



Hertsmere Borough Council

Draft Planning and Design Guide: Part D - Guidelines for  
Development (2012)

Consultation Statement

**March 2013**

## 1. Introduction

1.1 A review of Part D of the Planning and Design Guide SPD, which relates to the design standards of new residential and other non-householder development, has been undertaken. Part D of the Planning and Design Guide series was originally adopted in 2006, however a number of alterations are now required. These proposed alterations principally reflect changes to national and local policy, as well as lessons learnt from experience and best practice.

1.2 A summary of the main changes proposed is as follows:

- A new section giving guidance on the types of residential development that may be acceptable on garden land sites;
- A new section setting out internal guidelines, including minimum internal space standards;
- An amendment to remove reference to a minimum numerical density of development (dwellings per hectare);
- New text that explicitly mentions outlook from residential properties and seeks to protect this form of amenity and an amendment to the information regarding 'right to light';
- Amendments to separation distance guidelines, to align these with the Urban Design Compendium and place a stronger emphasis on the need for new developments to create good quality layouts and an appropriate level of enclosure;
- A new guideline for the amount of private usable amenity space that should be provided with new flats and maisonettes, 1 bedroom dwellings and new residential care homes
- An amendment to provide scope for a more flexible approach to private amenity space guidelines for higher density schemes of flats and maisonettes and to encourage private gardens, balconies and terraces for schemes of flats and maisonettes;
- An amendment to clarify the Council's position on gates and railings and
- Amendments to bring the section on car parking in line with the Parking SPD, and introduce size guidelines for parallel car parking spaces and garage door openings.

1.3 This statement has been produced in accordance with Regulation 12 (a) i of the Town and Country Planning (Local Planning) (England) Regulations 2012 and sets out those persons that have been consulted in the preparation of the Draft Planning and Design Guide: Part D – Guidelines for development (December 2012, for public consultation) and how those persons have been consulted.

1.4 The consultation has been undertaken in accordance with Regulation 12 (b) and 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

1.5 This statement includes a summary of the main issues raised by those persons and how those issues have been addressed in the draft SPD, pursuant to Regulation 12 (a) ii and iii of the afore mentioned Regulations.

## **2. Informal Consultation**

2.1 Officers have undertaken a collaborative approach whilst reviewing and updating the Draft Part D of the Planning and Design Guide series before the period of public consultation commenced.

### *Officers:*

2.2 Planning Policy Officers have undertaken an informal consultation amongst the Development Management (DM) team in order to gauge whether the proposed changes would be acceptable in practice in order to support appropriate development. A number of changes were made to the first draft of this updated document to reflect the points that were raised. For example, additional text has been added to the document to provide further clarity in respect of some elements of design, such as car parking layout.

### *Members:*

2.3 Planning Policy Officers delivered a presentation on the draft Part D of the Planning and Design Guide to Hertsmere's Planning Committee at the October 4<sup>th</sup> 2012 committee meeting. Members of the Planning Committee noted the proposed changes at the committee meeting. It should be noted that the draft document had been well received by Members.

2.4 Planning Policy Officers also presented draft SPD to members of the Executive during the December 12<sup>th</sup> 2012 meeting. This was in order to request that the contents of the draft SPD are noted and approved, subject to any minor amendments to be agreed by the Portfolio Holder for Planning and Localism and Head of Planning and Building Control, to be used in the determination for planning applications registered on or after 13<sup>th</sup> December 2012 and that the that the draft SPD can undergo a six week period for public consultation.

### *Further:*

2.5 The draft document was published on Hertsmere's website on the planning publications page from December 13<sup>th</sup> 2012 with a note outlining that the document is to undergo a period of public consultation shortly and to contact to the planning policy team if you would like to be notified directly or to keep checking the planning consultation page for details of the formal period of public consultation. Officers received at least two telephone queries and one request to be added to be added to the consultation database.

### 3. Formal Consultation

- 3.1 The formal consultation period ran from 23rd January 2013 to 5pm 8th March 2013, although a late representation was granted to the Building Futures working group for which a representation was submitted on 14<sup>th</sup> March 2013.
- 3.2 All of the Council's Members and Planning Officers were notified as well as 745 interested parties, which have been identified from Hertsmere's LDF database.
- 3.3 The draft document had been published on Hertsmere's website before the period of formal consultation, underneath the current adopted SPD with a note highlighting that a period of public consultation will be commencing in early 2013, and that anybody that would like to be notified of the period of formal public consultation should contact Hertsmere's Planning Policy Team.
- 3.4 Appendix 1 outlines the specific groups that have been consulted, in-line with the Local Development (England) Regulations, 2012 and Hertsmere's Statement of Community Involvement.

#### *Website*

- 3.5 During the public consultation and pursuant to Regulation 12 (b) and 35 (1) a and b a copy of the following had been made available on Hertsmere's website at the following location [www.hertsmere.gov.uk](http://www.hertsmere.gov.uk) on the planning consultations page.
- A pre-formal consultation statement.
  - The draft version of Part D of the Planning and Design Guide: Guidelines for Development (December 2012, for public consultation).
  - A copy of a response form, should interested parties wish to use it.
  - A copy of the covering letter and response form that will be circulated to consultees.
  - A notice outlining the address where representations can be sent to (via letter and/or email) and by which date they are to be made by.
  - The address and opening times of the inspection points (including the Civic Offices as the principal office) where hard copies of the documents can be viewed.

## 4. Consultation response summary

4.1 A total of 24 respondents comprising approximately 120 separate comments had been received. This number of responses is fairly typical of a thorough, borough wide consultation of an SPD in Hertsmere. Indeed, 31 respondents making a total of 130 separate comments had been received from the public consultation process regarding the introduction of the Design Guide series (Parts A to E) in 2006.

*Summary of the main issues raised by consultees:*

4.2 A table detailing all comments that had been raised during the consultation process and an officers response to those points raised (where required) can be found in appendix 2 of this statement of consultation.

4.3 It is considered that a majority of the document was supported by most of the respondents. Of those that either answered whether they were in support of the draft SPD or not, 8 were in outright general support of the revision to the draft SPD, 6 respondents were generally in support of the draft SPD but seeking positive revisions, 5 people objected to the draft SPD and 5 didn't answer. It should however be noted that of those that stated an overall objection to the draft 1 respondent only objected to the fact that there were no internal space standards for 1 person units, which has been modified and therefore can be considered to be removed.

4.4 The main issues that had been raised through the public consultation are as follows:

1. Conflicting comments regarding the proposed new guidance on garden land development (section 9.7). Five people objected to the new guidance on garden land development, whilst seven people were in support of the chapter. Generally, local residents and local interest groups welcomed the guidance but considered that the wording regarding to be too flexible whilst local developers generally objected to the introduction of guidance regarding garden land development stating that the guidance is too restrictive.
2. There had been a number of comments made regarding strengthening the climate change mitigation measures such as encouraging SuDS and water runoff in general.
3. It was considered by respondents that reference to landscaping, green walls and roofs and additional information regarding the enhancement and conservation of biodiversity (with special reference to the impact of lighting on the sky and bats) within the design process of development should be made stronger within the document.
4. Concern had been raised by one respondent that that the wording of the document should be made stronger (to remove flexibility – to remove 'should be' etc) whilst one respondent raised objection to references to 'requirements' and standards as the draft SPD was just guidance.

5. Four respondents objected to the change of back to front and side distances, with one respondent wanting to increase the distances in areas like Radlett, one insinuating that the reduction is to allow garden development to go ahead and another wanting more flexibility. It should be noted that 9 respondents agreed with the changes and no change to this guideline is proposed.

*How those issues have been addressed in the SPD*

4.5 A table detailing the proposed changes to the draft SPD as a result of the consultation comments can be found in the appendices (2 & 3). The main changes that have been made are as follows:

1. A small amount of additional information has been added to section 9.7 regarding the development standards that will be required of garden land development. The additional information has been added outlines how garden land development can harm the character of an area and how tandem development is discouraged. This has been concluded by extra research into broader appeal decision regarding this type of development (please see appeal references: 12/2168568m, 12/2170398, 12/2171610, 12/2125427, 12/2178090, 12/2140076, 11/2166567). It is considered the guidance in the draft SPD clarifies existing guidance within the broader design related policies within the garden land development context. Although the changes made are unlikely to satisfy both residents and developers, it is considered that the policy allows DM officers to assess the context of the area surrounding the development and using judgement regarding each application that that is lodged regarding garden land development and also more reflective of national policy.
2. Two new paragraphs have been added to section 8.1.2 (u & v) that refers to the requirement of a site to be assessed for SuDS delivery early on in the design process. Extra information regarding the requirement for draining approval from 2014 with reference made to the Herts County Council link has been added. It was considered that the more detailed information would not fall within the scope of the document. Some information has been passed onto policy officers to be incorporated into the forthcoming Development Management policy DPD
3. Internal space standard for single person units (at 37m<sup>2</sup>) has been added. The information had been taken from the information supporting the internal space standards of the London Plan.
4. A new sentence has been added regarding the need to take extra care with proposed lighting schemes where bats might be present in section 11.1.2 (m). Although greater detail was called for in terms of biodiversity impacts, it was considered that issues surrounding biodiversity (bats in particular) were covered in Hertsmere's Biodiversity SPD.
5. A glossary of common design related terms has been added in section 12.
6. The last sentence of the objectives box on page D-2 has been deleted as it was considered that this caused confusion regarding how the SPD should be used as it stated that 'failure to comply should not necessarily result in development being refused'. Rather, the sentence before this sentence which refers to the

fact that 'other factors' may be relevant when determining applications is clearer.

#### *Other Key points*

4.6 Other points that had been raised included the fact that a majority agreed with the introduction of internal space standards (10). Whilst there were three objections overall, one person specifically objected to this point only on the basis that internal space standards had not been set for single person households. This has been rectified now. Most respondents (7) agreed with the garden land revisions for 1 bed dwellings, flats and care homes with 3 respondents objecting and stating that they should be made weaker and one objecting stating that the standards should be stronger, especially for places such as Radlett. Considering that the Council has been criticised in the past due to onerous garden land requirements and the proposed requirements here offer a greater flexibility, no change is proposed.

## Appendix 1: A List of statutory consultees.

Ridge Parish Council  
London Colney Parish Council  
Hertsmere Borough Council  
Shenley Parish Council  
Aldenham Parish Council  
Elstree & Borehamwood Town Council  
Stevenage Borough Council, Civic Offices  
St Albans Council  
East Hertfordshire District Council  
Dacorum Borough Council  
Broxbourne Borough Council  
London Borough of Barnet  
London Borough of Enfield  
London Borough of Harrow  
Three Rivers District Council  
Watford Borough Council  
Welwyn Hatfield District Council  
North Hertfordshire District Council  
Hertfordshire County Council  
County Architectural Liaison  
HCC Director of Environment  
HCC Estates and Asset Management  
Defence Estates  
Defence Infrastructure Organisation (DIO)  
Department for Transport  
Natural England (Countryside Agency, EofE Region)  
English Nature  
Highways Agency  
Hertfordshire Partnerships NHS Foundation Trust  
National Grid Transco  
National Trust  
Nationalgrid Property  
National Grid Plant Protection  
Network Rail (Town Planning)  
Royal Town Planning Institute  
The Forestry Commission  
The Planning Inspectorate  
West Hertfordshire PCT  
Veolia Water Central Limited  
Hertfordshire Biological Records Centre  
Environment Agency





