Consultation Statement

Newcastle-under-Lyme and Stoke-on-Trent Urban Design Supplementary Planning Guidance

Background

The Urban Design SPD is a joint initiative between the Borough Council and Stoke-on-Trent City Council and aims to provide comprehensive urban design guidance for the whole of the two local authority areas.

Once adopted, the SPD will supplement the objectives and policies contained in the Joint Core Spatial Strategy and will be given additional weight in the determination of planning applications.

Client Group and Advisory Partnership

The project has been managed by a client group composed of the Borough Council, Stoke-on-Trent City Council, Renew North Staffordshire and Advantage West Midlands (now dissolved). "Expert" advice was received from CABE, English Heritage and Urban Vision North Staffordshire.

A Sustainability Appraisal was prepared alongside this Supplementary Planning Document. The Sustainability Appraisal process has enabled the social, economic and environmental impacts of the SPD to be evaluated. The Sustainability Appraisal informed persons wishing to make representations on the SPD of the likely impacts the options will have.

1. Introduction

- 1.1 The Town and Country Planning (Local Development) (England) Regulations 2004 (Regulation 17) state that before a local Planning Authority adopt a Supplementary Planning Document (SPD) they must prepare a statement setting out: the names of any persons the authority consulted in connection with the preparation of the SPD; how the persons were consulted; a summary of the main issues raised in these consultations and how these have been addressed in the SPD.
- 1.2 The Government's Planning Policy Statement 12 (PPS12) requires that the consultation arrangements for SPDs be set out in the local planning authority's Statement of Community Involvement (SCI) but as a minimum the authority should:
 - Make the Supplementary Planning Document available for inspection at their principal office and other public places, together with any supporting documents which will help to understand what they are being asked to comment on;
 - Place the same documents on their website;
 - Send a copy to the Government Office if the Government Office has asked to see it;
 - Send a copy to any other bodies referred to in Regulation 17 (3), and
 - Advertise in a local newspaper when and where the documents can be inspected;

- Ensure that adequate publicity is given to the documents.
- 1.3 This Consultation schedule explains the consultation process followed for the Urban Design SPD, and demonstrates that the council undertook sufficient public consultations, using its best endeavours to consult and involve the community in the most effective way possible.

2. The Consultation Process

Front Loading of the Consultation

- A deliberate attempt was made to involve prospective users well in advance of 2.1 the formal public consultation stage, as part of a front-loaded consultation. Therefore, in parallel with the production of the urban design guidance, Urban Vision, North Staffordshire's Architecture and Urban Design Centre, were commissioned to deliver an urban design skills training programme for officers and members from the two local authorities and regeneration professionals. This programme was designed around the production of the urban design guidance, and enabled prospective users from the public and private sectors to have an input from the very start, and to influence the focus and content of the document. Consultation and training events facilitated user feedback on urban design issues in the area, on the strategic urban design vision and principles, and on understanding and using the SPD. At certain stages in the process specific user groups - planning officers, elected members, or private practitioners and developers, were involved in consultation events to the exclusion of other groups.
- 2.2 A six week formal consultation programme was carried out on the draft consultation Newcastle-under-Lyme and Stoke-on-Trent Urban Design Supplementary Planning Document from 19th April 2010 to 31st May 2010.

The formal consultation involved:

- Letters and a Summary document containing a pdf version of the SPD on a CD Rom, together with feed back forms, were sent to: planning committee members; statutory consultees; and stakeholders.
- The draft SPD, supporting documents, and feedback forms were made available to download from the Council's website both during and after the consultation period.
- Electronic responses were invited to be submitted via a link to Stokeon-Trent City Council's website.
- An exhibition providing an easy to understand description of the SPD was displayed at the Guildhall and Town Centre Library for the first three weeks of the consultation. The exhibition then moved to Stokeon-Trent.
- Statutory Public Notice in the Sentinel
- Promotional poster displayed on the public notice board of the Civic Offices
- Inspection copies of the SPD in large print format made available in all Borough libraries, the Guildhall and Kidsgrove Customer Service Centre, together with take-away copies of the Summary Document and CD with feedback forms

- Inspection copies of the SPD were made available in all City Council libraries and the Civic Centre in Stoke.
- An event was held at Urban Vision, North Staffordshire's Design and Architecture Centre, to provide further explanation of the document to local developers and architects and to facilitate discussions.
- Urban Vision continues to test the draft Urban Design Guide at 'design' events and have prepared a case study, which is posted on various regeneration websites.

3.0 Summary of Representations, Client Group's Response and Action

- **3.1** The draft SPD has been well received by a wide range of practitioners, including the Council's Development Management team, and CABE. The most detailed comments were received from Staffordshire County Council, the Environment Agency, British Waterways, English Heritage and the Staffordshire Police Architectural Liaison Officer.
- **3.2** In total, 17 individuals or organisations submitted responses, resulting in 149 separate comments being recorded. This is a good sign that the front -loading of the consultation process was successful as it meant that issues were addressed early on in the production of the SPD. The representations were collated and discussed by both local authorities, prior to a meeting of the client group and advisors on 1st July 2010. Appendix A lists in summary the comments received as a result of the public consultation and outlines the main issues raised by the comments. Proposed amendments to the draft SPD are shown. Names of individuals making comments have not been included except where they are from officers' working for each local authority and a member of parliament.
- **3.3** Full copies of all representations have been retained on file and can be viewed on request.

Key issues and changes

- **3.4** The majority of the representations focussed on making a few detailed comments on specific sections of the SPD. Quite a few comments sought changes which went beyond the scope of what an Urban Design SPD could be expected to cover, including; green infrastructure, archaeological issues and biodiversity. These topics are covered in the SPD to a greater and lesser degree, but the client group considered that further information on these topics could not be added without the risk of the SPD becoming too lengthy and the key urban design principles becoming diluted. There have been no comments received that will result in any major changes to the consultation on any document, there were a number of comments received which, although they may be valid points, were not directly related to the content of the SPD.
- **3.5** However the client group considered that it was appropriate to provide more advice on how urban design can help mitigate against climate change by considering sustainability as an integral part of the design process from the very start, or how existing buildings or places can be re-designed and adapted to increase their environmental, economic and social sustainability and decrease energy consumption. The amendments were put forward by Stoke-on-Trent

City Councils Climate Change Support Officer, and can be viewed at Number 11, Appendix B.

