

Appendix

SPD comments and Council response

Reference	Respondent	Summary of Comments Provided	Council's Response
	Highways England	<p>Highways England is responsible for the operation and maintenance of the Strategic Road Network (SRN) in England. The network includes all major motorways and trunk roads. The SRN in the vicinity of the jurisdiction of the local plan comprises the A5 trunk road and M42 motorway.</p> <p>The SPD outlines an objective to create connected and permeable developments that promote sustainable alternatives to private motoring and the principle of this approach is welcomed by Highways England. We have reviewed the remainder of the SPD and no further comments to make at this time.</p>	Noted. No action required.

		<p>It is concluded that the implications of the objectives contained within the Tamworth Design Guidance (draft) SPD are anticipated to have minimal or no direct impact on the operation of the SRN.</p>	
	<p>Network Rail</p>	<p>Network Rail would advise that where proposals include development adjacent to the railway line:</p> <ol style="list-style-type: none"> 1. All structures and buildings have a gap of 3m from the railway boundary 2. 1.8m high trespass steel palisade fence is included in the outside party scheme and set back 1m from the railway boundary, to prevent unauthorised access on to railway land. 3. Vehicle parking spaces and access roads adjacent to the railway boundary would need to include high kerbs and/or Armco safety barriers to prevent accidental vehicle incursion. 4. Surface and foul waters to discharge away from the direction of the railway. 5. No soakaways within 30 of the railway boundary. 6. Rainwater goods must discharge in a direction away from the railway boundary 7. All balconies to have a 3m gap from the railway boundary 8. No over-sailing or encroachment onto or over 	<p>The comments are noted; however the issues raised are outside of the scope of the document. Network Rail is a consultee on planning applications that are adjacent to a railway and so these points can be raised on individual proposals where appropriate.</p>

		the railway.	
	Warwickshire County Council	We have no observations to make on the Design Supplementary Guidance.	Noted. No action required.
	Staffordshire County Council - Highways	<p>I haven't really many comments from a transport planning perspective on this design document but would reiterate the following:</p> <p>Street Design and Parking</p> <ul style="list-style-type: none"> • Well-connected and integrated walking and cycling routes should be prioritised in order to encourage sustainable travel. • Urban design should be mindful to avoid domination by motorised users and include consideration of vulnerable pedestrians. • Sustainable transport measures should encourage healthy lifestyles, walkability. 	Noted, these elements are included in section 3.22. No further action required.
	Staffordshire County Council – Flood Risk	<p>In paragraph 3.48 'New Developments should', It would be informative to add to the sentence, 'Encourage the use of sustainable urban drainage systems' the additional words:</p> <p>'In accordance with The Non-Statutory Technical Standards for Sustainable Drainage Systems as published by DEFRA in March 2015'.</p>	The text has been amended to include "in accordance with the latest technical guidance from DEFRA". The text has been moved from its original position to be included in the Best Practice Principles and Sustainable Design section.
		In section D 'Useful Guidance/Flood Risk and Pollution', we feel it would be useful to the developer to have a link to Staffordshire County	A link to SCC's SUDS risk management handbook has been added to section D under 'Flood Risk and Pollution'.

		<p>Council's Flood Risk Management Sustainable Drainage Handbook. This can be found at the following link: https://www.staffordshire.gov.uk/environment/Flood-Risk-Management/SuDS-Handbook.pdf</p>	
	<p>Staffordshire County Council – Archaeology, Ecology and Tree Protection</p>	<p>4.71-4.73 – these references to trees are welcomed.</p> <p>1.6- The aspiration to ensure that new buildings and spaces result in positive enhancement though innovation and sensitivity is welcomed.</p> <p>2.14- Welcome the reference to the Tamworth Historic Character Assessment here.</p> <p>2.16- Great that applicants are being encouraged to consult the Historic Character Assessment and Conservation Area Character Appraisals in order to inform their proposals.</p> <p>3.2- Highlighting Historic England's best practice guidance is welcomed.</p> <p>3.10- Good to see that the consideration of context, setting and character is advised here.</p> <p>4.109 This comprehensive guidance on shop frontages in conservation areas is welcomed.</p>	<p>These comments are noted. No changes are required to the document.</p>

		3.29 – refers to positioning of drainage in street design. Surface features such as rain gardens should be used as examples of good street drainage and can have valuable functions as, for example, a means of storm attenuation.	A reference to rain gardens as a potential drainage solution has been added to appendix B Climate Change Considerations.
		3.30 – refers to trees and verges in street design. It should be noted that trees have many functions, including important contributors to wellbeing (aesthetic), health (particulate and other pollutant absorption) and climate change (cooling effect and carbon storage). Tree planting should be encouraged as a requirement in street design.	The wording has been amended to reflect the comments. The paragraph now reads: <i>'Trees and grass verges will be encouraged as an aspect of street design in order to help provide character and identity. Trees have many other functions, including important contributors to wellbeing (aesthetic), health (particulate and other pollutant absorption) and climate change (cooling effect and carbon storage).'</i>
		3.42 – the reference to the natural environment is welcomed. Careful lighting near trees and other vegetation and near to features such as watercourses is important to prevent disturbance to wildlife. Reference could be made to Bat Conservation Trust / Institution of Lighting Professionals Guidance Note 08/18 Bats and artificial lighting in the UK	A reference to the Bat Conservation Trust has been added to appendix D Additional Useful Guidance.
		3.48 – refers to use of brownfield land. It should be noted that brownfield sites can be important for biodiversity, including the UK priority habitat 'open mosaic on previously developed land'.	It is acknowledged that the items listed in paragraph 3.48 may not apply in all instances. The text has been moved from its original position to be included in the Best Practice Principles and Sustainable Design section and has been revised