<p>2 (0)</p>	<p>1. Object to the draft SPD.  (Light, privacy and outlook) 2a. Ticked 'no'. 2b. Ticked 'no'.  (Amenity space) 3a. Ticked 'yes'. 3b. Ticked 'yes'.  (Garden land development) 4a. Ticked 'no'. 4b. Ticked 'no'.  (Internal space standards) 5a. Ticked 'no'. 5b. Ticked 'no'.  (Any other comments) 6. Ticked 'no'</p>	<p>None required.  None required. None required.  None required. None required.  None required. None required.  None required. None required.  None required. None required.  None required.</p>	<p>None required.  None required. None required.  None required. None required.  None required. None required.  None required. None required.  None required.</p>
<p>3 (13)</p>	<p>On the whole the draft SPD is supported. In particular the following should encourage better use of land and indeed better designed units:</p> <ul style="list-style-type: none"> <li>- The reduction in car parking standards.</li> <li>- The reduction in amenity space requirements for flats/apartments.</li> <li>- The reduction in the separation distances/standards required for 'back to back' etc.</li> <li>- The creation GIA floorspace requirements.</li> </ul>	<p>None required.</p>	<p>None required.</p>

	<p>Do not support many aspects of chapter 9.7 'Garden Land Development' for the following reasons:</p> <ul style="list-style-type: none"> <li>- Para 3.13 of the Core Strategy presumably stems from paragraph 57 of the NPPF. However, the NPPF doesn't rule out development of residential gardens, it merely invites LPAs to set out policies that resist inappropriate development where it would be proven to cause harm to the character of the area.</li> <li>- Paragraph 9.7 of the draft SPD does not explain how either tandem development (9.7.c) or a more intensive use (9.7.d) would be inappropriate.</li> <li>- This part of the draft SPD is contrary to the last line of paragraph 3.13 of the Core Strategy as 9.7.2 (c) and (d) are in effect blanket bans.</li> </ul>	<p>It is considered that section 9.7 of the Planning and Design Guide does not rule out garden land development. It is flexibly worded whilst acknowledging that these types of development do not reflect traditional street formats and a therefore, generally discouraged.</p> <p>Paragraph 9.7.2 highlights that narrow single road access are unlikely to comprise an adequate access, which many applications for tandem and back garden development comprises. Paragraph 9.7.2 k, l, m and n highlights the standards that should be considered for this type of development. Not to adhere to these standards would normally comprise inappropriate development. Paragraph (d) notes that incongruous development by virtue of not respecting the pattern of development comprises inappropriate development.</p> <p>For clarity, paragraph 3.13 of the Core Strategy states that redevelopment of back garden land had represented a significant source of windfall housing supply. With the changes to the definition of back garden land, the Core Strategy states that a considered approach rather than a blanket ban would be appropriate. This is considered to be in-line with section 9.7 of the document.</p>	<p>None required.</p> <p>Additional information has been added to 9.7.2 (c and d) regarding how tandem and back garden development can harm the character of an area and why it is discouraged.</p> <p>None required.</p>
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	<p>- 'Garden land' is not defined in the policy. Is it the intent of the policy to resist development on land to the flank of the property or to the front? It is assumed that the policy is aimed at curtailing development at the rear of frontage dwellings but this is not explained.</p> <p>- The approach [regarding garden land development] ignores the potential for garden land sites to be highly sustainable/well located and a sensible use of land which reduces the need to look for land outside of built up areas.</p> <p>- There is no justification given in 9.7.2 (c) to conclude that tandem development 'often results in a detrimental impact on the character of an area, residential amenity and highways safety'. This is a subjective blanket statement.</p> <p>There have been numerous such developments already in Hertsmere which were considered acceptable – it does not flow from the policy framework that suddenly in 2013 any further tandem schemes will create issues of harm.</p>	<p>Garden land is defined in section 9.7.2 (a). It is not the aim of the policy to resist development that is acceptable in terms of respecting the character of the area regardless of whether it is located in the rear, front or side of existing dwellings. The type of development that is likely to have less of an impact is considered to be development that would have its frontage to an existing highway as outlined in section 9.7.2</p> <p>Paragraph 9.7.1 states that 'the Council recognises the contribution that appropriate residential intensification can make towards the availability of houses'.</p> <p>Paragraph 9.7.2 (c) is started by the statement that 'although the Council will consider all individual on a case-by-case basis'. There have been instances where tandem development has had an impact on highway safety due to long narrow access and Hertsmere is not characterised by tandem or mew style developments historically and therefore it is discouraged.</p> <p>Each case is to be decided on its own merits although tandem development is discouraged. There have also been numerous developments within Hertsmere that been unacceptable and supported at appeal (TP/10/2317, TP/11/1791, TP/11/1556). Therefore, additional guidance is required which is what section</p>	<p>None required.</p> <p>None required</p> <p>None required.</p> <p>None required.</p>
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	<p>- Para 9.7.2(d) has a 'get-out' clause inserted. This is useful and should also be applied to 9.7.2 (c). Irrespective, if a site is sustainably located, is comprehensive and meets all other design guide criteria then there is no policy basis to conclude it is 'inappropriate' (the test within the NPPF) nor that harm would automatically result.</p> <p>- If the draft wording is not altered, other aspects of the SPD will require adjustment. E.G paragraph 9.1.2 should be re-worded so that any restriction against more comprehensive development where such development is not already in existence is lessened. E.g. flatted schemes where there are none immediately adjacent must not be deemed inappropriate just because there are none immediately adjacent as this will permit a greater delivery of units that could have otherwise been incorporated on garden land.</p> <p>- Paragraph 9.7.2 (e) (in contrast to the preceding two paragraphs) encourages development on garden land where there is a second highway accessible beyond a second boundary. Whilst the plural term 'properties' is welcome (which suggests a comprehensive scheme envisaged under 9.7.2 (d)</p>	<p>9.7 seeks to provide. It should be noted that Councils such as Harrow have produced policies and SPD outlining their general presumption against garden land development.</p> <p>Paragraph (d) notes that there is a greater degree of cul-de-sac creation in the Borough historically whilst there are few examples of tandem housing within the Borough.</p> <p>Paragraph 9.1.2 is considered to be good design guidance. It does not advise that residential intensification is not appropriate in low density areas (other than rural, isolated and inaccessible areas), it states that it is most likely to be acceptable in areas of high density which has historically been the case due to public transport services, and character of the area consideration. Paragraph (f) does state that each case will be decided on its own merits.</p> <p>The essence of this section highlights that traditionally placed dwellings (fronting an existing highway) are more likely to respect the character of an area and residential amenity than those that do not front a highway.</p>	<p>None required.</p> <p>None required.</p> <p>None required.</p>
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	could be acceptable) (e) is unnecessarily restricted in insomuch as reducing the development potential of sites that lack a secondary highway frontage.		
4 (0)	<p>1. No answer.</p> <p>(Light, privacy and outlook) 2a. Ticked 'yes'. 2b. Ticked 'yes'.</p> <p>(Amenity space) 3a. Ticked 'yes'. 3b. Ticked 'yes'.</p> <p>(Garden land development) 4a. Ticked 'yes'. 4b. Ticked 'yes'.</p> <p>(Internal space standards) 5a. Ticked 'yes'. 5b. Ticked 'yes'. (Any other comments)</p> <p>6. Ticked 'yes' but no comments had been made.</p>	<p>None required.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required.</p>	<p>None required.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required.</p>
5 (16)	- Disagrees with the use of terms such as 'should be' and 'may be' within the document as the non-definitive terms coupled with the new government automatic presumption in favour of development and viability concerns results in a fatal	The Planning and Design guide cannot provide definitive 'set-in-stone' restrictions owing to the fact that there are many different types of design and development within the Borough. Therefore, the document officers guidance that should generally be	None required.

	<p>undermining of any such Planning Design Guide.</p> <p>- Permits back garden development (up to 50%) without planning being required and further loss is being encouraged by infilling developments.</p> <p>- There is a lot of encouragement buried within the document which may never be read.</p> <p>- There are no hard and fast rules on what is expected for permission to be given. Example is the use of porous materials for hard surfacing. Car parking could use grass mesh.</p> <p>- Paragraph 8.2.2. Applicants on sensitive sites should be asked to provide plans showing the original feature and the features that they intend to create.</p> <p>- Where landscape features are to be enhance or</p>	<p>complied with unless other material considerations (which will be reported on by the development case officer) indicate a departure from the guidance. This process is set in planning law.</p> <p>Council officer have limited control over permitted development. However, where infilling reduces amenity space, development management officers often remove permitted development rights, although this is at the Council or officer's discretion and decided on a case by case basis.</p> <p>Whilst this concern is noted, the document has been drafted to enable a greater degree of accessibility to the content. Indeed, this is agreed by respondent 21.</p> <p>The concerns regarding hardstanding centred around porosity and appearance. New materials /good practice are always introduced and there are many areas with different characteristics (urban to rural) within the Borough, thereby making the provision of a definitive list of materials difficult. Therefore, this element is left to the case officer's professional judgement.</p> <p>This is considered to be outside of the scope of the SPD and is considered to be more suited to the forthcoming Part E of the Biodiversity, trees and landscape SPD.</p> <p>Again, this is considered to be outside of the scope of</p>	<p>None required</p> <p>None required.</p> <p>None required.</p> <p>None required</p> <p>None required</p>
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	<p>preserved a maintenance scheme should be required as a part of conditions or if of sufficient importance with an Article 4 Direction.</p> <p>- Demolition material can be recycled to create low fertility substrate (calcium rich) for growing wildflowers and early succession area for invertebrates.</p> <p>Paragraph 8.2.2(d) could introduce disease by using 'native' species that is actually grown abroad. The design guide should be indicating a list of suppliers.</p> <p>- Non-native species should be considered in urban areas as they can produce food and shelter for wildlife and shad for us.</p> <p>- The Table on page D-1 implies that developments of less than 10 houses has no implications on public space, views or landmarks which is not the case and will encourage developers of less than 10 units not to take this into account.</p> <p>- Section 8.2.2 (h) shows the poor design that is evident already. The building shown has a roof that looks like it has been hammered, the building has aged quickly with metal fitting discolouration, rust</p>	<p>this SPD.</p> <p>Core Strategy policy CS16 (viii) makes provision the use of recycled material</p> <p>The Council cannot provide a list of suppliers to the unfair advantage that it would give other good suppliers. Schemes of landscaping are often required as a condition and approved by Hertsmere's Tree Officer. There are often replanting clauses if the trees dies within a prescribed period meaning that it is in the developer best interest to purchase disease free trees.</p> <p>The reason that native species of trees are primarily recommended is that they are more likely to thrive in the soils and climate of Hertsmere.</p> <p>This has been amended.</p> <p>It is considered that the finish of the design may not be to everybody's taste, but the proposal is a good example of a positive relation to the street.</p>	<p>None required.</p> <p>None required.</p> <p>None required.</p> <p>Requested amended made to include minor development</p> <p>None required.</p>
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	<p>and brickwork straining.</p> <ul style="list-style-type: none"> <li>- Paragraph 9.1.2 (f) and (g) Backland development destroys the character of an area. It destroys ecological value by destroying tree and hedge lines. Bats move along such continual line and will not cross broken lines of trees or those which are lit by bright street lights.</li> <li>- Points out that the development adjacent to the station is below the 20m and 28m back to back separation distance required which provides poor outlook for occupiers. Points out that the Oakland's development is a poor high density scheme with no decent public open space provision.</li> <li>- Good design needs to include trees, soft landscaping and green walls to soften development and provide habitat for wildlife with the latter providing insulation. The frontage on Theobald Street around Croxdale Road is a good example with a spine of bush and scrub and would soften the concrete mass of Elstree Way.</li> <li>- Where concern regarding the effect of lighting on bats, the best your document can come up with is to seek advice from Herts Biological Records Centre.</li> </ul>	<p>The preservation of vegetation for ecological purposes can be added to paragraph 9.7.2(m) rather than paragraphs mentioned here. It should be noted that Part B deals with issues surrounding development and bats.</p> <p>Incidentally, both of the schemes were allowed after lengthy public inquiries meaning that to impose a greater degree of separation distances arbitrarily would be indefensible during an appeal.</p> <p>The new separation distances are adapted from the Urban design compendium which are taken from historic byelaws.</p> <p>The need to avoid large areas of hardstanding is threaded throughout the document (9.3.2 f, 9.6.2 s – aa, 10.3.2 a - g). Also reference to the sustainable toolkit is also threaded throughout the document (see the comments and amendments made in number 24 of this table)</p> <p>HBRC are ecological experts. Therefore, they would be consulted on such matters where bats are present and can advise on the best course of action for each particular scheme.</p>	<p>The Council will require that all healthy trees and hedges with <u>amenity and ecological value</u> be retained.</p> <p>Non required</p> <p>None required</p> <p>None required.</p> <p>None required.</p>
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	<p>- Applicants should be encouraged to use bat sensitive lighting schemes such as bollard lighting with opaque glass, wavelength restriction discharge lighting, lighting at the red end of the visible spectrum, external louvres, masked lighting and restricted hour lighting (which would also reduce anti-social behaviour).</p> <p>- There is no consideration for the encouragement of dark skies of which less than 1% in SE England.</p>	<p>There is a conflict between the need for lighting to provide security and the requirement that lighting solutions would not be detrimental to bats. Therefore it is proposed to amend section 11.1.2 (m) to include reference to bats although each case will have to be decided on its own merits.</p> <p>Light pollution will be considered as a part of Hertsmere's forthcoming Development Management policy DPD. It may be that a light pollution SPD is required as such a section is not considered to compliment this design guide.</p>	<p>...particularly on locations visible from the Green Belt or in other sensitive areas. <u>Where bats are known to be present, advice on lighting should be sought from a qualified expert.</u> In other sensitive areas, low-level bollards...</p> <p>None required.</p>
6 (0)	<p>1. In support of the draft SPD.</p> <p>(Light, privacy and outlook)</p> <p>2a. Ticked 'yes'. 2b. Ticked 'yes'.</p> <p>(Amenity space)</p> <p>3a. No answer. 3b. No answer.</p> <p>(Garden land development)</p> <p>4a. No answer. 4b. No answer.</p> <p>(Internal space standards)</p> <p>5a. Ticked 'yes'. 5b. Ticked 'yes'.</p>	<p>None required.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required. None required.</p>	<p>None required.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required. None required.</p>

