*

The following table provides a summary of representations received and the Council's response to the issues raised.

Comments	Action Taken and Justification
The need for the SPG	
<p>Disagree that there is a lack of clarity and consistency in the interpretation and of PPG3 at the national level. Objectives are consistently applied by the Inspectorate and detailed and well researched urban design guidance is available.</p> <p>The objectives are clear and desirable. There is a need for strong guidance, consistently applied, to preserve the special nature of Solihull's built environment.</p> <p>Believe the guidance will result in better design of redevelopment sites, key to public acceptance of PPG3.</p> <p>PPG3 opens the way for potentially major changes in character, so tightening of the guidelines is welcomed.</p>	<p>No change</p> <p>The Council's experience is one of inconsistency in appeal decisions. 'By Design' (DETR) recognises the role of SPG within the planning toolkit to tailor general urban design principles into the local context.</p>
Compatibility with Planning Legislation	
<p>Does not relate to or rely on any adopted UDP Policy, unacceptable in accordance with PPG12. The only link is a tenuous one to Policy H4 of the adopted UDP. The link to ENV2/1 of the emerging UDP is unacceptable as it may change as a result of objection.</p> <p>Does it form part of the UDP?</p> <p>Statements and views appear biased, oppressive and in non-compliance, breach and abuse of powers, duties and discretion delegated by legislature and executive.</p> <p>Compliance with the vague constraints and requirements is impossible and open to abuse.</p> <p>The assessment of local context is limited, contrary to PPG3 advice on assessing the wider context, and could therefore be contrary to PPG12, advising that SPG should be consistent with other planning guidance.</p>	<p>No change</p> <p>Policy H4 of the adopted UDP states "Planning permission will only be granted if the proposals pay due regard to the surrounding areas". This is the key objective of the SPG. The SPG is clearly cross-referenced in the UDP Review.</p> <p>No change</p> <p>The SPG has been developed in accordance with PPG12. The draft has been widely publicised and representations have been received from a variety of interest groups. Representations have been taken into account in the final publication.</p> <p>No change</p> <p>The scope of the assessment would be different in each case as appropriate and this is not restricted by the SPG.</p>
Achieving Objectives	
<p>Criteria that can be accurately compared are required for consistency in decision making. Any criteria will become watered down as no two sites are the same.</p> <p>Applicants' design statements or development briefs would be more appropriate than criteria lists.</p> <p>Applicants will be directed in too obvious a direction, not achieving schemes and land values required by developers, banks and landowners. The innovative designs and solutions necessary will still cause problems and will have to be judged subjectively beyond the scope of this guidance</p> <p>Could make reference to the need for applicants to submit the correct information.</p>	<p>No change</p> <p>The SPG provides guidance on each of the key elements of urban design that should be addressed, ensuring each planning application is consistently appraised. The methodology will result in a design statement assessing each of the key elements.</p> <p>No change</p> <p>Development briefs are only necessary where there are other significant material considerations and cannot be prepared for every site.</p> <p>No change</p> <p>Planning requirements influence land values, rarely vice-versa. The document will provide increased certainty to enable increased accuracy in valuations.</p> <p>No change</p> <p>This is included within the methodology.</p>

