

Planning Committee

2.00pm, Wednesday, 3 October 2018

Edinburgh Design Guidance – Post Approval Review

Item number	6.1
Report number	
Executive/routine	
Wards	
Council Commitments	C10 , C15 , C18 , C27

Executive Summary

The purpose of this report is for the Committee to note feedback on the [Edinburgh Design Guidance](#) since its approval in October 2017, and to approve some minor updates to the Guidance in response to this feedback.

Edinburgh Design Guidance – Post Approval Review

1. Recommendations

- 1.1 It is recommended that the Planning Committee:
 - 1.1.1 notes the feedback received about the Edinburgh Design Guidance since its approval in October 2017 following substantial review;
 - 1.1.2 approves the minor updates detailed in Appendix 1 which respond to the feedback received; and
 - 1.1.3 agrees that any future minor updates to the Edinburgh Design Guidance can be dealt with through the Annual Review of Guidance process which is presented to the Committee at the start of each calendar year, until such time as a more substantial review is required.

2. Background

- 2.1 Scottish Planning Policy (SPP, 2014) states that Planning's purpose is to create better places and that it should take every opportunity to create high quality places by taking a design-led approach.
- 2.2 The [Edinburgh Local Development Plan](#) (LDP) provides the basis for determining planning applications. Planning guidance documents such as the Edinburgh Design Guidance (the Guidance) interpret the policies set out in the LDP and explains how developments can comply with it. The Guidance is the Council's key document in setting out how new development can achieve high quality design and successful place making.
- 2.3 A review of the LDP is currently underway and its replacement, City Plan 2030, is anticipated to be adopted in spring 2021. Any changes to LDP policies as part of its review will need to be reflected in associated planning guidance, once adopted. Likewise, revisions to guidance documents which relate to new matters not currently reflected in the adopted LDP can only be made as part of its review and following its adoption.
- 2.4 On 12 October 2017, Planning Committee approved substantial revisions to the Guidance in line with policies in the adopted LDP. Due to the substantial nature of the review, the Committee agreed that the Executive Director of Place would submit a report in 12 months primarily to assess the outcome of these key changes on decision making. Feedback could then be used to determine any refinements

necessary so that the Guidance is being used as effectively as possible. The purpose of this report is to set out feedback following this post-approval review and to propose minor updates to the Guidance.

3. Main Report

- 3.1 The Edinburgh Design Guidance was reviewed substantially during 2016/17, culminating in its approval by the Planning Committee on 12 October 2017. The key revisions were:
- 3.1.1 a greater emphasis on place making;
 - 3.1.2 recognising and reflecting changes to policy and guidance nationally, [Placemaking \(2014\)](#) and [Low Emissions \(2015\)](#), and locally, the LDP (2016);
 - 3.1.3 integration and simplification of the Parking Standards which were viewed as overly complex and introducing new content relating to parking design;
 - 3.1.4 introducing new content covering Build to Rent housing, views to the Forth Bridge World Heritage Site and environmental protection which includes matters relating to noise, air quality and odour;
 - 3.1.5 updating content in some sections, notably the water environment section; and
 - 3.1.6 including the Edinburgh Street Design Guidance (ESDG) within the Guidance so it becomes a single point of reference for all design and place making matters.

- 3.2 This report sets out feedback regarding these key changes following almost 12 months of use and scrutiny since the approval of the Guidance. General feedback on other elements of the Guidance have also been summarised and minor changes proposed. Feedback has been gained primarily through internal officer-led discussions. Appendix 1 of this report sets out the proposed changes to the Guidance.

Feedback on key changes

Greater emphasis on place making

- 3.3 The Guidance sets the bar high for the delivery of good quality development and place making. Positive feedback has been received from officers regarding the greater emphasis on place making and therefore no changes are proposed to the Guidance in this regard.

Reflecting changes to national and local policy and guidance

- 3.4 Since the approval of the Guidance, there have been no changes to national and local planning policy and guidance which require to be reflected in this post approval review. No issues have been raised on the emphasis and content of current references to national and local policy and guidance.