			to read ' <i>Developments in the Borough should seek to achieve higher levels of sustainability by, where appropriate:</i> ' There are also existing references within the paragraph to conserving and enhancing habitats.
		3.48 also refers to use of native species planting, which is welcomed. In formal settings plants that provide nectar, berries and seeds can be selected from non-native species too and still provide benefit.	Noted. The word <i>native</i> has been replaced with <i>appropriate</i> in reference to planting schemes.
		Section 4 - It would be helpful to have some reference to the importance of taking onto account features that may be being used by birds or bats when considering householder development. Good design would retain these features or provide replacements in the form of bird / bat bricks etc. Species that utilise buildings are generally in decline and often cannot use other spaces such as trees. Swifts are a good example.	An additional paragraph has been added to Householder Development part of section 4 stating: ' <i>It is important to consider the potential impact of any development on birds or bats. This may require the retention of features or provision of bird/bat bricks or boxes.</i> '
		New residential and other development near open space should provide bird and bat bricks or boxes installed on buildings. A range of designs are available and can blend in well with any design.	An additional paragraph has been added to the Non-Residential Development part of section 4 stating: ' <i>It is important to consider the potential impact of any development on birds or bats. This may require the retention of features or provision of bird/bat bricks or boxes.</i> '
		2.1- Yes technically correct, however human activity in the area is attested to during the late	The comments are noted; however no changes have been made to the document.

		Bronze Age/early Iron Age by environmental samples taken from the Tame Valley which suggested pastoral farming by this period.	
		2.19- Welcome that the setting of heritage assets and buried archaeology are highlighted as a potential constraint against comprehensive future development. Early consultation with Staffordshire County Council's Historic Environment Team and the Tamworth Historic Character Assessment should be encouraged here also.	The comments are noted; however no changes have been made as it is not considered to be the appropriate part of the document to include a reference to consultation. This is included in appendix A.
		3.17- It is recommended that the Historic England documents Streets for All https://historicengland.org.uk/advice/caring-for-heritage/streets-for-all/ and Streets for All West Midlands https://historicengland.org.uk/images-books/publications/streets-for-all-west-midlands/ are referred to here and in the useful documents section.	A reference to the guidance documents mentioned has been added to the highways section of appendix D Additional Useful Guidance.
		3.48- Brownfield sites, by their very nature, can often retain above and/or below ground evidence of historic industry or activities associated with historic industry.	The comments are noted; however it is considered that no changes are required to the document.
		3.48- Adaptive reuse of existing buildings is to be supported- Historic England provide excellent advice and best practice examples for adaptive reuse and schemes that protect and enhance the significance of buildings and historic places (see	References to Historic England guidance are already included in appendix D Additional Useful Guidance.

		for example Constructive Conservation (https://historicengland.org.uk/advice/constructive-conservation/).	
		Page 50- In the first blue box it is suggested that applicants consult the Tamworth Historic Character Assessment and seek pre-application advice from Staffordshire County Council's Historic Environment Team before preparing an application.	Point 4 in the blue box has been amended to say ' <i>Consult the Tamworth Historic Character Assessment and seek pre-application advice from Staffordshire County Council's Historic Environment Team before preparing an application.</i> '
		Page 51- The labelling on this map/key is very unclear.	Noted. The map has been updated to improve clarity.
		Page 52- Recommend that a Heritage Impact Assessment is undertaken by someone suitably qualified and experienced for the task. It is also recommended that the Historic England Good Practice Advice in Planning 3- The Setting of Heritage Assets is included here too.	The text has been updated to include a recommendation that a Heritage Impact Assessment is undertaken by someone suitably qualified and experienced for the task. A specific reference to the advice document suggested has been included in the Historic Environment section of appendix D Additional Useful Guidance.
		Page 52- Link for location map of Scheduled Monuments does not work- suggest https://historicengland.org.uk/listing/the-list/ as an alternative	The broken link has been removed and replaced with a generic reference to the Historic England website to avoid the link becoming broken again if information is moved on the website.
		Page 52- Scheduled Monument Consent required from the Secretary of State for Culture, Media and Sport via Historic England.	The paragraph has been updated to reflect that the consent process is administered by Historic England. No reference has been included to the Secretary of State for Culture, Media and Sport to

			avoid the document becoming outdated in the event that the name of the Government department is changed.
		Page 52- Staffordshire County Council's Historic Environment Team will not advise on Scheduled Monuments- applicants are advised to contact Historic England directly in relation to these.	The reference to requesting advice on Scheduled Ancient Monuments from Staffordshire County Council has been removed.
		Page 52- This should be a Historic Environment Record 'Search' and not a 'Report'. It is also recommended that applicants consider the archaeological implications of their proposed development as early as possible in the process. Staffordshire County Council's Historic Environment Team can provide expert pre-application advice which can provide surety and mitigate against costly delays further down the line.	The word ' <i>report</i> ' has been replaced with ' <i>search</i> ' in the relevant paragraph.
		Page 57. The potential archaeological constraints/sensitivity of the area should be considered when applicants are proposing the installation of ground source heat pumps.	The comments are noted; however it is not considered that any changes to the document are required.
		Glossary- additional terms such as Scheduled Monument, Listed Building, Archaeology could be included here- see https://historicengland.org.uk/advice/hpg/hpr-definitions/ for these and other useful heritage-related definitions.	The comments are noted; however no additional heritage related definitions have been added at this time.
	Tetlow King	Paragraph 4.79 of the draft design guidance	Paragraph 4.79 has been amended to state that

	<p>Planning on behalf of West Midlands HARP Planning Consortium</p>	<p>expects all new residential development as a minimum to comply with the technical space standards-Nationally Described Space Standards, as set out in the PPG and referenced in footnote 46 of the NPPF. The adopted Tamworth Local Plan 2006-2031 contains no internal space standards for housing.</p> <p>From reviewing the council’s evidence base there appears to be no justification for or viability testing of the impact introducing the Nationally Described space standards would have on residential development, as required by the NPPG.</p> <p>The standards should only be included in a review of the Tamworth Local Plan and after rigorous viability testing to ensure that the practical implementation of the policy will help to deliver better housing, including affordable housing and more of it. Presently without the necessary justification and viability testing the policy could cause significant issues to the potential supply of affordable housing due to the additional practical and financial burdens that these standards impose on developers.</p>	<p>the Council “<i>would encourage applicants to aspire to</i>” the space standards to reflect that this is currently an aspiration for development and not a requirement.</p> <p>Other references in the ‘Residential Space Standards’ section have been amended to reflect this.</p>
		<p>The Design SPD also sets out external space standards for affordable housing developments</p>	<p>As above, references to external space standards have been amended to reflect that the minimum</p>