Comments	Action Taken and Justification
<p>Worthwhile exercise, persuasive to proceedings.</p> <p>Can only help to achieve what is right for residents and the environment.</p> <p>Objectives are clear, concise and commendable, acknowledging that design is a fundamental factor to quality of life. It goes a long way to interpreting why Solihull is a desirable place to live, providing clear aims for developers to follow.</p> <p>Agree that high quality and visually interesting developments in terms of design and build strength are essential to benefit the whole community.</p>	<p>No change Supporting comments.</p>
General Impressions	
<p>Inflexible, unduly prescriptive, likely to be onerous.</p> <p>Not convinced the SPG strikes the right balance between providing clear guidance and being too rigid, inflexible or over prescriptive.</p> <p>Prescriptive, contrary to the spirit of important elements of 'By Design' and PPG3.</p>	<p>No change Provides guidance on the key elements of urban design to be addressed which is flexible. It does not dictate design detail but provides clear advice on the elements, which will be appraised, thereby providing greater certainty to applicants.</p>
<p>Appears to be directed at maintaining rather than enhancing the distinctiveness, character and quality of Solihull's residential areas.</p>	<p>No change The enhancement theme runs throughout the document.</p>
<p>Should be more objective. Overall impression is that windfall development has negative impacts, but can also be positive.</p>	
<p>Well reasoned approach to reducing the impact on residents and the environment.</p>	<p>No change Supporting comments.</p>
<p>Support the introduction of guidance.</p>	
<p>Commend such a thoughtful, clear and detailed guide.</p>	
<p>Pleased that case studies and illustrations have been used.</p>	
<p>Clear and easy to understand for both professionals and lay-people.</p>	
Clarification	
<p>Tone is misleading and oppressive, especially in the misuse of 'windfall' for which there is no agreed legal definition, especially as misapplied to planning and could be deemed to imply public hatred and derogation.</p>	<p>The SPG was re-titled 'New Housing in Context' and references to 'windfall development on residential sites' were deleted.</p>
<p>A brief definition of 'windfall' would be helpful to wider audiences.</p>	<p>No change Windfall is a widely used and accepted planning term and is used by Government in national planning policy guidance. However, there are also non-windfall sites to which the guidance will apply</p>
<p>To what extent does it control brownfield development?</p>	
<p>Add a paragraph emphasising the need for consistency near the beginning. This should be tempered by the need to avoid the imposition on rigid mathematical standards.</p>	<p>No change Already included.</p>

Comments	Action Taken and Justification
Should clearly state that the focus is on housing, but does not preclude other forms of development proposals or site uses, particularly retaining a site as public open space.	<p>No change The SPG is not intended to apply to other uses or the principle of retaining open space, this is addressed in other Council planning policy.</p>
The PPG3 commentary implies that greenfield development is no longer appropriate, but these can offer important strategic development opportunities.	<p>"...the move away from greenfield development" was replaced with "...focusing on previously developed land"</p>
Recommend reference to redevelopment of land in addition to the existing reference to buildings.	<p>The reference was added.</p>
The considerations should apply to all schemes, not just intensive proposals.	<p>The reference was deleted.</p>
It would be useful to outline the role of larger scale urban characterisation studies, followed by more detailed consideration of local character and distinctiveness.	<p>No change The reference in paragraph 3.5 is to differences between one street and another, not differences within the street scene.</p>
Better to emphasise 'contribution' of key elements to character and local distinctiveness.	<p>"...in making..." was replaced with "...contributing to..."</p>
Suggest the list of important characteristics of local distinctiveness be provided as examples, as it may exclude other important considerations.	<p>No change The list does not claim to be exhaustive, referring to the "key", i.e. main characteristics.</p>
"sensitive" appears emotive, suggest replacing with "appropriate" (paragraph 4.3).	<p>"Any development which is not demonstrated to be sensitive to its local context will be resisted" was replaced with "Any development compromising the quality of the environment will be resisted".</p>
The 'Methodology' section should clearly define what is meant by typology.	<p>The definition was included within Appendix 1. Appendix 1 is referenced within the Methodology section.</p>
The Appendix 1 reference to landscape requires greater explanation.	<p>References to:</p> <ul style="list-style-type: none"> • landscape as an important and integral element of local distinctiveness • the contribution of landscape to the definition of public space • the fact that landscape features impact upon the feel of streets • the role of analysing typologies in identifying key traits of landscape <p>were added throughout the SPG.</p>
Landscape features should be given greater precedence.	
Developers should be persuaded to replace greenery, gardens and hedgerows. Hedge destruction is a national problem which should not be exacerbated.	
General Application	
Concerned that valid planning applications will not be registered without a planning and design statement for which there is no statutory requirement. There should be no prescriptive format.	<p>No change There is no prescriptive format. Application will not be registered if the context has not been addressed.</p>
The third evaluation stage of the methodology should precede the second.	<p>No change The evaluation is required to inform the design.</p>
Appears reasonable, allowing rational analysis, but some decisions depend on architectural considerations, unclear how these will be assessed objectively and consistently.	<p>No change The SPG provides guidance on each of the key elements to be addressed. There will never be only one design solution.</p>