Parking Standards

- 3.5 The key changes to the Parking Standards as a result of the review included the:
- 3.5.1 removal of minimum parking requirements for cars and revisions to the quantity of parking required for some use/user types;
 - 3.5.2 inclusion of design principles, technical details and diagrams to guide the design and integration of parking in new developments;
 - 3.5.3 inclusion of a minimum requirement for electric vehicle charge point provision and technical details on charge point infrastructure;
 - 3.5.4 requirement for applicants to submit evidence to support parking strategies, including parking surveys; and
 - 3.5.5 consolidation of the geographic zones to reflect public transport accessibility, and the alignment of the Standards to reflect Planning use classes.
- 3.6 Since the Guidance was approved in October 2017, transport officers have been consulted on around 460 planning applications. Feedback confirms that developers are generally adhering to the requirements in the Guidance, and where there is non-compliance it can usually be attributed to lack of awareness about what is required.
- 3.7 Developers are encouraged to engage with transport officers at the earliest opportunity. To assist with this, a comprehensive list of transport requirements has been produced to support the principles in the Guidance, and this is issued to applicants for all relevant proposals at the pre-application stage.
- 3.8 Compliance with the requirements for electric vehicle charging infrastructure has been positive. Procedures around the management and maintenance of infrastructure are in the process of being explored to ensure that vehicle charging points can be operated effectively. A business case examining maintenance and management procedures has been prepared and will be presented to the Transport and Environment Committee in October 2018.
- 3.9 For all Planning use classes (other than housing), the Standards require a level of accessible parking for employees with disabilities. This requirement has been questioned as these details can be uncertain at the planning application stage and may change over the lifetime of a development. This requirement was based on a review of best practice from other areas of the UK. On reflection, it is proposed that this requirement remains as it provides the impetus for engaging in site specific discussions around accessible parking provision to ensure that reasonable levels are included in new developments.
- 3.10 The Standards are set to ensure high levels of cycle parking. Where provision may seem excessive due to scaling (for example a 300 bed student accommodation development would require 300 cycle parking spaces) transport officers work with developers to determine a level of cycle parking that is reasonable and maximises the use of bicycles.

- 3.11 Feedback has suggested that garages should be excluded from car parking numbers, as very few garages are used for cars. However there is no proposal to change the Standards as this would increase overall parking provision, contrary to the ethos of the Guidance and the Council's wider place making ambitions. Garages are still an effective option to help reduce the visual impact of parked cars, especially if developments are designed to limit other types of parking elsewhere.
- 3.12 The diagrams in the Guidance have been helpful in demonstrating how developments should be designed to minimise the impact of parked cars. However, feedback suggests that the diagram in chapter 2.4 on page 51 showing good examples of parking options within semi-detached dwelling plots shows sufficient parking space for several cars. It is proposed that this diagram be altered to show less space for cars.
- 3.13 Overall, feedback confirms that the Standards and guidance on parking design have been well received and that there is very little resistance from developers to complying with the requirements. This will continue to be monitored and revisions suggested as required over the lifetime of the Guidance.

Build to Rent

- 3.14 As part of the review, a new section was included in the Guidance to reflect recent innovations in the Private Rented Sector (PRS) and the growth in proposals for the development and long-term management of housing for rent. This type of housing is commonly referred to as Build to Rent (BTR).
- 3.15 The Guidance acknowledges the role that BTR development can have in expanding Edinburgh's housing mix, and sets out the key characteristics of BTR housing as informed by recent experiences in Scotland and England. The Guidance also emphasises that BTR is mainstream housing and therefore relevant LDP policies and guidance will apply.
- 3.16 Since the approval of the Guidance, positive feedback has been received on the inclusion of specific advice for BTR developments, including from the BTR industry. Whilst there have only been a limited number of proposals relating to BTR coming forward in the Planning process since October 2017, most of which relate to amendments to existing applications, those using the Guidance consider that it has been beneficial in providing clarity on the Council's position and in facilitating meaningful discussions about the delivery of existing and prospective schemes. Overall, the guidance has been welcomed as a positive response to Scottish Government's call for local authorities to engage positively with the BTR sector.
- 3.17 During the review process one BTR issue attracted particular comment. The Guidance accepts that, in exceptional circumstances, flexibility in the application of certain design standards could be explored subject to the overall quality of the development. The Scottish Government advocates the use of such flexibility in its Planning Advice Note on BTR. The flexibility set out in the Guidance relates to potential relaxations on internal amenity space standards and the proportion of single aspect units.