	(Any other comments) 6. No answer	None required.	None required.
7 (0)	<p>1. In support of the draft SPD.</p> <p>(Light, privacy and outlook)</p> <p>2a. Ticked 'yes'.</p> <p>2b. Ticked 'yes'.</p> <p>(Amenity space)</p> <p>3a. No answer.</p> <p>3b. No answer.</p> <p>(Garden land development)</p> <p>4a. No answer.</p> <p>4b. No answer.</p> <p>(Internal space standards)</p> <p>5a. Ticked 'yes'.</p> <p>5b. Ticked 'yes'.</p> <p>(Any other comments)</p> <p>6. No further comments.</p>	<p>None required.</p> <p>None required.</p> <p>None required.</p> <p>None required.</p> <p>None required.</p> <p>None required.</p> <p>None required.</p> <p>None required.</p> <p>None required.</p>	<p>None required.</p> <p>None required.</p> <p>None required.</p> <p>None required.</p> <p>None required.</p> <p>None required.</p> <p>None required.</p> <p>None required.</p>
8 (Highways Agency) (0)	No comments.	None required	None required.

<p><b>9 Environment Agency (13)</b></p>	<p><i>Section 8: Layout – Urban Structure</i></p> <ul style="list-style-type: none"> <li>- We would like to see a section focussing in Sustainable Urban Drainage Systems (SuDS) at an early stage as this has a significant effect on the viability of cost effectiveness of SuDS integration and the ability of SuDS to deliver benefits (i.e. attenuation, amenity, biodiversity and water quality).</li> <li>- A site should be assessed for its topography, natural features, water bodies and flow paths so that the layout if the development can take into account opportunities to design SuDS features and integrate them into open spaces, public realm, roads and pathways.</li> <li>- Further discussion can be found in the CIRIA document ‘Planning for SuDS – making it happen’. Chapter 4 provides case studies.</li> </ul>	<p>This insertion has been made with the introduction of two new paragraphs 8.1.2 u and v.</p> <p>As above.</p> <p>A new further information box has been added on page D5 referencing this document as well as Hertfordshire’s SuDS policy documents as they are the SuDS Approval Body.</p>	<ul style="list-style-type: none"> <li>u. The design and integration of SuDS should be considered at an early stage of the development to ensure that the benefits of SuDS (attenuation, amenity, biodiversity and water quality) can be delivered.</li> <li>v. A site should be assessed for its topography, natural features, water bodies and flow paths so that the layout if the development can take into account opportunities to design SuDS features and integrate them into open spaces, public realm, roads and pathways.</li> </ul> <p><i>Further information:</i></p> <p><i>From 2014 larger development proposals will be required to seek approval for drainage systems for managing rainwater from Hertfordshire County Council as Herts mere’s SuDS Approval Body. Please see the website for more information: <a href="http://www.hertsdirect.org">www.hertsdirect.org</a></i></p> <p><i>Further information can be found on the Building Futures website (<a href="http://www.hertslink.org/buildingfutures">www.hertslink.org/buildingfutures</a>) and on the Environment Agency’s website (<a href="http://www.environment-agency.gov.uk">www.environment-agency.gov.uk</a>)</i></p>
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	<p><i>Section 8.2.2 – Guidelines (streetscape and building layout)</i></p> <ul style="list-style-type: none"> <li>- The section is supported but we would like to see development both conserve <b>and</b> enhance a site’s natural features.</li> <li>- Good design should recognise habitat features of a site (rivers, wetlands etc) and biodiversity as a positive feature and opportunity to create habitat through sensitive design which would result in a more attractive, resilient and sustainable development.</li> </ul> <p><i>Section 9.3.2 – Guidelines (solar orientation and natural sources of energy)</i></p> <ul style="list-style-type: none"> <li>- Section (f) which recommends the integration of green roofs is supported.</li> </ul> <p><i>9.5 – Set back and building lines</i></p> <ul style="list-style-type: none"> <li>- We would like to see a set back from water courses: 8m (min) to a main river and 5m (min) to an ordinary watercourse. Development that encroaches on watercourses has a potentially severe impact on their high ecological value.</li> <li>- Paragraph 109 and Paragraph 118 seeks to protect and enhance the natural environment in order to halt the decline of biodiversity through encouraging the incorporation of biodiversity in and around developments.</li> </ul>	<p>The requested amendment has been mad</p> <p>Paragraph 8.2.2 c is considered to cover these points.</p> <p>None required.</p> <p>This is considered to be more appropriate for the DM policies. This issues has been passed onto the officer that is drafting this section of the DM policies.</p> <p>Noted.</p>	<p>8.2.2.c conserve <b>and</b> enhance a site’s natural features.</p> <p>None required.</p> <p>None required.</p> <p>None required.</p> <p>None required.</p>
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	<p>- The Natural Environment and Rural Communities Act requires Local Authorities to have regard to nature conservation.</p> <p>- Article 10 of the Habitats Directive which stresses the importance of natural networks of linked corridors to allow movement of species between suitable habitats and promote the expansion of biodiversity.</p> <p>- The rights and responsibilities of riparian owners (are explained in the Environment Agency publication 'living on the edge').</p> <p><i>Section 9.7 – Garden land development</i></p> <p>- Any development on undeveloped garden land must achieve greenfield runoff rates to ensure that the risk of flooding is not increased through impermeable surfaces, removal of vegetation and compacting ground which can increase the volume and flow of water which can cause local flooding and exacerbate river flooding.</p> <p><i>Section 10.1.2 – Guidelines (appearance and detail), roofs</i></p> <p>- We would like to see the section on roofs including the design of green roofs. This is because green space helps mitigate climate change. Green roofs, living and brown roofs provide ecosystems, reduce the urban heat island effect, help to reduce flash floods and provide refuge for wildlife.</p>	<p>Noted</p> <p>Noted.</p> <p>It is considered that this level of detail would not fall within the scope of this part of the Planning and Design Guide Series.</p> <p>This detail is not considered to fall within the scope of the SPD. The Council will work to the standards outlined in Core Strategy policy CS16.</p> <p>Green roofs are included within section 9.3.2 of the document.</p>	<p>None required</p> <p>None required.</p> <p>None required.</p> <p>None required.</p> <p>None required.</p>
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<p>10 (4)</p>	<p>1. In support of the draft SPD but seeking changes.</p> <p>(Light, privacy and outlook) 2a. Ticked 'yes'. 2b. Ticked 'yes'.</p> <p>(Amenity space) 3a. Ticked 'yes'. 3b. Ticked 'yes'.</p> <p>(Garden land development) 4a. Ticked 'Yes'. 4b. Ticked 'no'. - Further comments: Garden land is development is defined as 'greenfield' in the NPPF and should be retained and only be built on for as a last choice.</p> <p>- Gardens contribute to the character of the area, setting of buildings, quality of life of residents, enhance biodiversity and mitigation of climate change effects.</p> <p>- Historic designated landscapes fall within the NPPF, either in their own right or as a setting for historic buildings. Which should be taken into account when calculating sustainability.</p> <p>(Internal space standards) 5a. Ticked 'yes'. 5b. Ticked 'yes'.</p>	<p>None required.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required.</p> <p>Garden land is classified as greenfield land. The NPPF allows gardens to be protected in their own right BUT there is no in-principle objection where gardens are in urban areas, subject to detailed considerations.</p> <p>It is considered that these points have been made in section 9.7.</p> <p>Historic garden are protected under Core Strategy policy CS14.</p> <p>None required. None required.</p>	<p>None required.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required.</p> <p>None required.</p> <p>None required.</p> <p>None required. None required.</p>
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	(Any other comments) 6. No further comments.	None required.	None required.
<b>11 (4)</b>	<p>Object to the SPD</p> <p>- Page 5 [page D-2] makes reference to the fact that the guide is just that. Therefore all references to 'requirements' and 'standards' should be removed in order to comply with Government policy as these must be in development plan documents that are subject to public examination.</p> <p>- Paragraph 174 of the NPPF states that SPDs should not add unnecessarily to the financial burdens on development' and that LPAs should assess the likely and cumulative impacts of their existing and proposed policies on development. There is no evidence that the Council has considered the effect of this document on viability and deliverability as required by the NPPF.</p> <p>- Paragraph 9.7.2 (c), (d) and (f) effectively seeks to prevent development on garden land which has historically made up much of shortfall in its housing supply as windfall sites.</p>	<p>Page D-2 was written to reflect the fact that the SPD represents a guidance document. However, as the guidance contained in the SPD <u>is</u> capable of being a material consideration during the determination of planning application (as defined in the NPPF) and therefore, reference to standards and requirements will be retained.</p> <p>The consultation is an update of the existing SPD, taking into account changes in national policy, and case law from recent appeals. The Development Economic Study and the CIL viability work both assess the cumulative impacts of policies, and future policy change and the viability impact on developments. Paragraph 174 notes Evidence supporting the assessment should be proportionate, using only appropriate available evidence. As noted from these studies such changes would be deemed viable.</p> <p>Hertsmere's adopted Core Strategy makes 5 year land supply plus 5% rolling supply. Therefore, housing and supply has been sufficiently planned for without the need to include windfall from garden land development.</p>	<p>The last sentence has been deleted for clarity.</p> <p>None required.</p> <p>None required.</p>



	<p>- Given the fact that the Core Strategy Inspector emphasised the need for the review in specific reference to housing supply, the development of garden land should be reconsidered in against Council's ability to meet future housing supply requirements.</p>	<p>This reconsideration will be made during the early review of Core Strategy. One benefit of the creation of SPDs is that they can be amended with ease. Currently the reconsideration that is proposed here is premature.</p>	<p>None required.</p>
<p>12 (27) Crime Prevention Design Officer</p>	<p>General:</p> <p>- The Taylor review recommends the cancellation of the Safer Places guidelines but this is not considered to be insurmountable.</p> <p>- One omission is BREEAM. Domestic refurbishment as well as the general BREEAM New Construction document for all buildings other than domestic will have an impact on planning and design.</p> <p>- There is no mention of Code for Sustainable Homes. Is this deliberate, or is this mentioned in other publications? We would like this code to be application for HA and non-HA homes.</p> <p>- It would be useful to mention lighting in general using BS5489-2013 or welcome lights outside resident's front doors.</p> <p>- Generally, the guide is very fair and provide a signpost for any developer large or small.</p>	<p>Delete reference to Safer Places.</p> <p>BREEAM is noted in Core Strategy policy CS16, in conjunction with the Building Futures modules.</p> <p>Code for sustainable homes is highlighted in policies CS16 and CS17 in the Core Strategy.</p> <p>Reference is made to the British Standards under section 11.1.2 in an information box.</p> <p>Officers do not want to propose a lot of lighting within the street and therefore, the use of welcome lights will not be referenced here.</p> <p>None required.</p>	<p>Delete reference to Safer Places in 8.3.1 (a)</p> <p>None required.</p> <p>None required.</p> <p>New information box 11.1.2 r</p> <p>None required.</p> <p>None required.</p>