- **3.6** The Healthy Cities Team at Stoke City Council recommended that a stronger emphasis was made to planning for healthy places in the SPD. Many of the changes requested would be too detailed for a generic urban design SPD, and would have resulted in the document becoming too lengthy. However, planning for healthy places is important and a paragraph has been added to the SPD address this issue. This paragraph can be viewed at number 15 of Appendix B. The more detailed comments in relation to health issues are also being addressed separately through a Healthy Planning SPD currently being produced by Stoke-on-Trent City Council.
- **3.7** A number of consultees welcomed the inclusion of a Strategic Vision but felt the concept needed to be clarified. Changes have been made to the text to make this easier to understand. The amended paragraph can be viewed at number 13 of Appendix B.
- **3.8** Another important change relates to reducing the use of references in the main text to other documents, which could soon be superseded. Key references have instead been inserted in the Further Information Boxes, which are easily located and updated. In particular, the Historic Environment Chapter has been updated to reflect recent updates in national planning policy.

Rep ID	Consultee Name	Summary	Response	Schedule of Changes
1	Advantage West Midlands	Representation received but no comments made	No change	No change
2	Environment Agency	Support and welcome the inclusion of the Canal and River Network Chapter	Noted	No change
		• would like to see an increased emphasis on deculverting of watercourses any development that did this would help meet the European Water Framework Directive and reduce flood risk and should encourage the naturalisation of river corridors future development should be encouraged by the SPD to restore these water courses	Not accepted -Satisfactorily addressed within section 6, additional information is contained within the Stoke Rivers Strategy which will be referenced in the Bibliography	No change No change
		 further emphasis should be given to 'blue corridors' regarding the protection and restoration of existing rivers, floodplains and water quality they should be mentioned alongside green corridors 	Not accepted. Term "blue corridor" should not be included. It is not considered that the term 'blue corridor' would be a recognisable term or one which would add significant emphasis to the SPD which already strongly considers the impact of rivers, waterways and canals.	No change
		a reference to Stoke Rivers Strategy should be made	Agreed. Reference added to bibliography.	Add in reference to Stoke Rivers Strategy to bibliography

Appendix A. Consultation Schedule - Comments Received, Client Group's Response and Actions Required.

		 SPD should specifically mention SUDS (Sustainable Urban Drainage Systems) Ciria 697 	Agreed – add in a reference in the bibliography	Add a reference in the bibliography for SUDS Ciria 697
		 SPD should contain a clearer statement regarding green roofs. 	Not accepted. Green roofs are referred to in employment section at E10. They are also noted in Section 2 at paragraph 2.72 and Section 7 paragraph 7.5.2	No Change.
3	Natural England	Welcome the intention to increase and reinforce a high quality green space network	Noted.	No change
		 Believe green infrastructure should be an integral part of the creation of sustainable communities. 	Noted	No change
4	Staffordshire County Council	 Guidance is too wordy, key issues have been overlooked. Most of the guidance is too generic; a focus on local issues is missing. 	Not Accepted. The style and content is a matter for local determination. The Draft SPD is produced in a new and innovative format. Most other consultees are complementary of its contents. Local urban design issues will be addressed as part of other LDF Development Plan Documents. This is intended to provide overarching design guidance	No change

 Should be a greater emphasis on design process. 	Not accepted. Unnecessary duplication of national design guidance. There are already references to CABE documents in the bibliography that relate to the design process	None Required
Drainage and Flood Risk section will need to be updated to take account of the Flood and Water Management Bill	Agreed, references will be included in the bibliography.	Add reference to bibliography
 Insufficient attention given to the agreement of a maintenance strategy with key stakeholders. 	Not accepted. Support for innovative management and delivery is dealt with in the Core Spatial Strategy at Policy CSP 1. Specific management requirements to form part of other LDF development plan document production	No change
 Significance of historic landscape and townscape should be more strongly emphasised. 	Agreed. Include a reference in historic environment section (see later comments)	No change (see later comments for action required)
 Importance of historic farmsteads needs to be addressed. 	Agreed. Bibliography reference	Add English Heritage historic farmsteads publication reference to bibliography
	Not accepted. Not relevant	

Document should clearly identify the archaeological sites and monuments covered by PPS5.	to reference specific sites	No change
PPG15 replaced by PPS5.	Agreed.	Remove references to PPGs and PPSs throughout the document and replace with "relevant planning guidance (see bibliography)"
 3.6.2 Should include reference for the need for Scheduled Ancient Monument Consent. 	Agreed	Include a reference in 3.6.2 for the need for Scheduled Ancient Monument Consent
 3.6.3 Reference should be made to the Historic Environment Records managed and maintained by Staffordshire County Council and Stoke-on-Trent City Council. Should link into HE6 in PPS5. 	Agreed.	Bibliography reference for the Historic Environment Records (HERs) managed and maintained by Staffordshire County Council and Stoke-on- Trent City Council
Under townscape character (p43) reference should be made to the Extensive Urban Survey	Agreed.	Refer to the Newcastle under Lyme Extensive Urban Survey (2007) in the Bibliography
• Heritage-led regeneration should be expanded within chapter 9.	Not accepted. This is very relevant to urban design, however we have several references to this throughout the document (in "appraising the context"	No change

	in particular)	
 9.1 Paragraph should be amended to read 'these are scheduled monuments, listed buildings, registered parks and gardens, conservation areas and locally significant archaeological sites and monuments.' 	Agreed.	Amend sentence in paragraph 9.1 in Historic Environment section to read what is stated in the column to the left in inverted commas
Reference to the EUS and PPS5 should also be made.	Addressed in previous comments	No change
 9.2 assets of positive value should include components which contribute to an understanding of the development of the historic settlements which include building plots and street patterns. 	Not accepted. This is relevant to urban design, but should not go in historic environment section. Insert one sentence into "Appraising the context" section in "Good Design Good Practice" chapter.	Insert "Developments should be designed with an understanding of the historical pattern of streets and development" into "Appraising the Context" section on p43
9.2 should be changed in line with PPS5.	Agreed. See previous comments relating to removal of specific PPS5 references and instead reference "relevant planning guidance"	See previous comments on proposed changes
Further Information Box should include the HERS.	Agreed	Insert reference to Historic Environment Record (HERs) into the further information box in the Historic Environment

			chapter (p114)
	 For compliance with English Heritage should be 'heritage assets' not 'historic assets' 	Not accepted. An asset can be anything, therefore keep the description of historic assets	No change
	 Introduction on p114 should be changed to read '.should retain and enhance features that contribute to landscape character, historic landscape character and ecological diversity' 	Not accepted. The SPD is not a specific landscape document. It is therefore considered sufficient reference is given.	No change
	Reference to Mow Cop as a historic landscape is supported, but implies rest of the rural environment is not historic and needs rewording.	Agreed	Reword the sentence of p117 on Mow Cop in the rural chapter to read "around Mow Cop, is the remains of a prominent landscape feature" and move the paragraph up to just after the paragraph starting "The Northern Meres and Mosses"
	 Reference should be made to retaining the key historic characteristics of the farmsteads. 	Agreed.	Reference the English Heritage Publication "Historic Farmsteads, Preliminary Character Statement, West Midlands Region (2006)"
		Not accepted. Manual for	No change