- 3.18 In terms of flexibility on internal amenity space standards, feedback confirms that the one-bed unit diagrammatic example in the Guidance has been helpful in negotiating limits to the level of flexibility allowed based on the overall quality of the development. Quality has been assessed by looking at matters such as the level of daylight and sunlight entering the unit and the inclusion of on-site shared facilities such as communal lounges, gyms and secure storage. In response to feedback, it is proposed that stronger emphasis on the benefits of delivering a variety of on-site shared facilities is included in the Guidance, as this is one of the key markers for determining the quality of the development.
- 3.19 With regard to flexibility on the proportion of single aspect units, the Guidance states that open plan layouts which increase useable space and allow light to penetrate more deeply into the units may justify a limited increase in single aspect units over the standard 50%. The Guidance however confirms that developments should still be designed to facilitate a substantial quantity of dual aspect units. Feedback confirms that further detail is required on the importance of and reasoning behind the benefits of providing dual (or more) aspects in dwellings to further support this position.
- 3.20 Proposed changes to the Guidance to respond to the feedback raised are set out in Appendix 1.
- 3.21 It is expected that, subject to market conditions, proposals for BTR development will continue to come forward as part of the Planning process. As such, the Guidance will continue to be monitored and any further revisions will be proposed through the Annual Review of Guidance process where appropriate. This continual process of monitoring and review will ensure that the Guidance reflects the city's growing experience in this type of development.

Views to the Forth Bridge World Heritage Site

- 3.22 No issues have been raised about the protection of key views to the Forth Bridge World Heritage Site therefore no changes are proposed to this element of the Guidance. However, additional clarity is proposed on matters relating to the consideration of developments which may affect the Outstanding Universal Value of either of the two World Heritage Sites (Old and New Town and the Forth Bridge).

Environmental protection

- 3.23 A new section was added to the Guidance under 2.5 'Environmental Protection' covering air quality, noise protection, lighting, contaminated land and odour. No issues have been raised about this content since the approval of the Guidance, therefore no changes are proposed.

Water environment

Feedback indicated that minor changes in relation to flood mitigation and the design of natural river environments would be helpful. Revisions are therefore proposed to the Guidance within the water environment section.

Edinburgh Street Design Guidance

- 3.24 A key revision to the Guidance was the inclusion of the Edinburgh Street Design Guidance (ESDG) within chapter four ‘Designing places: streets’.
- 3.25 The ESDG provides consolidated guidance on the design of projects that maintain, alter or construct streets (including urban paths) in Edinburgh, by adopting a design approach focused on place making and sustainable forms of transport.
- 3.26 The ESDG serves to ensure that new development proposals comply with planning policy objectives, while also ensuring the Council’s responsibilities under roads and transport legislation, including the delivery of public realm, comply with government policy.
- 3.27 Positive feedback has been received on the inclusion of the ESDG into the Guidance from a usability perspective and in strengthening the foundation that the design and planning of streets, buildings and spaces together is fundamental to creating good places.

Minor updates to Guidance on other matters

- 3.28 Feedback has also been received on other matters not relating to the key changes approved in October 2017. These matters are summarised as follows:

