

**Appendix 2: Draft Rushcliffe Design Code Supplementary
Planning Document – summary of consultation
responses**

Draft Rushcliffe Design Guide Supplementary Planning Document: consultation comments, proposed response and revisions to SPD

Name	Topic	Comment	Proposed response to comment
Local Residents			
Resident 01	Infrastructure	Schools, doctors' surgeries, village hall, other public amenities and shops should be built and in place before houses are built.	These strategic issues are beyond the scope of the SPD
	Street Hierarchy and Servicing	Provide bigger drives, not shared drives, and more double garages, and wider roads.	The Street Hierarchy and Servicing Design Note codes and provides guidance on driveways, garages and road widths in general accordance with the Nottinghamshire County Council Highway Design Guide – no modification to SPD.
	Housing	Provide large bedrooms, not box rooms. Provide big gardens.	The coding of bedroom sizes is not appropriate for a Design Code. <u>Modification</u> – guidance on garden sizes has been added in the Design Code.
	Renewable energy	Solar panels should be fitted onto all buildings. No heat pumps as they are a waste of space.	The Multi-dwellings and Taller Buildings Design Note and the Householder Design Note provides guidance on the installation of solar panels and air source heat pumps. The guidance states that developments should be designed with solar panels, to encourage provision where possible. The Code does not restrict air source heat pumps as it is a renewable energy source that contributes to decarbonising power use.
	Flooding	Don't build on flood plains.	This issue is covered by national and local planning policies.
Resident 02	Housing	All new developments should provide low cat housing and bungalows	This matter is sufficiently covered by local planning policies.
Resident 03	Highways and Transport	Roads are at capacity, particularly in the Costock/East Leake area.	This strategic issue is beyond the scope of the SPD.
	Flooding	New development (Algar Close) is a major contributor to flooding.	The Landscape Design Note includes code and guidance on sustainable drainage systems to ensure that development will contribute to a reduction in flood risk.
Resident 04	Infrastructure	Existing infrastructure should be upgraded to handle additional demand.	This strategic issue is beyond the scope of the SPD.
	Flooding	Flooding happens regularly at the tram station due to no upgrade of the drainage system.	The Landscape Design Note includes code and guidance on sustainable drainage systems to ensure that development will contribute to a reduction in flood risk.
	Highways and Transport	High levels of traffic at peak times, and large potholes due to the large volume of traffic.	This strategic issue is beyond the scope of the SPD.
Resident 05	Infrastructure	Too much new housing without additional doctors, dentists, shops, schools being provided.	This strategic issue is beyond the scope of the SPD.
	Highways and Transport	Too much new housing without additional roads being provided.	The Street Hierarchy and Servicing Design Note codes and provides guidance on roads to be delivered as part of new developments – no modification to SPD.
	Design	New development is designed in a homogenous way and makes everywhere look bland and boring.	The Design Code encourages good design practice and proposals to be submitted to the Council. For example, the Design Code includes code and guidance on the use of materials, landscaping and the scale of development – no modification to SPD.
Resident 06	General	Food, water and energy education and economy is the way forward.	The Design Code already supports this comment where possible.
Resident 07	Strategic	Failed to consult with the airfield users and General Aviation	This comment relates to a strategic site that is allocated in the Local Plan Part 1 and

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	Allocation East of Gamson/North of Tollerton	Industry on the outline consent for Gamston, therefore the Baseline Analysis and Design Code is flawed.	proposed for allocation in the Greater Nottingham Strategic Plan. It is therefore beyond the scope of the SPD.
Resident 08	Landscape	Section 4.6 headed 'Wayfinding...' the words about the provision of off-road routes for pedestrians and cyclists on new estates should be strengthened. Those provided on Compton Acres are a great example- separate paths encourage active travel free from traffic and fumes and enables connections with schools and shops. Whilst I appreciate the image of a road-side cycle lane is OK, I think it sends the wrong message. You could replace it with a local example which facilitates active travel.	Codes regarding active travel and pedestrian and cycle routes are already provided. As per the definition of active travel included within the Design Code, the image used pictures active travel.
	Appendix 1	The wording of Code 4.25 lacks coherence, either a word is missing or something else needs changing. The wording does not effectively describe off-road active travel routes as a feature for new estates.	<u>Modification</u> – the code contained in Appendix 1 has been updated to reflect the code in the main document.
	Householder	On one side is the heading 'Process'. It refers to planning applications and permitted development. There are domestic buildings where permitted development rights are removed. So, I suggest that the wording says that "...permitted development if applicable".	The current wording of the Design Code covers the resident's suggestion as it states that an applicant will need to determine if their proposed works can be covered under permitted development.
Resident 09	Housing	Supportive of the attempts to build better insulated and less fossil fuelled housing.	Noted.
	Highways and Transport	Supportive that cyclists and pedestrians are being thought of at the start of the planning process. Emphasis should be on walking, cycling and public transport. Suggest following the 15 minute city concept. Suggest making some roads one way to make room for cycleways. Suggest provision of EV charging hubs in the centre of new build estates and encouragement of car share systems. Plan a tram line to Ruddington.	The support is noted. The resident's suggestions are strategic in scale and therefore outside of the scope of the Design Code.
	High Streets Area Type	If new seating is planned for West Bridgford, a covered area would be preferred. Tudor Square area could be improved if it wasn't mainly car parking. Too few useful shops left in Central Avenue, it needs more sensitive planning.	The guidance in section 4.4 of the Landscape Design Note encourages the design of public realm to include spaces with shelter or partial shelter. The occupants of shops cannot be controlled by the planning system so lies outside of the scope of the Design Code.
	Householder	In central West Bridgford extensions are being allowed that are changing the character of the area and making it more crowded/terraced feel rather than open and spacious. Not enough room is being allowed between housing to allow maintenance of side walls and will also prevent outside solid wall insulation from being installed. Rear extensions seem to be allowing the majority of the garden being used for the extension itself, patio area and outbuildings. There should be some rules as to how much of the garden area is concreted/built over as this type of building will exacerbate the flooding problem.	<u>Modification</u> – The Householder Design Note includes code and guidance regarding extensions and the space to be left between neighbouring properties. Additionally, guidance on garden sizes has now been included in the Design Code.
	General	West Bridgford is politically arranged that 4/5 different wards make up the central area, meaning decisions about West Bridgford are	This issue is beyond the scope of the SPD.

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		made by people in remote rural areas of the Borough to the detriment of the local environment and people.	
	Ratcliffe on Soar Power Station	Disagree with freeports. The incinerator should not be built.	The comments relate to matters that are beyond the scope of the SPD.
Resident 10	Consultation Process	Summary of public feedback is minimal with no evidence the new guide addresses what people have asked for locally.	A consultation statement was produced to support the draft Design Code SPD consultation, and a final consultation statement will be produced to support the Design Code SPD if it is adopted.
	Design Code	The Design Code fails to provide a design code for each area type, as promised in the Baseline Appraisal.	During the development of the Design Code SPD, the scope of the document changed. It was determined that producing a Design Code for each area type was too large in scale to undertake within the timescales and budget given.
	Street Hierarchy and Servicing	Parking and traffic are recognised as a major public concern, but there are no clear proposals to address this. What people want is the public front cleared of cars, bins, bikes etc, which instead should be hidden to the rear in a mews area. Not shared, but each house with a dedicated defensible space which can also be used for deliveries, storage and work. Remote shared parking spaces ignore these other needs completely and can cause disputes over usage and management charges.	The Street Hierarchy and Servicing Design Note codes and provides guidance on car parking, bin storage and bike storage in accordance with the Nottinghamshire County Council Highway Design Guide.
	Infill and Intensification	No attempt has been made to address that new development is much bigger and dominant than existing development. It is not enough to say that "scale and massing of new development... must not exceed that of surrounding existing buildings". Because as before, this immediately becomes the minimum based upon the largest adjacent house, and 'mistakes' mean it is commonly exceeded to become the benchmark for the next development. New development should not exceed the average of existing development.	The suggestion is noted. However, it is considered that since the existing code specifies the surrounding existing buildings (plural) and not one dwelling, the code will provide the same results as the resident's suggestion.
	Householder	All Householder rules are also based upon the size of the original house – which for older houses means as it was in 1945 or 80 years ago. A fifty percent increase on that such as in the countryside is usually nil in practice, whereas the draft code allows a 50% increase on the current house if it is instead knocked down and rebuilt.	<u>Modification</u> – the Design Code has been amended to include a definition of 'original building' in the glossary. Codes and guidance on increasing the size of a dwelling has been amended to refer to the definition of 'original building' and not the current house.
		Many of the (far more prescriptive rules) for householder applications are very vague with unclear meanings. C5.10 'Outbuildings in the primary frontage will not be accepted'. The meaning 'in the primary frontage' is completely unexplained. Does this mean abutting the line of the primary frontage, or anywhere forward of the principal elevation? Also, C5.1 "Side extensions must not result in development within 1 metre of a common boundary with a neighbouring house or where terracing would result." What does common boundary with a neighbouring house mean? Does it mean the garden? Does it include any outbuildings?	<u>Modification</u> – the glossary has been amended to include definitions of primary frontage and common boundary. An illustration has also been included to demonstrate the common boundary.

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		The suggested new householder rules are to reduce the developable area of existing houses from 50% under current rules to only 13% (15/115) for plots over a quarter of an acre. This means that where most extensions and new outbuildings currently being allowed will no longer be acceptable in the future at all. No such restriction applies to new build which are often far more dense. These new rules on the developable area for householder applications also fail to be reasonably progressive. So, if you reduce your plot by selling a small piece off you can in some cases substantially increase the permitted developable area. There is no justification that the old 50% rule needs to be replaced with a progressive rule anyway. Better to replace the 50% rule with 25% if needed with a consistent rule for new builds	<u>Modification</u> – the meaning of this comment is not entirely clear. However, the code on developable areas has been amended to guidance to allow for some flexibility of interpretation.
Resident 11	Landscape	Is there any way of ensuring developers do not raze the site to the ground, ripping out trees and hedgerows, and replacing with fencing that has no benefit to the environment. Existing trees and hedgerows should be preserved. New trees planted by developers are left to die. Is there not commitment to care until a tree is established. When the Council requires an existing hedgerow to be retained by a developer, what protection is there to ensure it is also retained by the purchaser of the house.	The comments are noted. Ensuring that developers 'do not raze the site to the ground' is a matter that is dealt with outside of the scope of the SPD. Additionally, ensuring the protection of a hedgerow by the developer and then the purchaser of the house is a matter dealt with outside of the scope of the SPD. The code and guidance with the Landscape Design Note supports the protection of existing trees and hedgerows and the management of new planting, including the replacement of dead or dying trees (code C4.28).
	Householder	Does the plan stop people building third storeys on their houses, with large outward rather than upward facing windows? These ruin the privacy of the surrounding neighbours.	The comment is noted, but the building of third stories cannot be restricted. However, the comments on privacy are noted, and it is considered that the code and guidance covered within Section 5.2 of the Householder Design Note addresses the concerns.
Resident 12	Landscape	Little consideration for flora and fauna. There is nothing about animal crossings or continuing animal paths. The development of wildlife routes and replanting native trees/shrubs must be part of the process.	Code 4.8 in the Landscape Design Note requires robust boundary materials to be fitted with hedgehog holes, and the guidance encourages the provision of additional features to benefit certain species. The guidance within the Landscape Design Note encourages the planting of a diverse range of species which respond to local landscape character.
	Highways and Transport	Developers should be held accountable for the muck that is left on the highway and pavement. RBC should monitor developers more during the process to react to community concerns.	The comment is noted, but the concern is dealt with outside of the scope of the SPD. The Council prioritise their residents' concerns and ensure that any concerns are dealt with efficiently.
	Infrastructure	More local facilities such as doctors, dentists, parking is needed to support the increasing population.	These strategic issues are beyond the scope of the SPD.
Resident 13	Landscape	Support the provisions to protect wildlife, particularly hedgehogs. The NPPF recommends such additional protections, and RBC should adopt and exceed these standards.	Noted. The Council consider the code and guidance contained in the Landscape Design Note to provide suitable standards that align with those in the NPPF.
Resident 14	Support	Fully support the document.	Noted.
	Flooding	Flooding from run-off water should be given equal billing with river water flooding.	<u>Modification</u> – the commentary at the beginning of Section 4.1 of the Landscape Design Note has been amended to refer to flood risk from rivers and from surface water.
	Accessibility	A monochrome version would be useful, as the printed in document in black and white is difficult to read.	The adopted version of the Design Code SPD will be provided in an accessible format.

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Resident 15	Landscape	Concerns that the SuDS guidance does not go far enough. Object to the phrase 'avoiding any increase to the risk of flooding elsewhere' as a recent example is the flooding of Wheatcroft Island, which never happened prior to the new housing development. Stronger wording and guidance than avoid needs to be specified.	The comment is noted. The SuDS guidance has been prepared in consultation with the Lead Local Flood Authority to ensure appropriate information is provided in the Design Code.
Resident 16	Design Code	Queries over what the Design Code will replace, the Design Code's weight in decision making, and when the Design Code will be adopted.	The Rushcliffe Design Code SPD will replace the Rushcliffe Residential Design Guide SPD. The introduction to the SPD states that it will set out mandatory requirements and discretionary guidance for applicants to adhere to. The SPD will be subordinate to the adopted Local Plan.
		Will Nottinghamshire County Highways and RBC follow the same rules/principles. Raise serious concerns if they don't. Undermines the usefulness of the Design Code.	The Design Code SPD has been prepared in consultation with Nottinghamshire County Council Highways and aligns with the Highway Design Guide except where fully justified.
		Queried the need for a compliance statement as that would suggest that the Code does not have to be followed, or that the Council won't cross check the application with the Design Code.	A compliance statement is necessary to understand where a proposed development is non-compliant with the Design Code, and whether non-compliance can be fully justified.
		To highlight the changes the Design Code makes, it would be useful to have examples of (completed or fictional) planning applications that would have a different outcome using the new Design Code, and the reasons why.	This suggestion is noted and will be considered when reporting on the impacts of the Design Code SPD following its adoption.
	Planning and Design Process	<p>The Planning and Design Process note does not cover:</p> <ul style="list-style-type: none"> What kind of training are planners/planning committee, councillors going to get? How is the planning department going to properly vet all the new paperwork/applications and make sure rules are met? Who is going to determine whether an application passes or fails? How is consistency of decision making going to be regulated when there are still a lot of guidelines and not a lot of rules. 	The issues raised are generally beyond the scope of the Design Code. Consistency of decision making will be ensured through the compliance checklist and communication within the team.
		<p>Suggestions include:</p> <ul style="list-style-type: none"> Two weeks notice is insufficient when notifying relevant parties of a planning application Notice of an application should contain information on the process i.e. who the local ward councillor is and their role in objecting to an application. Objectors to an application should be able to appeal to Bristol Planning Inspectorate as well as appellants. Appellants should not be able to formally submit the same planning application on a rinse and repeat basis with the aim of wearing down objectors. Planning committee members should be aware that ALL objections to a plan have to be submitted on a first application 	The suggestions are noted but are beyond the scope of the SPD.