		<p>which sets out that a minimum of 5.5sqm of private outdoor space where the smallest dimension is not less than 1500mm is provided for one to two person flats.</p> <p>The standards should only be included in a review of the Tamworth Local Plan and after rigorous viability testing to ensure that the practical implementation of the policy will help to deliver better housing, including affordable housing and more of it. Presently without the necessary justification and viability testing the policy could cause significant issues to the potential supply of affordable housing due to the additional practical and financial burdens that these standards impose on developers.</p>	<p>amounts set out are currently aspirational targets to which the Council would encourage applicants to adhere.</p>
	Sport England	<p>Sport England supports the reference to Active Design and its 10 principles to promote opportunities to encourage sport and physical activity through the design and layouts of the built environment. It should be noted that the principles crosses over into parts of the preceding urban design considerations such as street design, street furniture and public realm.</p> <p>It would be beneficial if a link to the guidance was inserted into the document https://www.sportengland.org/facilities-planning/active-design/ and to help establish if</p>	<p>Noted. No further action required.</p> <p>Appendix D - Additional useful guidance has been updated to include: Active Design</p>

		<p>the principles of Active Design have been considered when preparing a plan for the development the applicant could complete the Active Design checklist</p> <p>https://www.sportengland.org/media/11631/active-design-checklist-oct-2015.pdf where relevant.</p>	<p>Sport England Active Design guidance https://www.sportengland.org/facilities-planning/active-design/</p> <p>Sport England Active Design checklist https://www.sportengland.org/media/11631/active-design-checklist-oct-2015.pdf</p>
	<p>Avison Young on behalf of B&S Aucott</p>	<p>The draft SPD states that the Council expects that new residential developments “must as a minimum comply” with the ‘Technical Housing Standards - Nationally Described Space Standards’ (2015) (‘Nationally Described Standards’). These Standards exceed the minimum requirements set by Building Regulations. However, in a Written Ministerial Statement, dated 25th March 2015, the Government established that the new Nationally Described Standards were “optional” and: “should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the National Planning Policy Framework and Planning Guidance.”</p> <p>The proposed internal space standards should, in Aucott’s view, be removed from the SPD. Notwithstanding the above, should the Council be minded to retain a reference to the Nationally</p>	<p>Refer to the response to comments from Tetlow King Planning on behalf of West Midlands HARP Planning Consortium above.</p>

		<p>Described Standards in the SPD the text ought to be amended to provide greater flexibility, as follows:</p> <p>“The Council expects that new residential development must as a minimum will encourage applicants to comply with the space standards set out within the ‘Technical Housing Standards – Nationally Described Space Standard, (DCLG, 2015).”</p>	
		<p>The draft SPD identifies proposed minimum external amenity space standards based on the number of persons per proposed dwelling/ flat. It accepts that there may be exceptions to these standards but only where mitigated through “excellence” in design.</p> <p>Evidence is required to demonstrate whether the proposed external space standards are justified and appropriate. It is also not clear how the proposed standards would be applied in practice.</p> <p>For the reasons set out above, such standards should not, in our view, be introduced through a guidance document. Therefore, the references to proposed minimum external space standards ought, in our view, to be removed from the SPD.</p>	<p>Refer to the response to comments from Tetlow King Planning on behalf of West Midlands HARP Planning Consortium above.</p>
		<p>Paragraph 1.4 of the document suggests that the</p>	<p>The introduction to the document has been</p>

		SPD will, once adopted, form part of the 'Development Plan' for Tamworth. However, the definition at Annex 2 of the NPPF is clear that SPDs "are capable of being a material consideration in planning decisions but are not part of the development plan". Therefore, this reference ought to be removed from the SPD.	amended and now explicitly states that the SPD is not a Development Plan Document but is an important part of the wider plan for the development of Tamworth and is, where relevant, a material consideration.
	Indigo on Behalf of AA Homes	Paragraph 3.7 - We object to the suggestion that any major scheme (which we assume means any major development eg more than ten dwellings) should be taken to a design review panel. This seems excessive and should be the applicant's choice whether or not to use design review; an applicant should not consequently be punished should they choose not to use the design review.	Paragraph 3.7 has been deleted.
		Paragraph 3.12 - Although we appreciate that developments need to respond to their context, there may be opportunities for buildings taller than three storeys in certain locations, which should be supported as a means of boosting housing supply, so long as other considerations are all addressed satisfactorily, including other design matters.	The paragraph contains a statement of fact; it does not preclude the development of buildings of more than three storeys. The document acknowledges that different forms of development may be appropriate in different areas of the Borough and this could include developments of greater than three storeys where the context and design are appropriate. It is considered that the existing text is sufficient to convey this message and so no changes have been made.
		Paragraph 3.15 - The SPD should include a	There is no absolute definition of what constitutes

		definition of what constitutes “tall buildings” within Tamworth.	a “tall building”. What might be considered a tall building will vary according to the nature of the local area. The text within the paragraph has been updated to reflect this point.
		Paragraph 4.87 - This paragraph should be toned down and recognise that not all sites will be suitable to include open space on site, for example due to size, shape or other constraint, in which case, we assume off-site provision should be supported instead.	The text states that open space should <i>usually</i> be provided on site. Without explicitly stating it, this already recognises that there may be instances in which it is not appropriate to provide on-site open space, and each application will be judged on its own merits. It is considered that no changes to the text are required at this time.
		Climate Change Considerations - The SPD should recognise that the design factors mentioned will all depend on site context, and that not every suggestion will necessarily be suitable. Otherwise, there is a risk that including all considerations will render a scheme or a site unviable.	The design factors are included as considerations and the document does not state that they should be used in all circumstances. It is therefore not considered that any changes are required.
	Canal and Rivers Trust	The canal network is an important part of the historic development of the area though it is not reference within the relevant section of the draft SPD. The draft document recognises the importance of Green Infrastructure and it is positive that at Para 3.44 the contribution of the canal corridor to the green character of the Borough is acknowledged. However, it is considered that references to the canal network could be strengthened throughout the document.	The comments are noted; however it is considered that there is sufficient recognition of the canal and rivers network within the document.
		Para 2.12 states that existing suburbs are often	The comments are noted; however the canal, like