Sustainable buildings

- 3.29 LDP Policy Des 6 ‘Sustainable Buildings’ is written to ensure that new buildings in Edinburgh meet the current carbon reduction standards set out in Section 6 of the Scottish Building Standards, with the knowledge that the Scottish Building Standards will rise over the lifetime of the plan, working towards net zero carbon.
- 3.30 Low and zero carbon technologies can be renewable energy sources such as solar panels and micro-wind, heat pumps, combined heat and power and district heating infrastructure and equipment such as mechanical ventilation and heat recovery which uses fossil fuels but results in significantly lower carbon dioxide emission overall.
- 3.31 The Guidance requires information from applicants to confirm the sustainability of all developments (apart from domestic alterations and extensions and change of use for local developments) to be submitted using the ‘S1 Sustainability Form’. As the form was aligned to the previous 2013 Building Standards, it will be updated to reflect the new 2017 Building Standards as part of this post-approval review.
- 3.32 On 22 August 2018, a report on '[Zero Carbon New Buildings – Feasibility](#)' was presented to the Planning Committee which recommended that the Council’s approach to achieving zero carbon new buildings in Edinburgh is reviewed as part of the preparation of the next LDP. The Planning Committee approved this recommendation in addition to agreeing that the LDP Main Issues Report should consult on how greater sustainability could be achieved in new developments to achieve gold or platinum level sustainability criteria in some or all of the eight aspects set out in the Scottish Buildings handbook. It was also agreed that a

mechanism to periodically review the standards and the sustainability levels required should also be considered.

Gull and pigeon deterrents

- 3.33 On 17 May 2018, the Transport and Environment Committee recommended that the Planning Committee give consideration to including guidance within a relevant planning document on designing roof structures on new developments and refurbishments to minimise their attraction to nesting gulls. This recommendation was made in response to the committee report on ‘Urban Gull Control Options’.
- 3.34 A new sub-section is proposed to be included within section 2.7 of the Guidance under ‘Materials and Detailing’ to confirm that all developments should include roof designs which deter roosting and nesting gulls. The new sub-section also includes pigeons as well as gulls, as pigeons are mentioned elsewhere in the report as requiring the same type of control measures. The proposed changes have been agreed in consultation with the Council’s biodiversity officers.

Minimising waste collection and storage infrastructure

- 3.35 In response to the Council’s ongoing commitment to decluttering streets, this post-approval review is considered a good opportunity to strengthen the emphasis on minimising waste infrastructure.
- 3.36 Amendments are proposed to section 2.11 ‘Housing mix and size, and supporting facilities’ in relation to new residential developments to confirm that the primary way to minimise waste infrastructure will be via the implementation of underground waste storage systems with above ground collection chutes. This system has been implemented already to some extent in the city and elsewhere in the UK, but it is considered that the emphasis in the Guidance is not currently strong enough to direct developers to this as the first port of call. The proposed wording confirms that unless constraints exist which cannot be overcome, this system should be the primary system for all new housing developments. The proposed wording has been agreed in consultation in with the Council’s Waste and Cleansing Service.
- 3.37 An amendment is also proposed to section 2.8 ‘Adaptability’, to include a requirement for commercial developments to include sufficient space to store waste within the site, preferably internally, so that it is off public land until it requires to be collected. This amendment will support the principles of the Council’s trade waste policy as part of the Street Scene Project, which precludes the storage of trade waste on public land.
- 3.38 The minimisation of waste infrastructure will have a positive impact on the appearance of streets and the delivery of high quality places.

Daylighting in Public Buildings

- 3.39 The Education, Children and Families Committee of 14 August 2018 considered a report on the Daylight Impact Assessment of the Central Library. The Committee decided to request that the Planning Committee *inter alia* considers reviewing the required lighting standards to be applied to planning applications coming forward in

the future. This report is another item on the agenda for this meeting. In response, it is proposed to make a minor addition to the section 2.10 Daylight, Sunlight, Privacy and Outlook.

Cycle Hire

- 3.40 A cycle hire scheme was launched in September 2018 and is being rolled out across the city. To encourage the provision of cycle hire points within major developments, section 2.4 of the Guidance will be updated to state that all major new developments will be asked to consider the integration of cycle hire points into layouts, taking into account LDP Policy Des 7.

Implementation and reinforcement of Guidance

- 3.41 To achieve effective use of the Guidance, there is a continued commitment to support officers with training and the development of new processes. As part of this, an officer-led internal design review process will be trialled to encourage early discussion about the design and quality of new proposals. This will also help achieve consistency in implementing the principles of the Guidance.