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		<p>rather than on a reiteration OR</p> <ul style="list-style-type: none"> The planning committee should be able to object to any aspect of a previously submitted planning application. It should be mandatory for appellants to consult residents affected by planning proposals Bristol Planning Inspectorate should make a site visit in the event of an appeal rather than judging from afar. Pre meetings with planning committee members should either not be allowed or should be transparent i.e. recorded. The Planning department should not be tying the hands of the planning committee before the main public meeting which is recorded e.g. for fear of not meeting its own KPIs or being fined by the planning inspectorate. 	
		<p>The DAS format is a useful overview for residents so is it disappearing for minor applications? If so, what will take its place? Something concise, useful and well written needs to be submitted for consumption by general public. Current documentation provided by applicants can be sub-standard, unreadable, inaccurate and unwieldy.</p>	<p>Design and Access Statements are not typically required for minor applications, and this approach is not changing. The information that needs to be submitted as part of a planning application is set out in the Council's Local Scheme of Validation.</p>
		<p>Shouldn't one of the research items be talking (and listening) to councillors/residents in the community in which they want to make a planning application? Would it be off the wall to ask what communities might like? Also, perhaps the applicant should show that they have anticipated, and taken into account, objections from local residents or communities?</p>	<p>Part two of the Planning and Design Process Note recommends engagement with stakeholders, including local residents and Councillors.</p>
		<p><i>Local stakeholders may include residents.</i> Suggest replace the word 'may' with 'must', and should be for all applications.</p>	<p>The suggestion is noted, but the sentence lists a number of local stakeholders who it might be appropriate to contact. Therefore, the Council considers 'may' is appropriate in this context.</p>
		<p><i>Site micro-climate: watercourses, flood risk, drainage, gradients, exposure to wind, sun path....</i> This misses the point on two counts:</p> <ul style="list-style-type: none"> The proposed dwelling might be built to deal with flood risk and the application accepted, but the planning process allows everyone else to drown around them as a result of yet more concrete, tanking of cellars etc. The process only deals with one application at a time, whereas it should be holistic e.g. multiple applications might be made next in the same area and passed on an individual level but together they transgress many criteria and cause many issues. <p>I would like to see these addressed in your proposal.</p>	<p>Noted. The Landscape Design Note includes code and guidance on sustainable drainage systems to ensure that a proposed development will contribute to a reduction in flood risk in the area. Applications can only be considered on their individual merits and cannot be considered holistically.</p>
		<p><i>Opportunities and constraints: summarising all the above positive factors in the area which gives the site an identity and character and identifying any negative aspects that redevelopment of the site could potentially improve.</i> Suggest regular events in the local</p>	<p>The suggestion is noted, and the Process and Design Note directs applicants to consider the wider movement networks of a site, which could include regular events in the local area. Additionally, the Design Note encourages engagement with local stakeholders, who are best to advise on local issues, such as impacts of events on the</p>

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		area should also be documented by the applicant in terms of effect on sustainability, parking, and transport, e.g. concerts, football matches, international cricket.	local area.
		<i>How is the design approach responding positively to input from the community and other stakeholders? How will RBC check who the applicant has spoken to and that what the applicant reports back is truthful? Who or what are 'Design Midlands'?</i>	<u>Modification</u> – Design Midlands has been included in the glossary.
		C0.1. Suggest it says <i>detailed and accurate</i>	The comment is noted but the proposed amendment has not been made as it would not substantively alter the code.
		<i>Care should be taken to ensure that masterplans are viable and understood by all stakeholders and include accurate representations of what the proposed development will look like. They must not be misleading to the public. Absolutely agree, but what are masterplans? Is this statement only relevant for master plans? Also, for the reader, they should be concise and simple as possible, easily accessible and easy to read</i>	Noted. It is considered that what are masterplans are already appropriately described within the Design Code.
	Street Hierarchy and Servicing	High occupancy dwelling applications should not be put forward or accepted in an area which already has limited parking. Conversely, if the dwelling cannot provide adequate car parking spaces, the application should not be accepted either.	The Street Hierarchy and Servicing Design Note codes and provides guidance on parking in accordance with the Nottinghamshire County Council Highway Design Guide and only deviates from it where justified.
		Not addressing or including the role of Nottinghamshire County Highways in planning applications seriously undermines the Design Code. It effectively allows RBC planning department to put forward and approve inappropriate applications and not take any responsibility for the decision.	The Design Code has been prepared in consultation with Nottinghamshire County Council Highways. The role of Nottinghamshire County Council Highways is explained in the introduction of the Design Code.
		I note on Page 10 in 'Streets for a healthy Life' it says: <i>Reducing car parking should not be used as a way of reducing levels of car use and ownership. Designers should anticipate realistic levels of car parking demand, guarding against displaced and anti-social parking; thinking about the availability and frequency of public transport and opportunities for active travel. However, car parking provision below normal demand levels can work successfully in sustainable locations when adequate on street parking controls are present.</i> Very often, there are no adequate street parking controls present!.	Noted. This comment does not relate to the content of the Design Code.
		Nottinghamshire County Highways do not acknowledge 'events', lack of garages, high occupancy dwellings (e.g. 8 students in a bungalow mostly with cars), buses getting stuck (even though cars are not parked inconsiderately or illegally), resident complaints, and indeed councillor's complaints (even NCC councillors). The list isn't comprehensive.	Noted. The comment is directed towards Nottinghamshire County Council Highways and not the SPD.
		<i>Rushcliffe residential street hierarchy is intentionally inverted to put the emphasis on the requirement to create streets that give</i>	Noted. The Design Code SPD applies to new development only, so cannot apply to existing areas.

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		<i>people priority over vehicles, and which are safe and attractive to all users.</i> I suggest that if you want that in Lady Bay you would need to sort out parking/traffic, and that means rejecting inappropriate planning applications, amongst other things. Other things include stopping scooters and bikes on pavements (electric or standard). The Design code talks about compliance, so can I suggest that both RBC and NCC need to comply to make the Design Code work. Note, in Lady Bay, everyone, apart from the relevant Council departments, seem to know that parking and driving in Lady Bay can be hazardous, not least because neither drivers nor pedestrians can see beyond and through all the parked cars, or indeed each other. On top of that, lorries for the co-op, buses, takeaway shops, school pickup/drop offs, events, all add to the hazards. Those hazards being unacknowledged by the very same whose job it is to make it safer for the community.	
		I do not consider the 'main street' section addresses the issues in Lady Bay, specifically Trent Boulevard. Is the Design Code just for new developments? There is an opportunity to address existing street issues. If the principles of the Design code are worth having, then surely they should be used to drive physical changes that can be retrofitted (e.g. bollards to stop pavement parking, residential parking only during football matches), and changing behaviour (in planning decisions) to mitigate issues which can't be addressed by retrofitting.	Noted. The Design Code SPD applies to new development as stated in the introduction, so the code and guidance cannot apply to existing areas or developments that are not the subject of a planning application.
		I can't see how this addresses current parking issues, or the relevance of some of the codes. What is a Classified Highway? Is Trent Boulevard one? I suggest that requests for perpendicular parking across the front of multiple consecutive dwellings onto a main street should be rejected.	The Design Code SPD applies to new development, so cannot apply to existing areas. The Street Hierarchy and Servicing Design Note codes and provides guidance on parking in accordance with the Nottinghamshire County Council Highway Design Guide. <u>Modification</u> – a classified road has been defined in the glossary.
		Deter cyclists on pavements, especially electric bike, and especially delivery bikes.	The Design Code SPD includes code and guidance on cycle lanes and where they should be segregated.
		Stop charging for parking that penalises trade and residents. There are other ways to stop people from parking for a long time.	The suggestion is noted but is beyond the scope of the SPD.
	Infill and Intensification	The Infill and Intensification section intensifies my concerns that new developments will be allowed to blight existing landscapes and the lives of existing residents, in fact the very things that this Design code is supposed to be protecting. This draft document even acknowledges that residents might not be happy about the proposals (see Backland Developments). It renders comforting comments about being a good neighbour and consulting communities empty statements.	Noted. The Design Code encourages good design practice and proposals to be submitted to the Council.
		<i>This type of development is usually on brownfield land (previously</i>	The Design Code does not seek to influence the types of development being

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		<i>developed land) and usually viewed positively due to being inherently more sustainable than expansion into greenfield sites. Do you view it as a positive to demolish a property that is serviceable and desirable when it is merely being replaced to meet targets or for greed? I suggest that greenfield sites might well be a viable alternative to destroying the settlements we already have since they can be built with sustainability in mind and can more readily adhere to the principles in this Design Code.</i>	submitted, but does aim to encourage good design practice and proposals to be submitted to the Council.
		<i>The priority when designing for infill and intensification is to be a good neighbour to surrounding buildings and uses. I agree with your intent, but this certainly has not been the case to date. The statement also sounds like the Design Code is suggesting to the applicant they comply with the principle out of the goodness of their heart...it's not a rule, only a guideline... Perhaps the wording should be taken literally - it is the neighbours who should have a big say in what constitutes 'good'.</i>	The suggestion is noted. Neighbouring properties are consulted as part of the planning application process, and any member of the public can submit a comment to a planning application to have a say on what they constitute as good.
	Multi dwellings and taller buildings	I would say that there are many guidelines and few rules which is not encouraging for a good outcome of planning decision, especially in relation to scale and context.	Noted. Not all matters can be coded, so the Council has opted to provide guidance to allow a pragmatic response to an issue, whilst still establishing design parameters.
	Landscape	<i>The layout and design of all new development should be planned with a SuDS system (Sustainable Drainage systems) which takes account of wider blue infrastructure beyond the site boundary, avoiding any increase to the risk of flooding elsewhere, and where possible reducing flood risk - unless it can be demonstrated that such measures are not viable or technically feasible. Proposals for new development should demonstrate that SuDs are integrated throughout the site layout and design rather than restricted to isolated locations, incorporating attenuation in to the heart of proposed schemes. A bit of landscaping and use of permeable driveways is not going to offset any major flooding caused by the Trent, or more likely, surface water caused by generally too much concrete and tanking of cellars etc. I query whether 'Landscaping' will resolve adverse consequences of 'Infill and intensification' e.g. flooding. When you say new development, does this include extensions to existing buildings?</i>	The SuDS guidance has been prepared in consultation with the Lead Local Flood Authority to ensure appropriate information is provided in the Design Code. The code in Section 4.1 of the Landscape Design Note will not apply to householder development, so typically will not apply to extensions.
	Householder	<i>When you apply for planning permission, your neighbours will be informed of your application and will have the opportunity to comment on the proposals.</i> Not necessarily. The council sends a copy of the application to the house that neighbours the property which is subject of the proposal. The council should send a copy of the planning application to the address of the owner of neighbouring properties (and opposite), not the house. The occupant of a neighbouring house is not necessarily the owner. RBC have been requested to do this, and refused.	Noted. This matter is outside the scope of the Design Code SPD.
	General	What aspects of the Design code will be impacted in the light of a proposed 'unitary council'?	The queries relate to matters outside of the scope of the SPD.

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		What will the planning and transport departments look like in a unified council? Will Bristol Planning Inspectorate still exist and with the same role?	
	High Streets	Consistent and pleasant shop signage in WB.	Noted, but the request is too specific to be coded.
		Avoid smells from restaurants and takeaways from affecting residents and passers by	Noted, but this is outside of the scope of the Design Code SPD.
Resident 17	General	Picking up on the positive content of the Code in the area of active travel that is evident, I would trust that the Borough Council can be relied upon to engage with the highway authority to secure policy alignment on the subject and to encourage a far better embrace by them of the many benefits that active travel can and does deliver.	Noted. The Design Code SPD has been prepared in consultation with Nottinghamshire County Council Highways and aligns with the Highway Design Guide except where fully justified.
	Vision	It's disappointing that the overall vision for Rushcliffe doesn't make reference to climate change or carbon reduction, particularly when the Borough Council aims to become carbon neutral by 2030 for its own operations. In this context, surely carbon reduction aims should be part of the overall vision, particularly when the code itself does go on to address the subject.	The comment is noted. In order to create a short and focused vision 'well-designed, high-quality and sustainable development' was used. It is intended that sustainable development in the Borough will seek to reduce carbon.
		That there's no reference in the overall vision to biodiversity is also disappointing. Surely this should be part of the vision when biodiversity is so vital in supporting the health and stability of ecosystems, the economy, and society more widely.	The vision refers to 'sustainable development'. It is recognised that sustainable development has three objectives, including an environmental objective. It is therefore assumed that sustainable development will seek to protect and enhance the natural environment
		I'd repeat my suggestion that in the vision for West Bridgford there should be mention of active travel.	The vision for the West Bridgford Area Type includes 'improved connectivity' which encompasses active travel.
		I'd also repeat my suggestion that in the vision for High Streets addition of the words "in particular by active means of travel" after the words 'easy to visit' would be entirely appropriate	The suggestion is noted, but to keep the vision concise it has not been included.
	Ratcliffe on Soar Power Station	That it's proposed that the code will not apply to the area of the LDO for the Ratcliffe Power Station site surely can't be right. This approach must be reconsidered as part of the effort to see that the redevelopment of the site neither sits uneasily with nor blights large swathes of adjacent areas	The Local Development Order at Ratcliffe on Soar Power Station is subject to a site-specific Design Guide, so is not subject to the Design Code SPD.
	Street Hierarchy and Servicing	Section 1.3 - the code should also require that level footways are provided across junctions that give access to tertiary streets from the secondary street; and level footways are provided across junctions that give access to tertiary streets from the main street. Requirement for bike storage should match the scale of the dwelling and how many occupants are likely.	The Street Hierarchy and Servicing Design Note has been prepared in consultation with Nottinghamshire County Council Highways and aligns with the Highway Design Guide except where fully justified. Code and guidance have been included on bike storage, however, as the number of occupants of a proposed development will be unknown, this suggestion not been included.