All public realm work particularly in designated Conservation Area or historic areas should be shaped by the English Heritage/Department for Transport guidance 'Streets for All Manual'	Streets is referenced in the bibliography	
 References to biodiversity, semi natural green space and ecological networks not carried through to the more detailed guidance in sec 3.2, 3.4 and 3.5. 	Not accepted.– as all Design and Access Statements are different. Considered too detailed for an SPD that is intended to provide overarching urban design guidance	No change
3.6 mentions ecological habitats but not green corridors or ecological connectivity.	Noted but no changes required. See above	No change
• Role of transport networks in contributing to green infrastructure and ecological corridors is not acknowledged.	Noted, but changes not considered necessary. Again this is considered to be too detailed for an SPD that is intended to provide overarching urban design guidance.	No change
 5.6.3 role of street trees in contributing to biodiversity and climate change adaptation at the local scale should be referenced 	Not accepted. Street trees are already referenced in the SPD on p75 at 5.6.3	No change
6.2.1 Lacking reference to ecological connectivity	Not accepted. Have not got a policy in Core Strategy to back this up. No change required	No change
 RE1 refers to retention and enhancement of ecological diversity. Should apply to all development. 	Not accepted. Not relevant for an Urban Design SPD. This SPD is not the place to consider this in detail; it is	No change

		mentioned as part of the landscape chapter where it is directly relevant.	
	 Absence of policy reference to ecological connectivity on biodiversity in s11 Public Realm. 	Not accepted. Not relevant for an Urban Design SPD. Too much detail for an SPD intended to provide overarching urban design guidance.	No change
	 Reference to tree planting in s11.6 ignores the value of existing and potential habitats and their importance to ecological connectivity. 	Not accepted. Not relevant for an Urban Design SPD. Too much detail for an SPD that is intended to provide overarching urban design guidance	No change
	 Page 133 - text should highlight the need to protect Biodiversity Action Plan habitats in any plans for enhancement for community use. 	Not accepted. This is addressed in Core Spatial Strategy and should not be addressed in the Urban Design SPD as well	No change
	 Difficult to see how the key objectives relating to green infrastructure, biodiversity and ecological connectivity will be met in the absence of reference to detailed guidance in the SPD. Meaning it fails to meet its objectives. 	Not accepted. Not relevant for an Urban Design SPD. Not an objective of the SPD this is a overarching design SPD not a specific SPD on Biodiversity	No change
	 Lacks reference to landscape design informed by local ecological character. 	See above.	No change

		 Recommended that the SPD reference Natural England publication 'Enhancing Biodiversity in the West Midlands' 	Agreed.	Add in a reference to the Natural England Publication "Enhancing Biodiversity in the West Midlands"
		 Reference to Planning for Landscape Change in 2.10.1 should be amended to say 'prepared by Staffordshire County Council' 	Agreed.	In 2.10.1 amend to say "prepared by Staffordshire County Council"
5	English Heritage	Welcome the document and particularly pleased to see the clearly laid out messages in the summary document.	Noted	No change
		 Good balance between general design principles and practical application. 	Noted	No change
		 Document needs to be reviewed against PPS5 which is now published. 	Agreed	See amended historic environment text at number 12 of Appendix B. References to PPG5 have been removed and compliance with PPS5 has been checked.
		 Archaeological considerations are underplayed in places as an element in the design process. 	Not accepted. Archaeology does not have an impact on Urban Design	No change
		 HER should be referred to on p114 and in other places 	Agreed.	Add in a reference to the Historic Environment Record (HER)
		 Archaeological priority areas are discussed but not defined. 	Agreed.	Remove the reference to Archaeological Priority Areas on p44 and replace

		 Page 44 paragraph 3.6.3 should light pollution also be included? Page 44 and page 117 Landscape character, emphasis should be put on understanding and defining its 'characteristic features' rather than biodiversity. Information sources mentioned from the County which should be referenced. 	Agreed. Agreed	with just "archaeology" Add in "light pollution" to the list in 3.6.3 on p44 Replace "biodiversity" with "characteristic features" on p44 and p117
6	Paul Farrelly MP	 Support the much needed guidance, welcome the well designed, well presented on screen format. To improve ease of use an orientation map should be included at the beginning of the document. 	Noted	No change No change
		 Document contains a large amount of information which could be overwhelming. The summary boxes used in Section 4 should be repeated and reused to summarise other sections. 	Not accepted. Contradicts first comment about the well presented format. There are space issues within the document and it is considered additional summary boxes are justifiable.	No change
		 Glossary should be included in the introduction; text is very dense with a large amount of jargon. 	Not accepted. The interactive nature of the document means that the position of the glossary within the document does not really matter. In any event most people would expect to find a glossary to	No change

			the end of a document.	
		 Strategic vision 2.1 needs to be clarified. Final rigorous edit needed by someone new to the document. 	Agreed. Review Strategic Vision 2.1	See Revised Strategic Vision 2.1 at number 13 of Appendix B.
		• Very little detail about the Western Urban Villages in Newcastle. Given proposed levels of development design issues will be important here.	Valid point but not practical to action an entire additional section of the SPD at this stage.	No change
		The 'Three Dales Vision' work should be referenced for this area.	Not accepted. Not relevant to the Urban Design SPD	No change
7	Woodland Trust	Document should be used to help increase the access to woodland for people in Stoke-on-Trent and Newcastle.	Noted	No change
		• Would like to see trees and woodland citied as key cross cutting element of urban design in line with 'Strategy for England's Trees Woods and Forests'	Noted, but this is a generic design SPD.	No change
		 Any policy on climate change should recognise the value trees and woodlands can provide in mitigating climate change. Woodland creation is a cost effective way of fighting climate change. Full rep contains a large amount of supporting evidence on these points. 	Noted, but this is an SPD that is intended to provide overarching urban design guidance. More on climate change has been added to the text (see representation below), but not specifically about trees and woodland	No change
		• Trees and woodlands should be integrated into all development proposals at the very beginning of the planning process.	Noted	No change
		 Pleased to see policy PR11- Design SPD should consider the 'No trees, no future' publication. 	Agreed.	Include a reference to the publication "No Trees, no

				future" in bibliography.
8	Nick Jones, Climate Change Support Officer, Stoke-on- Trent City Council	 Changes to text proposed on pages 36, 37, 40 and 51. See full rep for details. 	Agreed.	Please see number 11. Climate Change, Appendix B for changes.
9	Healthy Cities Team / Jerry Spencer	Document is well laid out and free of jargon	Noted	No change
		 Would be useful to include in chapter 3 a section outlining the key community and economic issues of the sub-region. 	Not accepted. This is already addressed in the Core Strategy	No change
		 Document fails to present an analysis of how aspects of the sub regional urban form - despite its greenery - can discourage healthy lifestyles. 	Not accepted. Too detailed for a general Urban Design Guide. Further information on this subject is for the consideration of a different SPD.	No change
		 Document could be improved by a greater focus on some of the specific issues and problems of the sub-region (in terms of health) 	Not accepted. This information is contained within the Core Spatial Strategy	No change