	<p>Detailed:</p> <ul style="list-style-type: none"> <li>- Paragraph 8.1.1 Objectives: Reword the first bullet point to 'safe <u>and secure</u>.'</li> <li>- Para 8.1.2 (n) Whilst total permeability is not being sought, research has indicated that there is a link between and increase in permeability and increasing crime which should be avoided.</li> <li>- Paragraph 8.2.1 Objective: No mention is made of safety and security within the built form and wider streetscape. This objective should be amended in order to highlight to developers the need to consider it within the designs of the street and layout of buildings i.e. the removal or reduction of recessed / darkened or not overlooked areas.</li> <li>- Para 8.2.2 (i) Strong support for active frontages with perhaps some land between the building and the street to demark public and private land.</li> <li>- Para 8.2.2 (q) We would also wish to avoid blank walls as they attract graffiti and gatherings. We would look for an active window in a home so any anti-social behaviour can be observed.</li> <li>- 8.2.2 (t) I feel that there is a place for gates in some designs and they can enhance an area rather than detract from it.</li> </ul>	<p>Recommended change to be made in the SPD.</p> <p>Whilst it is noted that there is a link between permeable places, permeability also encourages sustainable form of transport and legibility. Therefore, in this instance, this paragraph will remain unchanged.</p> <ul style="list-style-type: none"> <li>• Create safe and secure built environments;</li> </ul> <p>None required demarcation between public and private space is highlighted elsewhere in the document.</p> <p>As the wish for blank wall is highlighted, no further changes are required.</p> <p>Gates are not generally encouraged, but where they are considered appropriate, there is guidance included in the paragraph. Therefore, it is considered that this paragraph will not be further amended.</p>	<p>Paragraph 8.1.1 Objectives: Reword the first bullet point to 'safe <u>and secure</u>.'</p> <p>None required.</p> <p>Added to 8.2.1 fourth bullet point.</p> <p>None required.</p> <p>None required.</p> <p>None required</p>
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	<ul style="list-style-type: none"> <li>- 8.3.1 Designing out crime – Objectives: The Taylor Report has recommended the cancellation of Safer Places (apart from a few key aspects that should form part of a shortened guide) as it was considered that the concept of design and safety were well understood.</li> <li>- The opening paragraph could be reworded to exclude reference to safer places but retain the overall approach with more emphasis placed on secured by design.</li> <li>- Removal of this portion of the guide presents difficulties and perhaps Secured by Design could fill this breach. It may be worth including comments regarding Secured by Design within this paragraph and strengthening (b); thereby removing the need for the two further information boxes at the bottom of the page.</li> <li>- Paragraph 8.3.1 Further Information boxes should be reworded:</li> <li>- In the left hand box, the term Secured by Design is mentioned, the word Focus should be removed and the final website to be shown is <a href="http://www.britishparking.co.uk">www.britishparking.co.uk</a>.</li> <li>- The box on the right hand side could be incorporated in the paragraph 8.3.1 but I would recommend using the generic email address <a href="mailto:cpds@herts.pnn.policy.uk">cpds@herts.pnn.policy.uk</a>.</li> </ul>	<p>This has been amended to remove reference to the Safer Places document.</p> <p>This paragraph has been amended.</p> <p>The section has been updated to remove reference to Safer Places.</p> <p>Recommended change made regarding using the generic email address. The information is considered to better fit in the information box.</p> <p>Recommended change made.</p>	<p>Delete reference Safer Places in paragraph 8.3.1.</p> <p>Delete reference Safer Places in paragraph 8.3.1.</p> <p>Delete reference Safer Places in paragraph 8.3.1.</p> <p>Recommended changes made to the information box</p> <p>Recommended changes made.</p>
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	<p>- Para 8.3.2 Checklist. It would be worth not only highlighting SBD principles and also early consultation with the Crime Prevention Design Advisor whose comments can be included in the Design and Access Statement.</p> <p>- Para 9.1.2 (e) under croft car parking – lighting is indicated as an appropriate security measure. Could the sentence in the parenthesis finish after “security measures”. The indication is that lighting is the answer whereas there may be other security measures needed dependent on the location.</p> <p>- Para 9.6.2 (e). An indication of the type of fencing would be useful. i.e a 1.8m high fence topped with trellis next to a footpath for security, although it is appreciated that this type of fencing may not suit all areas.</p> <p>- Para 9.6.2 (f) no mention of cycle storage nor garden sheds, although cycle storage is referenced under para 9.9.2 (j).</p> <p>- 9.8.1 Objectives: supports the safety for pedestrians but there is no mention of safety for vehicles. Although it is noted that para 9.8.2 (k) highlights the need for parking areas to be overlooked and have adequate lighting, this could be emphasised in the objectives.</p>	<p>Recommended change made.</p> <p>Recommended change made.</p> <p>Whilst this is good advice it considered to be too prescriptive in this instance due to that many different character areas in Hertsmere</p> <p>9.9.2 (g) states that new developments should make secure provision. 9.6.2 (f) cycles could be stored in the side access to a dwelling or under the stairs for example.</p> <p>Recommended change made.</p>	<p>When preparing Design Statements as part of an application submission early consultation with the Crime Prevention Design Advisor whose comments can be included in the Statement, is strongly advised.</p> <p>Recommended change made.</p> <p>No changes made.</p> <p>No further changes required.</p> <p>9.8.1 Objectives Bullet point three ‘and vehicles’</p>
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	<p>- 9.8.2 (m) car parking is being advocated at the rear of development. Up to 6 parking spaces at the rear of development that is overlooked by active rooms with lighting which is preferably not bollard light.</p> <p>Respondent refers to the following publications:</p> <ul style="list-style-type: none"> <li>- Institute of Highway Engineers Guidance note: Residential parking.</li> <li>- English Partnership: 'what works where'</li> <li>- CABE's 'what homebuyers want: attitudes and decision making amongst consumers'.</li> <li>- University of Huddersfield 'It looks good but what is it like to live there?'</li> </ul> <p>- Page D25: The Information Design Tip Box. There is a need to make car parking safe for both travellers and vehicles. A communal car park should seek the Park Mark Accreditation.</p> <p>- Page D39 Crime reduction head. The word 'Focus' should be removed from the SBD title. Individuals details should be changed to generic details looking forward.</p> <p>- Under the crime reduction heading could The British Parking Association be added and show the BPA website <a href="http://www.britishparking.co.uk">www.britishparking.co.uk</a>.</p>	<p>Recommended change made.</p> <p>Recommended changes made to the reference list rather than information box.</p> <p>Recommended change made.</p> <p>Recommended changes made.</p> <p>Recommended change made</p>	<p>... Off-street car parking to the side or rear of buildings should be broken up into small groups of no more than 6 spaces to avoid large, concentrated areas of car parking and should be well overlooked with an appropriate lighting scheme.</p> <p>These references have been added to the reference list at the rear of the document.</p> <p>Added to the information box: Consideration should be given to achieving the ACPO Park Mark award where communal car parking is proposed.</p> <p>'Focus' is removed and the generic email address is added.</p> <p>BPA and the associated website is added.</p>

<p>13 (2)</p>	<p>Objects to section 9.10: Residential Internal Guidelines, paragraph 9.10.2 as there is no provision for studio flats, i.e. 1b/1p.</p> <p>The guide should be updated to include studio flats that cater for single occupancy which there is a strong demand and increasing rents for 1 bed flats and the proposed welfare reforms which will be implemented in April 2013.</p>	<p>This point is considered to be pertinent to ensure that all types of households can have</p> <p>Space standards have been amended to include provision for 1b/1p @ 37m2 and a further information box outlining the documents where the minimum space standards had been taken from</p>	<p>9.10.2 (b) 1b / 1p = 37m2 Further information box added after 9.10.2 (h)</p>
<p>14</p>	<p>1. In support of the draft SPD.</p> <p>(Light, privacy and outlook) 2a. Ticked 'yes'. 2b. Ticked 'yes'.</p> <p>(Amenity space) 3a. Ticked 'yes'. 3b. Ticked 'yes'.</p> <p>(Garden land development) 4a. Ticked 'yes'. 4b. Ticked 'yes'.</p> <p>(Internal space standards) 5a. Ticked 'yes'. 5b. Ticked 'yes'.</p> <p>(Any other comments) 6. No further comments.</p>	<p>None required.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required.</p>	<p>None required.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required.</p>

<p>15 Elstree and Borehamw- ood Town Council (5)</p>	<p>1. Broadly supportive of the draft SPD.</p> <p>(Light and outlook) 2a. Yes. 2b. Yes. - Further comment: Section 8.1.2.f – where streets and footpaths were listed as being well lit, some Members queried how such a plan fitted in with the policy to turn off lighting in order to make efficiency savings and reduce unnecessary lighting.</p> <p>(Amenity space) 3a. Yes. 3b. Yes. - Further comments: It was considered that there should be some flexibility in accordance with the surroundings.</p> <p>(Garden land development) 4a. Yes. 4b. Yes. - Further comments: Members welcomed the increased width of garage specifications.</p> <p>(internal space standards) 5a. Yes. 5b. Yes.</p> <p>(Any other comments) 6. Yes. - Further comments: Members felt that the document was very comprehensive.</p> <p>- However, as with previous consultation</p>	<p>Street lights on some roads in Hertsmere are turned off during certain periods within the night</p> <p>None required. None required. It is considered that paragraph 9.6.2.l provides flexibility</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>Whilst officers appreciate this comment, this is</p>	<p>None required.</p> <p>None required. None required. None required.</p> <p>None required. None required. None required.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required.</p>
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	responses, concerns were raised regarding the envisaged volume of development in Elstree and Borehamwood insofar as the implications for the local infrastructure (especially GP surgeries and schools).	considered to be a response to be considered for a strategic housing policy document (such as the Core Strategy or Elstree Way Corridor DPD).	
16 (2)	<p>- Pleased to see the Council recognises the problems of back garden development. However, whilst it seems that that the proposed changes are a step forward, with the possible exception of the access rules, they appear to be largely a wish list.</p> <p>- The revised Privacy Guidance is retrograde as there is a largely urban set of rules (20 metres instead of 28m) for a largely outer, suburban/rural area in order to ease back garden development.</p>	<p>The proposed updated SPD provides guidance only. Applications will continue to be determined on a case-by-case basis, with the guidance that is contained in the SPD in mind.</p> <p>The Council has been criticised in the past for refusing development, in-part, due to excessive distance standards. These standards are widely used and therefore, more defensible at an Appeal.</p>	<p>None required</p> <p>None required.</p>
17 (11)	<p>1. Objects to the draft SPD primarily due to the restrictive approach to garden land development.</p> <p>(Light, privacy and outlook)</p> <p>2a. Yes.</p> <p>2b. Yes subject to further comments.</p> <p>- Further comments: The proposed back to back distance is reasonable.</p> <p>- The back to front distance requires more flexibility based on site circumstances and overall 'grain' of development on proposed development.</p>	<p>None required.</p> <p>None required.</p> <p>This is based on the urban design compendium standards which is based on old byelaws and which is used as good practice. Therefore, these standards will remain and it will be for the applicant to outline why this standard will not be met if that is the case.</p>	<p>None required.</p> <p>None required.</p> <p>None required.</p>