4. Measures of success

- 4.1 Measures of success will include:
- 4.1.1 continued effective use of the Guidance to support decision-making to deliver high quality places;
 - 4.1.2 less need for pre-application advice due to the clarity of the guidance presented; and
 - 4.1.3 the submission of high quality planning applications which detail all the relevant information required to demonstrate that proposals are compliant with achieving good design and place making.

5. Financial impact

- 5.1 The Guidance involves no additional financial commitment, with the costs of publishing the updated Guidance being met from existing budgets.

6. Risk, policy, compliance and governance impact

- 6.1 This report does not raise any concern in relation to risk, policy, compliance and governance. Where possible, each section of the Guidance is clearly aligned to, and explicitly states, specific LDP policies. This helps to promote adherence to the policies and rigour in-terms of the quality of design.

7. Equalities impact

- 7.1 The report has no significant impact on equalities, health, wellbeing, human rights, the environment, sustainability and the economy, as its primary role is to present feedback on the revised Guidance. The minor updates proposed to respond to the feedback received, as set out in Appendix 1 of this report, are not considered to be significant enough to require Integrated Impact Assessments.

8. Sustainability impact

- 8.1 The proposals in this report will:
- 8.1.1 reinforce LDP requirements to meet the current carbon reduction standards in line with the Scottish Building Standards 2017;
 - 8.1.2 help achieve a sustainable Edinburgh because whilst the post-approval review will not directly promote social justice, several of the requirements in the Guidance do;
 - 8.1.3 help achieve a sustainable Edinburgh because whilst the post-approval review of the Guidance will not directly promote a healthy and resilient economy, several of the requirements Guidance do;
 - 8.1.4 have a positive impact on environmental stewardship because the updated Guidance will be published in electronic-only format, reducing the use of paper; and
 - 8.1.5 will contribute positively to sustainability including with regard to the protection of the historic and water environment as a result of a number of the minor updates proposed to the Guidance (refer to Appendix 1).

9. Consultation and engagement

- 9.1 Widespread public and stakeholder consultation and engagement was undertaken as part of the review of the Guidance during 2016/17. Feedback on the content and usability of the Guidance since its approval in October 2017 has been gained primarily through internal officer and elected member discussions, along with some industry feedback.
- 9.2 There is no need for additional consultation in relation to this report, which is primarily to set out feedback and propose minor updates in response to this feedback.

10. Background reading/external references

Relevant documents:

- 10.1 [Review of Edinburgh Design Guidance for consultation, Report to Planning Committee](#) (2 March 2017)
- 10.2 [Review of Edinburgh Design Guidance, Report to Planning Committee](#) (12 October 2017)
- 10.3 [Edinburgh Design Guidance](#) (12 October 2017)
- 10.4 [Edinburgh Local Development Plan](#) (2016)

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11. Appendices

- 11.1 Appendix 1 – Minor updates to Edinburgh Design Guidance

Chapter, Section	Reason for Update	Proposed Text Changes (new text in blue, bold and italics)	Proposed Image Changes
Foreword	To reflect the appointment of a new Planning Convenor	New text to reflect final foreword	Replace photograph of Councillor Lewis Ritchie with Councillor Neil Gardiner
Introductory pages	Update required to remove reference to the Edinburgh Street Design Guidance as a separate document.	N/A	<u>Page 4, 'How does it relate to other guidance?'</u> Remove image of Edinburgh Street Design Guidance and replace it with front cover of ' Guidelines on development in the countryside and green belt ' document.
Introductory pages	Update required to reflect embedding of Edinburgh Street Design Guidance and other minor text changes.	<p><u>Page 5, 'Introduction'</u> Amend fifth paragraph as follows:</p> <p>This guidance is intended for all new buildings developments and but also includes a revision to the parking standards alongside the inclusion of and will ultimately sit alongside a revised the Edinburgh Street Design Guidance, which was previously a separate document. This will allow a holistic, place-based approach to design and development. The examples given show principles and concepts that apply to a range of different developments building types. These will also include and examples of good street design. once the Street Design Guidance has been aligned with this guidance.</p> <p>Amend eighth paragraph as follows:</p> <p>The Council's design-related policies can be broadly divided into themes relating to context, built form, landscape and biodiversity. This is reflected in the structure of the guidance. Where appropriate, technical guidance is included along with links to associated guidance and information. A fourth section, related to streets, will be appended to the finalised guidance.</p>	N/A

