

**Summary of responses to the Draft Sustainable Design
in Plymouth SPD
18th October – 21st December 2007**

There were 9 external and 4 internal responses to this Supplementary Planning Document as outlined below:

Consultee	Issues	Response
EXTERNAL		
The Environment Agency	<ul style="list-style-type: none"> • Supports the document • Makes constructive points on Climate Change Chapter. 	Support welcomed.
Morrison Supermarkets PLC (agents Peacock & Smith Ltd)	<ul style="list-style-type: none"> • Concerned about requirement for applications to submit a Climate Change & Sustainability Statement wishes this to be optional. 	This requirement is necessary in order to assess how proposals meet policy CS20.
Queens Anne's Quay Residents Association	<ul style="list-style-type: none"> • Concerned that Tall Buildings guidance includes their car park within the Zone of Opportunity for Tall Buildings. 	The car park for the Queen Anne's Quay is not included in the tall buildings area.
Persimmon Special Projects Western (agents Pegasus Planning Group)	<ul style="list-style-type: none"> • Generally commends the Council for the production of the SPD considers it to be sound & makes constructive detail comments. • Seeks recognition that the LPA should be flexible in its acceptance of design solutions, and level of detail required for outline planning consents. • Seeks pragmatic stance in relation to zero carbon development, will attempt 	<p>Support welcomed.</p> <p>Good design is a fundamental part of national planning policy and Plymouth's Local Development Framework. It is important to set a benchmark for assessing proposals. However it is acknowledged there has to be flexibility in decision making about design.</p> <p>Policy CS20 applies to all developments of a specified threshold. Careful design can</p>

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	<p>to achieve what is economically possible for each site.</p> <ul style="list-style-type: none"> • Seeks LPA resources to maintain constructive pre-application discussions. • Document should avoid duplicating energy efficiency issues more readily addressed by the Building regs. • Welcomes the flexibility made regarding renewable energy technologies and considers that solutions should be specific to each site and should include off site solutions. 	<p>optimise the potential for installing renewable technologies and or gas CHP schemes.</p> <p>Accepted. Pre-application for major applications continue to be encouraged.</p> <p>Accepted. The purpose of the Design SPD is to enforce sustainability standards above the building regulations.</p> <p>Support welcomed. However off site renewable energy solutions are not accepted under policy CS20 in Plymouth's Core Strategy.</p>
Francis Bettison	<ul style="list-style-type: none"> • Tall Buildings, considers the Zone of opportunity should include the area of Colin Cambell Court given this is in what he considers to be the Central Business District of the City. • Seeks recognition that Climate Change & Sustainability targets are more difficult to deliver economically with Tall Buildings. • Makes corrective text and notes within an appended copy of the document. 	<p>Part of Colin Campbell Court (the south and western frontages) is within the Tall buildings zone. The rest is within the zone of intensification for mixed used development.</p> <p>Although there may be particular challenges for tall buildings, such buildings should set high sustainability standards given their high profile status.</p> <p>Noted.</p>
South West Regional Assembly	<ul style="list-style-type: none"> • Supports the SPD, notes it fits well in respect of Policy E High Quality Design and Policy G Sustainable Construction 	Support welcomed.

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Sport England	<p>of the emerging RSS.</p> <ul style="list-style-type: none"> • Considers that their publication “Active Design” would be helpful to promote health & well being of new populations through its guidance on the layout and design of new developments. 	<p>Link to website will be included on website.</p>
Maritime Plymouth	<ul style="list-style-type: none"> • Considers that the diversity of Plymouth’s maritime environment should be recognised in this SPD. • Seeks recognition that Inland development can have direct & indirect impacts upon the Maritime environment. • Concerned that the Council’s stance towards high design standards may make pure maritime Industrial applications undeliverable. • Suggests the SPD should acknowledge views from the sea towards the City and comment on good and bad points. • Seeks recognition that Plymouth’s Eastern Gateway is home to Plymouths commercial Port not picked up in the SPD (not readily visible to 	<p>Noted. The importance of Plymouth’s coastline is included in this SPD. Further recognition of the coast and guidance on development will be covered in a separate document – Coastal Planning SPD.</p> <p>Accepted. This matter will be treated separately in the forthcoming Coastal Planning SPD. This document will set the framework for considering proposals which affect the coastal environment – including cumulative impacts of development.</p> <p>Not accepted. Each application will be considered on its merits bearing in mind the guidance in the SPD. The guidance is not intended to make development undeliverable.</p> <p>Noted. The SPD seeks to protect important views of the city from the sea (see section on ‘Views and Tall Buildings’). This topic will also be covered in the Coastal Planning SPD.</p> <p>Noted. To be considered as part of the Coastal Planning SPD.</p>