	<p>(Amenity space) 3a. Yes. 3b. No in relation to the proposed amenity standards. - Further comments: The requirement for at least 20m<sup>2</sup> of amenity space for a 1 bed flat or maisonette is understood, the requirement for a further 10m<sup>2</sup> of amenity space per bedroom is arbitrary, unnecessary and will result in a significant constraint on flatted development outside of town centres and Elstree Way Corridor.</p> <p>- Many non-centre sites are located close to open space and/or Green Belt where the open and visual character of a locality becomes a tangible amenity to occupiers and sufficient to outweigh a small numerical 'deficiency' in provision.</p> <p>(Garden land development) 4a. No</p> <p>- Further comments: Concern regarding back garden development were made during representations at the Core Strategy Main Mods stage. The proposed guidance is unduly restrictive and significantly constrains schemes involving garden land which deliver housing mix, choice and quality across the Borough.</p> <p>- It is accepted that the NPPF excludes garden land from the definition of PDL. However, to use the term 'Greenfield' is unwarranted and emotive. It</p>	<p>The garden land requirement is not considered to be arbitrary. This approach is a step change from a more onerous approach requirement that had not been readily supported at appeals.</p> <p>This approach and requirement is reflective of North Herts and Three Rivers.</p> <p>This would be a material consideration that would be for the case officer to assess whether the proximity, access to and quality of green spaces nearby would merit a departure from the guidance.</p> <p>The Core Strategy has demonstrated a 5 year land supply plus 5%. Therefore, it is considered that HBC have planned positively for arrange of housing mix, choice and quality across the Borough.</p> <p>Greenfield is a planning term and should remain on that basis. Although the term has been used, section 9.7 does not state a general presumption against</p>	<p>None required.</p> <p>None required.</p> <p>None required.</p> <p>None required.</p>
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	<p>could imply to a layperson that there is a presumption against garden development.</p> <p>- Criterion C is an unreasonable generalisation that pays little regard to the capacity of localities and individual sites to absorb tandem development, both visually and in terms of infrastructure.</p> <p>- Criterion D: Requiring the existence of cul-de-sac development in an area to justify garden land development is unduly prohibitive.</p> <p>- Criterion E requires the creation of new properties creating their own frontage with access directly onto an existing highway. This restricts development which creates its own streetscene and also integrates into the established streetscene.</p> <p>- A positive approach to back garden development using a perimeter block approach, active frontages, distinction between public and private areas, continuity of frontages within the original streetscene (LPA ref: TP/12/0750).</p> <p>- Another example of a more controversial tandem</p>	<p>garden land, it highlights the design considerations that will have to be met in order for this type of development to be approved.</p> <p>As noted in response 3, paragraph 9.7.2 (c) is started by the statement that ‘although the Council will consider all individual on a case-by-case basis’. There have been instances where tandem development has had an impact on highway safety due to long narrow access and Hertsmere is not characterised by tandem or mew style developments historically.</p> <p>Paragraph (d) notes that there is a greater degree of cul-de-sac creation in the Borough historically whilst there are very few examples of tandem housing within the Borough.</p> <p>As noted in response 3, The essence of this section highlights that traditionally placed dwellings (fronting a highway) are more likely to respect the character of an area and residential amenity than those that do not front a highway.</p> <p>Criterion 9.7.2 k and L also outline the specific criteria that back garden development should meet.</p> <p>As noted in response 3, whilst there are examples of</p>	<p>None required.</p> <p>None required.</p> <p>None required.</p> <p>None required.</p> <p>None required.</p>
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	<p>development was considered to result in a positive contribution to the streetscene and wider locality within a mature suburban setting (LPA ref: TP/10/2075).</p> <p>(Internal space standards) 5a. Yes. 5b. Yes.</p>	<p>development that create a positive contribution there have also been examples where this type of development has been considered to be unacceptable and section 9.7 aims to provide a greater degree of certainty as to how officers will assess these schemes.</p> <p>None required. None required.</p>	<p>None required. None required.</p>
18 (9)	<p>Considers that overall, the proposed design guide should be supported.</p> <p>Particular observations were made on the following:</p> <ul style="list-style-type: none"> <li>- Page D2 which highlights that the SPD is for guidance only and that failure to comply will not necessary result in the development being unacceptable. However, the Council should be under obligation to explain why the guidance is not being followed.</li> <li>- Criterion 9.1.2(a) that the Council would expect all development to respect the context of their surroundings is strongly supported.</li> <li>- The amendments to paragraphs 9.1.2(f) are not supported. Intensification of existing residential</li> </ul>	<p>The last sentence is considered to be superfluous and confusing. Professional Development Management Officers review each case on it material considerations with the guidelines in mind. The guidelines will not suite all development, hence the flexibility required. Where there is a significant departure, it will be for the case officer to assess the harm (if any) arising from the departure.</p> <p>None required.</p> <p>Both paragraph (f) and (a) state that residential intensification (f) and higher density (a) will be</p>	<p>To delete 'Failure to comply with the guidance, or any of its constituent guidelines, should not necessarily result in a development being considered unacceptable.'</p> <p>None required.</p> <p>None required.</p>

	<p>land use should not be permitted where the development proposal is out of contexts with the surrounding area. Therefore paragraph (f) and (a) are inconsistent.</p> <p>- Paragraph 9.2.2(d) – gaps between buildings need to respect the existing pattern of development on a street.</p> <p>- Paragraph 9.4.1 – The objectives are supported.</p> <p>- Paragraph 9.7.2 (j) is strongly supported. The sentiments could be made stronger by making schemes that are out of character of an area will be refused.</p> <p>- Paragraph 10.1.2: the criteria contained in paragraphs (a) and (d) are supported. Buildings that are wide or deep should be modified to help break up the bulk of the building. The policy should be amended to recognise that this could mean breaking up one larger unit into two smaller units.</p> <p>The respondent makes reference to their experiences in dealing with the Council regarding an application for a development adjoining their boundary. In particular reference is made to the consultation processes of the Council in regards to publicising planning applications and insufficient justification regarding departures from guidance in</p>	<p>supported where there is not harm to the character of the area. There is no objection to higher densities and residential intensification in an existing urban area (i.e not green belt), given that the character of the area is not harmed, which will be assessed using the criteria in this guide.</p> <p>Section 8.2.2 requires the maintenance of a rhythm of development.</p> <p>None required.</p> <p>The word ‘normally’ is considered to be efficacious as there may be other material considerations that would require flexibility regarding this piece of guidance.</p> <p>This is a positive suggestion. As breaking up a larger building can actually increase the perception of bulk it will therefore be introduced as <u>one</u> of the ways that bulk <u>can</u> be reduced in some instance</p> <p>The issues raised here are considered to be in response to a complaint received by the Council regarding a specific planning application which is currently being investigated. Therefore, this point is not considered to be separate to this public consultation process.</p>	<p>None required.</p> <p>None required.</p> <p>None required.</p> <p>Paragraph 10.1.2 (d) to read...balconies, roof forms or a physical separation between blocks</p> <p>None required.</p>
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	officer reports.		
19 (Aldenham Parish Council) (0)	<p>1. In support of the draft SPD.</p> <p>2a. Ticked 'yes'. 2b. Ticked 'yes'.</p> <p>3a. Ticked 'yes'. 3b. Ticked 'yes'.</p> <p>4a. Ticked 'yes'. 4b. Ticked 'yes'.</p> <p>5a. Ticked 'yes'. 5b. Ticked 'yes'.</p> <p>6. No further comments.</p>	<p>None required.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required.</p>	<p>None required.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required.</p>
20 (8)	<p>Generally supportive of the draft SPD, particularly where they tighten up the guidance in respect of over-development, lack of spacing, back garden schemes etc.</p> <p>It is suggested that the guidance would benefit from having a glossary that explains the meaning of words that are used such as 'mass', 'vibrant', 'respect', 'scale', 'active frontage', 'dominant feature'.</p> <p>9.1.2(b): Density. We note that because of varying housing types across the Borough the guidance cannot be prescriptive but we would like to see</p>	<p>None required.</p> <p>A glossary of common urban design terms that are not already explained in the SPD is included.</p> <p>The various sections of the design guide and the new Local Plan is considered to be sufficient in preventing over-development, although the term 'overdevelopment' is subjective. Indeed, flatted</p>	<p>None required.</p> <p>A small glossary of common terms is provided in section 12 of the guide.</p> <p>None required.</p>

	<p>guidance that resists cramming in more housing than the average density for the area so that over-development is discouraged in places like Radlett.</p> <p>9.2.2(e) The separation distances are inappropriate in certain localities such as Radlett. Proposes increasing each separation distance in the draft SPD by 10m in order to retain the feeling of spaciousness around new buildings. Therefore the back-to-back distance would be 30m and the back to front or back to side distance would be 20m.</p> <p>9. Height and Mass: we would advocate wording that treat houses with three habitable floors (where there is habitable space in the loft) as three storeys.</p> <p>9.4.2 (c) Suggested amendments to prevent 3 storey houses that 'look like 2 storeys: <del>where the</del> <i>ridgeline of existing buildings forms a dominant</i></p>	<p>development that is of a similar scale, mass and height of the surroundings can complement existing development. Therefore, it would be not be considered to comprise 'overdevelopment' just because it is at a higher density. Therefore, when assessing whether a scheme is at a higher density, officers will consider whether it appears cramped in the streetscene, whether there is a decent level of park parking and amenity space, whether the scale and bulk is in keeping etc on a case-by-case basis.</p> <p>The revised separation distances have been introduced to enable development to take note of the surrounding areas and are noted as a minimum. Whilst it is noted that there are areas in Hertsmere with higher and lower densities, the back to back distances are considered to be a fair minimum standard the comply with standards set out in the Urban Design Compendium, which is based on historic byelaws. Elsewhere is the guide, more specific guidance regarding creating an appropriate sense of enclosure.</p> <p>It is not considered good practice to refer to habitable space in the loft as a third storey, especially when the space would otherwise serve as an empty roof space and is served by dormers and/or rooflights.</p> <p>Whilst officers have carefully considered this approach given its merit, when reviewing how this would work in practice within different streets, it looked likely to be</p>	<p>None required.</p> <p>None required.</p> <p>None required.</p>
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	<p><del>feature</del> The ridge height of proposed developments adjacent to existing dwellings should not exceed the average ridge height by more than 10%.</p> <p>9.6.1 (h) Minimum garden areas:  1 Bedroom house: <del>40m2</del> 60m2  2/3 Bedroom: <del>60m2</del> 80m2  4 bedroom: <del>80m2</del> 100m2  5 bedroom: <del>100m2</del> 150m2</p> <p>9.7.1 (d) delete the words: <del>unless the prevailing character of the surrounding area is already defined by cul-de-sacs of this type.</del></p>	<p>problematic on application and unlikely to be defensible on appeal. Therefore, the original wording 'The ridge height of proposed developments should generally not exceed this ridge height.' Is considered to be more appropriate.</p> <p>The rear amenity space for houses is considered to be sufficient and has been used in the past successfully. An arbitrary increase could result in indefensible guidelines, such is the reason for lowering amenity provision for flats.</p> <p>It is considered that where cul-de-sacs already make up part of the character of an area, it is unlikely to cause greater harm to introduce similar layouts of development.</p>	<p>None required.</p> <p>None required.</p>
<p>21 (3)</p>	<p>In favour of the proposed SPD in general as it is clear and made interesting and illuminating reading.</p> <p>One comments regarding light, privacy and outlook.</p> <p>Issues can occur where neighbours plant vegetation so as to obtain privacy, on the boundary division. There should be some provision for taking the ultimate height and width of the proposed trees and shrubs into account when considering landscaping schemes so that they are appropriate to the size of the property and proximity to</p>	<p>None required.</p> <p>This suggestion is considered to be a positive addition to the guidance. Although it is envisaged that more comprehensive guidance will be provided in Part E of the Biodiversity, Trees and landscape SPD, and officer seek the tree officer's advice regarding any scheme of landscaping for new development Paragraph 9.2.2 (g) will be amended.</p>	<p>None required.</p> <p>Paragraph 9.2.2 (g) to read 'Tree screening along boundaries can help to retain the privacy of neighbouring properties. However, trees do not necessarily provide a permanent screen throughout the year. The type of tree/vegetation to maintain</p>