Name	Topic	Comment	Proposed response to comment
	Landscape	Section 4.6 - the code should include a requirement for clear and coherent signage for walking and cycling routes.	<u>Modification</u> – the guidance contained within Section 4.6 of the Landscape Design Note has been amended to require clear signage for active travel.
Resident 18	Design Code	The document has no search facility, which makes it unwieldy.	When adopted, the Design Code will be supported by search facility to filter by development type and area type, which will bring up the codes relevant to the application. Appendix 1 of the document sets out in a list which of the Codes apply to which application type and which area type.
		Concerned that the document will have no weight, as the Code caveats examples where certain code may not apply, or viability may remove need to apply the code.	The SPD sets mandatory requirements and discretionary guidance for applicants to adhere to. A proposed development must comply with the code, unless non-compliance can be fully justified.
	Multi dwellings and taller buildings	It is mentioned that taller buildings are only appropriate on the Riverside area, but almost nothing is specified about how these can be acceptable neighbours. For instance, how far should they be set back from the recommended 2m public footpath? Just as there are angle diagrams specifying acceptable overlooking and overshadowing, tall buildings could have similar specifications to avoid: unpleasant dominating of the footpath due to inadequate verge/open space/buffer, wind tunnelling problems as referred to, or becoming an obstacle to safe street crossing. These considerations should also apply to residence intensification (new multi-occupancy) for buildings not as tall as 5 storeys, of which there are ever-increasing numbers in West Bridgford. They can still be unacceptably domineering, with insufficient soft landscaping to buffer their effect within more residential situations	The Multi Dwelling and Taller Buildings Design Note defines taller buildings as a building that is 5 storeys and above. The range of proposals that could be submitted under that definition requires a more pragmatic approach to be taken to the design of the individual application, so the Council have opted to provide limited code with a lot of supporting guidance to enable flexibility whilst still establishing design parameters. The same applies for multi-dwellings.
	Biodiversity	From our experience there is a disappearance or dwindling of the following animals locally: water voles, owls, hedgehogs, lapwings, skylarks. Even populations of collared doves, starlings, and house sparrows are much contracted. Strategies and Opportunity Mapping Reports need to become reality.	Noted. The Rushcliffe Biodiversity Opportunity Mapping has been referred to in the guidance of Section 4.2 of the Landscape Design Note to encourage developers to direct biodiversity enhancements to these opportunity areas.
	Householder	Materials used in modifications to homes ' <i>should not add new notes to the street palette</i> '. But where does this leave external thermal insulation cladding? We are in a climate emergency, and the old buildings in our neighbourhood are on the whole poorly insulated. Adding a faux-brick veneer to such cladding adds thousands of pounds to the cost, and – if made a requirement – will probably put many off. Besides, it's a bit phoney. Should we contemplate being a little relaxed about a more varied 'street palette' when it comes to external insulation? Can we confer as a neighbourhood on an acceptable approach to this issue?	<u>Modification</u> – the guidance has been amended to state "should not add new materials to the street palette unless justified when taking into account the local context".
	Landscape	Possible not a planning matter - but management companies are mentioned without reference to their poor record in delivering services and charging residents extortionately.	The comment is noted but the matter lies outside of the scope of the Design Code SPD.
Resident 19	General	Recommend more mitigation measures to combat the severity of storms and droughts.	The comment is noted. The Design Code SPD has been prepared in consultation with the Lead Local Flood Authority and the Environment Agency to ensure appropriate information is provided.
	Design	Suggest more emphasis on the need for more adaptable building	Code and guidance are provided in the Householder Design Note regarding

Name	Topic	Comment	Proposed response to comment
		design for future proofing, in particular for housing to meet the changing needs of inhabitants over time to accommodate layout changes and extensions (as family units grow and reduce in number), and also to provide readiness for the installation of solar panels, heat pumps and other energy providing technologies	householder extensions, to allow for a house to change to match family changes, and the installation of on-site renewables.
Resident 20	Support	In principle I am supportive of the proposed SDP, I appreciate the fact that footpaths and cycle routes will be prioritise within new development and built to the LTN 1/20 standard.	Noted.
	Street Hierarchy and Servicing	The Nottinghamshire County Highways design standards should be encompassed within RBC design standard and be supportive of any infrastructure needs.	The Design Code SPD has been prepared in consultation with Nottinghamshire County Council Highways and aligns with the Highway Design Guide except where fully justified.
	Rural Area Type	The connectivity proposed in the Riverside vision should also be included in the rural vision.	The suggestion is not considered appropriate given that the Riverside Area Type and the Rural Area Type are very different.
	Planning and Design Process	The on off site movement is very important in the site appraisal. Connectivity to local networks should be built where there are deficiencies.	Noted.
	Infill and Intensification	Backland development should bring benefits to adjoining development. Development should not restrict further movement by car, cycle or walking to adjoining communities.	Noted.
	Renewable Energy	It is proposed that roof space on larger buildings should be constructed to accommodate the installation of PV electrical power generation. This should be a requirement for all houses to reduce our carbon footprint and make homes more energy efficient	The Code cannot require solar panels on all houses as that may not always be feasible. Instead, the guidance states that developments should be designed with solar panels, to encourage provision where possible.
	Landscape	Green infrastructure corridors should be at the heart of all planning applications and provide links between the development site and other amenities. Point C4.24 and C4.26 is again important. Active travel should be requested for this point as should any Neighbourhood Plan.	The Landscape Design Note contains code and guidance on green infrastructure, ensuring it's a priority within new developments. Noted.
Parish Councils and Councils			
Keyworth Parish Council	Householder	There have been occasions where applications for significant extensions to properties have been refused because they are considered not in keeping with their surroundings or the design of the extension. When in the same locality demolition and New Builds have been approved that are significantly less attractive / in keeping / larger but judged simply as a stand-alone design with more apparent latitude. Some way of describing a better balance between the merits of the final project when it is an extension against a New Build would be useful.	The comment is noted but the Council cannot control whether an applicant submits an application for an extension or for a demolition/rebuild. Planning decisions can only be based on what has been applied for. The Design Code encourages good design practice and proposals to be submitted to the Council
		Side extensions within 1m of common boundary - this appears to be a "must not" rule and in general a useful "protection" for neighbours to protect the issue of terracing. Yet there are a few occasions particularly with semi detached houses of questionable	The SPD sets mandatory requirements and discretionary guidance for applicants to adhere to. The comment is in relation to a code. A proposed development must comply with the code, unless non-compliance can be fully justified.

Name	Topic	Comment	Proposed response to comment
		70's architectural merits, when a well-designed extension to a side boundary may produce a better overall street scene, even if more terraced in general appearance. Perhaps this should be a usual and not a must.	
	Infill and Intensification	You are including a reference to 21m as guidance but not a rule. This guidance in itself would seem to be a reduction from that in the existing guidelines, why? and moreover would benefit from the inclusion of some nuance as to the location. Closer proximity might be appropriate or acceptable in a built-up area but there are many rural locations as well as in Keyworth roads such as Nicker Hill and Selby Lane where the expectation of proximity would reasonably be considerably more than 21m. There should also not be a reliance on the garden say of one property to provide the majority of separation distance from an intensive infill development built up to the boundary.	The comment refers to existing guidelines, however, the Design Code will replace the Rushcliffe Residential Design Guide SPD. The content of the Design Code updates the existing guide to ensure current code and guidance is up to date and relevant to the current context. The guidance states that 21 m is a useful reference points but is not mandatory, allowing for differences in approach to reflect local context.
		Suggest there should be something explicit in design terms that covers back or side land.	The Design Code SPD covers backland development in Section 2.3 of the Infill and Intensification Design Note.
	Landscape	Should increase measures to include bee bricks, bat boxes etc. There should also be a requirement to not remove existing green infrastructure, and where this is not possible, require a like for like replacement.	Guidance provided in Section 4.2 of the Biodiversity Design Note encourages the provision of ecological features such as bee bricks and bat boxes. Guidance in Section 4.3 of the Biodiversity Design Note encourages the provision of new green infrastructure and the enhancement of existing green infrastructure.
	General	The integration of play areas should be considered.	Code and guidance on play spaces is provided at Section 4.5 of the Landscape Design Note, including code on the connectivity of play spaces.
	Street Hierarchy and Servicing	Recognise the proposed reduction in speed limits, but this should be a result of discussions from residents rather than imposed, in order for it to be effective.	The Design Code SPD has been created in consultation with stakeholders, including local residents.
Tollerton Parish Council	Area Types	The 'Vision and Area Types' spread of pages is well presented overall however, there are some discrepancies that may confuse the reader. The titles of the visions do not correspond with the legend of the map. It is also confusing that there is reference to five area types but there are eight items on the legend. The five area types could be grouped together on the legend to make it clear they are the 'areas'. The text on page 8 does not explain these eight legend items fully. The purple text seems disconnected from the plans, we assume these are the plan titles.	<u>Modification</u> –Vision and Area Types section of the Introduction has been amended for reasons of clarity.
	Design Code	The codes being labelled as 'C1.38' are not clearly the code, suggest the word code is included.	The Council is satisfied that the labelling of the Codes is clear.
		There are references to local government organisations that may cease to exist in their current form so perhaps the document could be better future proofed against this.	It is considered that there is flexibility provided in the code to account for changes to Government organisations.
	Strategic	Tollerton Parish is located within the 'Rural' Area but the strategic	The Strategic Allocation East of Gamston/North of Tollerton has been excluded from

Name	Topic	Comment	Proposed response to comment
	Allocation East of Gamson/North of Tollerton	site allocation in the parish is identified separately as 'Gamston - Site Specific Design Code'. The Parish Council has serious concerns regarding the exclusion of the strategic housing allocation from the Design Code.	the Design Code SPD and will be subject to a site-specific Design Code, which is currently being prepared.
		This raises the question of whether development that comes forward within the Gamston site will be subject to the Design Code at all. There are multiple elements within the Design Code that are directly relevant to a large site, and if they are not set out within the Gamston site specific Design Code they may not be enforced. There are already strong concerns regarding how this site may come forward. This is not helped by the lack of a masterplan for the site and the poor quality of the planning application submitted for the land promoted by Vistry Group. The Tollerton Parish Community have no assurances that the promotion of good urban design is being prioritised on this site.	The Design Code SPD will not apply to the Strategic Allocation East of Gamston/North of Tollerton as the site will be subject to a site-specific Design Code, which is currently being prepared.
		Furthermore, the naming of the allocation as the 'Gamston site' is problematic. The site is not within Gamston, it is separated by the A52 and to date the intention has been for it to create a new settlement. There is an opportunity to ensure the new settlement comes forward in a way that is sensitive to the existing local communities and that ensures that the functionality and urban design of the site is the best it can be for new residents.	<u>Modification</u> – the site has been renamed to the 'Strategic Allocation East of Gamston/North of Tollerton' to align with Policy 25 of the Local Plan Part 1.
		We therefore strongly request that the Design Code should be altered to include the 'Gamston site' (ideally with an alternative name) to ensure that the proposals that come forward fully comply with the design principles being promoted across the rest of the borough. These are important in maintaining a high level of design across the borough and the largest perhaps most influential sites in the borough should not be excluded. The masterplanning process should have to take account of all planning and design policy and guidance across the borough and provide additional detail above and beyond the baseline of existing policy and guidance. In addition, failing to apply the Design Code in a consistent manner across all developments in all locations and of whatever size, is likely to be seen as unfair by other, particularly smaller, developers and individual householders making applications.	The Design Code SPD will not apply to the Strategic Allocation East of Gamston/North of Tollerton as the site will be subject to a site-specific Design Code, which is currently being prepared.
		A huge proportion of the Design Code would be of direct relevance to the 'Gamston' allocation and the Design Code should be applied to it. This is important in ensuring the allocation comes forward with as robust a design as possible and one that functions well and fits into the parish and context appropriately.	The Design Code SPD will not apply to the Strategic Allocation East of Gamston/North of Tollerton as the site will be subject to a site-specific Design Code, which is currently being prepared.