		<p>poorly integrated with the canal weakening links between adjacent residential areas. However, the canal network is unlike other infrastructure, such as railways and major highways in that the towpath provides a vehicular free pedestrian/ cycle route, connecting people and places along the length of the canal corridor.</p>	<p>the other infrastructure mentioned, does have an impact on permeability. No changes have been made to the document as a result.</p>
		<p>Street Design and Parking - Para 3.22 states that the layout and design of streets is integral for the success of the urban environment. It should however also be ensured that developments have regard to the existing infrastructure in the surrounding area. Developments should be required to include well designed connections to existing networks, such as the towpath, to promote connectivity and sustainable travel.</p>	<p>The list of elements that contribute towards effective street layout and design has been amended to include <i>“Promote sustainable travel through improved connectivity to existing networks, including canal towpaths where appropriate;”</i></p>
		<p>Developments need to consider the visual impacts of parking areas and parking on access roads on the canals outward perspective. Proposals must aim to avoid creating direct views of the developments 'back of house' from the canals outward perspective which heavily degrades the canals credentials as a green corridor, tranquil retreat and its use as a treasured public amenity. Back of house elements might include car parks, service areas, such as bin stores. delivery areas, sub stations etc.</p>	<p>The comments are noted, however this is covered in sufficient detail by the public realm section (para 3.23) and the landscaping elements (para 4.65) of the guidance.</p>

		Street Signage - Developments should be required to include signage to integrate with the surrounding areas and in the case of development adjacent or connected to the canal corridor this should include appropriate Wayfinding to/on or from the towpath.	The comments are noted. A section on street signage is already included within the document. No changes have been made as a result.
		Lighting - it is positive to see at Para 3.44 that consideration is given to the impacts of lighting on the natural environment. The Trust advise that waterside lighting affects how the waterway corridor is perceived, particularly when viewed from the water, the towpath and neighbouring land, for example waterside lighting can lead to unnecessary glare and light pollution if it is not carefully designed. Any external lighting should be angled downwards, and light directed into the development site and it should not provide flood lighting to the canal corridor to show consideration for bats.	The section on lighting has been amended to include a reference to ensuring that the design of any lighting scheme takes account of the potential impact on the amenity of neighbouring uses as well as the historic and natural environment, including bats. No specific reference to canals has been inserted as this would be included under neighbouring uses.
		Sustainable Design - Whilst it is positive that the contribution of the canal network to the green character of the Borough is acknowledged at Para 3.44 the canal is an important element of the Green Infrastructure network that runs through Tamworth. This should be clearly identified, and canals referenced within the Glossary definition of Green Infrastructure.	The glossary definition already includes a reference to waterways which incorporates canals. No changes have been made to the documents as a result.
		The Trust also wish to highlight the potential of	A reference has been added to the climate change

		<p>the canal for heating & cooling for district heating network or individual schemes and reference to this potential for the canal to contribute to low carbon technologies should be included.</p> <p>In addition, the potential for the canal to accept surface water discharges from sites should be referenced. It should however be noted that the drainage methods of new developments can have significant impacts on the structural integrity, water quality and the biodiversity of waterways and the Trust is not a land drainage authority and therefore any proposed discharges are not granted as-of right and where they are granted they will usually be subject to completion of a commercial agreement.</p>	<p>considerations section to exploring the potential for using the rivers and canal network for heating/cooling where appropriate.</p>
		<p>Health & Urban Design -The canal network offers opportunities for leisure, recreation and sporting activities as part of the '<i>natural health service</i>' acting as 'blue gyms' and supporting outdoor activity and physical and mental health and wellbeing. The Trust therefore recommends adding '<i>Active Waterways</i>' to the list of principles at Para 3.57.</p>	<p>The principles of Active Design listed in paragraph 3.57 are taken from the Sport England guidance. It is therefore considered that it would not be appropriate to add active waterways directly to this list.</p>
		<p>Boundary Treatments – Boundary treatments are a key design aspect in any canal side development and engagement with the canal should be encouraged. Whilst robust barriers are required to prevent vehicles accessing the waterway the</p>	<p>The section relating to boundary fences and walls already contains a reference to designing boundary treatments to respect the surroundings and amenity of neighbouring areas and properties. It is not considered that a specific</p>

		<p>provision of fences, walls and railings to the canal boundary can have a negative visual impact on the canal corridor. Developments should therefore be required to carefully consider the choice of boundary treatment along both sides of the canal corridor.</p>	<p>reference to the canal is required.</p>
		<p>Landscaping -As identified previously there are particular considerations that development proposed adjacent to the canal network should take into account and landscaping is a key consideration. It needs to be ensured that any planting proposed includes native species and is appropriate for the waterside setting. Any planting needs to be set back sufficiently from the canal corridor to allow for future growth and ensure it does not adversely impact on the stability of the canal infrastructure or affect safe navigation of the waterway.</p> <p>The long-term maintenance/management regimes for landscaped areas can also impact on their overall design success and development should be required to consider this and include details with any Applications.</p>	<p>The section on landscaping has been updated and provides guidance on the design of appropriate landscaping schemes including their management and maintenance.</p>
		<p>Self-build and Custom Build - Self-build and custom build housing is high risk development strategy for the setting of the canal corridor. There is high potential impact upon the canal as it</p>	<p>The section on custom and self-build development has been deleted as it was considered to be outside of the scope of the document. The design principles contained within</p>