<p>Chapter 1: 'Context, placemaking and design'</p> <p>Section 1.1: 'Appraising the site and context'</p>	<p>Text changes required to provide a link to the 'World Heritage Management Plans', a link to the 'Managing Change in the Historic Environment – World Heritage' document, and clarity on wording around Outstanding Universal Value.</p>	<p><u>Page 14, 'Historic Environment'</u> Add links and amend text in second and third paragraphs as follows:</p> <p>Sites within the two World Heritage Sites (WHS), The Old and New Towns of Edinburgh and the Forth Bridge require particular consideration. Historic Environment Scotland's 'Managing Change in the Historic Environment: World Heritage' provides advice. There are management systems in place for the Old and New Towns of Edinburgh and the Forth Bridge WHS.</p> <p>The Proposals should explain the impact on the Outstanding Universal Values <i>of the WHS</i> within the Environmental Impact Assessment. <i>If an Environmental Impact Assessment is required, impacts should be set out in there.</i></p>	N/A
<p>Chapter 1: 'Context, placemaking and design'</p> <p>Section 1.1: 'Appraising the site and context'</p>	<p>Emphasis required on the need to assess new developments in the World Heritage Sites against their Outstanding Universal Value.</p>	<p><u>Page 17, Technical Guidance 'Historic Environment'</u> Add new bullet point after fourth bullet point as follows:</p> <ul style="list-style-type: none"> • <i>New developments which impact on either of the two World Heritage Sites (WHS) should be assessed against their impacts on their Outstanding Universal Value.</i> 	N/A
<p>Chapter 2: 'Designing places – buildings'</p> <p>Section 2.4: 'Design, integration and quantity of parking'</p>	<p>Images show driveway and garage with enough parking for multiple vehicles – change required to show smaller driveways with limited space for cars.</p>	N/A	<p><u>Page 51, image showing 'Semi-detached plots example with parking to side & on street'</u> Alter driveways in image to show less space for parking.</p>

<p>Chapter 2: 'Designing places – buildings'</p> <p>Section 2.4: 'Design, integration and quantity of parking'</p>	<p>To encourage the provision of cycle hire points within all new major developments.</p>	<p><u>Page 55, 'Parking spaces for bicycles'</u> Add new paragraph at the end of this section as follows:</p> <p><u>Cycle hire facilities</u> <i>A cycle hire scheme was launched in September 2018 and is being rolled out across the City. All major new developments should consider the integration of cycle hire points into the layout taking into account LDP Policy Des 7.</i></p>	N/A
<p>Chapter 2: 'Designing places – buildings'</p> <p>Section 2.7: 'Materials and detailing'</p>	<p>Requirement to respond to recommendations set out in the 'Urban Gull Control Options' report approved by Transport and Environment Committee on 17th May 2018. The report recommended that roofs on new builds and for refurbishments are designed to minimise their attraction to nesting gulls and pigeons. rooftops designed appropriately can actively deter gulls and pigeons from roosting and nesting.</p>	<p><u>Page 72 (roofs)</u> Add new sub-section after 'Green Roof's as follows:</p> <p><u>Gull and Pigeon Deterrents</u> <i>All developments should include roof designs which deter roosting and nesting gulls and pigeons. Example of roof designs which are unattractive for nesting are:</i></p> <ul style="list-style-type: none"> • <i>Roofs which have a smooth surface and a pitch of more than 25%; and</i> • <i>Green roofs which are intensive, accessible roof gardens as the associated human disturbance will prevent nesting.</i> <p><i>Where a flat roof, or features on other types of roof, may support roosting and nesting, appropriate deterrent measures should be included in the design. Any measures must be carefully designed and maintained to avoid impacts on non-target species and also to avoid welfare issues such as trapping, injury or death of birds. Gulls are a protected group by law (Wildlife & Countryside Act 1981). Measures which would have an adverse impact on the special character of the building or its context will not be supported.</i></p> <p><i>Useful information about design, appropriate measures and maintenance can be found here.</i></p>	N/A
<p>Chapter 2: 'Designing places – buildings'</p>	<p>Update required to support the principles of the Council's trade waste policy as part of the Street Scene</p>	<p><u>Page 2.8, 'Adaptability'</u> Add new bullet point after second bullet point as follows:</p>	N/A