 An overview of the sub regional community and economic issues that need to be addressed through good design. This will include the need to improve community health. Add more sub regionally specific design content, to address some spatial issues that are of particular concern in the sub region, and which have impacts on physical or mental wellbeing. I suggest include content on: the spatial form of new development to maximise its integration with existing development and so foster integration between new and existing communities creating a more legible urban form which is also attractive to everyday walking modifications to the form of existing older development in order to prolong its useful life integration and better use of the huge areas of open space in the sub region to maximise benefits to the community 	Agreed.	Add in a paragraph in 1.7 on designing for health (see number 15, Appendix B)
• Add an appendix listing all the sub-regionally specific content required by the authorities in design and access statements. This should include a requirement to consider how the design will address health issues and promote healthy lifestyles	Not accepted. No space to go into this much detail – if go into detail on this need to do it for everything. Again this should be the subject of a different SPD.	No change
• A specific aim of improving the link between city centre and Central Forest Park to the north. At present improved links are shown on the plan, but the tremendous potential to enhance city centre life and the health benefits from making this connection are not described, whereas some other linkages are. The potential synergy between a currently depressed city centre and this large and pleasant park could have tremendous regeneration benefits, and could greatly improve health of city centre workers and residents.	Not accepted. This is covered in the City Centre Area Action Plan (Hanley)	No change

	• Add a section in the Centres chapter on Festival Park. This is a much larger centre and has far higher footfall than some of the town centres. This section would be an opportunity to introduce clear guidance on improving the urban form of the area. Specific improvements which would encourage walking include re arranging parking and footpaths to provide unimpeded direct paths between retail frontages and across car parks; more pedestrian priority at road crossings, introduction of residential uses to make it safer at night, and improving public awareness of the large adjacent public space through better sign posting and clearer approach paths.	Not accepted. The concept of Festival Park as a centre is not supported. It is considered sufficient guidance is given to retail and leisure developments within the SPD. Additional detail if needed can be developed through the Inner Urban Core Area Action Plan.	No change
	 Content on improving retail park design could follow the advice contained in the Nottingham design guide for commercial areas available on the Resources for Urban Design website: <u>http://www.rudi.net/node/7397</u> 	Agreed. Include link within Bibliography. It is considered sufficient examples were considered in the preparation of the SPD.	Include a reference to the Resource for Urban Design Information (RUDI) website which has a link to the Nottingham urban design guide in bibliography.
	 The term 'local transport corridors' should be replaced with another term more suited to their multiple function as conduits of local community activity. I suggest 'main street corridors'. 	Whilst not replacing the term "local transport corridors" other local transport corridors with more of a "street character", such as Moorlands Road.	Generic statement to say that there are also other Local Transport Corridors such as Moorlands Road, to be inserted into the transport section
	• Additional content on main street corridors should demonstrate how new development can accommodate parking whilst still creating a strong built edge to the street with good surveillance from within buildings. This can be achieved if the parking is to	Not accepted. Reference to residential "parking within the curtilage of a property" already in the residential	No change

the side rather than the front of buildings, allowing the leading edge of the building to back onto the pavement.	design section of the document. Do not consider any other reference required	
• Add advice on how the car can be accommodated to give a new lease of life to business and residential properties occupying the older buildings still lining parts of main street corridors. Options include selective demolition, and compulsory purchase of vacant shed developments, to create small visitor and resident car parks for neighbouring properties.	Not accepted. Do not wish to promote demolition or compulsory purchase. Do not think relevant to Urban Design SPD	No change
 The section on cycle ways should offer practical design solutions, such as how to safely allow main street cycle ways priority over access from side roads. 	Not accepted. Too much detailed information for an Urban Design SPD - more a highways issue.	No change
 Cycle parking areas should be promoted at shopping and public places including parks. 	Agreed, but not an Urban Design SPD matter	No change
 Dog chains should be provided at shopping and public places including parks. 	Not accepted. Not an Urban Design SPD matter	No change
 In order to reduce land take by car parking, the SPD should advise that new car parking in the city and town centres is expected to be underground or multi deck. 	Not accepted. More relevant to be included in documents that relate to site specific proposals. Also do not want to be overly prescriptive on such issues given the potential expense and knock on effect on development.	No change

 May be more appropriate to keep car parking away from the waterside. Health benefits will be achieved where there is good access for people to the waterside and opportunities to exercise or to sit and unwind. 	Noted but there are equally reasons why in certain circumstances it would be not considered reasonable to do so.	No change
• SPD should consistently acknowledge the importance of locally distinctive urban forms and state a presumption on retention of older buildings and streets unless they are unfit and incapable of economic adaptation and repair for current day users.	Not accepted. This matter is covered elsewhere in the document as a recurring theme. See chapters 3 and 4.	No change
• SPD policy amplification number R23 should be altered, as it implies that only those extensions visible from public places should be well designed. Neighbouring residents can suffer stress from the impact of poor design when it is not publicly visible.	Agreed	Re-word R23, to say that all extensions should be well designed, not just those visible from public places
 Add guidance on how to design for good surveillance, for example by the introduction of bay windows with glazed side panels. See the Nottingham guide to community safety in residential areas <u>http://www.rudi.net/books/5384</u>. 	Agreed, although there are already several references to passive surveillance in the SPD. Document could be referenced in Bibliography.	Reference to the Resource for Urban Design Information website (RUDI) to be included in bibliography.
• Revise the guidance on car based development such as offices and supermarkets. The pedestrian should be given equal or greater priority to the car driver, by placing the building frontage and entrance as close to the back edge of pavement as possible, allowing direct access off the back edge of the pavement and placing car parking to the rear or side of the building. See Nottingham Commercial Design Guide <u>http://www.rudi.net/node/7397</u>	Not accepted. E5.a already addresses this issue	No change