		<p>creates an inconsistent visual character between plots, mixed quality design, construction and differing boundary treatments.</p> <p>Design codes can address this to some extent though further assessment of the impact of self-build and custom housebuilding on 'sensitive locations' such as adjacent to the waterway corridor should be undertaken. Any Design codes would need to include an assessment of the visual impact from the canal corridor and clear set out details of design principles to be applied across the whole of any sites being put forward (not just any self-build/custom build areas) boundary treatments, materials etc would also need to be detailed to ensure a consistent approach and limit any adverse visual impact.</p>	<p>the document apply to all developments, including custom and self-build schemes, where appropriate.</p>
		<p>Appendix A: Heritage Guidance - there are a number of listed structures along the Coventry Canal, such as canal bridges and milestones. It should however be acknowledged within this section that the canal network and associated infrastructure are non-designated heritage assets in their own right and this needs to be considered as part of any development proposals.</p>	<p>Non-designated heritage assets are identified by the local planning authority and, in the case of Tamworth, are included on the list of locally listed buildings. The canal itself is not included on the list; however there are a number of structures along the canal included. No changes have been made to the document as a result.</p>
		<p>Appendix B: Climate Change consideration - as identified above reference to the potential of the canal for heating & cooling for district heating network or individual schemes, contribute to low</p>	<p>This comment is addressed above.</p>

		carbon technologies and accept surface water discharges should be included.	
		Appendix C: Glossary-the canal should be specifically included within 'Green Infrastructure'	This comment is addressed above.
		Appendix D: Additional Useful Guidance - within this section reference should be made to the Canal & River Trust E-planning Toolkit	A reference to the Canal & River Trust planning webpage has been added to the additional guidance section.
Environment Agency		In line with your adopted Policy SU4, the actions of the Humber River Basin Management Plan should be supported within good design, in order to achieve wider Water Framework Directive objectives. A Blue Corridor approach should be encouraged and integrated solutions for Sustainable Urban Drainage Schemes (SUDS) should be sought along with rain water harvesting, flood risk water management and habitat (wetland creation) with WFD and water sensitive design.	The comments refer to the policies of the Local Plan and are therefore outside of the remit of the SPD. References have been included in the document to the use of Sustainable Urban Drainage Systems. No additional changes have been made to the document as a result.
		<p>The River Humber Flood Risk Management Plan advocates a 'whole catchment' approach to managing flood risk to ensure that all new development contributes to flood risk reduction. Key measures that should be reflected within the SPD comprise:</p> <p>Preventing risk:</p> <ul style="list-style-type: none"> • Improving management of surface water • Avoiding inappropriate development in 	The comments are noted, however many of the points are beyond the scope of the document. There are existing references within the document to integrating SUDS into the design of developments and links within the additional information section to both EA and Staffs County Council guidance. No specific changes have been made to the text as a result.

		<p>floodplains</p> <ul style="list-style-type: none"> • Deculverting of watercourses • Reinstating natural river channels and restoring functional floodplains <p>Preparing for risk</p> <ul style="list-style-type: none"> • Sustainable management of urban rivers and floodplains • Development and implementation of Local Flood Risk management Strategies (LFRMS) <p>Protecting from risk</p> <ul style="list-style-type: none"> • Managing and reducing surface water flood risk • Investigating potential solutions for flood risk mitigation 	
		<p>Surface Drainage</p> <p>Developments should consider how Sustainable Drainage (SuDS) systems can be integrated into developments at the earliest stage of site design. This will enable the biggest environmental gains in terms of water quality improvements and pollutant removal, prior to discharging from the site. Habitat provision and flood risk reduction should similarly be provided as standard through a well-designed system based upon source-control methods.</p>	<p>There are existing references within the document to integrating SUDS into the design of developments and links within the additional information section to both EA and Staffs County Council guidance. No specific changes have been made to the text as a result.</p>

		<p>Water pollution should be reduced through the careful management of surface and foul waters on site through the following measures:</p> <ul style="list-style-type: none">• Surface and foul water drainage systems are separated, and any surface water channels, constructed as part of the SUDS scheme are not culverted.• Prior to being discharged into any watercourse, surface water sewer or soakaway system, all surface water drainage from parking areas and hard standings susceptible to oil contamination is passed through an oil separator designed and constructed to have a capacity and details compatible with the site being drained. Roof water should not pass through the interceptor.• Surface water from roads and impermeable vehicle parking areas are discharged via trapped gullies.• Vehicle loading or unloading bays and storage areas involving chemicals, refuse or other polluting matter should not be connected to the surface water drainage system.• Any facilities, above ground, for the storage of oils, fuels or chemicals should be	<p>The comments are noted; however the technical guidance is available elsewhere and is considered to be outside of the scope of the document. The additional guidance section contains links to information from the EA and the Staffordshire County Council SUDS handbook.</p>
--	--	---	--

		<p>sited on impervious bases and surrounded by impervious bund walls.</p> <ul style="list-style-type: none"> • Only surface water from roofs and paved areas not accessible to vehicles, should be discharged to any soakaway, watercourse or surface water sewer. 	
		<p>All precaution must be taken to avoid discharges and spills to ground both during and after construction. For advice on pollution prevention measures, the applicant should refer to guidance available on our website (www.gov.uk/environment-agency).</p>	<p>The comments are noted; however they are considered to be outside the scope of the document.</p>
		<p>Developing alongside rivers Where developing alongside watercourses, development should always look for opportunities to improve the habitat value of the water environment through development. Development should always face onto a watercourse in order to foster a sense of ownership, and the watercourse should form a key feature of public open space. The opportunity for safe access for all persons to the riverside should be of paramount importance to all developments and improvements. Development should not restrict access to the riverside. By creating attractive and active frontages to rivers, and adequate easements it can also decrease activities such as fly tipping which can result in</p>	<p>The comments are noted, however this is covered in sufficient detail by the public realm section (para 3.23) and the landscaping elements (para 4.65) of the guidance. Information is also included in Additional Information section at the end of the document</p>