Comments	Action Taken and Justification
<p>No site size threshold will require developers of individual plots to undertake a detailed analysis of local distinctiveness. This is onerous and will cause delay.</p> <p>Evaluation and analysis does not account for peculiarities and could be inappropriate, irrelevant, onerous and time consuming. Time could be better spent in detailed discussions with planning officers.</p>	<p>No change</p> <p>Very few buildings stand in isolation, so an analysis of local distinctiveness is important, whatever the site size or location, to ensure the design of new development respects and complements its surroundings. The appendices demonstrate that this is not an onerous process.</p>
Matching Typologies and Allowing Innovation	
<p>Government advice on the need for high quality design does not come through. Local distinctiveness is primarily repeated but there will be areas where there is no common theme.</p> <p>Not compromising the quality of the environment is a valid concern, but is subjective and may not mirror the Secretary of State's view.</p> <p>Seeks undue restriction of development type and form, failing to recognise that street frontage variety can enhance quality and appearance. Implementation is likely to result in uniformity and monotony.</p> <p>The SPG's overly prescriptive nature will stifle the ability of architects and designers and constrain thought, contrary to PPG3, para.54.</p> <p>Positive benefits and opportunities presented by innovative design must be recognised and encouraged. This is highlighted in 'Buildings in Context: New Development in Historic Areas' (English Heritage and CABE 2001). Suggest including these themes earlier to ensure innovative design is not discouraged.</p> <p>Appendices 1 and 2 will encourage uniformity and pastiche, which the SPG states is not the intention. From experience, the Council criticises anything other than a mimic of neighbouring property.</p> <p>Modern designs in a mature setting could be an improvement, but prove unacceptable to a planning officer.</p> <p>There is an absence of good modern buildings, chasing the pastiche of neighbouring houses.</p> <p>Does not preclude modern building, but tends towards the historic. The aim should be to promote high quality design, and this should be given a higher profile.</p> <p>There is a need for flexibility in a document which will apply to the whole borough. Quality would be dragged down to a poor level in some areas.</p> <p>Suggest that all new development should only normally be required to respect, maintain and enhance local distinctiveness and character.</p>	<p>"whilst allowing for high quality contemporary and innovative design" was added to the local distinctiveness section.</p> <p>The guidance repeats the theme of enhancing the environment throughout. It does not specify detail, but refers to examining detail themes and designing to complement these themes. This would not preclude innovation, which is encouraged in the document, this could, however, be clarified in the local distinctiveness section.</p> <p>In most areas there will be common themes as areas of dwellings tend to be built around the same time. In areas where dwellings have been built on a one-by-one basis, resulting in individuality, this in itself will be a theme that should be reflected in any development proposals.</p> <p>No change</p> <p>Local distinctiveness can be both respected and enhanced.</p>

Comments	Action Taken and Justification
<p>Matching prevailing typology would allow developers to match existing unacceptable developments, such as streets that already have many intensive developments.</p> <p>Would like to see positive guidelines concerning height in terms of storeys.</p> <p>Welcome the positive and proactive approach to maintaining and enhancing the quality of the urban environment. Objectives are fully supported by English Heritage, particularly emphasis on maintaining and enhancing local character and distinctiveness and good design in new development fundamental to protecting the historic environment.</p> <p>Welcome the willingness to embrace the audacious. Promises a memorable piece of architecture which may be contextual.</p>	<p>The following paragraph was added to the 'Proposals for New Development' Section: The demolition of existing buildings may result in the loss of the character and local distinctiveness of an area altogether, for example, the redevelopment of isolated buildings. In such cases the existing typology should normally be the guide. This also applies to sites where the neighbouring typology detracts from the character and local distinctiveness of the area. Case study 2 provides an example of this.</p> <p>No change This will depend on the existing typology of the area and the siting of the new buildings. It is not something that can be prescribed.</p> <p>No change Supporting comments.</p>
The Efficient Use of Land	
<p>The most efficient use of land will not be achieved.</p> <p>There may be tensions between achieving densities of at least 30 dwellings/ha and maintaining character. Clearer guidance is required.</p> <p>There are some areas where the rigid application of Government density policies would adversely affect character where design and quality will be more important than meeting density targets. These areas should be identified and may be more extensive than conservation areas.</p> <p>The introduction does not include any detail regarding density.</p>	<p>The following paragraph was inserted into the Local Distinctiveness Section:</p> <p>"The Council will encourage densities of 30-50 dwellings per hectare in accordance with Government guidance, but, not at the expense of the quality, character and local distinctiveness of the environment. Higher densities will be considered in town centre locations or in areas well-served by public transport."</p>
Other Material Considerations	
<p>Should be compatible with current policy and Council strategies and initiatives. Reference should be made to:</p> <ul style="list-style-type: none"> • guidelines on spatial separation for privacy, overlooking and overshadowing • amenity space for residents • other design documents • existing parking and circulation difficulties • detail regarding number of parking spaces per dwelling • highway constraints and safety • engineering requirements • crime and disorder strategy • community strategy 	<p>A note advising that the worked examples do not attempt to address all material planning considerations or development constraints was added to the Methodology section.</p> <p>The title of the 'Other Material Considerations' section has been changed to 'Other Considerations'. Overshadowing and oppressive development have been added as amenity considerations and the reference to parking was amended as follows:</p>