	<p>neighbours. Just as Laylandii were discouraged a few years back for growing too high for small town gardens and where a shrub may grow 8 ft wide, it should be planted no closer than 4ft to the boundary.</p> <p>Planting the trees and shrubs so that they can be pruned without encroaching into neighbouring properties or needing to be too severely chopped annually to the detriment of the tree or shrub.</p> <p>I think that these suggestions could avoid a neighbour dispute.</p>		<p>privacy should be chosen so as to avoid future neighbour disputes regarding over dominant tree or vegetation species and should be plated so as to avoid encroachment onto neighbouring resident's land. '</p>
<p><b>22 (7)</b></p>	<p>1. Generally in support of the draft SPD but seeking changes.</p> <p>(Light, privacy and outlook) 2a. Yes. 2b. Yes. Further comments: 9.2.2 is very important and these guidelines must be policed by the Planning Department.</p> <p>(Amenity space) 3a. Yes. 3b. Yes. Further comments: Section 8.2 is well liked.</p> <p>Section 9.1.2 is well intended but there is little evidence of this in Radlett. Fine gardens are built on, small houses are replaced with larger ones and</p>	<p>None required.</p> <p>None required. None required. None required.</p> <p>None required. None required. None required.</p> <p>The aim of the SPD is to provide guidance regarding the acceptability of the design of development in order to improve the design of development within Hertsmere.</p>	<p>None required.</p> <p>None required. None required. None required.</p> <p>None required. None required.</p> <p>None required.</p>



	<p>mediocre blocks of flats which is ignoring the guidelines.</p> <p>Section 9.3 is good.</p> <p>(Garden land development)</p> <p>4a. Yes. 4b. Yes</p> <p>Further comments: Section 9.7 is desperately needed and residents (not developers) will support this.</p> <p>This section should apply to extensions as it will give the go-ahead to anyone who wishes to extend a house to completely cover the garden.</p> <p>(Internal space standards)</p> <p>5a. Yes. 5b. Yes.</p> <p>(Any other comments)</p> <p>6. Further comments: There are two missing elements in the guidelines.</p> <p>1. There is no clear mention of the impact of ground levels for sloping ground in the context of over dominance of proposed building work on neighbours. Without this being included, it is easy for planners to overlook such impacts.</p>	<p>None required</p> <p>None required. None required. None required.</p> <p>Part E of the planning and Design Guide provides guidance on residential alteration and extensions. The guidance states that the construction of extensions should not result in the significant loss of rear garden space. There are other safeguards provided in this part of the design guidance regarding side and front extensions also.</p> <p>None required. None required.</p> <p>'Section 9.4 states that Where the topography of a site or the locality contributes to increased visual dominance, consideration should be given to lowering the ground level or other such measures to reduce the overall visual bulk / dominance. Positive use can be made of changing ground levels across a site to</p>	<p>None required.</p> <p>None required None required. None required.</p> <p>None required.</p> <p>None required. None required.</p> <p>None required</p>
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	<p>2. There is little reference to the effect that building has on water apart from driveways being of porous materials:</p> <p>If an area of open land that is built on, what will be done with the water? Will it discharge to the sewer and where will it end up? There is concern about flash flooding. Walls also divert water and with the expected increased precipitation this should be taken into account such that new risks must be mitigated or be a reason to prevent such a building.</p> <p>Section 9.7.2 o. seems to give permission to completely pave over gardens in order to provide parking for vehicles. This runs counter to the vision within the design guidelines.</p>	<p>increase the size of buildings without increasing its mass (e.g. stepping a building up a slope).'</p> <p>Part D encourages small areas of permeable paving so that water can soak away naturally.</p> <p>For larger schemes, Hertfordshire County Council are the Sustainable Drainage Approval Body and will be responsible for approving, adopting and maintaining SuDS. A new section has been introduced to 8.1.2 u and v.</p> <p>Strategically Core Strategy policy CS16 and the Building Futures water module provides guidance that is considered should not be replicated within this SPD.</p> <p>This section reiterates the Council's requirement for adequate parking provision. All sections of this guidance are to be read together and not in isolation. Therefore, section 9.8 of the guide covers considerate parking design. In particular, section 9.8.2 states that large areas of impermeable paving would likely be refused.</p>	<p>None required.</p> <p>New paragraphs and an information box have been added. Please see the response to respondent 9.</p> <p>None required.</p>
<p>23 (1)</p>	<p>1. Generally in support of the draft SPD.</p> <p>2a. Ticked 'Yes'.</p> <p>2b. Ticked 'yes'.</p> <p>Further comments: Does not agree with garage doors having to be set back from the front of</p>	<p>None required.</p> <p>None required.</p> <p>None required.</p> <p>Ensuring that active frontages of main dwellings are the dominant feature in the streetscene rather the 'blank'</p>	<p>None required.</p> <p>None required.</p> <p>None required.</p> <p>None required.</p>

	<p>properties.</p> <p>3a. Ticked 'yes'. 3b. Ticked 'yes'.</p> <p>4a. Ticked 'Yes'. 4b. Ticked 'Yes'.</p> <p>5a. Ticked 'Yes'. 5b. Ticked 'Yes'.</p> <p>6. No further comments made</p>	<p>garages is considered to be 'good design' in most instances. Therefore, this approach will continue to be the preferable approach.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required.</p>	<p>None required. None required.</p> <p>None required. None required.</p> <p>None required. None required.</p> <p>None required.</p>
24 (4)	<p>Discussions have taken place between officers at Hertsmere and the Hertfordshire Building Futures Partnership regarding the integration of the new Building Futures Sustainable Design Toolkit within Hertsmere's Local Plan, supporting documents and development management processes.</p> <p>It is recommended that additional reference to the toolkit at sections Via the information boxes.</p> <p>This reference should appear as "Hertfordshire Building Futures Sustainable Design Toolkit: <a href="http://www.hertslink.org/buildingfutures">www.hertslink.org/buildingfutures</a>:</p> <p>- 8.1.2</p>	<p>It should be noted that as a result of the public consultation more references to building futures modules have been made.</p> <p>Recommended reference inserted in the information box.</p>	<p>More information can be found at Hertfordshire Building Futures Sustainable Design Toolkit (<a href="http://www.hertslink.org/buildingfutures">www.hertslink.org/buildingfutures</a>)</p>

<p>- 8.2.2</p>	<p>Recommended reference inserted in the information box.</p>	<p>Hertfordshire Building Futures Sustainable Design Toolkit (<a href="http://www.hertslink.org/buildingfutures">www.hertslink.org/buildingfutures</a>) and the Biodiversity, Trees and Landscape SPD....</p>
<p>- 8.3.1</p>	<p>Recommended reference is not inserted in the information box. The Secured By Design Principles and advice provided by the Hertfordshire Crime Prevention Design Officer is more focussed on designing out crime than the information in the sustainable toolkit.</p>	<p>None required.</p>
<p>- 9.9.2</p>	<p>The recommended change has been made.</p>	<p>More information can be found at Hertfordshire Building Futures Sustainable Design Toolkit (<a href="http://www.hertslink.org/buildingfutures">www.hertslink.org/buildingfutures</a>)</p>
<p>- 10.3.2</p>	<p>Recommended change made</p>	<p>Hertfordshire Building Futures Sustainable Design Toolkit (<a href="http://www.hertslink.org/buildingfutures">www.hertslink.org/buildingfutures</a>) and the Biodiversity, Trees and Landscape SPD...</p>
<p>- 11.1.2</p>	<p>Recommended change made.</p>	<p>Hertfordshire Building Futures Sustainable Design Toolkit (<a href="http://www.hertslink.org/buildingfutures">www.hertslink.org/buildingfutures</a>) and the</p>

	<p>- 11.2.2</p> <p>Reference should to building futures at: 9.3.2 (information box) and D39 should be changed to “Hertfordshire Building Futures Sustainable Design Toolkit: <a href="http://www.hertslink.org/buildingfutures">www.hertslink.org/buildingfutures</a>” for purposes of consistency and clarity.</p>	<p>Recommended change made</p> <p>Recommended changes made.</p> <p>Recommended changes made.</p>	<p>Further advice can be found from Hertfordshire Building Futures Sustainable Design Toolkit (<a href="http://www.hertslink.org/buildingfutures">www.hertslink.org/buildingfutures</a>)</p> <p>Now referenced as “Hertfordshire Building Futures Sustainable Design Toolkit: <a href="http://www.hertslink.org/buildingfutures">www.hertslink.org/buildingfutures</a>”</p>
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### Appendix 3: Table of changes

N.B. Deletions are crossed through; insertions are underlined. Where deletions have occurred as a result of changes made during the public consultation these are shown as a double strike through. Insertions added since the public consultation are shown as a double underline.

Page number (paragraph number)	Tracked change	Comment
D-1	<p>...Part E contains more specific guidelines on residential extensions. <u>Part F sets out more detail in relation to shop fronts. [New paragraph].</u></p> <p><u>Part D has been updated to reflect development pressures, experience, best practice and changes to national and local policy since its adoption. This draft contains proposed new chapters dealing with backland development and internal residential guidelines, as well as a number of minor changes.</u></p> <p><u>Minor development to include consideration of views and landmarks</u></p>	<p>This new text signposts Part F, which was adopted in September 2010, and explains that the document has been updated.</p>
D-2 - Objectives	<p><del>These guidelines are the planning and design considerations that the Council will take into account when assessing an application. All development proposals should take these guidelines into account.</del></p> <p><del>These guidelines and standards are the minimum requirements that should be adhered to in order for an application for development to be considered acceptable.</del></p>	<p>This change is intended to make clear that Part D constitutes guidance only and explain how this would be applied.</p>

<p><del>Each application will be judged on its merits having regard to the circumstances of the site and the prevailing character of the area. The Local Planning Authority will therefore look for developments that exceed these standards and the onus will be on the applicant to justify why these minimums have not been exceeded.</del></p> <p><del>A proposal that does not comply with the relevant guidelines is likely to be refused permission, unless it can be demonstrated that the proposal meets all the relevant objectives and is consistent with other design guidelines contained in the Guide.</del></p> <p><u>The Planning and Design Guide sets out guidance only. It should inform the design and assessment of development proposals. However, in some cases other relevant factors will result in new development legitimately departing from the Council's guidance.</u>  <del>Failure to comply with the guidance, or any of its constituent guidelines, should not necessarily result in a development being considered unacceptable.</del></p> <p><u>The Council recognise that not all forms of development require planning permission. Nevertheless, it is strongly encouraged that all development adheres to the standards in this guidance document.</u></p>	<p>After the public consultation, it was considered that the last sentence caused confusion and detracted from the meaning that proposal were expected to comply with the guidelines unless material considerations indicated otherwise</p> <p>This has been inserted as new permitted development rules are to be introduced on May 30<sup>th</sup> 2013 which could removes certain types of development from requiring planning permission and therefore being required to adhere to the standards within this guide. This statement does however, encourage the use of this guide whether planning permission is required or not.</p>
<p><del>Where a development that just meets the minimum standards set out is assessed as acceptable in relation to Part D of this Guide and is granted planning permission, the Council will assess whether it is appropriate to remove permitted development rights on the property by way of a condition attached to any</del></p>	<p>This wording change reflects the proposed emphasis on Part D as guidance only, allowing officers a certain level of flexibility.</p>

	permission granted.	
Header	<del>Draft update</del> <u>Dec 2012</u>	For clarity
(8.1.1 Objectives)	<ul style="list-style-type: none"> <li>• Safe <u>and secure</u></li> </ul>	Clarification on the recommendation of the Hertfordshire Constabulary Crime Prevention officer.
(8.1.2 h)	<p>...A range of design guidance on home zones has also been prepared by external organisations, including the Commission for Architecture and the Built Environment (CABE) <u>(now part of the Design Council)</u> Design Council, the Institute of Highway Engineers (IHE) and the Institution of Highways and Transportation (IHT).</p>	Updated information.
(8.1.2 n)	<p><del>Residential areas</del> <u>New residential developments should be located and laid out to provide ease of access to nearby local services and facilities, and to provide the wider community with easy access to any new services and facilities provided as part of the new development. Often the most effective way of achieving this is to ensure that the site is laid out so that new routes connect directly with the existing network of surrounding routes.</u></p>	This is a clarification and expansion of the existing guidance, which is considered necessary based on officer experience. It is adapted from the Urban Design Compendium.
8.1.2	<p><u>Sustainable urban Drainage Systems (SuDS)</u></p> <p><u>u. The design and integration of SuDS should be considered at an early stage of the development to ensure that the benefits of SuDS</u></p>	These paragraphs have been inserted on the advice of Environment Agency. It is considered that the Core