		<p>blockages and increase flood risk.</p>	
		<p>A natural character should be maintained, or where appropriate a straightened, culverted channel should be opened up and its banks softened to produce opportunities for habitat along the banks. Development should enable the restoration of a natural, sinuous river channel with development set back from its banks to allow a functional floodplain to form. Culverting of an open channel should only ever be allowed to enable essential bridges and road access.</p>	<p>The comments relate mostly to technical considerations for a particular type of development which would need to be considered on a case by case basis. No changes have been made to the document as a result.</p>
		<p>New development should not be built over the line of culverts and an appropriate buffer zone should be maintained along the river corridor in order to protect the integrity of the structure from piling and foundations. Consent is required from the Environment Agency for any development within 8m from the top of the bank or tow of a flood defence, and any encroachment into this should be fully justified as part of the wider site design. Furthermore, where the Environment Agency has identified a failing asset within the development the applicant must repair or make a financial contribution to ensure that its function is not compromised.</p>	<p>The comments relate mostly to technical considerations for a particular type of development which would need to be considered on a case by case basis. No changes have been made to the document as a result.</p>
		<p>We recommend that the SPD highlights landowners' responsibilities towards managing watercourses. Landowners who own land</p>	<p>The comments are noted; however they are outside of the scope of the document and no changes have been made to the text as a result.</p>

		<p>bounding upon a river or other body of water are, under common law, riparian owners. Riparian owner's responsibilities include the maintenance of the bank and bed of that section of watercourse, in order to avoid any obstruction of flow in the watercourse.</p>	
		<p>The use of low-lying ground in waterside areas for recreation, amenity and environmental purposes can provide an effective means of flood risk management as well as providing connected green spaces with consequent social and environmental benefits.</p>	<p>The comments are noted.</p>
		<p>Residential Extensions The Environment Agency has developed flood risk standing advice for minor household extensions that would be applicable for people extending their homes, even when the proposed works are classified permitted development. Often homeowners are unaware that new extensions and alterations to their garden and fencing may require an environmental permit from the Environment Agency. If not considered such amendments could potentially increase the risk of their property flooding, or increase the risk of flooding to their neighboring properties. Household extensions should also consider how flood risk could pose a risk to safety and mitigation measures should be</p>	<p>A link to the flood risk standing advice has been added to the additional useful information section.</p>

		<p>encouraged such as raising electrical points, and prevent the conversion of basement areas to bedroom in areas of risk.</p> <p>Whilst larger extensions are likely to require planning permission and they can be assessed through the planning system, it would be helpful to signpost householders to the following information:</p> <p>https://www.gov.uk/guidance/flood-risk-assessment-standing-advice</p>	
	<p>Persimmon Homes</p>	<p>Residential Space Standards</p> <p>If the SPD is to be pursued further, Persimmon suggests that this section is either deleted or completely revised.</p> <p>In relation to paragraph 4.79 the Council cannot expect minimum compliance with the space standards set out within 'Technical Housing Standards – Nationally Described Space Standard, (DCLG 2015)' as it is something which must be introduced through the planning system by including a policy in the Local Plan. The adopted Tamworth Local Plan contains no such policies, and as such they would have to be justified through a Local Plan review and tested at EiP. It would not be appropriate to apply the space standard through supplementary planning documentation (guidance), since that is not</p>	<p>Refer to the response to comments from Tetlow King Planning on behalf of West Midlands HARP Planning Consortium above.</p>

		<p>subject to a sufficient level of scrutiny. Tamworth Borough Council did not present any evidence at the CS EiP nor has the draft SPD presented any new evidence to justify this.</p> <p>The reference to optional national space standards in the draft SPD should therefore unquestionably be removed.</p>	
		<p>The comments above also apply to the external space standards stated in paragraphs 4.80 and 4.81.</p>	<p>Refer to the response to comments from Tetlow King Planning on behalf of West Midlands HARP Planning Consortium above.</p>
	Tamworth Civic Society	<p>Much of it is high-level, generalised, and aspirational, with little therefore to cause any objection. We feel that it would therefore benefit from more specific and practical examples - and preferably local ones - on how to do things, that the reader can relate to the aspirational guidance, and so not possibly misinterpret or misunderstand the guidance.</p>	<p>Much of the guidance is necessarily generalised as it applies to a number of different development scenarios. Specific examples are given where appropriate to provide further clarification, but to provide specific examples in all eventualities would risk the document becoming overly prescriptive and difficult to use.</p>
		<p>We do wonder if a little more coverage could be given to road infrastructure and public transport. And the need for public toilets in the town centre should not be omitted.</p>	<p>These things are often beyond the scope of individual developments for which the guidance is intended. Although the comments are noted, this SPD is not considered to be the appropriate place to include these.</p>
		<p>More emphasis should be given to conservation areas and avoiding planning difficulties through residents and businesses easily identifying that they are in conservation areas, and having</p>	<p>It is considered that there are sufficient references to conservation areas within the document and a link is included in the additional useful guidance section to the conservation areas</p>

		<p>awareness of the responsibilities they have in that regard. Page 52 should also point out that a Heritage Impact Assessment is needed where building near to a listed building.</p>	<p>information on the Council’s website. A reference is already included to the need for a Heritage Impact Assessment where development could affect the setting of a listed building. No changes have been made to the document as a result.</p>
		<p>We have concerns regarding Paragraph 3.15 “Tall buildings should be designed...” which seems to assume that tall buildings will be acceptable without defining “tall” to avoid misinterpretation, and without any recognition that the effects on historic streetscape and skyline can be catastrophic.</p>	<p>The reference to tall buildings has been amended to reflect what is meant by ‘tall buildings’ in response to other comments on the document. The paragraph forms part of the wider ‘Massing and Materials’ section that sets out how the surrounding context should be taken into account when considering building height.</p>
		<p>The reference to “High Density Design” also causes concern. We do not wish to be encouraging social problems and future slums through over-development.</p>	<p>National planning policy requires that planning policies and decisions make efficient and effective use of land by making optimal use of the potential of each site. The reference to high density development in the document states that this will be encouraged ‘<i>where appropriate</i>’. The appropriateness of any individual development is a matter for the decision maker, taking account of both national and local planning policies and guidance (including the content of the SPD once adopted), and any other material considerations. It is therefore considered that the reference to encouraging high density development where appropriate should be retained.</p>
		<p>Paragraph 3.48 says that new developments should use modern building materials. That is far</p>	<p>It is acknowledged that the items listed may not apply in all instances. The list has been moved</p>

		too simplistic as there is a place to use traditional, 'old-fashioned', or reclaimed materials where appropriate - especially within conservation areas and with listed buildings.	within the document to be included in the section titled 'Best Practice Principles and Sustainable Design' and has been amended reflect that the list applies ' <i>where appropriate:</i> '
	Natural England	<p>While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major effects on the natural environment, but may nonetheless have some effects. We therefore do not wish to provide specific comments, but advise you to consider the following issues:</p> <p>Green Infrastructure This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area.</p> <p>There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through:</p> <ul style="list-style-type: none"> • green roof systems and roof gardens; • green walls to provide insulation or shading and cooling; • new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity). <p>You could also consider issues relating to the</p>	<p>No response required.</p> <p>Noted. Principles of Good Urban Design chapter provides general guidance by referencing environment, sustainability and socio-economic performance. Within the same area, best practice principles and sustainable design section expand on this further as well as Appendix B climate change considerations.</p>