Comments

- affordable housing, to include flexible parking standards
- environmental policy
- ecological survey where protection is necessary
- boundary treatments and their implications for security
- sustainable development and construction methods
- UDP conservation area and listed building policies
- Conservation of the natural environment, landscape, bio-diversity, protected species and conservation of resources
- Light pollution
- Relationship to existing and proposed conservation area appraisals

Hours and time-scale of construction should be addressed.

A comprehensive Transport assessment will be required in accordance with PPG13 and Circular 04/01 where development is likely to have a significant impact on a trunk road.

Appears to be little consultation with Severn Trent and matters of flooding seem to be left to them and development permitted where drainage is inadequate.

It is inappropriate to suggest high density can result in a lack of parking as it is contrary to Government guidance, particularly PPG13, para. 51.

The application of parking policies is too prescriptive, suggest replacement with:

“The provision of car parking to the rear of properties, adjacent to private gardens, will be considered carefully so as to avoid unreasonable detriment to amenities of neighbours by reason of noise, disturbance and the emission of fumes.

The reference of parking standards contained within PPG13 is commended.

Conservation Areas and Listed Buildings

Replace ‘conservation status’ with ‘...warrant formal designation as a conservation area...’

Include a specific reference to the statutory duty to pay special attention to the desirability of preserving and enhancing the character and appearance of conservation areas and the requirement to regard the potential impact of development on the setting, or views into or out of a conservation area.

Action Taken and Justification

“Although more recently parking standards are more relaxed, in some circumstances high density development on small sites can lead to a lack of sufficient parking space with specific implications for congestion and highway safety on site”.

and the following paragraph was added:

“There will be other material considerations and development constraints to be addressed as an integral part of the design process on a case-by-case basis, for example:

- ensuring development is sustainable
- protecting the amenity of both the new and neighbouring residents
- conserving and encouraging bio-diversity
- highway safety and parking standards
- preventing crime
- ground conditions”.

The document is not intended to provide exhaustive advice on all material planning considerations, just the density, design and local distinctiveness aspects, but there is a need for a general cross-reference to other considerations to clarify this issue.

Changed as suggested

The following first paragraph was added:

“There is a statutory duty to pay special attention to the desirability of preserving and enhancing the character and appearance of conservation areas and a requirement to regard the potential impact of development on the setting, or views into or out of conservation areas.”