	<p><u>(attenuation, amenity, biodiversity and water quality) can be delivered.</u></p> <p><u>v. A site should be assessed for its topography, natural features, water bodies and flow paths so that the layout if the development can take into account opportunities to design SuDS features and integrate them into open spaces, public realm, roads and pathways.</u></p> <div style="border: 1px solid black; padding: 10px; margin: 10px 0;"> <p><b><u>① Further information:</u></b></p> <p><u>From 2014 larger development proposals will be required to seek approval for drainage systems for managing rainwater from Hertfordshire County Council as Hertsmere's SuDS Approval Body. Please see the website for more information:</u>  <a href="http://www.hertsdirect.org">www.hertsdirect.org</a></p> <p><u>Further information can be found on the Building Futures website (<a href="http://www.hertslink.org/buildingfutures">www.hertslink.org/buildingfutures</a>) and on the Environment Agency's website (<a href="http://www.environment-agency.gov.uk">www.environment-agency.gov.uk</a>)</u></p> </div>	<p>Strategy outlines Hertsmere's Approach to SuDS and advice given by the SuDS Approval Body (Hertfordshire County Council) and the Building Futures partnership should not be replicated, it is considered that a link to the advice provided by other organisations should be made in this document.</p>
(8.2)	<p>...The relationship between buildings, the street and other spaces and uses nearby, are key to the development of attractive and high quality neighbourhoods. <u>New development should respond to its surroundings and, as such, standard designs are often inadequate.</u></p>	<p>This is to make clear that each development should be designed in response to its environment and that standard designs that fail to do this risk being found unacceptable.</p>
8.2.1 Objectives	<ul style="list-style-type: none"> <li>• <u>Create safe and secure built environments:</u></li> </ul>	<p>Recommended insertion from crime safety officer.</p>
(8.2.2 a)	<p>...Meeting the <del>standards required by</del> <u>guidelines set out in</u></p>	<p>This wording change reflects the proposed emphasis on</p>

	the Local Plan/LDF and this Guide.	Part D as guidance only. The deletion of LDF reflects that the NPPF refers instead to Local Plans.
	i Further information: 'Biodiversity By Design' (Town and Country Planning Association), <del>'Integrating Biodiversity into Development: Realising the Benefits' (Essex Biodiversity Partnership), and 'Design for Biodiversity' and 'Building Green' (Greater London Authority), all Hertfordshire Building Futures Sustainable Design Toolkit and the Biodiversity, Trees and Landscape SPD gives further guidance on designing for biodiversity in developments.</del>	This alteration signposts the Council's Biodiversity, Trees and Landscape SPD, which was adopted in December 2010.  Reference is now made the Hertfordshire Building Futures Sustainable Design Toolkit and the Biodiversity, Trees and landscape SPD.
(8.2.2 i)	Development should respect the existing street pattern, <u>create active frontages</u> and provide buildings that front streets and integrate with surrounding development rather than being isolated within a site.	This is a clarification and expansion of the existing guidance, which is considered necessary based on officer experience. It is adapted from the Urban Design Compendium.
(8.2.2 k)	Buildings should be orientated to address streets and public spaces. <u>All main entrances and doors should be visible from the public realm.</u> Development that follows the boundary of the street block will help to create a clear distinction between public and private space. <u>Where a building sits on a corner site, it should turn the corner and address both frontages.</u>	This is a clarification and expansion of the existing guidance, which is considered necessary based on officer experience. It is adapted from the Urban Design Compendium.
(8.2.2 n)	<u>New development should help to create a sense of enclosure.</u> The width of new streets should be proportionate to the heights of buildings and its location (e.g. town centre, suburban, village / rural). <u>A continuous building line, with few significant gaps between buildings, can also help to create a greater sense of enclosure and lines of street trees can have an important impact along otherwise weakly contained</u>	This is a clarification and expansion of the existing guidance, which is considered necessary based on officer experience. It is adapted from the Urban Design Compendium.

	<u>routes.</u>	
(8.2.2 o)	Road layouts should be designed in accordance with the guidance set out in 'Roads in Hertfordshire: a guide for new developments'. <u>It is important that all new roads should be designed to an adoptable standard, regardless of whether it is intended that they are adopted by the Highway Authority. Where new roads are not designed to an adoptable standard, the onus will be on the applicant to demonstrate why this could not be achieved.</u>	This is a clarification and expansion of the existing guidance, which is considered necessary, given that HCC may no longer adopt all roads created by developments.
(8.2.2 r)	Buildings should not be separated from the street solely by areas of hard-standing such as car parking. <u>Car parking should not dominate building frontages.</u>	This is a clarification and expansion of the existing guidance, which is considered necessary based on officer experience. It is adapted from the Urban Design Compendium.
(8.2.2 s)	Development should aim to create a clear distinction between public and private spaces, for example by siting the building to follow the boundary of the street block <u>or through the use of landscaping</u> <del>(as well as through the use of landscaping screens, walls, fences, railings, gates, arches, signage and paving where appropriate).</del>	It was considered that the latter part of this paragraph could cause confusion regarding the Council's position on gates and railings that is set in paragraph 8.2.2 t.
(8.2.2 t)	Gates can define entrances and signal circulation routes. Gated developments can create a sense of segregation, reduce connectivity between developments and can increase fear and perception of crime and will be resisted by the Council. The installation of high security gates to the front of individual properties can have a similar effect and will also be resisted. Where planning permission is granted exceptionally for gates because of the particular circumstances of an individual property, they should be set back from the street <u>so that</u>	Extra clarification regarding the standards that apply when assessing gates have been added to ensure that the design of boundary treatments is appropriate and to tie in Highways safety, in line with Hertsmere Local Plan policy M2.

	<p><u>they do not dominate the street scene in any way or impact on highway safety</u>, modest in scale, well screened and capable of closing quietly. The same principles will apply to piers, columns and walls adjoining the gates.</p>	
<p>D-9 (under 8.3.1 (a))</p>	<p>...more likely to provide a safer environment. <del>Government guidance recognises that the environment is a crucial factor in influencing levels of crime, vandalism and anti-social behaviour, and the Council endorses the key principles of the government guide 'Safer Places - The Planning System and Crime Prevention' (ODPM, March 2004) which includes Aa...</del> series of key....</p> <p>i Further information box Secured by Design focus provides a range of information from ACPO Crime Prevention Initiatives on designing for security and crime prevention. See their website for more details: <a href="http://www.securedbydesign.com">www.securedbydesign.com</a> <a href="http://www.britishparking.co.uk">www.britishparking.co.uk</a></p>	<p>Removing reference to Safer Places which is recommended for deletion.</p> <p>Clarifying up-to date information.</p>
<p>D-9 (under figure 13)</p>	<p>i Further information: Designing out Crime, Designing in Community Safety: A Guide for Planning Authorities and Developers is a detailed guide produced by the <del>Architectural Liaison Service of the Hertfordshire Constabulary</del> <u>Crime Prevention Design Service</u>. For more information contact the <del>County Architectural Liaison Officer</del> <u>Crime Prevention Design Advisor</u>. Telephone: 01707 638865 355226 or email: <a href="mailto:john.white@herts.pnn.police.uk">john.white@herts.pnn.police.uk</a> <a href="mailto:michael.sibley@herts.pnn.police.uk">michael.sibley@herts.pnn.police.uk</a></p>	<p>This alteration is necessary to update the contact details in line with organisation name and personnel changes.</p>

	<a href="mailto:cpds@herts.pnn.policy.uk">cpds@herts.pnn.policy.uk</a> .	
8.3.2 Checklist	<u>When preparing Design Statements as part of an application submission early consultation with the Crime Prevention Design Advisor whose comments can be included in the Statement, is strongly advised.</u> The following checklist is also provided for developers and should be considered from the outset, in the planning and design stages of new proposals. Developers may wish to use this checklist when demonstrating how Secure-by-Design principles have been incorporated:	This sentence had been added in order to encourage early consultation with the Herts Crime Prevention Design officer.
(9.1.2 a)	...Higher density schemes will only be considered appropriate where it is clear that proposals would have no adverse effects on the surrounding area. <del>Development Control officers will help to balance any conflicting views regarding the potential affects of such developments on the surrounding area.</del>	In June 2010 PPS3 was updated to remove any reference to a minimum density requirement, so that densities could be better guided by local factors. The NPPF carries this change forward. The proposed change reflects current central government guidance.
(9.1.2 b)	The Council will not use numerical densities to assess the suitability of schemes of fewer than five units. <del>However, subject to the requirements of the previous paragraph, most residential developments of more than five units will be expected to achieve a density of at least 30 homes per hectare. It is recognised that some flexibility will be needed where such a density may well be harmful to the area. Nor will it adopt a prescriptive approach towards the density of any development.</del>	As above.
(9.1.2 e)	Design solutions should be applied where higher density development is proposed to ensure that proposals do not overly dominate its <u>their</u> surroundings. <u>For example,</u>	This is a clarification and expansion of the existing guidance, which is considered necessary based on officer experience.

	<u>underground or under-croft car parking (with appropriate security measures such as lighting) can help to reduce the visual impact of hard standing associated with car parking.</u> Access roads, car parking and landscaping should contribute to achieving a high quality development.	As a result of the public consultation with the Crime Prevention Design officer, the term 'such as lighting' has been removed to encourage measures other than lighting to be used.
(9.1.2 f)	Proposals for the intensification of existing residential land use, <del>such as through backland garden land</del> developments or the replacement of a large house with a series of smaller properties, <u>for example,</u> will be considered on their individual merits. However, they should be designed in a manner that achieves adequate garden space, parking space, cycle and bin storage, and without harming the character of an area. <u>Further guidance can be found in the section on garden land development.</u>	This change is required to signpost the proposed new section on garden land development.
(9.1.2 g)	<del>The development of large numbers of different backland schemes within close proximity of each other may irreversibly harm the character and appearance of an area. Much of the Borough is characterised by a pattern of established residential development with a limited capacity to absorb backland development and intensification. The Council will expect an applicant's site appraisal and design statement to demonstrate how proposals are being integrated into existing residential environments.</del>	This text is no longer required due to the proposed new section on garden land development.
(9.1.2 i)	...The mix provided should reflect the requirements set out in the Local Plan /LDF and latest Housing Needs Survey for Hertsmere.	The deletion of LDF reflects that the NPPF refers instead to Local Plans.