		<p>protection of natural resources, including air quality, ground and surface water and soils within urban design plans.</p> <p>Further information on GI is included within The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "Good Practice Guidance for Green Infrastructure and Biodiversity".</p>	
		<p>Biodiversity enhancement This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.</p>	<p>An additional paragraph has been added to Householder Development part of section 4 stating: <i>'It is important to consider the potential impact of any development on birds or bats. This may require the retention of features or provision of bird/bat bricks or boxes.'</i></p>
		<p>Landscape enhancement The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example</p>	<p>The section on landscape has been expanded to provide further guidance on appropriate landscaping schemes.</p>

		<p>through green infrastructure provision and access to and contact with nature. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might makes a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts.</p> <p>For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.</p>	
		<p>Other design considerations The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 180).</p>	<p>The comments are noted. A section on lighting is already included within the document.</p>
	<p>British Sign and Graphics Association</p>	<p>In the box following paragraph 4.113, the second bullet point partly contradicts the fourth and other advice in the SPD. “multiple” only means more than one. What we think you mean is that no shopfront should be so cluttered with advertisements as to spoil its appearance and its</p>	<p>The comments are noted. The text has been amended to <i>“Multiple adverts on the same building should be avoided where this would lead to visual clutter that would negatively on the appearance of the building or its surroundings.”</i></p>

		<p>surroundings. The text of the SPD clearly states that more than one advertisement is acceptable on the same shopfront (e.g. a fascia and a projecting sign). We therefore suggest that the second bullet point should be amended to: <i>“a building’s façade should not be so covered with advertisements as to spoil its appearance and that of its surroundings.”</i></p>	
		<p>In Paragraph 4.115, there is no justification for the suggestion that signs above ground floor level (particularly if illuminated) will not normally be approved. Why not? Many premises in shopping areas have signs (including illuminated signs) above the ground floor level; and Tamworth is no different in this respect. There are many Projecting/hanging signs above ground level in the centre of town: And there is no evidence that these signs cause any harm of amenity; in fact, they add to the charm and interest of the street scenes. We suggest that the second sentence of paragraph 4.115 be deleted.</p>	<p>Advertisements above ground floor level are prominent and detract from the visual amenities of an area or buildings. Usually such signs are within the Town Centre (which is covered by a Conservation Area). A proposal should enhance or preserve this character and therefore in most circumstances such advertisements are not acceptable. Appropriate sympathetic signage should be directed at ground floor level. No changes required.</p>
		<p>In Paragraph 4.118, we understand the intention. But we think that “retail unit” should be amended to “premises” retail Frontage. This would allow for premises with more than one frontage, e.g. corner shops or pubs.</p>	<p>The comments are noted, however the text states that only one sign will <i>normally</i> be permitted. It is considered that this provides sufficient flexibility for instances in which more than one may be acceptable, such as in the example stated. No changes have been made to the document as a result.</p>

		In the box following paragraph 4.120, in the second bullet point, there is no justification for requiring illumination to be restricted to fascia and projecting signs. Again Why? Whatever the nature of the sign, its impacts on amenity and public safety are the decisive considerations and not just whether it is called a “fascia” or a “projecting” sign. We think that this bullet point should be deleted.	The comments are noted; however the point states that illuminated signs will <i>normally</i> be restricted to fascias and projecting signs, not always. This means that, where appropriate, other forms of illuminated sign may be acceptable. No changes have been made to the text accordingly.
		In the same box, in the third bullet point, We think that “face onto any adjoining residential areas”, is not the proper consideration. A sign may well face towards an adjoining residential area, but this does not make it automatically unacceptable. What matters is its impact. So we consider that the words “face onto any” should be deleted and replaced with “have any adverse impact on”	The comments are noted and the text has been changed in line with the suggestion.
		Finally paragraph 4.126 is incorrect in law. There is no requirement for any sign to have “written” consent from the property owner. The regulations require only consent. The word “written should be deleted.	The text has been amended to state <i>‘Before displaying any advertisement, consent should be obtained from the property owner.’</i>
	Comments received from members of the public	Spelling errors Under Heritage Guidance – Wilnecote is misspelt. Under Scheduled Ancient Monuments etc the	The errors are noted and have been changed where applicable.

	Spelling errors	<p>sentence begins 'There a' instead of 'There are'.</p> <p>Spelling Much OF the post war... not MUCH TO.</p> <p>2.9 an hour's drive not "an hours drive".</p> <p>Pages 50 & 51list conservation areas. Recommend correct spelling error to Wilnecote Conservation Area.</p>	
	<p>Comments received from members of the public</p> <p>Positives</p>	<p>This document is welcome, and long overdue. It must be ensured that the guidelines will have "teeth" and will be adhered to in future, as it seems quite clear that many of its principles are currently being ignored, disregarded, and flouted.</p> <p>Context – A fair historic and topical summary. However character areas can only be maintained with application of items as defined under 'purpose'.</p> <p>Purpose – 1.5/7 and 1.12 Happy with these statements but how are they implemented? Are all councillors/officers to become familiar with these?</p> <p>Public Realm – 3.21 good statement but is this implemented in line with S.C.C.</p>	The comments are noted. No further action is required.