Comments	Action Taken and Justification
<p>Regardless of merit, the test in a conservation area should be that new development should preserve or enhance in accordance with the statutory instrument.</p> <p>Small-scale incremental change is a particular problem, affecting character and appearance of conservation areas, so cumulative effects need to be taken into account.</p> <p>Statutory duty to have regard to the setting of a listed building should be a specific consideration, not confined to works to the building or adjacent land, but also proposals some distance away.</p> <p>Welcome the presumption in favour of the retention of unlisted buildings in conservation areas.</p>	<p>The reference was amended as follows:</p> <p>“Where a proposed development requires the demolition of an existing building, the developer will be required to prove that the existing building is not of individual merit, or of particular prominence in a streetscape or of group value, i.e., that it does not make a positive contribution to the character and appearance of the conservation area. This will be the starting point for any judgement.</p> <p>“It must maintain and enhance the character and appearance of the conservation area” was added to the following paragraph.</p> <p>The following reference was added:</p> <p>“Small scale incremental change can be a particular problem, adversely affecting the character and appearance of conservation areas, so cumulative effects will be taken into account.”</p> <p>“and Near Listed Buildings” was added to the title of the ‘Development in Conservation Areas’ section and an additional paragraph was added: “There is a statutory requirement to have regard to the setting of listed buildings. This will be a specific consideration not confined to works to the building or adjacent land, but also to proposals some distance away.”</p> <p>No change Supporting comment.</p>
<p>Case Studies</p> <p>More examples of suitable locations should be included, such as other parts of the borough and smaller plots, requiring long accesses, unsuitable for service vehicles.</p> <p>There are a number of inconsistencies between the list of key characteristics within the Local Distinctiveness section and Appendix 1, e.g. parking, plot accesses and building format are not included in the typology data of Appendix 1.</p> <p>Case studies must account for and be compatible with current policy, Council strategies and initiatives to avoid criticism. Many exhibit inconsistencies against the methodology with the SPG and other development control issues often raised:</p> <ul style="list-style-type: none"> 1 – highway implications 1 & 2 – access close between two dwellings 2 – mews houses close to adjoining rear garden 2 – relevance of adjacent groups of apartments <p>Case studies 1 & 2 – Where is the context drawn for the mews?</p>	<p>The following caveat was added to the Methodology section:</p> <p>“The application of this guidance is illustrated in Appendix 2 using worked examples. These examples focus purely on the urban design issues addressed in this SPG and do not attempt to address all material planning considerations or development constraints. The examples are intended purely to prompt thinking on contextual urban design issues. They are indicative proposals, not design prescription.”</p> <p>It was made clear that the case studies are only intended as examples to demonstrate the application of density, character and local distinctive guidance and not as a holistic solution.</p>

Comments	Action Taken and Justification
<p>Case Study 1 – Leads developers to believe this is acceptable. It will overlook and overshadow the garden at 349. No consideration need be given to the church as they are profiting from the development and are not residential. The road layout will pave the way for development at 37-39 Avenue Road.</p> <p>Case studies 2 & 3 – The fact that the Secretary of State concluded the schemes to be entirely appropriate is not mentioned and therefore unacceptable for the Council to suggest otherwise.</p> <p>Case study 3 – Considered to be an improvement on the neighbouring properties, which are C1870, not Edwardian. There is a place for paraphrase, rather than reworking.</p> <p>Case Study 4 – Disregards advice given on the planning application and the Inspector's reasons for dismissal on scale and massing grounds, the proposal being an increase at the same density, compromising the Council's position and setting a precedent. It only deals with the design in relation to the roundabout, not something key to the appeal. The illustration also sits on a highway improvement line.</p> <p>Design attention is only given to front elevations. Rear elevations can be just as prominent.</p>	<p>The following paragraph was added to the 'Proposals for New Development' Section:</p> <p>"It should also be noted that the characteristics of all elevations can be important in defining local distinctiveness particularly those viewed from public areas."</p> <p>It was agreed that views from all sides of buildings can be important to preserving character and local</p>
Legislation	
<p>There seems to be no Council opposition to windfall development, just advice on how it can be done better. Ways to close the loopholes should be found.</p> <p>Household types are an inherent part of any road's character. Mixing multi-occupancy with single occupancy will significantly change the character. The guidelines should required new property to be to the same occupancy level as its neighbours.</p> <p>Planning applications that are not on sites capable of providing a significant increase in housing to meet national need should be rejected.</p> <p>The inclusion of deliberately created vacant residential sites in the interpretation of planning guidelines for the re-use of brownfield sites should be reviewed.</p> <p>Drawings of the present and proposed street scene would assist attention to detail.</p> <p>Computer generated, three-dimensional images should be requested to show the true implications of a proposal.</p>	<p>No change Intensifying development within existing urban areas and creating mixed communities is national policy, not a loophole, and cannot be resisted. SPG is important to ensure a balance between intensification and maintaining and enhancing the quality of residential environments.</p> <p>No change The cumulative sum of small schemes makes a significant contribution to meeting overall new housing requirements.</p> <p>No change This is a national definition included in Planning Policy Guidance Note 3: Housing.</p> <p>No change These are not necessary to determine planning applications, so are not something the Council could request under legislation. Any requests are likely to be considered onerous by applicants, leading to appeals against non-determination. In any case, such drawings could provide a false impression in the applicants favour.</p>