Name	Topic	Comment	Proposed response to comment
		<p>The number of sections that are in whole or in part directly relevant to the Gamston site is significant. The Design Code as drafted leaves a vacuum in terms of how this site is to come forward as it does not currently require compliance. There is no reference to the status or progress of this separate design code document to be produced and it is not referenced within the accompanying text. The only reference to it at all is within the map and legend on page 9. This is concerning to the Parish Council as the longer this vacuum exists the more likely it is that this large allocation will come forward with no coherent strategy nor any adherence to the design principles set out in this code. Including the large allocated site within the Design Code will secure compliance with these good principles of design as a minimum.</p>	<p><u>Modification</u> – additional information on the site-specific Design Code for the Strategic Allocation East of Gamston/North of Tollerton has been provided on Page 8 to explain its exclusion from the Design Code SPD.</p>
	Householder	<p>We have concerns that the Householder section of the document is a little buried and could be better positioned within the document and website. Having the Householder section feature earlier in the document and in a more prominent location on the website would make it easier for members of the public to find.</p>	<p>When adopted, the Design Code will be supported by a search facility that can be filtered by development type and area type, which will bring up the codes relevant to the application.</p>
		<p>It is positive that this section seeks to guide homeowners who may be looking at extending or altering their homes and gives them some pointers as to where to start.</p>	<p>Noted</p>
		<p>The Context and Character section seeks to aid residents in understanding the character of their homes, but it does not perhaps explain what one then does with that information, and how it should influence the design of an extension or alteration. We felt the guidance on page 122 had good intentions but may be hard for homeowners to apply to their schemes alone. The section as a whole contains a lot of guidance and only a few codes. We wondered if the balance between codes and guidance here could be more balanced.</p>	<p>The comments are noted, but as advised in the Householder Design Note, it is recommended that a design professional is engaged who can guide homeowners through the process. Not all matters can be coded, so the Council has opted to provide guidance to allow a pragmatic response to an issue, whilst still establishing design parameters.</p>
		<p>Section 5.2. includes some abbreviations that may be confusing to the reader, 'deg' instead of 'degrees' for example. Generally, we feel this section on protecting amenity is well explained and illustrated.</p>	<p><u>Modification</u> – the SPD has been amended to remove the abbreviation 'deg' and refer to 'degrees'.</p>
		<p>We have also considered whether the codes would be practical to enforce in Tollerton. Specifically, the code relating to 'Outbuildings', section 5.6. states that outbuildings in the front of properties will not be permitted. This seems to forget about garaging, or for example if a property has a very large south facing front garden it could be a barrier to a greenhouse that does not impact the streetscene negatively.</p>	<p><u>Modification</u> – the comment is noted, and the code has been changed to guidance to allow more flexibility should outbuildings in the front of properties be acceptable taking account of local context.</p>

Name	Topic	Comment	Proposed response to comment
		Section 5.3. is a part of the code that we foresee being repeatedly relevant to planning applications in Tollerton – side extensions. We feel the illustrations on pages 128 and 129 could be clearer. The bad examples, indicated with the 'x' show a massing model but may confuse the reader as they do not take the form of a typical side extension. The labels refer to 'terraced housing' and should instead state 'detached or semi-detached' housing. We feel these drawings could be clearer in communicating the type and form of development that would lead to terracing. Currently the images are too abstract.	<u>Modification</u> – the images have been amended to reflect the comments received.
		Code 5.4. provides quite a prescriptive control over plot ratios, and whilst the intention is positive to ensure properties are left with sufficient garden space once extended, we're unsure this would apply well to properties in Tollerton many of which are not a regular rectangular form.	<u>Modification</u> – the comment is noted, and the code has been changed to guidance to allow for more flexibility.
		Code 5.5. stipulates that extensions within the Green Belt must not exceed 50% of the total volume of the property, this is not a requirement set out within local planning policy. In some instances, a 50% increase will not be appropriate and this code could therefore make it harder to refuse disproportionate additions to dwellings. 30% may be more appropriate if a figure must be given.	<u>Modification</u> – the code has been moved to the Rural Design Note to sit with the other codes and guidance relating to development in the Green Belt. The 50% is a maximum limit, so it will not always be appropriate to achieve 50%, as set out in the guidance.
		On site renewables are discussed in section 5.7. We have concerns that whilst the appearance of solar panels is important the guidance on page 135 may disincentive those wishing to install solar panels.	The Council has opted to provide guidance to allow varied approaches to solar panels, whilst still establishing design parameters.
		The materials section on page 5.8 is quite brief, contains no examples and it does not specifically state that appropriate contemporary styles would be supported.	<u>Modification</u> – section 5.8 has been amended to provide guidance and has been amended to state 'should not add new materials to the street palette unless justified when taking into account the local context'.
		We assume that the aim of section 5.9 and 5.10 is to avoid gardens dominated by hardstanding or astroturf, this aim could be made clearer and the Parish Council are in full support of this aim.	Noted. The code and guidance provide clear advice on what is supported.
	Planning and Design Process	Suggest more consultation and testing of concepts with the public is encouraged.	The Planning and Design Process Note encourages applicants to engage with stakeholders early in the planning process.
	Landscape	Landscape misses an opportunity to apply these principles to smaller schemes, it seems very focused on larger sites. That said it does contain requirements such as two swift bricks per dwelling, presumably for developments of all scales, but again this is hidden within a section of the document that those promoting smaller scale development may miss.	<p>The codes contained within the Landscape Design Note apply to smaller schemes (minor applications and householder applications) where reasonable, considering the application's scale.</p> <p>When adopted, the Design Code will be supported by a search facility that can be filtered by development type and area type, which will bring up the codes relevant to</p>

Name	Topic	Comment	Proposed response to comment
			the application. Additionally, Appendix 1 of the document sets out in a list which of the Codes apply to which application type and which area type. This ensures codes, such as C4.7 and C4.8 regarding swift bricks, will not be missed.
	Street Hierarchy and Servicing	Section 1 includes some principles that could be applied to individual or smaller scale housing developments, for example the sections on parking and bins. This could be more clearly signposted to gain the attention of those promoting smaller schemes, perhaps with a change to this section's title.	The suggestion is noted. When adopted, the Design Code will be supported by a search facility that can be filtered by development type and area type, which will bring up the codes relevant to the application. Additionally, Appendix 1 of the document sets out in a list which of the Codes apply to which application type and which area type. This ensures that codes applicable to smaller schemes (minor applications and householder applications) will be clearly signposted.
	Design Code	Generally small to medium sized sites seem a little forgotten in the document with the main focus being on major schemes and householder schemes. Those promoting those types of development would need to filter through all the sections to find the most relevant sections, some changes to aid them in this could result in better quality applications being submitted.	The suggestion is noted. When adopted, the Design Code will be supported by a search facility that can be filtered by development type and area type, which will bring up the codes relevant to the application. Additionally, Appendix 1 of the document sets out in a list which of the Codes apply to which application type and which area type.
	Infill and Intensification	Infill and Intensification would apply to applications for additional dwellings on large gardens or side plots, or on infill sites in the village. This section also contains space standards that would be applicable to larger housing sites and not simply infill / backland sites. This links back that fact that the principles in the document should be applicable to larger sites, including the 'Gamston' site and as a result these elements may not be in the best section of the document.	The first page of the Infill and Intensification Design Note sets out when to apply the code and guidance of the Design Note. Appendix 1 and the spreadsheet set out which codes apply to which type of planning application and which area type.
Normanton on Soar Parish Council	Rural Area Type	Opposes development that results in the loss of agricultural land. Supports policies that encourage development within existing villages rather than into the countryside.	Noted. The matter is sufficiently covered by local planning policies and does not fall within the scope of the SPD.
		Encourages the use of traditional architectural styles and materials in new developments to maintain the village aesthetic. Supports infrastructure projects that enhance village life without leading to overdevelopment.	Noted. The Rural Design Note seeks to preserve and enhance the distinctive rural buildings and landscape of Rushcliffe
	Consultation Process	Encourages engagement with residents and collaboration with local authorities to uphold planning policies that align with rural preservation goals.	The Planning and Design Process Note encourages applicants to engage with stakeholders early in the planning process, including residents and the Local Planning Authority.
	Renewable Energy	Support policies that require/incentivise the installation of solar panels on new residential and commercial buildings. Promote grants and subsidies available for renewable energy adoption.	The Multi-dwellings and Taller Buildings Design Note and the Householder Design Note provides guidance on the installation of solar panels. The guidance states that developments should be designed with solar panels, to encourage provision where possible. The promotion of grants and subsidies for renewable energy adoption falls outside the scope of the SPD, which is focused on improving design.
		Advocates for energy efficient building designs that minimise carbon footprints. Encourages the use of energy saving technologies such as passive heating/cooling methods.	Noted supportive comments.

Name	Topic	Comment	Proposed response to comment
		Encourages developers to includes renewable energy sources in planning applications. Supports low impact construction techniques.	Noted supportive comments.
Gedling Borough Council	Accessibility	Certain pages do not have the colour/contrast level and do not meet accessibility levels. Suggest the checklist is split up into development types in order to create separate checklists for householder and minor applications with less requirements, and hence easier to follow, as they often come from people without technical knowledge.	The comments on accessibility are noted. An accessible version of the final Design Code SPD will be made available. When adopted, the Design Code will be supported by a search facility that can be filtered by development type and area type, which will bring up the codes relevant to the application. Additionally, Appendix 1 of the document sets out in a list which of the Codes apply to which application type and which area type.
East Leake Parish Council	Support	Support the document in principle, especially keeping villages as villages.	Noted supportive comments.
	Rural Area Type	Avoid urbanising creep into rural and farmland areas.	The matter is covered by local planning policies and does not fall within the scope of the SPD.
	Renewable Energy	Support installation of solar panels	Noted supportive comments.
	Design	Support traditional features to be maintained in Conservation Areas	Noted supportive comments.
Ruddington Parish Council	Key Settlement Area Type	The vision for the future planning priority for the village is the 'integration of new development'. The Parish Council feels that we have already taken our fair share of new development, and that the vision for the village should be closer to that for Urban West Bridgford, which is based on 'increasing the amenity for residents'.	Ruddington is identified as a Key Settlement within the Local Plan Part 1: Core Strategy. It shares similar design characteristics with the other Key Settlements, so has been identified within the Key Settlement Area Type. The amount of new development to be apportioned to settlements is a subject for the Local Plan, outside of the scope of the SPD.
	Infrastructure	More emphasis should be placed on the assessment of local public services and whether they can support large new developments. It is briefly mentioned on P.15, section 4, as part of the site appraisal, but given our experience and the priority given to other issues (i.e. swift boxes) and the impact on residents when it is incorrect (i.e. schools) it needs significantly strengthening.	The comment is noted. However, the need for services and infrastructure is a matter that falls outside the scope of the SPD, which is focused on improving design.
	Street Hierarchy and Servicing	The guidance on car parking for new development is too vague (page 25). If followed, it theoretically would be possible to apply for a large new development with absolutely no provision for parking and be within the plan requirements. It follows the significant recognition in the plan (p.36) that car ownership is increasing. The plan assumes adoption of a 20mph speed limit on developments. This may be advisable, but who has agreed this significant change?	The Street Hierarchy and Servicing Design Note codes and provides guidance on parking and limiting speed in accordance with the Nottinghamshire County Council Highway Design Guide.
	High Streets and Local Centres	The Code bans external roller shutters from high streets but some businesses (jewellers) may want shutters for security.	A proposed development must comply with the code, unless non-compliance can be fully justified. The example provided may be one such exception.

Name	Topic	Comment	Proposed response to comment
		No reference to disabled people needs as part of the High Streets.	The guidance provided in Section 7.2 of the High Streets and Retail Design Note encourages shopfronts to be accessible to all users.
Radcliffe on Trent Parish Council	Landscape	We particularly welcome the emphasis on tree planting, green corridors, and sustainable drainage systems (SuDS) as outlined in the Landscape and Green Infrastructure section. These elements are crucial for maintaining Radcliffe on Trent's green character, improving biodiversity, and supporting climate resilience. The prioritisation of tree-lined streets and the protection of mature trees will help ensure that development enhances, rather than diminishes, our natural environment.	Noted supportive comments.
	Street Hierarchy and Servicing	The Design Code's approach to new development layouts is another key strength. By promoting a street hierarchy, pedestrian-friendly environments, and appropriate building scales, the guidance ensures that new developments integrate well with existing village character. The focus on active frontages, clear block structures, and accessible public spaces aligns with best practices in placemaking, creating a welcoming and functional environment for both residents and visitors.	Noted supportive comments.
	Householder	We also appreciate the guidance for householder developments, which ensures that extensions, dormers, and outbuildings are designed sympathetically. By encouraging proportionality, high-quality materials, and consideration of neighbouring properties, the Code helps maintain architectural harmony while allowing homes to evolve with residents' needs. This additional clarity is beneficial in ensuring consistency and quality beyond what existing planning rules provide.	Noted supportive comments.
	High Streets and Local Centres	The principles outlined for high streets and local centres are particularly relevant to Radcliffe on Trent. The focus on walkability, active frontages, public seating, and traffic calming measures will contribute to a more vibrant and accessible village centre. Encouraging mixed-use developments and well-designed shopfronts will help sustain local businesses and enhance the attractiveness of our main roads.	Noted supportive comments.
	General	The inclusion of low-carbon building design, energy efficiency, and climate adaptation strategies is an excellent step towards future-proofing development in the borough. Encouraging green roofs, permeable surfaces, and enhanced insulation will ensure that new and existing buildings contribute to Rushcliffe's broader sustainability goals.	Noted supportive comments.
	Support	I am writing to express strong support for the Rushcliffe Design Code and its role in guiding future development within Radcliffe on Trent. This document provides clear, locally relevant design	Noted supportive comments.

Name	Topic	Comment	Proposed response to comment
		<p>expectations that will help protect and enhance the character of our village while supporting sustainability, high-quality design, and community-focused public spaces.</p> <p>The Rushcliffe Design Code is a valuable framework that goes beyond standard planning rules to set clear, practical, and high-quality design expectations. It ensures that new developments and alterations respect the village's character while incorporating sustainable and people-friendly design principles</p>	
Statutory Consultees and Local Groups			
Radcliffe on Trent Biodiversity and Environment Working Group	Landscape	Supportive of the inclusion of hedgehog highways.	Noted supportive comments.
Active Travel England	No comment	This statutory consultee role does not extend to plan-making consultations, therefore ATE does not respond to any consultations that it does receive.	Noted.
National Highways	No comment	We have reviewed the associated documents, and we conclude that the proposed SPD will have no impact upon the Strategic Road Network. National Highways has no further comments.	Noted.
Environment Agency	Support	We support the incorporation of low carbon and sustainable design, the incorporation of SuDS features and biodiversity measures. We welcome references to green and blue infrastructure throughout the document.	Noted.
	Multi-dwellings and tall building	Section 3.1 contains the following: "The Riverside is a suitable place for densification given its proximity to West Bridgford and Nottingham City centre but also comes with the complexities of being in flood risk zone 2" This reference is only partially correct. The area highlighted "Riverside" is predominantly in Flood Zone 3 with some sections in Flood Zone 2. This section should be amended appropriately.	<u>Modification</u> – guidance on the Riverside Area Type provided at Section 3.1 of the Multi-dwellings and Taller Building Design Note has been amended in response to the comment.
	Design Code	It appears that the site-specific design code for the "Riverside" is not yet published but currently in development. Presuming this is the case we would like the chance to input into the "Riverside" element once it is available. The Environment Agency has a particular interest in development in this area given the proximity to the River Trent and our flood wall which runs through the whole "Riverside" area.	During the preparation of the Design Code SPD, the scope of the document changed. It was determined that producing a Design Code for each area type was too large a project to undertake within the timescales and budget available.
	General	The Environment Agency welcomes and supports development which conserves natural resources including water, energy, materials, buildings, and land. Energy efficiency, minimising carbon emissions, and measures to mitigate and adapt to climate change form the basis of and well-designed place from an environmentally sustainability perspective. We encourage the	The comments are noted. Whilst the Design Code covers some aspects of low carbon and sustainable design, the Low Carbon and Sustainable Design SPD covers matters in more depth.