		<p>I support the principles of design in respect of shop fascia/front designs, specifically 4.96 and would hope it could be vigorously progressed, particularly with respect to the church street area.</p> <p>Retail Development and Shopfronts – 4.95/6 Very simply shown and put why has this not been implemented in the past.</p> <p>I Generally Support the Document which will help to improve design standards for Tamworth. Paragraph 2.8.</p> <p>Climate Change Considerations – I like this section.</p>	
	Comments received from members of the public	What is 'white land'? There is nothing in the definitions at the end to qualify white, brown or green land.	<p>The opportunities section has been revised and there is no longer a reference to 'white land' included in the document.</p> <p>Definitions have been added to the glossary for Brownfield Sites and Greenfield Sites.</p>
	Clarifications	Incorrectly states the population has grown and is estimated to be just 80,000 this is incorrect, the latest figures from the ONS for mid –year population estimates is 76,527.	The reference to the potential future population has been amended from 'just under 80,000' to 'over 75,000' to better reflect the projected population.
		3.15 seems at odds with earlier paragraphs. It says "Tall buildings should be designed"... which seems to assume that tall buildings will be	See response to comments received from Indigo on Behalf of AA Homes.

		acceptable. But "tall" is not actually defined. So this needs to be made clearer as it is open to misinterpretation.	
		Para 1.5 Tamworth has retained SOME not MUCH of its historic character.	The word 'much' has been changes to 'some'.
		2.13 What evidence is there to say the housing is well-liked? People like having somewhere to live, but we are well aware the standard of the housing is not even average, it is very substandard and poorly built and badly planned.	The comments are noted. The reference to existing residential development being 'well-liked' has been removed.
		Section 3.40 to 3.42 on lighting really should take the opportunity to lay down guidance to stop shops and businesses using bright illuminated signage which is on all night, eg the banks in Market Street. This should be covered more thoroughly at 4.121 - 4.123.	There is guidance relating to illuminated signage already contained within the advertisements and signs section.
		3.48 says new developments should use modern building materials. This is dangerous overly prescriptive. There might be a place to use traditional or old-fashioned materials where appropriate.	See response to comments received from Tamworth Civic Society.
		It is also potentially harmful to stipulate that we must have High Density Design.	See response to comments received from Tamworth Civic Society.
		The guidance should actively discourage people from paving over their front gardens, due to the environmental and flooding impact.	The section on garages and vehicle access contains guidance on this matter.
		Lighting Paragraph 3.40-3.42 Where street lightening is close to properties	The section on lighting already states that the design of lighting schemes should consider the

		<p>which could impact on ground and particularly upper floors, downward facing reflections/light shields should be added to street lamps to minimise residential light pollution where appropriate. The shields and reflections with lower wattage lamps which should be used due to higher proportion of light being reflected downwards, cost benefits as a bonus.</p>	<p>impacts of the positioning of fixtures and the quality of light on the amenity of any neighbouring uses. No additional changes have been made to the text as a result.</p>
	<p>Comments received from members of the public</p> <p>Queries</p>	<p>Householder Development – is there a proforma/handout for ‘house owners/tenants that makes them aware of the restraints historic buildings/conservation area.</p>	<p>Information on listed buildings and conservation areas are available on the Council’s website.</p>
		<p>What steps will be taken to ensure that its good intentions are implemented, eg in relation to the removal of ugly "safety railings" which particularly mar Upper Gungate (para 3.31)?</p>	<p>The document, once adopted will be a material consideration in determining planning applications within the borough.</p>
	<p>Comments received from members of the public</p> <p>Other comments</p>	<p>3.36 Public Art had been included in the past i.e. In the Kerria Development including walls but this seems to be disregarded when re-build is planned. As it is paid for by the public and represents the work of recognised artists this should not happen.</p> <p>Heritage Guidance – Conservation areas etc. The implementation of this does require the services and expertise of a designated person, the</p>	<p>These comments are noted, however they raise concerns that are outside of the remit of the SPD document and therefore no changes have been made to the document as a result.</p>

		<p>borough appears to have lost its conservation officer and also the town conservation group which bearing in mind the historic context of the town is not advisable to avoid conflict in the future.</p> <p>Have found much to support in section 3 but would raise one small “crazy” point around trees/public realm etc. This is in respect of one tree at the corner of Corporation St and Church Street and is just within the low walled boundary of building adjacent to the bus stop. In summer its beautiful green branches stretch right out and give space brings people together (without street furniture) and provides an attractive green space. I just hoped that there may be an opportunity for planners to work with neighbours there on encouraging positive landscape/public realm idea.</p> <p>Disappointed to see little reference made within the document to supporting or strengthening public transport. The only reference I could find was on page 26 3.48 “encourage the use of public transport, create walkable neighbourhoods....”and was disappointed that there is no mention of public transport in Appendix B Climate Change Considerations. It would have been good to see the aspiration of a</p>	
--	--	---	--

		<p>Bus Station for Tamworth planned in.</p> <p>3.51 and 3.56 should mention the need for incorporating public toilets.</p> <p>None of the conservation areas represent the boroughs connection with mining of both coal and Gibbs and Canning although there is evidence reflected in house development in Glascote and Amington.</p>	
		<p>Section 4 is useful but ought to incorporate more guidance for people to be able to check and know if they are in a conservation area. This is also relevant at p50 onwards.</p>	<p>A link is already contained within the section on conservation areas and in the additional useful guidance section to the part of the Council's website that contains information on the conservation areas. No changes have been made to the document as a result.</p>
		<p>Guidance should also state that the planners will consult and take advice from the Conservation Area Advisory Committee, which has considerable relevant expertise and experience.</p>	<p>The comment is noted but is outside of the scope of the document. No changes have been made to the document as a result.</p>
		<p>The Coventry Canal goes through the Borough and should be added into contact information, as an important historic and attractive asset which need inclusion assessment considerations.</p>	<p>A link to the Canal & River Trust planning guidance is contained within the additional useful information section of the document.</p>
		<p>Page 52 should also point out that a Heritage Impact Assessment will be needed where they are building near a listed building.</p>	<p>A reference is already included to the need for a Heritage Impact Assessment where development could affect the setting of a listed building. No changes have been made to the document as a</p>

			result.
		Page 42 onwards: Great care should be applied to the standards required for town centre shops.	Noted.