Section 2.8: 'Adaptability'	<p>Project, which precludes the storage of trade waste on public land.</p> <p>N.B. This update will also be proposed to the Council's Guidance for Businesses, as part of the Annual Review of Guidance process in Spring 2019.</p>	<ul style="list-style-type: none"> Ensuring there is sufficient space to store waste within the site, preferably internally, so that it is off public land until it requires to be collected; 	
Chapter 2: 'Designing places – buildings' Section 2.10: 'Daylight, sunlight, privacy and outlook'	<p>Reference is made to the availability of a copy of the <i>BRE Guide, Site Layout Planning for Daylight and Sunlight – A Guide to good practice</i> at the Council's Planning Helpdesk. Whilst this document is still relevant it is no longer available to view at the Council's Planning Helpdesk. The document can be obtained online, for a fee.</p> <p>Acknowledge importance of maintaining good natural light into reading spaces in libraries, classrooms and educational buildings where ADF already exceeds 2%. For clarity, ADF is referred to in full earlier in this section as 'Average Daylight Factor'.</p>	<p><u>Page 77, Protecting daylight to existing buildings</u> Amend 1st paragraph as follows:</p> <p>New buildings should be spaced out so that reasonable levels of daylight to existing buildings are maintained. The layout of buildings in an area will be used by the Council to assess whether the proposed spacing is reasonable. When there is concern about potential levels of daylight, the Council will refer to the <i>BRE Guide, Site Layout Planning for Daylight and Sunlight – A Guide to good practice</i>. This shows how to measure daylight and sunlight. A copy is available to view at the Council's Planning Helpdesk.</p> <p>Add a line to the table below 'Minimum ADF for kitchens 2%' as follows:</p> <p><i>Minimum ADF to reading spaces in libraries, classrooms and educational buildings where these currently exceed 2% 2%</i></p>	N/A

<p>Chapter 2: 'Designing places – buildings'</p> <p>Section 2.11: 'Housing mix and size, and supporting facilities'</p>	<p>Further clarity and detail is required on the importance of and reasoning behind the benefits of providing dual aspects in dwellings.</p>	<p><u>Page 80, 'Improving Internal Amenity'</u> Amend the first paragraph and create a new second paragraph as follows:</p> <p>In order to ensure a good standard of overall amenity for new development, <i>dwellings with two (dual) or more aspects should be maximised</i>. Single aspect dwellings should not make up more than 50% of the overall dwelling numbers.</p> <p><i>Dwellings with a dual aspect have windows which face out from two separate elevations. The provision of more than one aspect can result in multiple benefits for internal amenity. These benefits include opportunities for better daylight and sunlight, and in providing greater flexibility as to the use of spaces, such as positioning bedrooms towards a quieter aspect if the development is on a busy road.</i> Where <i>single aspect dwellings</i> are incorporated, it is important they meet the requirements for <i>daylight, sunlight and internal amenity space</i>.</p>	<p>N/A</p>
<p>Chapter 2: 'Designing places – buildings'</p> <p>Section 2.11: 'Housing mix and size, and supporting facilities'</p>	<p>A stronger emphasis is required on directing developers to providing underground waste storage systems with surface collection chutes, to minimise the amount of surface waste storage infrastructure. This would have a significant positive impact on the delivery of high quality places.</p>	<p><u>Page 81, 'Key points for consideration'</u> Add new bullet point at start of list of bullets as follows: Your waste management strategy must ensure that:</p> <ul style="list-style-type: none"> • <i>Surface waste collection and storage infrastructure should be minimised on all new developments. The delivery of underground waste storage systems with surface collection chutes are the Council's primary option for meeting this aim. Applications should clearly demonstrate that this option has been explored with the Council's Waste and Cleansing Service at the outset of the design process and it should only be discounted if there are constraints which cannot reasonably be overcome, such as the presence of important underground archaeology or specific operational constraints.</i> <p>Amend the existing third bullet point as follows:</p>	<p><u>Page 81</u> Remove image of '1280 litre recycling bins' and replace it with existing image underground bin chutes photo.</p> <p>Amend caption for image of waste collection chutes associated with underground waste storage as follows: <i>Waste collection chutes for</i> underground bins for residual waste allow large volumes to be held with minimal impact on the street scene. It is important that the Council's Waste and Cleansing Service are involved early, as their requirements may <i>will</i> impact on the design.</p>