Name	Topic	Comment	Proposed response to comment
		application of energy efficiency measures and the latest technology for new and where appropriate re-developments. The design of buildings can contribute to the efficient use of water.	
	General	As of 2021 Rushcliffe Borough authority area lies within an area categorised by the Environment Agency as being under water stress. The Design Code is therefore an opportunity to encourage water saving mechanisms and habits, for example Waterwise Rainwater Harvesting Guidance, and by making reference to Optional Technical Standards for water efficiency standards. The latest BREEAM guidance should also be followed.	<u>Modification</u> – reference to the Waterwise Rainwater Harvesting Guidance has been included in the Landscape Design Note. Water saving mechanisms are covered in more detail in the Low Carbon and Sustainable Design SPD, which covers this matter in more depth.
Natural England	Screening Opinion Report	Natural England agrees with the report's conclusion that it is not likely there will be significant environmental effects arising from the SPD, which have not already been accounted for within the adopted local plan. Therefore, the SPD does not require a Strategic Environmental Assessment (SEA) to be undertaken. Natural England also agrees that the SPD would be unlikely to result in any significant effect to European Sites, either alone or in combination, and therefore an appropriate assessment under the Habitats Regulations is not required.	Noted.
Coal Authority	No comment	We note that this current consultation relates to a Design Code SPD and I can confirm that we have no specific comments to make on this document.	Noted.
Swifts Local Network	Landscape	Clauses C4.9, C4.10 and C4.11 relating to biodiversity species features are very welcome, and could be an exemplary example for other local authorities to follow.	Noted supportive comments.
		Please amend the Guidance section 3rd paragraph on page 93 to mention "swift bricks" in the list of options, for clarity and for consistency with C4.9 and C4.10.	<u>Modification</u> – the guidance has been amended as suggested.
		Also mention for clarity that: "Swift bricks are a universal nest brick for small bird species and should be installed in new developments including extensions, located in accordance with best-practice guidance such as BS 42021 or CIEEM."	<u>Modification</u> – the definition of a swift brick has been added to the glossary of the SPD.
		To cater for house martins (another red-listed species) where appropriate, please also add: "Artificial nest cups for house martins may be proposed instead of swift bricks where recommended by an ecologist."	The suggestion is noted, but to be concise, house martin cups have not been included in the list of examples, particularly as nesting boxes for birds has been listed.
		Also please add for clarity: "Existing nest sites for building-dependent species such as swifts and house martins should be protected, as these endangered red-listed species which are present but declining in Rushcliffe return annually to traditional nest sites. Mitigation should be provided if these nest sites cannot be protected."	The suggestion is noted. The guidance contained within the Landscape Design Note states 'All new development should protect existing biodiversity features wherever possible and improve these where appropriate. All new development should demonstrate mitigation measures to minimise impacts to biodiversity'. The guidance, whilst not specific to swifts and house martins, incorporates the same principles as included within the suggestion.
		In more detail, for supporting evidence relating to the above proposed changes: Swift bricks are considered a universal nest	Noted.

Name	Topic	Comment	Proposed response to comment
		brick suitable for a wide range of small bird species including swifts, house sparrows and starlings (e.g. see NHBC Foundation: Biodiversity in New Housing Developments (April 2021) Section 8.1 Nest sites for birds, page 42: https://www.nhbc.co.uk/foundation/biodiversity-in-newhousing-developments). Therefore, swift bricks should be included in all developments following best-practice guidance (which is available in BS 42021:2022 and from CIEEM (https://cieem.net/resource/the-swift-a-bird-you-need-to-help/)).	
Nottinghamshire County Council (Flood Risk, Minerals and Waste, Public Health)	Landscape	The County Council note that in section 4.1 SuDS are discussed which is welcomed. However, the reference to flooding forms the Trent and its tributaries does not cover the risk from surface water. As there is surface water risk in Rushcliffe, it would be prudent to include a reference to it within section 4.1. The County Council has a preference that any surface water scheme submitted includes provision for above ground SuDS features.	<u>Modification</u> – section 4.1 of the Landscape Design Note has been amended to refer to surface water flooding.
		With regards to an acceptable surface water management scheme The County Council would offer the following comments and recommendations; <ul style="list-style-type: none"> • Provide evidence of a proven outfall from the site in accordance with the drainage hierarchy the following options should be considered, in order of preference; infiltration, discharge to watercourse, discharge to surface water sewer or discharge to combined sewer. • Justification should be provided for the use or not of infiltration, including the results of soakaway testing, in accordance with BRE 365. • The maximum discharge should be set to the QBar Greenfield run-off rate for the positively drained area of development. • The site drainage system should cater for all rainfall events up to and including the 1 in 100-year event including a 40% allowance for climate change. For all exceedance to be contained within the site boundary without flooding any properties in a 1 in 100year+CC storm. • SuDS systems should be incorporated into the surface water management scheme for sites, preference should be given to above ground SuDS which provide multi-functional benefits. Details of who will manage and maintain all drainage features for the lifetime of the development would be required prior to construction.	The suggestion provides specific guidance on surface water management schemes, that doesn't entirely relate to design. It has therefore not been included within the Design Code SPD.
	Minerals	The County Council does not wish to raise any objections to the SPD from a minerals' perspective.	Noted.
	General	In terms of the Waste Core Strategy, as set out in Policy WCS2 'Waste awareness, prevention and re-use' of the Waste Core	The comment is noted but does not provide further guidance on matters relating to design.

Name	Topic	Comment	Proposed response to comment
		Strategy, any development should be 'designed, constructed and implemented to minimise the creation of waste, maximise the use of recycled materials and assist the collection, separation, sorting, recycling and recovery of waste arising from the development.' In accordance with this, any proposal that is likely to generate significant volumes of waste through the development or operational phases, would require the application to be supported by a waste audit. Specific guidance on what should be covered within a waste audit is provided in paragraph 049 of the Planning Practice Guidance.	
	General	<p>It is recommended that a health checklist is completed to enable the potential positive and negative impacts of the SPD on health and wellbeing to be considered in a consistent, systematic and objective way, identifying opportunities for maximising potential health gains and minimising harm and addressing inequalities taking account of the wider determinants of health.</p> <p>To address Childhood Obesity in 10-11-year-olds. It is recommended that the six themes by the TCPA document 'Planning Healthy Weight Environments' are considered to promote a healthy lifestyle as part of this application.</p> <p>In addition, Active Design Sport England 10 principles promote activity, health and stronger communities through the way our towns and cities are built and designed to encourage activity in our everyday lives.</p>	The various references to further guidance for health has been noted and considered during the formulation of the Design Code SPD.
Pedals	General	We welcome the many references in this draft Document to the importance of promoting Active Travel within new and older settlements in the Borough and particularly as an integral part of the many new housing developments planned, helping them to have a character and environment that is far less dominated by the demands of moving and parked motor vehicles than in recent developments, large and smaller-scale.	Noted.
	Consultation process	Implementation of schemes needs to be carefully coordinated between the Local Highways Authority, Active Travel England, National Highways, Rushcliffe Borough Council and private developers, in consultation with Sustrans and local User Groups and residents' groups and Parish Councils.	The comment is noted. The Planning and Design Process Note encourages applicants to engage with stakeholders early in the planning process.
	Area Types	Urban (West Bridgford) - it is very important to aim to reduce the domination of current roads and streets by the demands of parked motor vehicles, especially if cycling to and from the town centre is to be encouraged.	The Design Code SPD applies to new development only, as stated in the introduction, so the code and guidance cannot apply to existing areas/roads. However, throughout the Design Code, code and guidance has been included to support cycling.
		Riverside - "...provides accessibility and connectivity to the riverside and connects with existing public rights of way, highways and cycleways.' The new Waterside foot-cycle bridge across the	The comment is noted.

Name	Topic	Comment	Proposed response to comment
		River Trent will encourage people to enjoy the very attractive riverside environment along with the prospect of the major expansion of the NFFC City Ground. In view of the increased importance of this whole riverside area between Trent Bridge and the Water Sports Centre and Holme Pierrepont Country Park it is vital that there is a well-coordinated plans to enhance the whole of this environment, including the River Trent end of the Grantham Canal, the canal towpath between the City Ground and the Environment Agency Offices north of Scarrington Road) and the southern end of the Lady Bay Bridge approach road, with safe coherent routes to other cycle facilities in the vicinity, including nearby sections of Route 15 of the Sustrans National Cycle Network and its various link routes such as the narrow section of the Grantham Canal towpath between the riverside and Scarrington Road, West Bridgford, and the narrow link path by the Nottingham Sailing Club at Holme Pierrepont between the riverside and Adbolton Lane.	
	Street Hierarchy and Servicing	1.8 Cycle Storage - We firmly welcome and endorse this statement and would add that cycle parking, for short and longer stays, should include some conveniently sited and secure undercover cycle parking, to help encourage cycling in wetter weather	The comment is noted and the guidance for Section 1.8 of the Street Hierarchy and Servicing Design Note has been amended as per the suggestion.
	Landscape	P97. Landscape - Green corridors can make a useful contribution to the wider Active Travel network, especially for leisure trips, but need to be designed with regard to the need for social safety, especially by users of the path outside daylight hours.	<u>Modification</u> – the comment is noted and reference shas been included as guidance in Section 4.3 of the Landscape Design Note..
		4.6 Wayfinding and Navigation - “Connections that enable transport, active travel, communication, and social interactions across urban and rural areas improve accessibility and mobility for residents, with a positive impact on health and wellbeing”. Good, clear, coherent and consistent cycle and pedestrians signing is crucial not just to encourage people to walk and cycle but to show clearly the status routes (e.g. cycle paths or shared paths). This is all the more important where the local cycling and walking network involves the use of very different routes than those used by motor vehicles, and where, without good signing, there is a danger of people getting lost. To reduce this risk there must also be good maintenance of signing, to ensure that signs are not removed or swivelled round. Signing must include local destinations such as shops, health centre and leisure centres, as well as more distant destinations. Routes must be easy to follow.	<u>Modification</u> – additional guidance on signage has been included in Section 4.6 of the Landscape Design Note.
	Highways and Transport	It is also important that new Active Travel provision within Rushcliffe links clearly and coherently to that in adjoining areas. Such major developments also need safe connecting routes to and from nearby existing settlements.	The comment is noted and the guidance in Section 4.6 of the Landscape Design Note encourages the provision of continuous routes to improve connections.
Sport England	General	Sport England has also produced Design Code Guidance and a	Noted.

Name	Topic	Comment	Proposed response to comment
		Design Code Guide Checklist which aim to help those drafting design codes effectively embed Active Design Principles into the coding process. These documents are available on the following webpage: https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-costguidance/active-design?section=design_code_guidance .	
	Landscape	We note that section 4.3 includes guidance on green infrastructure and section 4.4 on Public Realm, which includes sports and recreation grounds. The section on green infrastructure refers to the Green Infrastructure Standards published by Natural England. There is no specific guidance on how provision for sport should be incorporated into developments. We are aware that the Council uses Sport England's Sports Facility and Playing Pitch Calculators alongside their evidence base for playing pitches and sports provision to determine requirements for indoor and outdoor sports provision. We would therefore query whether reference to this could be included within the SPD to ensure that the approach to securing provision for sport is clear.	The comment is noted, but it is considered that sports provision is a matter outside the scope of the SPD.
Historic England	Design Code	Overall, the Design Code would benefit from a specific chapter on the historic environment and how to consider the wider issues within Rushcliffe, akin to other environmental considerations within the Code such as biodiversity, landscape and green infrastructure, for example.	The comment is noted. A specific heritage chapter will be considered as part of the next iteration of the Design Code or as a separate subject-specific code or guidance on heritage. Local and national planning policy relating to the historic environment will continue to be applied in the determination of relevant planning applications to ensure heritage considerations are appropriately taken into account.
	Planning and Design Process	Page 13, under the context heading, it would be useful to include a reference to any historic environment considerations and the need to consider the significance of any heritage assets, including their setting.	<u>Modification</u> – the comment has been made as suggested.
		Page 15, section 4 we welcome the inclusion of heritage. This should also include reference to setting and where a proposed site is in the setting of a heritage asset.	<u>Modification</u> – the comment has been made as suggested.
		Page 17, 'Concept Design', should reference the historic environment, where relevant to a proposal. Considering how to protect heritage assets and their setting at the outset is essential, in order to ensure the best possible design comes forward.	<u>Modification</u> – the comment has been made as suggested.
	Street Hierarchy and Servicing	Page 23, 'Streets', it is important to consider what impact this form of development may have on the historic environment and in particular when considering issues such as street lighting, street furniture and signage etc. and ensuring that appropriate considerations are made, which factor in the historic environment. This comment is relevant for the entire 'Streets' section and it will be useful to understand how the historic environment will be considered and protected.	The comment is noted. The Planning and Design Code Process Note, including the revisions requested by Historic England, will help ensure the historic context of development is appropriately addressed. It is not clear that more specific changes are required to this Design Note. Local and national planning policy relating to the historic environment will continue to be applied in the determination of relevant planning applications to ensure heritage considerations are appropriately taken into account.
	Infill and Intensification	Page 48 could benefit from a reference to heritage within this section and the need to consider local distinctiveness as well as	The comment is noted. The Planning and Design Code Process Note, including the revisions requested by Historic England, helps to the historic context of development