Comments	Action Taken and Justification
<p>A policy that only one application can be under consideration at any one time and none if an appeal is pending should be incorporated.</p> <p>Limiting the number of intensive schemes considered in an area will help preserve character and maintain social balance.</p> <p>The number of planning applications accepted on any site should be limited and the developer required to ensure the application is right first time to avoid disruption to lives; particularly in ageing communities.</p> <p>New planning applications should not be allowed once a development is underway.</p> <p>Reducing the time of the planning process would reduce stress, anguish, anxiety and certainty for neighbours.</p> <p>Limiting the time an application can be considered would reduce the opportunity to submit endless amendments.</p> <p>The threat of costs on appeal should be a minor consideration and justifiable expense.</p> <p>Once approved, the sooner a development is built the better. This should be limited within a year of approval with strict penalties for failure.</p> <p>What remedies are in place to ensure repair of damage to property outside of the developers' ownership?</p>	<p>No change The frustrations of repeated planning applications and amendments is appreciated, but these suggestions are all contrary to planning legislation, so cannot be considered by the Council.</p> <p>It is hoped that the SPG will provide clear guidance to developers on what is expected and likely to be considered acceptable, thereby reducing the need for multiple amendments and the cost to the developer of chasing more profitable, unacceptable schemes.</p> <p>No change Under planning legislation, there is a presumption in favour of granting planning permission, unless there are sound planning reasons justifying refusal. So, it is in all parties interests to negotiate schemes, rather than to approve applications before negotiating improvements or refuse and rely on the appeal process, which in many cases will lengthen the process.</p> <p>No change The threat of costs is in place to discourage unreasonable behaviour from both the applicants and local authorities and therefore should be respected. To do otherwise would be a misuse of public funds.</p> <p>No change Normally, developers have five years from the date of approval of an outline or full planning permission in which to commence development. The Council can shorten this time period, but without sound exceptional planning reasons for doing so, this is likely to be considered unreasonable and could result in the award of costs against the Council.</p> <p>No change This is a private legal matter that cannot be addressed through planning legislation or policy.</p>
General Observations	
<p>The attitude to Solihull as a desirable place to live is showing signs of change.</p> <p>Developments often result in developers national house types, with no relationship with the Midlands.</p> <p>Corner plots appear to be earmarked for development.</p> <p>Developers threaten neighbours that they will be overlooked if they do not sell.</p> <p>The guidance needs to be complete and definite as it may form the basis for similar documents by other authorities.</p>	<p>No change</p>

Comments	Action Taken and Justification
<p>Hope guidelines will be endorsed by developers and make it easier to operate avoiding unnecessary conflict and expense.</p> <p>Should be used to inform pre and post application discussions and negotiations and not substitute for them.</p> <p>Procedures will have to change drastically to comply with the proposals. Officers and members of the Planning Sub-Committee will need to be familiar with the guidelines. Planning Officers have recommended refusal, provided that there have been no objection. A scheme in Streetsbrook Road was later allowed on appeal.</p> <p>More Planning Sub-committees are required to allow sufficient time for proper consideration of proposals. Members would benefit from training to familiarise themselves with the guidance.</p> <p>Objectors are not always informed of changes to applications.</p> <p>Maintaining similar occupancy levels would maintain proportionate local services and will not incur undue costs upon the utility providers.</p> <p>A user forum of developers, agents, consultants, planning officers and councillors would improve understanding.</p> <p>Useful if plans were viewable on line.</p> <p>The building line could be used as a delaying tactic. It should be used with great care and some flexibility.</p> <p>Great attention is paid to the building line. This was recently ignored by planning officers recommending approval to flats 12m in front of the existing building line.</p> <p>English Heritage have a programme of characterisation initiatives, such a framework would provide the necessary context for informing and ensuring consistency between smaller-scale character analysis. In the absence of a framework, some indication of the process for reviewing analysis for accuracy and consistency is recommended.</p> <p>The Arkell site, Kenilworth Road, development breaks all the key characteristics of the SPG.</p> <p>If the reference to privacy and overlooking guidelines is to those approved in 1994, they should be updated in line with current national guidance.</p> <p>Leaving mutual relationships between units to the developer avoids inflexible standards and enables the provision of variation to suit individuals needs.</p> <p>Fear it becoming a political tool to substantiate a subjective and possibly biased viewpoint.</p>	<p>No change</p>