		<ul style="list-style-type: none"> • If an underground waste storage system cannot be accommodated, a decision is made regarding the use of above ground individual or communal bins, the initial supply for these and their ongoing maintenance. If above ground storage is the only feasible option it should be done so within a suitable housing/building; and • That arrangements are in place to allow for the ongoing maintenance and repair of waste storage areas bin stores, above ground waste collection chutes, bin housings etc. <p><u>Page 81, ‘Sizes and bin types’</u> Amend first paragraph as follows:</p> <p>If it is not possible to deliver an underground waste storage system, the Waste and Cleansing Service will advise you whether individual or communal bins should be used. A range of bin types may be employed from kerbside collection boxes for glass and some other materials right up to 3200 litre communal bins. The Waste and Cleansing Service will advise on the capacities required to provide for each waste stream, the detailed design requirements for bin stores etc.</p>	
Chapter 2: ‘Designing places – buildings’ Section 2.12: ‘Purpose Built Homes for Rent’	Use of the word ‘innovative’ is ambiguous and emphasis should be on providing high quality, place specific and energy efficient developments.	<u>Page 82, Summary points in blue box</u> Amend third paragraph as follows: Design should be place specific, high quality, innovative and energy efficient.	N/A
Chapter 2: ‘Designing places – buildings’ Section 2.12: ‘Purpose Built Homes for Rent’	Additional text is required to emphasise that the provision of a variety of different on-site shared facilities will provide a better quality experience for residents and will contribute to delivering a higher	<u>Page 82, ‘Design Approach’</u> Add sentence at the end of 1 st bullet point as follows: Provision of high quality, professionally managed accessible on-site shared facilities i.e. Communal gathering spaces, secure storage as well as storage within units, workspaces, a cinema room and a gym. A variety of different on-site shared facilities will provide a better quality experience for residents	N/A

	quality development. In addition, cinema rooms should be reflected in the examples.	<i>therefore the provision of a range of options should be explored to enhance the overall quality of the development.</i>	
Chapter 3: ‘Designing places: landscape, biodiversity and the water environment’ Section 3.8: ‘Water Environment’	Guidance is required to encourage schemes to incorporate flood mitigation measures on site which would contribute to resolving flood risk on land adjacent to the development site boundary.	<u>Page 110, ‘The River Environment’</u> Add new sentence after second paragraph under subsection ‘Flooding’ as follows: <i>Opportunities to remove existing adjacent properties from the flood plain should be explored as part of any scheme.</i>	N/A
Chapter 3: ‘Designing places: landscape, biodiversity and the water environment’ Section 3.8: ‘Water Environment’	Clarity is required on the creation of natural river environments for straightened or otherwise modified river channels.	<u>Page 110, ‘The River Environment’</u> Add new sentence after third paragraph under subsection ‘culverts’ as follows: <i>Also a natural river environment should be included in development design when there is a straightened or otherwise modified river channel on site, unless the archaeological value of the straightened channel is exceptionally high.</i>	N/A
Sustainability Statement Form (S1)	For all relevant applications, a <u>sustainability statement form (S1)</u> should be completed and submitted with the application to demonstrate compliance with current sustainability standards relating to carbon reduction. The form requires to be updated primarily to reflect the new 2017 Building Regulations.	To be updated as required.	N/A