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 Add guidance on commercial and office building design, to include health promoting features such as through ventilation and priority for stair over lift access. 	Noted, however there are space issues of inserting new sections. This is a matter best considered in a Sustainable Construction SPD.	No change
 Investment should be based on community aspirations rather than abstract landscape concepts. 	Not accepted. Not an SPD matter.	No change
• Focus investment on improving the range and management of open space activity options, and improving access and signposting from surrounding areas into the open spaces.	Not accepted. Already covered in PR2	No change
 Add reference on the need for seating spaced at regular and frequent intervals and for public toilet facilities 	Not accepted. Not a matter for the Urban Design SPD to address.	No change
 reference on the need for wheelchair and pushchair accessible path networks 	Not accepted. Already addressed in PR 3	No change
• The importance of good design in facilitating activity for all sections of the community in central spaces should be emphasised.	Not accepted. Considered this is already emphasised generally throughout the document	No change
• Add a proposal to review the stock of open space and sell off and develop those which are of no public benefit in order to channel more funds to useful community spaces.	Not accepted. Not a matter for an Urban Design Issue	No change

10	Highways Agency	Support the principle of the document.	Noted	No change
		 In 5.2 would suggest the map is amended to show that the A500, A50 and M6 are part of the Highways Agency Strategic Road Network. 	Noted – but no changes to map considered necessary. The inclusion of these roads within a map showing them as Highways Agency routes is not deemed necessary for the Urban Design SPD.	No change
		 Proposal for the Burslem Link Road will need to be carefully designed HA will be involved due to its connection with the A500 	Noted	No change
11.	Trent and Mersey Canal Society	 Page 78 the canal route diagram places Middleport in Longport. The description is 'key potential hubs of canalside activity - destinations' this could also be applied to the area proposed for Burslem Port. The actual description for Burslem Port is however different. 	Agreed. On the diagram, change "Middleport" to "Longport" and place Middleport beneath	On the diagram on page 78, change "Middleport" to "Longport" and place Middleport label beneath Longport
		 Page 81, 6.3.1 seems to relate to Longport despite the title being Middleport and the wharf being named Longport Wharf. 	Agreed. Change title to "Longport and Middleport"	Change Title to "Longport and Middleport"
12	Madeley Conservation Group	 Would have liked to see more prescriptive guidance on insulation between housing units, as this is a common complaint 	Not accepted. Issues of this nature should be considered alongside sustainable construction techniques and are not a matter for an Urban Design SPD	No change
		 Guidance on housing design and rural development would have been influential in preventing a number of development mistakes in our village (Madeley) 	Noted	No change

13	Police Architectural Liaison Officer, Staffordshire Police	• The document fails to sufficiently embrace the legal requirement as laid out on Sec 17 of the Crime and Disorder Act 1998 in that it does not seem to incorporate crime prevention considerations demonstrably within the text in a way that is in empathy with crime prevention planning guidance; it fails to take the many available opportunities to embed crime prevention at its heart, with clarity, under headings of Crime and Community Safety. No such headings appear within the text or in the headings- key in the right hand side of each page.	Noted	See Number 10, Appendix B for details of new paragraph about crime prevention
		 No reference to "Safer Places" CABE document or "Secured by Design" 	Agreed. We do not want to reference specific documents in the text as it may be superseded. Also it is noted that the objectives of secure by design can at times conflict with urban design. Notwithstanding this it is considered prudent to include the document in the bibliography.	Add reference to bibliography.
		 Obviously the guide is a complex document covering a broad range of issues but I would suggest that guidance of such importance must contain clearly identified references to crime prevention throughout as the opportunity arises, and in such a way as to be embedded as one of its core threads. 	Agreed. However this is an urban design SPD, not a crime prevention SPD, and references are made throughout the document to crime prevention, passive surveillance etc which are considered to meet the requirement of including this point, whilst not losing sight of the key aim of the document to provide urban design guidance.	Add in a generic paragraph about crime prevention in "Importance of Good Design" section on p5 (See number 10 of Appendix B for paragraph to be inserted)

		 Crime ridden communities, residential, commercial and economic centres, are unsustainable communities and the UDG must encourage planning applicants to give both forethought and proposals that will seek to maximise crime reduction and community benefits within any given development. 	Agreed. Comments as above	See above.
14	Comments on the Draft SPD made by attendees at the consultation event organised by Urban Vision North Staffordshire 17/5/2010	 Historic Environment Reference to PPG15 needs updating (p42 and Appendix 2) Local Transport Corridors The use of the term "Local Transport Corridors" was questioned as to its appropriateness. It was said that the phrase implies that these roads are just places for travelling through, whereas in reality they are streets where people live and which have or should have a range of active uses fronting them. The latter kind of urban development should be reinforced by the Urban Design SPD, whereas it seems to be encouraging a green landscaping approach alongside these roads which will reduce the intensity of their frontages. 	Agreed. Not accepted. "Local Transport Corridor" is just a phrase/ description for primary routes between centres.	No change (previously dealt with) No change
15	The Staffordshire Historic Buildings Trust	 The SHBT welcomes the urban design guide, and is pleased to have been offered an opportunity to comment on the draft text. The Trust is broadly sympathetic to the ideas and guidance contained in the document, and hopes that it will play a positive role in the future development of the area. Some design guides are more prescriptive than that here proposed, and there are times when more detailed guidance might be useful. But composing such guidance would be a real challenge. For example, part of 2.6 refers to 'creating a memorable image by utilising ceramic materials in the external surfaces of buildings and in the public realm'. This risks 	Noted Not agreed. Every application is assessed on its own merits, and providing guidance on the use of ceramic materials would not result in the use	No change No change

caricaturing the area and could easily encourage token use of ceramic facing materials. There are strong historic precedents for the bold use of stone, metal, glass and timber – as well as ceramic materials – in North Staffordshire. And these are often structural, not limited to external surfaces.	of this for external surfaces of buildings everywhere	
• Conversely, the repeated references to a particular kind of public transport system (the Streetcar) seem potentially over-specific. Had a system of trams or urban railways been proposed, it would have been natural for the guide to emphasise the point, but decisions about the size and frequency of road-based public transport systems are likely to change over relatively short periods.	Not accepted, but support for strategic sub regional highways projects is considered important within the SPD as illustrations of potential schemes.	No change
• The Trust supports all efforts to reduce the area's dependency on the private car. It suggests that the guide's authors should consider removing references to non-car users (e.g. in 2.10.4, but also in many other places). The phrase is in danger of seeming to normalise car use, and thereby creating a sub- normal category of people dependent on public transport. We suggest, for instance, in place of 'Better quality connections between places for non-car users' a wording such as 'Better quality alternatives to the car in connecting places'.	Not accepted. The guidance has strong emphasis on the role design can play reducing our car dependency.	No change
• Understandably the draft guide places great importance on public buildings, housing and commercial premises. Would it not be desirable to make mention of places of worship, however (possibly in section 9)? Many of the area's landmark structures are churches and chapels, and the appearance of new places of worship for other faiths is likely to continue. The twin mechanism of conventional planning controls with (for some Christian bodies) exemption from the secular system of listed building consent is a further complication worth noting.	Agreed. Don't need to discuss Ecclesial Exemption – not an Urban design issue	Add in a reference to landmark places of worship to the Historic Environment Section (see number 12.1 of Appendix B for the paragraph)
• The Trust would encourage some more explicit guidance to be	Agreed.	Add in a paragraph about