Name	Topic	Comment	Proposed response to comment
		the significance of heritage assets and their setting. For example, how would the guidance apply if an infill plot was in a Conservation Area or in the setting of a Listed Building?	is appropriately addressed. It is not clear that more specific changes are required to this Design Note. Local and national planning policy relating to the historic environment will continue to be applied in the determination of relevant planning applications to ensure heritage considerations are appropriately taken into account.
		Page 50 we welcome a reference to Conservation Areas within this page, however, consider that additional detail is required to ensure that their significance is fully understood and issues from the relevant Management Plan are fully applied. A link to where you can find the Conservation Area Appraisals and Management Plans, on the Council website, would be useful here.	Additional detail has not been provided as the reader is directed to further guidance outside of the Design Code SPD. A link has been provided to the Area Appraisals and Management Plans.
		Page 53 under building height we consider that reference to the historic environment is essential here. For example, the reference of a church spire is useful, and this should be in the context of the church as a Listed Building and having dominance as a landmark on the skyline, which could contribute to its significance and how the building is understood. Building heights need to consider their surroundings and ensure that they consider the significance of heritage assets and their setting and do not dominate or compete for dominance on the skyline and through views etc.	The comment is noted. The Planning and Design Code Process Note, including the revisions requested by Historic England, helps to the historic context of development is appropriately addressed. It is not clear that more specific changes are required to this Design Note. Local and national planning policy relating to the historic environment will continue to be applied in the determination of relevant planning applications to ensure heritage considerations are appropriately taken into account.
	Multi dwellings and Tall Buildings	Section 3.1 how has the historic environment been considered in the context of considering tall buildings within the Riverside area of the Borough. What constitutes an appropriate height and how has the significance of heritage assets, including their setting, been considered?	The comment is noted. The Planning and Design Code Process Note, including the revisions requested by Historic England, helps to the historic context of development is appropriately addressed. Local and national planning policy relating to the historic environment will continue to be applied in the determination of relevant planning applications to ensure heritage considerations are appropriately taken into account.
		Section 3.3, this section will also need to consider how solar orientation may be affected on a Listed Building or within a Conservation Area, for example and where its use may be inappropriate in the context of heritage assets.	Comment as above.
		Page 84, 'Materials' would benefit from reference to the local distinctiveness and character of an area and taking this into consideration within new development.	<u>Modification</u> – the comment has been noted and the guidance in Section 3.12 of the Multi Dwellings and Taller Buildings Design Note has been amended per the suggestion.
	Landscape	Page 87 would benefit from reference to the historic environment within the introductory paragraph and recognition that the historic environment is an important component of landscape.	<u>Modification</u> – the comment has been noted and the introduction to the Landscape Design Note has been amended per the suggestion.
		Section 4.1 should consider the impacts of SuDS proposals on the historic environment and in particular consider how changes to the watercourse may have an impact on heritage assets such as waterlogged archaeology.	The comment is noted. In the future, a chapter on heritage will be considered as part of a next iteration of the Design Code or as a separate subject-specific Design Code on heritage. Local and national planning policy relating to the historic environment will continue to be applied in the determination of relevant planning applications to ensure heritage considerations are appropriately taken into account.
		Page 96 would benefit from including a sentence on the historic environment as a component of Green Infrastructure and how there are enhancement opportunities for the historic environment	Comment as above.

Name	Topic	Comment	Proposed response to comment
		through appropriate green infrastructure strategies.	
		The issues discussed on page 102/103 should also consider the impact on the historic environment and the significance of heritage assets, including their setting.	Comment as above.
	Householder	Page 117 could reference when there is a householder application that applies to a heritage asset for example a Listed Building or within a Conservation Area. We welcome the additional detail on page 119.	The flow chart on page 118 illustrates what a householder applicant will need to apply for if their proposal applies to a Listed Building or falls within a Conservation Area.
		Section 5.7 it is possible on-site renewables will not be appropriate in the context of a heritage asset, or that alternative considerations will need to be made.	The comment is noted. In the future, a chapter on heritage will be considered as part of a next iteration of the Design Code or as a separate subject-specific Design Code on heritage. Local and national planning policy relating to the historic environment will continue to be applied in the determination of relevant planning applications to ensure heritage considerations are appropriately taken into account.
	Rural	Page 142 we recommend to insert a sentence on the appropriate reuse of historic farmsteads and the need to consider appropriate reuse that protects the significance of the heritage asset and its layout. I provide a link to further information on Historic England's website regarding how to consider historic farmsteads. We do welcome the inclusion of this topic within the Design Code. https://historicengland.org.uk/advice/caring-for-heritage/rural-heritage/farmbuildings/	<u>Modification</u> – the comment has been noted, Section 6.1 of the Rural Design Note has been amended to include the suggestions, including a link to Historic England's guidance.
	High Streets and Local Centres	Page 153, we are supportive of the reference to historic high streets and the need to protect heritage assets and historic features on the High Street. We would request that 'preserve' is amended to 'protect'. It may also be worth considering our successful High Street Heritage Action Zone Project and whether there are any lessons learned through this process that could benefit in Rushcliffe. https://historicengland.org.uk/advice/heritage-actionzones/regenerating-historic-high-streets/	<u>Modification</u> – the comment has been noted and 'preserve' has been amended to 'protect'.
Section 7.2 should have a specific reference to heritage shop fronts and signage/advertisements and special consideration in these situations.		The comment is noted. In the future, a chapter on heritage will be considered as part of a next iteration of the Design Code or as a separate subject-specific Design Code on heritage. Local and national planning policy relating to the historic environment will continue to be applied in the determination of relevant planning applications to ensure heritage considerations are appropriately taken into account.	
Developers/Agents			
Uniper	Ratcliffe on Soar Power Station	We would prefer that the proposed Code includes a stronger statement that it is not applicable to the LDO site, and confirming that the existing approved LDO design guide applies. This would provide additional clarity should any future development come forward, that cannot be consented via the approved LDO, for example because a Development Consent Order is required. In this context, the LDO design guide would remain a more appropriate document to be considered as a “material planning	<u>Modification</u> – the LDO at Ratcliffe on Soar Power Station is subject to a site-specific Design Guide, so is not subject to the Design Code SPD. A stronger paragraph has been added to the Vision and Area Types page of the SPD to provide clarity on the position.

Name	Topic	Comment	Proposed response to comment
		consideration" than the draft Rushcliffe Design Code.	
Simon Middlecote Architecture Ltd	Multi dwellings and taller buildings	There is guidance on page 68 that states, 'All new and adapted homes should be dual or multiple aspect unless there are exceptional circumstances which make this unreasonable or unsuitable.' However, some of the diagrams illustrating different apartment block arrangements on page 66 show single aspect apartments. I think this contradiction needs addressing.	<u>Modification</u> – the illustrations have been labelled with good and bad to clarify what is acceptable design, and what is not.
	Householder	On page 125 the diagram shows a single storey rear extension with a hipped roof and states that it is, 'A carefully considered roof form of extension at property B has been considered to mitigate impact on property A'. This statement is not correct for the following reasons: <ul style="list-style-type: none"> • The gutter to the extension cannot be maintained from the property owners land and requires access onto the neighbours' site both during construction and for future maintenance and replacement • There is a clear risk that if property A is extended the gutter to property B extension becomes even more difficult to access. • If this gutter fails in the future then a problem could remain unknown and lead to significant damp and/or structural issues with both properties 	<u>Modification</u> – on review, the images on page 125 did not clearly illustrate what was being sought through the '45 degree rule'. The images have been replaced, taking into account the concerns raised in the comment.
		A 'Designer' under the Construction (Design Management) Regulations 2015 needs to 'eliminate, reduce or control foreseeable risks that may arise during the maintenance and use of a building once it is built'. The solution shown in the diagram embeds a foreseeable risk into the design and should therefore be avoided. Note that if a gap was left between the extension and the property boundary of, say 600mm, then both of these issues would be resolved. As such, I think the diagram needs to be updated to show this.	As above
		On page 137 the document states in relation to facing materials for extensions that, 'Materials should reflect the qualities and characteristics of the street and should not add new materials to the street palette.' I wonder if the use of 'new materials' is unnecessarily restrictive and that a sentence that states 'Materials should reflect the qualities and characteristics of the street' is sufficient. It would then be up to the applicant/agent to justify the use of proposed materials on a case by case basis.	<u>Modification</u> – the guidance has been amended to state "should not add new materials to the street palette unless justified when taking into account the local context".
	Design Code	More generally I think it would be worth highlighting the CDM Regulations in the document and state that these apply to virtually all building works and place Duties on building owners and Designers. Although this legislation is wholly separate to Planning, this document provides an opportunity to raise the profile of health	The comment is noted, but not related to design matters, so has not been included in the SPD.

Name	Topic	Comment	Proposed response to comment
		and safety. Similarly, the document rightly highlights the Party Wall Act which I also wholly separate from Planning.	
	Design Code illustrations	In a similar vein, many of the diagrams feature semi-detached dwellings with gable fronts and shared valley gutters. Whilst architecturally 'en vogue' these arrangements require regular maintenance which, if not undertaken, can lead to significant issues of water ingress into a building. Although I appreciate the diagrams are shown for guidance only, the repetition of these type of diagrams runs the risk of leading agents and applicants towards schemes that embed this risk and maintenance costs into projects. In a single detached dwelling under single ownership then a valley gutter would likely be maintained. If it is shared between two parties then there is a significant risk that the maintenance will fall between two stools and not get done at all. Along with this, when the valley needs to be replaced and one party has the means to pay and one party does not then there is risk of friction between two.	<p>Comment noted, but the type of house used in the illustrations are typical across the Borough so it is considered reasonable to use the same style of house as illustrative guidance.</p> <p><u>Modification</u> – within the introduction of the Design Code SPD, the following statement has been added “All visuals are indicative offering an example of how the code or guidance might be implemented”.</p>
	Design Code	There is little discussion or guidance on retrofit measures. On page 85 the document states that ‘External renders require painting every 5-10 years, but with the right selection of insulation can be very low in carbon, ideal for retrofits’. This is the only instance of the use of the word retrofit in the document. Retrofit is extremely complex, and must be looked at on a case by case basis and consider the whole building fabric, its building services and its means of ventilation as well as the visual impact and the impact on the heritage of the building. To say that external wall insulation is ‘ideal for retrofits’ is, I believe, too strong a statement. EWI can be appropriate if well considered, designed and implemented but if ill considered, poorly designed and poorly implemented can lead to significant detrimental impacts on the health of the building and the health of the building occupier. Retrofit is too complex a subject for this document to consider properly but to essentially ignore it would be a missed opportunity. Perhaps pointing the way towards appropriately qualified Professionals to assess appropriate retrofit measures would be useful? Or towards other recognised industry guidance? (Historic England, Leti, for example)	<p>The comment states that retrofit is complex and must be looked at on a case-by-case basis. This statement demonstrates why the Design Code has not covered retrofit in detail, as the Code does not allow for a case-by-case approach.</p> <p><u>Modification</u> – however, a paragraph has been added in Section 3.12 encouraging retrofit, and a link to further external professional guidance on retrofitting has been included.</p>
Davidsons Developments	Design Code	In summary, it is not explicitly clear how Code compliance can be achieved. This is partly illustrated by a number of illustrative sketches contained within the Code that in some instances are not Code compliant. An example is the axonometric sketch on p.37 that does not comply with the quantum of car parking required by the Highways Design Guide. It also does not comply with the quantum of new tree planting specified in C4.16.	<u>Modification</u> – within the introduction to the Design Code SPD, the following statement has been added “All visuals are indicative offering an example of how the code or guidance might be implemented”. The images seek to illustrate the individual codes, and therefore may not be compliant with all codes within the SPD, although it has been endeavoured to achieve this wherever possible.
		Has the Code been tested on recently approved or current live planning applications? Based upon our detailed comments we	As part of the engagement process, the Council’s Development Management team tested the code against several applications, and provided feedback on what did and

Name	Topic	Comment	Proposed response to comment
		question how deliverable the Code is. As well as raising design quality, Codes need to speed up the planning process. However, our detailed comments highlight areas of potential conflict and confusion.	did not work well.
		We consider that these issues and areas of potential conflict and confusion need to be resolved prior to adoption.	Noted
	Planning and Design Process	"How will the development address the site boundaries and look out on adjacent land and development?" If a site is adjacent to existing development (for example, existing homes with back gardens against the 'red line' boundary of a proposed development site) it is appropriate for new development to 'back onto' the red line boundary, abutting existing back gardens. This approach serves to complete a perimeter block.	The Design Code includes a Design Note on Infill and Intensification which includes guidance on the space between homes, which is considered to address the scenario suggested in the comment.
		It is characteristic of settlement growth patterns to back onto undeveloped land that could form part of settlement growth in the future. We suggest that this scenario needs to be considered and codified.	The suggestion is noted, but there is uncertainty on what specifically is being requested. The Infill and Intensification Design Note includes codes and guidance on the scale and of development and building height, and the space between homes, which has been amended to include guidance on garden size.
		We would take the view that facing onto undeveloped land is only justified if the site boundary is formed by an ecologically significant hedgerow and/or where neighbouring land is either unsuitable for development or otherwise never has the prospect of being developed (looking beyond current Local Plan periods but instead anticipating settlement growth patterns). Across Rushcliffe, this 'back on' relationship is frequently seen.	Noted
	Street Hierarchy and Servicing	Have the street types been tested in partnership with the LHA? Illustrations do not show how street types provide the required level of car parking. The NCC Highways Design Guide sets out the quantum of allocated and unallocated spaces. None of the illustrations show how the level of car parking that is required is to be provided.	The Design Code SPD has been prepared in consultation with Nottinghamshire County Council Highways and aligns with the Highway Design Guide except where fully justified.
		The photographs show completed developments that use a high proportion of non- standard materials. As there is no piece of Code specifying non-standard materials, are we correct to assume that the photographs are purely illustrative or will officers use these as a basis for requiring non-standard materials on proposed new developments? For example, on page 27 (image bottom right) shows tarmacadam with what appear to be Countryside kerbs. Is the Code requiring the use of non-standard materials, if so where and how much needs to be budgeted for?	To clarify - the photographs are illustrative.
		C1.2 - Can traffic calming be vertical as opposed to horizontal? The Code illustrates straight as opposed to curvilinear streets. Is	Detail on traffic calming measures has not been included in the SPD, allowing the applicant to choose the measures which are most appropriate for their scheme. The