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	<p>motorist on approach to the city).</p>	
Gov't Office of South West	<ul style="list-style-type: none"> Acknowledges that they have no comments or objections to make. 	Noted.
INTERNAL		
Plymouth Design Panel	<ul style="list-style-type: none"> Makes constructive comments on the presentation of the Document. Checklist in Chapter 2 should prompt the developer to ensure he has an adequate professional Design Team and ensure a reasonable site analysis & and site context has been undertaken. More explanation sought on how this document fits within the LDF suite of Documents (diagram here would be useful). 	<p>Noted.</p> <p>Accepted. This is provided in chapter 4, which states: 'It is therefore important that developers' proposals provide, through their Design and Access statement, a thorough analysis and understanding of the area within which their development is proposed.'</p> <p>Noted. Explanation of how the SPD related to the LDF is given in the Introduction, under 'What is the document?'</p>
Development Management Team	<ul style="list-style-type: none"> Makes considerable comment and constructive points on the practical use of this document to their team. Considers the SPD could be significantly improved to help users navigate its pages & content.(offers useful ideas). Improve its content add elements that are felt missing such as advice on soft landscape & trees check usefulness of content (offers useful notes). That the document should target a wider range of 	<p>Accepted changes to the document made accordingly.</p> <p>Accepted. The format of the document has been changed to make it easier to use.</p> <p>Accepted. Further guidance on landscaping is added.</p> <p>Accepted. This document was specifically created to address</p>

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	<p>audiences rather than being focussed upon a notional major developer.</p> <ul style="list-style-type: none"> • Document difficult to navigate needs improved presentation to break it up into Chapters possible use of physical projecting tabs • Improved referencing to other sources of information • Move the tall Buildings Chapter to the rear of the Document • Contents section far too long break up and include in Chapter 2. • Consider that you can loose your way within chapters. • Some diagrams are difficult to read & photos should provide footnote to illuminate the point being made. • Checklists in green boxes are presented in the same way as other sources of advice; feel there is a need to differentiate between introductory text and 	<p>the most complex of issues more readily brought up by major applications. Audiences are clarified in Chapter 1, 'Who is this Document for?' A further Development Guidelines SPD is planned for minor development issues.</p> <p>Structure of the document has been changed. Tabs are being considered for easier use of the document</p> <p>References to other guidance will be at the end of each chapter.</p> <p>Tall building guidance is reduced and now within chapter on image of the city.</p> <p>New structure should deal with this issue.</p> <p>Quick reference at front of each chapter indicating what topics are covered</p> <p>Noted and amended accordingly.</p> <p>Noted and amended accordingly</p>

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	<p>useful guidance.</p> <ul style="list-style-type: none"> • The principle issue of retaining trees should be acknowledged in chapters 8, 3 and 6 picking up restrictions in conservation areas. • Use of best practice example and worst practice examples • P.12:- DAS web link wrong or misleading? P.12:- Design Code web link wrong or misleading? These may be a product of a generally difficult to navigate website but would benefit greatly from resolution. P.14:- 3.5, Link to Policy needs to be referred to in suggested revised Chapter 2 <p>P.20:- 3.26, Comments that views “as identified in the plan” should be sustained and enhanced. Where have these views been identified?</p> <p>P.32/33:- Example of diagrams that are too small to be useful with tiny hard to read writing. P.39:- Example of pictures adjacent to each other not being easily distinguishable</p>	<p>Noted and amended</p> <p>More examples in particular in Plymouth will be included</p> <p>Web refs have been changed in new document. :ldf/spds/ldfdesignstrategies Web ref :ldf/spds/ldfdesignstrategies- link not operational (30.1.08)</p> <p>Accepted. Link to policy heading colour issues here & throughout document.</p> <p>Accepted. Provide a strategic diagram indicating the relevant viewpoints</p> <p>Accepted. Tiny images & text to be resolved.</p>
TIE Highways Team	<ul style="list-style-type: none"> • Considers the SPD lacks recognition of transport issues. 	Accepted. Amended accordingly to ensure transport issues are fully recognised.