		given about the need for durability in public artworks, signage, street furniture and the like. North Staffordshire has more than its fair share of well-intentioned artworks that are already rusting away; bus shelters whose once neat design has been severely compromised by botched repairs after vandalism; and flimsy signs that have become useless long before their time. Section 11 would be a natural place for such advice.		public art in the Public Realm section
16	Keele Parish Council	 Concern with the ambiguity between Edwardian and Victorian and that Newcastle should be described as – "sited in a valley bottom". There was however, a general consensus that the document could potentially provide a useful framework when considering planning applications. 		No change
		 Members felt that the failure to use examples drawn from Keele in the sections - Historic and Rural environments represented a missed opportunity. 	Agreed	Replace an image of Madeley with an image of Keele in the Historic Environment and Rural Environment Sections

Appendix B Changes in addition to those set out in the Consultation Schedule

Appendix B expands on the changes required and set out in the Consultation Schedule and presented in Appendix A, It also sets out any changes identified separately by the client group.

The underlined text is the proposed new wording.

1. p53

Refer to the "<u>Newcastle-under-Lyme Town Centre Conservation Area Appraisal and</u> <u>Management Plan</u>" in the Further Information box on page 53.

2. 4.4.3, p53

Last sentence: Insert "<u>As a place, the aim is to improve and strengthen the linkages</u> across the ring road to improve the attractiveness of adjacent commercial areas and town centres"

3. p53

Put a reference to the "<u>Newcastle-under-Lyme Extensive Urban Survey</u>" in the Relevant Information Box.

4. p114

Add the "<u>Newcastle-under-Lyme Borough Council Extensive Urban Survey</u>" into the Further Information Box

5. Public Realm Chapter

Add a Further Information box to this section at the end, and add into the box the "<u>Newcastle-under-Lyme Town Centre SPD, Newcastle-under-Lyme Green Space</u> <u>Strategy</u>"

6. Rural Environment Section

Include a reference to "*Planning Policy Statement 7*" (Sustainable Development in Rural Areas) in the Further Information Box

7. Rivers and Canals Chapter

At C1 it refers to canals and rivers having a "green" or urban character. At 6.2.1 it gives further advice regarding areas with a "green" character and at 6.2.2 it gives advice on the other character but in this section it refers to settlement and does not use the term urban character. It would be clearer to the user that any advice on canals/rivers with an urban character is found at 6.2.2 if in the heading the term *"urban character"* is specifically used

8. Remove all references to specific National Planning Policy Guidance and Statements (PPS and PPG) from the text and replace with "<u>relevant national</u> <u>planning guidance (see bibliography)</u>" This will save time consuming changes being required when the document is being updated in the future, meaning that only references in the Further Information Boxes and in the bibliography will need updating.

9. Bibliography

Remove reference to Planning Policy Guidance Note16 from the bibliography as this has been superseded by Planning Policy Statement 5.

10. Crime Prevention

Crime prevention is a key area for further consideration in the SPD. It is considered that we need to put some more thought into crime prevention. At our steering group meeting we didn't think the principles of urban design and secure by design are always complementary but we should reference Secured by Design in the Bibliography at the least, and include a paragraph addressing the need to consider how urban design and well planned environments can help to design out crime and decrease anti social behaviour.

Insert the following paragraph in the "Importance of good design" section on p5, in the second column after"...complementary objectives and can successfully support one another."

"Crime, fear of crime and anti-social behaviour within the urban environment all have negative impacts upon community well-being and quality of life. As well as the direct costs of crime experienced by its victims, the fear of crime contributes to social exclusion. Crime also threatens the success and vitality of town centres and employment areas by acting as a brake on economic growth and prosperity. Promoting good design and layout in new development is one of the most important ways in which the Council can address crime issues. Good design and layout make crime more difficult to commit, increase the likelihood of detection of criminal activity and improve public perceptions of safety. Attractive and well-designed environments also encourage a sense of pride and 'ownership' amongst the local community"

11. Climate Change

The following underlined text needs to be added into the SPD. The text that is crossed out has been removed from the SPD.

11.1 p36, part 3.2.8, Sustainability

This section of the statement should summarise how sustainability has been considered in the formulation of the proposal including:

a. How the planning policy context <u>and the use of nationally described</u> <u>sustainable building standards</u> haves been taken into account in the scheme design;

b. Key sustainability principles that have been adopted;

c. The strategy adopted for energy, including minimising demand, efficiency of supply and the use of renewables <u>and its relationship to current Building</u> <u>Regulation requirements.</u>

<u>d. What is the TER (Target Emissions Rate) and BER (Building Emissions</u> Rate) for non-domestic development, expressed in kgCO₂/m² per annum, and for domestic developments what is the TER (Target Emissions Rate) and the DER (dwelling emissions rate) for each building (expressed in kgCO₂/m² per annum)?

<u>e</u>d. The strategy adopted for water resources, including minimising use <u>potable water consumption</u> and surface water management (drainage);

- fe. Waste management, including recycling; and
- <u>g</u>f. Maintenance <u>and management.</u>
- 11.2 p37, part 3.4.2, Analysis

Thinking sustainably about design

Adapting to climate change is now a priority for planning and the government has set out a timetable for increasing these requirements so that new housing is zero carbon rated by 2016.

<u>To deliver truly sustainable design</u> However it is vital that design teams think consider the sustainability of the design from the very start. A sustainable design is one that is environmentally, economically and socially sustainable.

The design must seek to reduce its impact upon the environment, and also reduce the environments' impact on the design. The first process is called mitigation, the second adaptation.