Name	Topic	Comment	Proposed response to comment
		this principal supported by the LHA? 3.5.1 of the NCC Highways Design Guide states, "in order to achieve the required target speeds we would in the first instance encourage traffic calming through... the omission of long straights... and limiting the lengths of streets."	Design Code SPD has been prepared in consultation with Nottinghamshire County Council Highways and aligns with the Highway Design Guide except where fully justified. NCC Highways did not object to the draft Design Code.
		C1.4 – It is not clear having reviewed the guidance what an acceptable pedestrian priority feature would be. Page 27 (photograph bottom right) shows a 'build out' containing soft landscaping. This would seem to be some form of chicane and could function as a pedestrian priority feature. However, the NCC Highways Design Guide (3.5.1) states that it will not usually accept the use of chicanes. It is also not supportive of features such as cushions and humps. As such, what will be acceptable pedestrian priority features that allow more linear (straighter) street patterns to be created? Note: the illustration on page 33 shows a raised table.	Detail on acceptable pedestrian priority features has not been included in the SPD, allowing the applicant to choose features which are most appropriate for their scheme.
		C1.6, C1.13, C1.24 - If a street is 100m long, how much linear space must a developer allocate for verges and planting areas? Currently only width is prescribed. Would it be code compliant to provide one tree for 100m of street in a 2m x 2m 'pocket'?	Specifics on this matter have not been provided in the code to allow developers to interpret the code in a way that is appropriate to their scheme.
		P.26 - The street axonometric sketch shows vertical boundaries to the front of homes. These appear to be solid structures and could be read as being low walls or railings. We understand that these are purely illustrative as 'setback' guidance (p.30) refers to the optional use of walls, railings or fencing.	<u>Modification</u> – all images contained with the Design Code are illustrative, and the following statement has been added to the introduction of the Design Code SPD "All visuals are indicative offering an example of how the code or guidance might be implemented".
		C1.8 - A drawing showing the design of junctions is required to provide clarity on what is required (and acceptable to the LHA). For instance, are Manual for Streets corner radii required by the Code? In addition, good practice requires pedestrian priority across side junctions with carriageways 'coming up' to footway level. Is this required by the Code?	A drawing has not been provided, to allow developers to interpret the code in a way that is appropriate to their scheme. If the applicant has queries on junction design, engagement with Nottinghamshire County Council Highways team prior to the submission of an application is recommended, as suggested in the introduction to the Street Hierarchy and Servicing Design Note.
		C1.10 - What is meant by "level footways across driveway access points"? Does this mean that driveways, footways and carriageways are to all sit on the same level? If so, is the intention that there will be no kerb upstand on footways that abut carriageways?	The intension of the code is to prevent footways that undulate up and down as a result of vehicle crossovers, as this creates accessibility issues for pedestrians and prioritises vehicle movements on and off driveways over pedestrians walking along footways/pavements.
		C1.12 - What quantum of soft landscaping and tree planting including SUDS is required within a street? As previously highlighted (and applying C1.13) is a single 2m x 2m 'pocket' of	Specifics on this matter have not been provided in the code to allow developers to interpret the code in a way that is appropriate to their scheme.

Name	Topic	Comment	Proposed response to comment
		landscaping in the form of a tree with a rain garden an acceptable response along one street?	
		P.30 - 'On street parking' guidance states that this can be provided and it is recommended that one space is provided per three dwellings and one additional visitor space per five dwellings. NCC Highways Design Guide requires one unallocated parking space per three homes however the word used in the Code is "can". As such, is it acceptable to provide no unallocated car parking? It is not clear what is exactly required by both the LPA and LHA.	<u>Modification</u> – the guidance has been amended to remove reference to the provision of visitor parking space. The Nottinghamshire County Council Highways Design Guide should therefore be referred to.
		1.4 - Are we correct to assume that residential developments will not be required to utilise the main street typology?	The introduction to Section 1.4 Main Streets confirms that 'Not all new developments are required to contain a main street'. The guidance confirms 'A main street must provide direct access to a mix of land uses. Where it is only providing access to residential development the street must be designed as either a secondary or tertiary'.
		1.5 - NCC Highways Design Guide requires 3 allocated (off street) car parking spaces for 4+ bedroom homes. It would be helpful for a sketch to be provided to illustrate how it is expected this will be provided taking into account that the LHA does not support triple tandem car parking.	The comment relates to guidance provided by the Nottinghamshire County Council's Highways Design Guide and not the Design Code. It is not within the Design Code's remit to provide illustrations explaining external guidance.
		C1.27 - States that "all parking space [sic] must have permeable surfaces". For the avoidance of doubt, does this mean that every single off street driveway space and on street unallocated car parking spaces need to have permeable surfaces?	<u>Modification</u> – The code has been modified to require all parking spaces to have permeable surfaces or be connected to a sustainable urban drainage system
		P.36 - States that, "landscaping should be arranged in such a way that it is not easily converted into another parking space." What will the Council be seeking with respect to this?	Specifics on this matter have not been provided in the guidance to allow developers to interpret the code in a way that is appropriate to their scheme.
		P.37 - The illustration shows 22 houses and 2 apartment blocks. If we were to assume that the houses shown are all (as a minimum) 2 bedroom, 2 car parking spaces are required (as per NCC Highways Design Guide). The illustration shows allocated car parking being provided within a courtyard. Excluding the apartments, 44 car parking spaces would be required within this illustrative development block. However only 12 spaces are shown.	<u>Modification</u> – the drawing is illustrating an example of courtyard parking as explained in the image title, not how parking for all the dwellings could be provided. Within the introduction to the Design Code SPD, the following statement has been added "All visuals are indicative offering an example of how the code or guidance might be implemented". The images seek to illustrate individual codes, and therefore may not be compliant with all codes within the SPD, although it has been endeavoured to achieve this wherever possible.
		In addition to this, courtyard parking solutions are not popular and frequently contribute to displaced car parking as people will often prefer to park their car close to their front door.	Noted. It is one parking solution that applicants could consider.
		Furthermore, (assuming the rear car parking illustration is defined	<u>Modification</u> – the image has been amended to show a row of 5 spaces.

Name	Topic	Comment	Proposed response to comment
		as a 'parking square' (?), the rows of car parking that are shown take the form of 2 x 6 space rows, however C1.32 limits clusters to 5 spaces?).	
		C4.16 states that new trees planted in the public realm must be provided at a minimum rate of 1 per parking space provided. This would require the development block illustrated on p.37 to provide at least 44 trees. As such, this development block is not Code compliant. We consider that the illustrations contained within the Code are themselves Code compliant.	<u>Modification</u> – within the introduction to the Design Code SPD, the following statement has been added “All visuals are indicative offering an example of how the code or guidance might be implemented”. The images seek to illustrate individual codes, and therefore may not be compliant with all codes within the SPD, although it has been endeavoured to achieve this wherever possible.
		On page 44, a development block is shown but consists of one single car parking area. This is not a viable design solution with the various requirements placed on developers with respect to car parking.	<u>Modification</u> – within the introduction to the Design Code SPD, the following statement has been added “All visuals are indicative offering an example of how the code or guidance might be implemented”. The images seek to illustrate individual codes, and therefore may not be compliant with all codes within the SPD, although it has been endeavoured to achieve this wherever possible.
		C1.33 - How is overlooking defined? Can overlooking be provided from first floor windows? What sort of lighting is required?	<u>Modification</u> – yes, it is reasonable for overlooking to come from first floor windows. An example of an overlooked rear parking courtyard is provided on page 39. The code has been amended to specify street lighting.
		C1.35, C1.36 - Does this require every unallocated on street car parking space to be provided with a charging point? If so, this could have major implications on development viability. It is also unclear how charging systems would operate.	<u>Modification</u> – the codes have been amended to clarify that the amount of EV charging infrastructure is to be decided separately to the codes.
		C1.39 - It is not explicitly clear what is required to meet the cycle storage requirement. For example, is a garage a Code compliant solution? In the case of a row of three terraces, what would be considered as a Code compliant option for each of the three homes?	Specifics on this matter have not been provided to allow developers to interpret the code in a way that is appropriate to their scheme.
		C1.41 - If waste storage is provided in back gardens, does this need to be enclosed? P.44 shows a covered rear bin store - is this necessary?	It is considered good design practice, so has been included as code.
	Infill and Intensification	C2.5 We support the requirement for corner plots to be dual aspect.	Noted.
		P.59 - The illustration (bottom right) shows shared space between the back of homes. We appreciate that this approach has been used at Marmalade Lane in Norwich, but consider that, as a general rule, that this is a problematic design feature as it breaks perimeter block structure.	The comment is noted but the Council believes that the images on page 59 demonstrate multiple ways in which spaces between homes can be designed well, and the images are for illustrative purposes only.
	Multi dwelling and taller buildings	This section is purely guidance as there are no numbered pieces of Code. Is this correct?	There are codes included within the Multi Dwellings and Taller Buildings Design Note.

Name	Topic	Comment	Proposed response to comment
		C3.2 - Whilst balcony dimensions are specified it is not clear if providing balconies is a specific requirement? This section of Code could be interpreted as applying if balconies are provided.	Code 3.2 does not require balconies to be provided as part of every application.
		C3.4 - States that meter boxes must not be located on primary elevations. Where can meter boxes be placed on mid terraces?	The code falls within the Multi Dwelling and Taller Buildings Design Note. It will therefore not apply to terraced buildings.
	Landscape	Section 4.1 - The practicality and viability implications of integrating SUDS including rain gardens within streets is questioned. Are there a precedent schemes that can be provided to illustrate how this expectation can be delivered and in a way that is supported by the LHA?	<u>Modification</u> – codes 4.4, 4.5 and 4.6 have been removed following the concerns raised.
		C4.9 - Is the requirement for two swift boxes ("in addition to any other ecological enhancements") required as it would seem that ecological features are addressed by Biodiversity Net Gain?	The provision of swift bricks as per the code is in addition to biodiversity net gain. Biodiversity Net Gain does not account for individual wildlife species. Instead, it uses habitat categories as a proxy measure for biodiversity and the species that those habitats support.
		C4.18 - In the case of new residential developments there are no existing users as spaces do not exist at the time of submitting proposals for planning approval. As such, it is suggested that this piece of code is amended to read, "Public realm design proposals...by an analysis of (anticipated*) movement patterns..." *in the case of proposed new public realm.	<u>Modification</u> – the code has been amended as per the suggestion.
		C4.20 - Consolidation of play facilities can be an appropriate response in some circumstances.	<u>Modification</u> – 'and not be segregated to one area' has been deleted from the code to allow for better suitability when considering locations of play areas.
		C4.23 - What is explicitly required to satisfy this requirement: "new development must integrate opportunities to play outside of designated play areas"?	<u>Modification</u> – the code has been removed following the concerns raised.
	Householder	Section 5.10 - Do the rear garden pieces of Code apply to proposed residential developments? If so, developers provide bare earth back gardens. If so, it is assumed that this will be acceptable as C5.12 states that the requirement is "should" as opposed to "must".	<u>Modification</u> – following the comment, Section 5.9 Front Garden and Section 5.10 Back Garden have been merged to form one 'Garden' section for clarity and conciseness. The codes in this section will only apply to householder development. The code referenced has been amended to state 'must'. <u>Modification</u> – C5.12 has also been included as guidance within Section 2.7 of the Infill and Intensification Code that it is encouraged in all new developments.
		High Streets and Local Centres	
	High Streets and Local Centres	C7.1 - We suggest the following: a) High Streets and Local Centres. b) to protect windows from full or partial obscurement: "Plans must label ground floor street and public facing windows as 'clear, two way glass within the entirety of the window frame".	The comment is noted. Reference to Local Centres in the Design Code has been deleted so it is not prudent to include the suggestion. It is also not feasible to require developments to include two way glass.

Name	Topic	Comment	Proposed response to comment
Fiona Harrison Architect Ltd	Householder	C7.2 - We suggest the following: a) High Streets and Local Centres. b) Specify 'main entrance'.	<u>Modification</u> – reference to Local Centres in the Design Code has been deleted so it is not prudent to include the suggestion. The code has been amended to specify 'main entrance'.
		Is the intention that these rules cover local centres, such as the recently completed ones at Edwalton (NG12 4GF) and Wilford Lane (NG2 7QY). If so, it is not considered that these two rules alone will be sufficient to cover the common urban design issues associated with the design of these local centres.	The Council have opted to provide supporting guidance in Section 7.1 on retail centre developments to enable flexibility whilst still establishing design parameters for this type of development.
		p119 'Professional Services'. It's brilliant that the code encourages applicants to use an architect and mentions the ARB and protection of the title architect. However, I wonder whether it also needs to make references to architectural technicians and CIAT who are often appointed for extensions?	It is recommended that a design professional is engaged, such as an architect. Applicants have the flexibility to engage other design professionals.
		p128 'Side extensions'. I was very surprised to see the flat roof form on the 'tick' examples for side extensions. Is this really what Rushcliffe wants to be encouraging? I think this sets a dangerous precedent for encouraging poor development . There are numerous flat roof side extensions around West Bridgford which highlight exactly how damaging to the streetscene this roof form can be. I've had numerous enquiries from clients over the years who have bought a house with a flat roof side extension and want to alter the roof form to remove the ugly addition!	<u>Modification</u> – the images on page 128 have been amended to demonstrate two storey extensions that are set back and set down to the original dwelling with a non-flat roof.
Fiona Harrison Architect Ltd	Householder	p131 'Rear extensions'. Again, I don't understand the encouragement of flat roofs over other roof forms! I think the statement 'Flat roofs can be one of the more efficient forms in keeping the roof profile and impact low' is incorrect and should be removed from the Code. There are many different roof forms that work well and the best solution for the property and the neighbours need to be assessed case by case. A well designed flat roof with a decent overhang or parapet can work well. However, often flat roofs are poorly detailed and are not a positive addition (see example image attached). A monopitch roof while higher at the high point is normally lower at the low point than a flat roof and therefore has less impact on a neighbours outlook than a flat roof (see sketch attached). Alternatively an apex extension, although higher at the ridge, usually creates a lower eaves line along the boundary than a flat roof. I'm not against flat roofs (both extensions I've done of my own house have been flat roofs!) but I don't think they should be suggested as being better than other solutions.	The comment relates to guidance, and not a code. This leaves things open to interpretation, depending on an individual site's context. The guidance does not intend to indicate preference for a certain roof form.
		p132 Dormers. I'm unclear on point C5.8 re dormers not being	Side dormers are often damaging to the existing street character, so the code has