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	<ul style="list-style-type: none"> • Should relate the document to other sources of transport guidance relating to parking access and movement, such as the Manual for Streets, but other relevant national, regional and local transport documents as well. • Need to provide a source of further transport information. • Include access in para 5.12 • Wishes other considerations to be mentioned when the doc promotes straight over crossings –sometimes stagger is necessary • The public realm strategy needs to acknowledge that the highway authority should be part of the consultation for changes to existing hws and new adoptable hws inc processes • Tall Buildings – recognition that if TB is in an area of air quality management that the impact of the TB on air quality is determined. • Need to recognise that parking provisions need to accord with LTP2 & that levels are determined 	<p>Accepted. Reference to the Manual for Streets and other documents is given in the document (Accessibility and Movement)</p> <p>Accepted. References to LTP2 MfS & PPG13 added.</p> <p>Accepted and amended accordingly.</p> <p>The Design SPD is aspirational not policy and so we would aspire to have straight over crossings always even if there may be times when it is not possible.</p> <p>These issues were addressed in the original draft & have been removed ...add back?</p> <p>Can this be picked up independently through highway consultation on planning applications</p> <p>Noted. Document acknowledges that walking and PT are</p>

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	<p>in relation to accessibility levels promoting public transport discourage car use</p> <ul style="list-style-type: none"> • Cycle Parking provisions are also set out in LTP2 • Possibly add in certain circumstances car free developments may be appropriate. • Utilities - buried services underground have a factor on development potential access to these often important • Public realm Strategy should consider maintenance implications of the materials it delivers • Need to acknowledge that major developments will be required to provide a transport assessment as a comprehensive study of transport matters • Safety – need to mention that changes to the existing highway will require a safety audit 	<p>promoted and car usage discouraged</p> <p>Noted and will include reference to cycle parkig</p> <p>Noted and amended accordingly.</p> <p>Acknowledged in relation to street trees. Will be something that can be picked up through the pre app process.</p> <p>Amended</p> <p>Not accepted. Not appropriate for a design SPD</p> <p>Not accepted. Not appropriate for a design SPD</p>
TIE Development Projects Team	<ul style="list-style-type: none"> • Considers the SPD is overly wordy and text should be reduced. • Needs to improve presentation of diagrams and keys to make them more understandable. • Use of more local images sought (useful suggestions made). 	<p>Noted. Minor alterations and additions have been made for clarification.</p> <p>Noted. Improvements to be made.</p> <p>Accepted. To be incorporated in final document.</p>

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	<ul style="list-style-type: none"> • Makes other useful comments on detail points. • Recognition that the entire document will assist in the production of a Design & Access Statement • Absence of chapters for Design Codes & Design & Access Statements • Principle 1 - Gateways diagram on pg 15 illegible – title key gateways on plan Problem with the key • Principle 2 - Mention The Civic centre & Roland Levinsky buildings as landmark building • Principle 3 - No mention of how topography can contribute to the character of an area • Principle 3 - Considers Topography map too small • Thinks abutting photos is confusing gives example on pg 26 • Principle 5 – need to include transportation issues here 	<p>Noted.</p> <p>Design and access statement advice elsewhere</p> <p>Will either be a web link or an appendix to the paper document or a separate leaflet</p> <p>Maps to be improved.</p> <p>Noted.</p> <p>Not strictly true 3.31 explains how built form responds to levels however amendments made.</p> <p>Noted. Enlargements to be made.</p> <p>Amended accordingly.</p> <p>See highways comments</p> <p>Noted.</p> <p>Accepted. New structure has included some transportation issues. Other transport issues</p>

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	<ul style="list-style-type: none"> • Principle 6 – considers tile should read: “ensuring that the public realm and private space is made safer & attractive. • Considers Tall Buildings Chapter is too long consider reducing • Considers Street Life & Public realm section could have better illustrations use more Plymouth ones • 5.33 SLPR could provide commitment to salvaging and reusing traditional materials • 5.38 public realm in Historic Areas needs illustration • Public Art – use some illustrations from Plymouth • Who is managing the public art initiative from the Councils perspective? • Shouldn't the Council be producing the public realm strategy • Historic Environment - reference needs to be 	<p>should be picked up through the LTP and planning application discussions.</p> <p>New structure has resolved this issue.</p> <p>Noted and changed.</p> <p>Noted. Plymouth examples can only be used if they provide good examples. Otherwise examples from elsewhere provide aspirations for us to meet.</p> <p>The SPD offers a method for making the most of opportunities through the planning system.</p> <p>Illustrations are provided in the Historic Environment leaflets.</p> <p>Noted and some images added.</p> <p>The documents purpose is to highlight the need for Public Art, consideration.</p> <p>Advice leaflets are provided as</p>

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	<p>made on repair SPAB advice leaflets & Victorian Society Leaflets would be of use</p> <ul style="list-style-type: none"> • Historic Environment - under repairs to windows & doors it should be said that PVCU & Aluminium are unacceptable refer to EH leaflets • Section on how Plymouth has preserved & enhanced its Conservation Areas would be helpful would add weight to arguments for proper stewardship of the same • Historic Environment - further guidance & contacts can be found with Institute of Historic Building Conservation & Standard and Guidance for the Stewardship of the Historic Environment 	<p>links on the website.</p> <p>Advice leaflets provided.</p> <p>Advice leaflets provided.</p> <p>Acknowledged in advice leaflets</p>