Mitigation

The design must demonstrate how it reduces the developments' impact on the environment, for example:

- <u>carbon emissions;</u>
- water consumption;
- sustainable travel modes;
- <u>material use;</u>
- construction method;
- <u>surface water mitigation</u>

<u>What targets have been set for CO₂ emissions (kgCO₂/m²); potable water consumption; recycled material content; sourcing of materials; construction waste minimisation targets (m³ of waste / 100m² of gross internal floor area or tonnes waste/100m² of gross internal floor area)</u>

Adaptation

<u>The design must also demonstrate how it will cope with future climate</u> <u>change. The West Midlands Regional Observatory has identified for the West</u> <u>Midlands the following shifts in weather:-</u>

- <u>hotter drier summers</u>
- wetter warmer winters
- <u>more intense weather events (rain storms; high winds; extended dry</u> <u>periods; extended cold spells – snow and ice).</u>

<u>(Source: Challenge or Opportunity? How to plan for Climate Change - West</u> <u>Midlands Regional Observatory 2009</u>

about design and that sustainability is not just interpreted as being some features that can be tacked on to a scheme late on in the process. <u>It is</u> imperative that sustainability is dealt with as an integral and essential part of the design process and clearly illustrated through the Design and Access Statement. Sustainability should not be a secondary consideration for developers in formulating development proposals; as it won't be a secondary consideration for authorities when determining planning applications.

The design approach should accommodate today's requirements for sustainable design but should also allow for future upgrades, for example, solar panels may not be provided now but roof forms should allow for their potential installation in future.

Sustainability must be considered at the same time as the appraisal of the context. The Core Spatial Strategy requires <u>development to demonstrate</u> <u>compliance with best practice standards (nationally described sustainable building standards) and the incorporation of on-site or near-site renewable or low carbon energy provision where viable. The requirements for sustainability measures must be sensitive to market conditions and not unduly constrain development. If the requirements are not viable; the onus will be on the applicant to clearly demonstrate this by a financial assessment. New housing to reach specified Code for Sustainable Homes targets; and offices, and other non domestic buildings, to meet BREEAM targets and other targets in relation to the Building Regulations.</u>

Certain sustainability issues may have a particular influence on the appropriate design approach for a site, including energy/ CO_2 emissions; surface water run-off; and ecology. These need to be considered as part of, or together with the Appraisal of Context. The energy strategy should be based on the energy hierarchy below:

(Please Insert a suitable energy hierarchy diagram after this text)

11.3 Page 40 3.5.2 Appraising the context

(4th paragraph)

It is vital that design teams think sustainably about urban design and integrate all of the <u>sustainability</u> issues identified of sustainability considerations, including those of infrastructure and utilities, into the masterplanning process at an early stage. <u>The design team should also</u> identifying opportunities for area-wide <u>energy provision (such as decentralised energy networks)</u> as well as site based approaches.

11.4 Page 51

Opportunities for environmental sustainability

The potential expansion of the City Centre creates an opportunity to introduce sustainable area-based approaches to heat and power generation, waste disposal and upgrading utilities and other 21st century infrastructure, for instance <u>decentralised energy networks and data</u> networks.

12. Historic Environment Chapter

12.1 Remove 9.3 first three paragraphs. Put title "<u>9.3 Listed Buildings"</u> just before "where development is proposed......" then insert the following statement:

"Heritage assets add value in a variety of ways. They can be landmark buildings with a distinctive silhouette marking highpoints, ridges and hills in the landscape as our churches do, clearly marking the separate settlements. But they are often more modest structures that give character to a place through the use of local materials and their colour and texture. Spaces, such as parks, gardens, cemeteries and battlefields are also defined as heritage assets and as such have their own settings and character which need to be carefully considered when evaluating the context for new development."

- 12.2 Insert into the Further Information box: <u>"Conservation Area Maps"</u> <u>"Conservation Area Appraisal and Management Plans"</u> <u>"Shop Fronts in Conservation Areas Design Guidance"</u>
- **12.3** HE1, p112– Replace "Buildings and areas with special architectural or historic interest" with "*Heritage Assets*"
- **12.4** HE1, p112 Insert "*and the Historic Environment Records*" after ".....and areas identified as having definite value in the North Staffordshire: Assessment of Historical Significance"
- **12.5** At 9.3, p112 replace *"legislation*" with "*Local Planning Authority*" in the sentence "....the legislation requires special regard....."
- 12.6 HE2 title, P113 Replace "building" with "heritage asset"
- 12.7 HE2a, p113 replace "building" with "heritage asset"
 - On the end of HE2a, insert new sentence "This means it should normally have a subservient role."
 - HE2b, amend to read "It relates well to the listed heritage asset, in terms of height, massing, scale and materials palette."
- **12.8** At 9.4, p113 2nd column, amend sentence to read "...for the removal <u>and</u> <u>works to</u> trees."

12.9 HE4c, p113, amend to read "....or detract from the qualities <u>and significance</u> that contribute to its character..."

- **12.10** 9.7, p114, amend to read "In particular, traditional <u>and high quality</u> materials must be incorporated in any street enhancement works."
- **12.11** In the Further Information Box, Amend reference to PPG 5 to PPS 5, and amend the following "LDF: Stoke-on-Trent Conservation <u>and Heritage</u> Guidance SPD (forthcoming)

13. Strategic Urban Design Vision

The following text is to replace the first three paragraphs of section 2.1 on page 13 and the penultimate paragraph of the second column on page 13.

"The Introduction, and the Baseline Report, outline the complex issues which have shaped the urban form of the conurbation as we know it today. To begin to address the historic problems we need to take both a strategic approach (macro) to urban design and also at street level (micro). This section on the Strategic Vision deals with the macro level, it is concerned with the relationship between the City and town <u>centres and rural area, as well as, working towards a new distinctive and sustainable</u> <u>settlement hierarchy, whilst still respecting the area's special historic character.</u> <u>At the heart of the Strategic Vision is the need for a more distinct settlement pattern</u> <u>created by a clear pattern of three distinct spatial types:</u>

<u> Urban – for the conurbation settlements</u>

<u>Landscape led urban – for the areas forming the setting for conurbation settlements</u> <u>and shown on pages 31 and 32.</u> Rural – the remaining Area

This will create a more legible and more distinct pattern of settlements and a well connected network of high quality places, each with its own distinctive character. The aim is to create a new sense of place and more immediate and positive image for the conurbation. Ultimately we want to transform the quality of life of people living and working in the area and particularly the urban core and encourage economic success.

The strategic urban design themes guiding this Vision Statement arose from the appraisal and consultation process carried out in the very early stages of preparing the Urban Design Guide. These themes mirror a number of the key spatial principles and policies of the Core Spatial Strategy, including the hierarchy of centres on pages 36 and 37."