Name	Topic	Comment	Proposed response to comment
		accepted on side elevations. A side dormer is required for most loft conversions so is this basically saying that loft conversions are unlikely to be permitted unless done under permitted development?	been drafted to prevent this. Rear dormers are acceptable, and C5.4 covers front dormers. A proposed development must comply with the code, unless non-compliance can be fully justified. The example provided may be one such exception.
	Householder	p135 On-site renewables. I think LPA's should be encouraging use of renewable energy sources. I don't see why panels on a front elevation need to inset and involve more costly roof works. Additionally, I think it's wrong to say an ASHP can't be sited on a side elevation - in many scenarios with good separation to neighbouring properties, a side elevation would be the best location. Presumably most people will continue to install solar PV and ASHP under PD rights anyway so the guidance in the Code will not be an issue.	<u>Modification</u> – the Council has opted to provide guidance for on-site renewables to allow a pragmatic response, whilst still establishing design parameters. As it is not code, an applicant does not have to conform with the guidance where it is not appropriate. Guidance on ASHP has been amended to accept installation on a side elevation where it does not front a highway.
AMK Planning	Design Code	The proposed Rushcliffe Design Code has the potential to clarify the Council's position on a number of design issues in new development in a way that will provide helpful guidance to developers and design professionals.	Noted
		However, as drafted the guide is far too prescriptive and rigid. The guide comes across as a set of absolute 'design laws' that provide insufficient flexibility for experienced design professionals to offer innovative solutions beyond simplistic criteria – which cannot possibly cover every individual and unique situation.	<u>Modification</u> – following further review, the matters covered by a number of the draft codes have been moved guidance to provide more flexibility where this is considered appropriate. However, a Design Code, as stated by the Ministry of Housing, Communities and Local Government, is a set of design requirements, made up of rules that are clear, specific and unambiguous. An application must comply with the code, unless non-compliance can be fully justified.
		The best use of this sort of design code is to guide an approach to large scale development and prevent volume housebuilders from churning out bland repetitive designs, particularly in key gateway locations and prominent road frontages. The legacy of many recent schemes in Rushcliffe, where the Council has made little effort to force the developer to alter mass produced bean counter designs and improve at least the outward facing aspect of large estates in critical locations, is a very poor one.	The Council has produced a Design Code that has focused on specific area types that were identified in the scoping stage. The suggested focus on large scale development will be considered in the next iteration of the Design Code. It will be expected that strategic allocations, such as East of Gamston/North of Tollerton, will be subject to a site-specific Design Code.
		If this design code could achieve significant improvement to mass housebuilder architecture and elevational design and force these companies to move away from rabbit box standard housetypes in key locations then it would serve a valuable purpose but it seems to focus more on unnecessary minutiae and unwieldy administrative procedures.	The Design Code encourages good design practice and proposals to be submitted to the Council.
		More importantly there is more than enough unnecessary bureaucracy in the current planning system without introducing	Design Codes are a requirement of the Levelling Up & Regeneration Act. The Act makes it a requirement for every local planning authority in England to prepare a

Name	Topic	Comment	Proposed response to comment
		another layer of 'by the book' regulations and checklists to explain a design process, particularly for relatively small scale development (e.g up to 20-25 units) that can ill afford this unnecessary additional time and cost. Have planning officers really become so incapable of making their own judgements on design issues on straightforward development sites that they need to be spoon fed in this way?	design code for its area.
		The really sad thing is that this sort of guide will only hit the small developer and make already overburdened SME's question whether it is worth carrying on in a world of BNG, Zero Carbon, Building Safety Levies, Ecology, Archaeology, Hydrology, Micro-Climate, Ground Surveys, Arboricultural Surveys, Noise Surveys and countless other completely unnecessary box ticking exercises. Whereas the volume developers will just pay lip service to a guide like this and carry on as normal.	It is not the aim to overburden a developer, but nstead to aid them in delivering high quality new development in Rushcliffe.
		There also needs to be far more awareness of the cost of introducing many of the shopping list and 'nice to have' measures in this guide (even a minor example – communal bin stores must have green roofs and insect habitats – it all adds up). Margins in development have been squeezed as never before in a post-Brexit/Covid world where construction cost increases are completely out of kilter with property value increases. With the already overwhelming cost burden of the elements referred to in the previous paragraph, not to mention development land taxes in the form of Affordable Housing, S106 contributions and CIL, then something has to give and the imposition of costs on development need to be considered as a whole and prioritised. I have recently been asked to appraise the viability impact of a draft design code in another Nottinghamshire Authority and before this document progresses any further I assume it will be undergoing a similar exercise.	The Design Code has been prepared as a supplementary planning document and therefore supplementary to existing local plan policy, which has been subject to appropriate financial appraisal of policy requirements, including the achievement of high quality design.
		I have to say that when I started out as a Planning Officer, national practice guidance extended to 8 four page sheets. Planners had freedom to use common sense and experience. Decisions and outcomes were no worse and no better than they are today but there was an awful lot less superfluous administration and a lot less time wasted.	Noted
		There is real problem with the approach adopted here which (and I had to read this twice to believe the language used) actually states 'Design codes are a set of rules – you must – you must not.' This will inevitably lead to situations in Development Management where inexperienced officers will take a black and white position	The Office for Place set out good practice guidance for creating Design Codes . Part 6 encourages the setting of requirements through Code using unambiguous words like 'must', 'will' and 'required'.

Name	Topic	Comment	Proposed response to comment
		on a document like this and point to the absolute statements in the Code sections, with a blank refusal to consider any other position, regardless of whether a proposed solution is better than the route the Code is pointing towards. It is acknowledged that Codes, by their nature, should have a binary 'compliance or non-compliance' nature, particularly on technical matters, but should not be written in a way that offers no flexibility in more aesthetic judgements or that prevents innovative design. This sort of approach will only result in backing both Officers and the Development Industry into unnecessary and avoidable corners.	
		Have a design code to meet legislative requirements by all means but it needs far more flexibility, less prescription and certainly doesn't need to extend to 186 pages! Perhaps further consideration needs to given to the first recommendation of the Government's National Model Design Code Guidance Notes :- "Flexibility in local design codes can be introduced by setting an acceptable range for a parameter or not coding for it at all. Effective design codes are: Simple, concise and specific"	It is considered that the Design Code SPD includes an appropriate balance of codes and guidance to allow a pragmatic response to most issues, whilst still establishing design parameters.
	Compliance Statement	The administrative burden of registering a planning application is complicated enough already without introducing yet another layer of unnecessary tick box procedures in relation to design. Why should the introduction of a design code focus so heavily on validation procedures for planning applications.	A compliance statement is a necessary document to validate an application in order for officers to understand where a proposed development is non-compliant with the Design Code, and whether exceptional circumstances can be provided to justify this.
		Whilst going through the sort of exercise suggested here may be relevant to large scale or complex residential development that is going to change the shape of an area, it is completely unnecessary for smaller scale developments (eg up to 25 units).	It is considered necessary for all scales of development to complete a compliance checklist, to ensure the compliance of all development with the Design Code.
		The document appears to suggest that applicants have to go through the 19 pages of checklists referred to in Appendix 1 and explain how they have complied with them in order to get an application validated. This is excessive and unreasonable.	A compliance checklist will be made available when the Design Code SPD is adopted.
	Planning and Design Process	This appears to require NINE stages of design explanation for every application regardless of scale over 10 units. The purpose is stated as helping to 'speed up' the planning process – Really? The purpose is also stated as helping design teams to adopt good design principles and practices. This comes across as pretty condescending and intimates the contents of the design code should act as a set of 'design laws' which must be adhered to – rather than the reality that they are an incredibly subjective interpretation of general practice guidance and wider planning policy that have not been publicly examined or scrutinised.	The nine stages set out in the Planning and Design Process Note are provided as guidance to help applicants and their design teams to adopt good design principles and practices. It has been provided to improve the quality of design in Rushcliffe and is provided as a support aid.
		Context - This seems unnecessarily burdensome for smaller	

Name	Topic	Comment	Proposed response to comment
		<p>urban, edge of settlement or rural infill schemes.</p> <p>Stakeholders - The planning application process provides ample opportunity for stakeholders to have their say and for planning officers to make balanced judgements accordingly and make suggestions on design amendments. Advocating a 'design by committee' approach is never going to work and just adds further delays to an already ridiculously protracted process.</p> <p>There is no reason why developers and designers should not just put their proposals forward, taking account of the design code, BHL etc, and let them be judged on their merits. This should be the primary function of a development management process not inviting everyone to have their own specific desires pandered to at design stage.</p> <p>Benchmarking - Why do applicants need to explicitly set out how a development reacts to the 12 considerations of BHL. Why isn't this the planning officer's responsibility to determine if they have any specific concerns?</p> <p>Site Appraisal - Whilst this level of analysis may be reasonable for large scale development and significant allocated sites it will be largely irrelevant to smaller schemes and introduce an unnecessary cost burden. When is 'micro-climate' really a critical factor in small housing developments?!</p> <p>Low Carbon and Sustainable Design - Part L of the Building Regulations in tandem with Future Homes policy more than takes care of this issue and planning does not need to introduce a duplicated layer of consideration.</p> <p>Concept Design - These elements will be included in a standard D&A statement and don't need re-enforcing. It is particularly interesting that this appears to be the one section of the Guide that recognises that scale dictates a different approach with developments over 50 units requiring a concept masterplan.</p> <p>A differential approach to the detailed analysis and reporting requirements of the guide related to scale of development – particularly Section 1 - needs to be properly considered.</p>	
		<p>C0.1 - This requirement should redefine major applications (for the purpose of application of the design code) to a minimum of over 30 units and ideally over 50 units.</p>	<p>A Design and Access Statement is required for:</p> <ul style="list-style-type: none"> • Applications for major development, as defined in article 2 of the Town and Country Planning (Development Management Procedure (England) Order 2015); • Applications for development in a designated area, where the proposed development consists of: <ul style="list-style-type: none"> • one or more dwellings; or • a building or buildings with a floor space of 100 square metres or more.

Name	Topic	Comment	Proposed response to comment
			<ul style="list-style-type: none"> Applications for listed building consent.
	Street Hierarchy and Servicing	It would, in our view, be unnecessary to adopt all of the complex requirements of this section to a small scale residential infill scheme of say 15 units with a single access road. Again scale needs to be considered.	A proposed development must comply with the code, unless non-compliance can be fully justified. The example provided may be one such exception.
	Infill and Intensification	C2.2 - This definition should be tightened up to refer to the 'predominant' scale of surrounding buildings to avoid situations where the existence of a single neighbouring bungalow is used to dictate the theme and scale of new development that is otherwise surrounded by 2 storey houses.	It is considered that since the existing code specifies the surrounding existing buildings (plural) and not one dwelling, the code will provide the same results as the suggestion.
		C2.5 - This is too prescriptive. There will inevitably be situations where it is appropriate not to have windows on ground floor elevations on street frontages for a variety of sound planning reasons – privacy, security etc. There are other means of introducing interest in otherwise blank gable ends (architectural detailing, varied cladding materials etc) rather just inserting fenestration.	A proposed development must comply with the code, unless non-compliance can be fully justified. The example provided may be one such exception.
		C2.7 - This section makes some sensible points and uses the right sort of language to get them across and reflects the way the rest of this guide should have been written rather than the 'must do – must not do' approach.	Noted
	Multi Dwellings and Taller Building	C3.1 - There is no justification for this code. There will be many circumstances where single aspect apartment development will be perfectly acceptable in planning terms, with habitable spaces providing perfectly acceptable amenities and outlook. Similarly why should Rushcliffe BC determine that the occupiers of apartments are not allowed to face North. Many people prefer not to be in direct sunlight – this is far too prescriptive without any sound justification	An explanation for the code is provided in Section 3.2 of the Design Note. A proposed development must comply with the code, unless non-compliance can be fully justified.
		C3.3 - Why? Many modern buildings present spectacular architecture without prescribed window reveals Similarly the requirement to provide inset panels rather than full height glazing harks back to 1970's tower blocks. Provided buildings can comply with heating and ventilation standards who are Rushcliffe Borough Council to dictate design philosophy in such prescriptive terms?	An explanation for the code is provided in Section 3.9 of the Design Note. A proposed development must comply with the code, unless non-compliance can be fully justified.
	Landscape	C4.4 - This is overly prescriptive and will not be practicable in smaller developments with limited space.	<u>Modification</u> – this code has been removed in recognition that alternative approach may be appropriate.
		C4.7 - This is overly prescriptive and imposing the particular taste of the Council. This should be a matter for the individual householder.	The comment is noted. The Council consider rainwater harvesting a good practice of landscape design, and it is encouraged by the Environment Agency.
		C4.12 - Whilst I don't disagree with the sentiment this is again	Noted. The Council has decided to include the code as it promotes good design

Name	Topic	Comment	Proposed response to comment
		imposing the Council's particular taste on occupiers and should not be the purpose of the planning system	practice and is better for biodiversity.
		C4.14 - This will not be relevant to smaller scale development and should have a minimum unit application - say 50 units.	As confirmed in Appendix 1, this code will apply to major development, and not minor development.
		C4.16 - This is unreasonable a detached house with an integral double garage and two driveway spaces does not require 4 trees on its frontage – it would be overwhelming.	The code states that the tree/s must be planted in the public realm, not on the frontage of a house.
		C4.18 - This may be relevant to larger scale estate development but is unnecessary for smaller residential schemes.	As confirmed in Appendix 1, this code will apply to major development, and not minor development.
	Householder	C5.3 - This is too prescriptive. There will inevitably be situations where it is appropriate not to have windows on ground floor elevations on street frontages for a variety of sound planning reasons – privacy, security etc.	A proposed development must comply with the code, unless non-compliance can be fully justified. The examples suggested may be such an exception.
		C5.4 - Again this is too prescriptive – this table cannot cover every situation and there needs to be more flexibility built into the wording of this code section.	<u>Modification</u> – this code has been moved to guidance to allow a pragmatic response, whilst still establishing design parameters.
	General	We are hearing a consistent message from the current Government that unnecessary bureaucracy in the planning system will be removed. If you attend any industry forum the number one reported problem in housebuilding is planning delays. Determination periods are at the point of becoming farcical and the 'work from home' based inability to speak to planning officers in person or obtain any feedback on planning applications within reasonable timescales is undermining the entire planning profession.	Design Codes are a requirement of the Levelling Up & Regeneration Act. The Act makes it a requirement for every local planning authority in England to prepare a design code for its area.
		The addition of another unnecessary layer of administration by way of a design code checklist to validate applications just adds to the problem. Moreover Design Codes should not be used as a another means of extending determination timescales by making application validation more difficult.	A compliance statement is a necessary document to validate an application in order for officers to understand where a proposed development is non-compliant with the Design Code, and whether exceptional circumstances can be provided to justify this.