14. How to use this Design Guide (page not numbered)

The underlined text amends the second paragraph on the page "How to use this Design Guide"

<u>It is strongly recommended that you</u> first, please refer to the strategic urban design vision and any of the key strategic urban design principles that may be relevant. Check that you propose to follow the good practice principles set out in Section 3, Good design: good practice. Then refer to the character area guidance if applicable. Finally, refer to the relevant topic sections that apply to the situation. <u>Over time</u>, regular users of the Urban Design Guide should be able to go straight to the relevant character and topic areas.

On the "How to use this design guide" page, remove the sentence: "When printing, please bind along the top of the pages to maintain a format as close as possible to the original intention."

15. Paragraph to be inserted at 1.7.1, p4 on healthy planning

Good Urban Design can be a powerful force to help communities make healthier lifestyle choices about exercise, social integration and healthy eating and it can also reduce potentially harmful impacts of development. Through good design developments can be encouraged to consider their health impacts and be designed to have a positive impact on the health of the areas in which they are built. The importance of good urban design to health is well documented and further information can be found by visiting the World Health Organisation website at www.euro.who.int

Changes required to the Sustainability Appraisal for the Newcastle-under-Lyme and Stoke-on-Trent Urban Design SPD

The following amendments are for the Sustainability Appraisal of the Urban Design SPD. These amendments were identified by the client group.

- **16. p1.** Replace "North Staffordshire" with "<u>Newcastle-under-Lyme and Stoke-on-</u> <u>Trent</u>"
- 17. p4. 1.4. 3rd Bullet Point replace "deign" with <u>"design</u>"
- **18. p7**. 3.3 bullet point 7 "a future quality of life through sustainable well designed" seems like an unfinished sentence. (should end in "development")
- **19. p9**. 5.1 bullet point 3. Replace "North Staffordshire" with "<u>Newcastle-under-</u> <u>Lyme and Stoke-on-Trent"</u>
- **20. p9.** 2nd bullet point in 2nd column, replace "North Staffordshire" with <u>"Newcastle-under-Lyme and Stoke-on-Trent"</u>
- **p9.** 2nd bullet point in the 3rd column, remove reference to M6 impacting upon Stoke.
 3rd bullet point in the 3rd column, replace "North Staffordshire" with "<u>The area</u>"
- **22. p9**, 4th bullet point in 3rd column, replace "North Staffordshire with "<u>Newcastle-under-Lyme and Stoke-on-Trent"</u>
- **23. p10.** Sustainability Objective 13 uses acronyms which are not in the glossary. Please define these acronyms in a glossary or at the bottom of this page.
- **24. p10.** The point in blue regarding another sustainability objective means that there are 22 sustainability objectives in total, so this needs changing on p10 in the introduction paragraph and also needs adding to the list of objectives.
- 25. p11. Column 1, 3rd box down from top, replace "North Staffordshire" with <u>"Newcastle-under-Lyme and Stoke-on-Trent"</u>
- 26. p12. Top left box, replace "North Staffordshire with "the area"
- p13 top left hand box, same amendment as above 4th box down on the left, replace "North Staffordshire" with <u>"the area</u>" There is a bracket in pink that needs changing to black Column 3, 4th box down, "SBis" needs changing to "<u>SBIs"</u>
- 28. p14. 2nd box down, replace "North Staffordshire" with "the area"
- 29. p15. The current policy context needs amending from "The Core Spatial Strategy Submission May 2008" to <u>"the adopted Core Spatial Strategy,</u> <u>September 2009</u>"
- **30. p17.** Insert "<u>as"</u> "which highlights the need to address sustainability <u>"as"</u> a national priority"

31. p17. Residential Design - S012 "Retain "and" (replace "ad")

Sustainability Appraisal Appendices

- **32**. A3. Replace "PPG 4 Industrial, commercial development and small firms" with <u>"PPS 4 – Planning for Sustainable Economic Growth"</u>
- 33. PPS 4 also replaces PPS 6 so remove this from the list
- **34.** A4. 2nd Column replace "May 2008" with "<u>October 2009"</u> for the Newcastleunder-Lyme and Stoke-on-Trent Core Spatial Strategy, May 2008"
- 35. A15 Business as usual column SA17 change "off" to <u>"of"</u>

Sustainability Objectives - How does the SPD improve on the Core Spatial Strategy

This section includes the policies of the SPD which improve on the Core Spatial Strategy policies.

- **36.** pA11. **SO1-To help meet the housing needs of the whole community** Where it says, "Better Places for living and working – Strategic Principles" it should state "*Strategic Principles - High Quality Places for Living and Working*"
- **37.** pA11. SO2 To increase life expectancy and improve the health of the population overall

Refers to the same policies of the SPD as SO1, but should also refer to "*Better Quality Connections*", which refers to the promotion of walking and cycling which helps to promote healthy lifestyles (p16 of SPD) It should also refer to "*Strategic Principles: Future Quality of life*", (p24 of the SPD) which refers to the promotion of high quality living environments and contributing to creating healthy and sustainable communities.

- pA12. SO3 To provide the best possible environment to encourage and increase economic enterprise and employment
 Only refers to E1, E2, E3 and E4, however should also refer to *E13*
- **39.** pA13. **SO4-** To enable access to the widest range possible of shopping and commercial services for the resident population Refer to C1 of the SPD which refers to the creation of a diverse mix of uses and a concentration of activity, to support the vitality of the centre.
- 40. pA13. SO5. To protect and enhance the vitality and viability of the city, town and district centres within the conurbation and village centres in the rural area

Refer to C1 of the SPD which refers to the creation of a diverse mix of uses and a concentration of activity, to support the vitality of the centre

- pA14. SO6 To provide a more equitable society where the provision of the widest possible range of community, cultural, educational, health, recreational and leisure facilities are available to all sectors of the population with particular emphasis on deprived neighbourhoods Should it be "Successful and Thriving Centres" not just "centres" Refer to the "Strategic Principles: High Quality Green Space Network" in particular part 1.
 Refer to "Strategic Principles: Future Quality of Life" in particular parts 1 and 2 Refer to PR1 Successful Streets and Spaces (p123 of the SPD)
- **42.** pA14. **SO7- Reduce Crime and the Fear of Crime** Refer to T4 (p69 of the SPD) Refer to PR7 (p125 of the SPD) Refer to PR12 (p128 of the SPD)
- pA16. SO14 Increase the amount of accessible, natural green space Refer to "Strategic Principles: Legible and more distinct settlement patterns" point 2. Create a positive "green" character for the setting for the different settlements in the conurbation, to form "a network of vibrant, complementary centres within a spacious and green urban environment". Refer to T6 of the SPD which refers to the creation of "green gaps" in certain key locations Refer to C1 (p78 of the SPD) Refer to R1 (p84 of the SPD) Refer to PR1 (p123 of the SPD) Refer to PR10 (p127 of the SPD)