D-12	<p>i Further information:  <del>'The Provision of Affordable Housing – A Guide for Developers' Supplementary Planning Guidance</del> <u>The Affordable Housing SPD</u> contains more information of the Council's approach to affordable housing in development.</p>	<p>The altered text signposts the Council's Affordable Housing SPD, which was adopted in October 2008.</p>
(9.2)	<p>Light and, <u>privacy and outlook</u></p>	<p>New text to refer explicitly to outlook as a relevant material consideration.</p>
(9.2.2 a)	<p><u>New development should be designed so that residential outlook is not unduly affected. Windows serving habitable rooms should not look directly onto nearby blank walls.</u></p>	<p>This alteration explicitly refers to and seeks to safeguard residential outlook.</p>
(9.2.2 c)	<p><u>The first three metres of a residential rear garden's length is likely to be its most private area. Planning permission will normally be refused for development that allows direct and interrupted views from habitable rooms or elevated external areas into this part of a neighbouring garden.</u></p>	<p>This alteration provides additional clarity in relation to the protection of residential privacy. The Council already seeks to safeguard privacy and recognises that the area of garden immediately to the rear of a house is normally the most sensitive, as this is the area used most intensively by occupants.</p>
D-12 (9.2.2 d & e)	<p>Developments will be expected to maximise gaps between buildings, <u>to ensure that there is an appropriate level of enclosure and provide residential occupants with privacy particularly where there are facing windows. Where the front or side elevation of a new development directly opposes another front or side elevation (i.e. front-to-front, front-to side or side-to-side) the gaps between buildings should be determined by the distances required to create an appropriate level of enclosure and ensure a good street layout. [New paragraph].</u></p>	<p>This change is intended to encourage applicants to design new residential developments with the primary aim of achieving a good layout. It is considered that it is inappropriate to have design that is guided by the achievement of separation distances that do not relate directly to the specific context of a development. This is especially true, given the NPPF's requirement that design guidance should be concerned with delivering 'high quality outcomes', avoid unnecessary prescription and not 'stifle innovation, originality or initiative'.</p> <p>It should be noted that the Council has previously been</p>

	<p>Where <del>there are directly opposing a rear</del> elevations within <u>a new developments containing windows to habitable rooms directly opposes another rear elevation containing windows to habitable rooms (i.e. back-to-back), one and two storey buildings should be a minimum of 20 metres apart. Where such an elevation directly opposes a front or side elevation containing windows to habitable rooms (i.e. back-to-front or back-to-side), buildings should be a minimum of 10 metres apart. In cases where one or both of the opposing elevations does not contain windows to habitable rooms closer distances may be acceptable. <del>or 28 metres where one or both of the buildings is three storeys or more (front and rear elevations). Where further room(s) are provided in the roof space of a two storey building through the provision of rear dormer windows, a 28 metre distance should be maintained between the rear elevation and the facing elevations of other properties. These distances should be exceeded wherever possible and in all cases, where habitable rooms in existing homes are affected by new development. There will be an onus on applicants to demonstrate why it has not been possible to exceed the minimum distances set out above.</del></u></p>	<p>criticised at appeal by the Planning Inspectorate for refusing development on the basis of existing separation distances (planning application reference number TP/09/0596).</p> <p>Specific separation distance guidelines are retained in relation to rear elevations containing habitable rooms, to ensure that the privacy of rear gardens is safeguarded. This is consistent with advice set out within the Urban Design Compendium.</p>
(9.2.2 f)	<p>Where <del>opposing a rear</del> elevations <del>face each</del> <u>opposes another elevation at an</u> angle, there may still be some potential for overlooking without an adequate distance between buildings. The required distance between buildings will vary according to the angle between facing windows of habitable rooms. However, the <u>guidance guidelines</u> in the previous paragraph will be taken into consideration when assessing whether there is likely to be an unreasonable loss of privacy.</p>	<p>Alterations to reflect the main changes proposed elsewhere in relation to separation distances.</p>



(9.2.2 e)	<p><del>Where new developments propose buildings that face (front or rear) onto the side of existing buildings and vice versa, they should be a minimum of 16 metres they should be a minimum of 16 metres apart. These distances should be exceeded wherever possible and in all cases, where habitable rooms in existing homes are affected by new development. There will be an onus on applicants to demonstrate why it has not been possible to exceed this amount.</del></p>	<p>Alterations to reflect the main changes proposed elsewhere in relation to separation distances.</p>
9.2.2(g)	<p><u>... The type of tree/vegetation to maintain privacy should be chosen so as to avoid future neighbour disputes regarding over dominant tree or vegetation species and should be planted so as to avoid encroachment onto neighbouring resident's land.</u></p>	<p>So as to encourage considerate tree planting within schemes. This has been added as a part of the public consultation process.</p>
(9.2.2 h)	<p>While there is no 'right to light' <u>within planning legislation, a right to light exists under common law. In any case, it will be expected that</u> new buildings and boundary trees should not significantly reduce sunlight to the habitable rooms or solar collectors of neighbouring properties.</p>	<p>Paragraph updated to reflect other legislation that does protect 'right to light' and to emphasise the expectation that a decent amount of light will be sought to be maintained when assessing new development.</p>
(9.2.2 j)	<p>The layout of new developments should take into account any overshadowing by adjoining buildings, structures or trees so as to maximise the availability of light and promote energy efficiency. <u>[New paragraph]</u>.</p>	<p>This is a clarification and expansion of the existing guidance, which is considered necessary based on officer experience.</p>

	<u>In some cases it may be appropriate for applications to be supported by daylight / sunlight assessments of the type developed by the Building Research Establishment (BRE).</u>	
(9.2.2 k)	Balconies and roof terraces will not be permitted where they would result in the overlooking, shading and loss of privacy of neighbouring properties. <u>The screening of balconies and roof terraces may be necessary to protect neighbouring amenity.</u>	This is a clarification and expansion of the existing guidance, which is considered necessary based on officer experience.
(9.2.2 m)	Buildings should be built to a depth and shape that enables maximum light penetration into internal rooms. Buildings that are too deep will require artificial lighting and ventilation and reduce their ability to adapt to other uses over time. Buildings that are dual aspect are normally able to benefit from natural lighting and ventilation. <u>Light wells and internal courtyards can also be utilised, especially in respect of larger buildings.</u> See the Solar orientation and natural sources of energy section (page D-14) for more information.	This is a clarification and expansion of the existing guidance, which is considered necessary based on officer experience.
D-13	<del>i Further information: The Home Energy Conservation Act contains good practice guidance for integrating reduced energy consumption features into new and existing properties.</del>	This information is out-of-date and no longer relevant.
9.3.2 – Further information	Further advice can be found from Hertfordshire Building Futures Sustainable Design Toolkit ( <a href="http://www.hertslink.org/buildingfutures">www.hertslink.org/buildingfutures</a> )	Reference to Buildings Futures changed for the purpose of consistency and clarity

	( <a href="http://www.hertslink.org/buildingfutures">www.hertslink.org/buildingfutures</a> ) 'Building Futures: The Hertfordshire Guide to Sustainable Development' provides more guidance on designing sustainable buildings.	
9.5	<i>Setback' refers to the distance that a building is located from its boundaries to the street and to neighbouring properties. Buildings that relate to a common building line define and reinforce the street. Building setbacks should respect the character of the local area, the setbacks of other buildings in the street (particularly those next door), and the privacy and solar access of adjoining properties (see also <u>Light, privacy and outlook</u>).</i>	To update the paragraph in reference to the update of section 9.2
9.5.1	The Council wishes to ensure that new development across the Borough provides setbacks that: <ul style="list-style-type: none"> <li>• Complement the streetscape;</li> <li>• Avoid impacting on the light, privacy and outlook of neighbouring properties;</li> <li>• Provide flexibility in the siting of buildings; and</li> <li>• Allow for suitable landscaping and open space.</li> </ul>	As above.
D-17 (9.6.2 g)	The height and area of decking should be limited to what can be achieved without compromising the appearance of the property and the privacy of neighbouring land. <u>Where necessary screening should be used to protect neighbouring amenity.</u> Decking or paving over large areas of the garden can be harmful to local biodiversity.	This is a clarification and expansion of the existing guidance, which is considered necessary based on officer experience.
	House / bungalow size                      Minimum garden area	A garden space guideline for houses and bungalows

	<p><u>1 bedroom</u>                      <u>40m<sup>2</sup> per unit</u></p> <p>2 / 3 bedrooms                60m<sup>2</sup> per unit</p> <p>4 bedrooms                      80m<sup>2</sup> per unit</p> <p>5+ bedrooms                    100m<sup>2</sup> per unit</p>	<p>with one bedroom is proposed to provide advice in relation to this type of development. It has been arrived at by using the existing guidelines for larger houses and bungalows and is based on a sliding scale.</p>
<p>D-18 (9.6.2 l)</p>	<ul style="list-style-type: none"> <li>• In certain other circumstances, where an alternative design approach fully accords with the objectives and considerations set out in this section <u>and / or the prevailing character of an area; and</u></li> <li>• Where roof gardens are proposed; <u>and [New bullet point].</u></li> <li>• <u>In cases where amenity space would be provided off site via a planning obligation (to be read conjunction with the Planning Obligations SPD).</u></li> </ul>	<p>These are clarifications and expansions of the existing guidance and also cross reference the Council's Planning Obligations SPD, which was adopted in December 2010. They are considered necessary based on officer experience.</p>
<p>(9.6.2 m)</p>	<p>Flats and maisonettes should be provided with sufficient private useable amenity space <del>a minimum of 15m<sup>2</sup> of private useable communal garden space for every 20m<sup>2</sup> of internal gross floor space (or part thereof).</del> <u>1 bedroom units should provide at least 20 sq m of amenity space, with a further minimum 10 sq m of amenity space for each additional bedroom. Private useable amenity space can be either communal, allocated to individual units or a combination of these two options.</u> These amounts should be exceeded wherever possible and where there is scope to provide additional, useable garden space, the Council will expect this to be achieved. <u>Where any impact on neighbouring amenity would be acceptable, roof gardens are considered to make a valuable contribution towards garden space provision.</u></p>	<p>It is considered that the current guidelines for flats and maisonettes are restrictively high. If the Council wishes to realise its proposed policy of concentrating 95% housing in urban areas, and especially along the Elstree Way Corridor, then it is likely that flatted schemes will have to be built at relatively high densities. High densities mean that it is difficult to deliver large amount of private usable amenity space; in particular, it is considered unreasonable to expect that flats and maisonettes are provided with the same level of private amenity space as houses that are delivered at much lower densities.</p> <p>North Herts and Three Rivers as they include 18 sq m and 21 sq m for 1 bed flats plus 10 sq for each</p>



	<p><u>normally be expected to make provision for private usable communal garden space on the same basis as schemes of flats and maisonettes. The Council may exercise some limited flexibility in cases where it can be demonstrated that there has been an emphasis on the quality of landscape design, rather the quantity of space, to meet the specific needs of occupants.</u></p>	
(9.6.2 z & aa)	<p>The use of different colours, textures and materials in the hard elements of a landscaping scheme can create a sense of character and identity. <u>[New paragraph].</u></p> <p><u>Larger developments should normally include on-site play areas. Please see the Council's technical note on recreation provision for residential developments for more information including details of which schemes are eligible. Any on-site play areas should be located sensitively, so that the activities that take place within them do not cause disturbance to new or existing nearby residential properties.</u></p>	<p>This new text signposts the Council's technical note on recreation provision for residential information, which is due to be updated.</p> <p>It also seeks to protect the amenity of nearby residential properties.</p>
9.7	<p>NEW SECTION Garden land development</p> <p>The proposed guidelines address the following issues:</p> <ul style="list-style-type: none"> <li>• Garden space;</li> <li>• Outlook and light;</li> <li>• Density;</li> <li>• The pattern and rhythm of development;</li> <li>• Detailed design;</li> </ul>	<p>Whilst there is no automatic presumption against the development of garden land simply because it is not classified as PDL, officers are of the view that certain types of garden land development are capable of harming the character of established residential areas, in line with paragraph 53 of the NPPF which states that LPAs should consider 'setting out policies to resist [the] inappropriate development of residential gardens'. In particular, this is encouraged in situations where 'development would cause harm to the local area'.</p>

	<ul style="list-style-type: none"> <li>• Planting and landscaping;</li> <li>• Car parking;</li> <li>• Refuse storage; and</li> <li>• Vehicular access.</li> </ul>	<p>Between April 2008 and March 2010, prior to the relevant revisions to PPS3, the Council used Policies H8 and H10 and the existing guidelines set out within Part D to refused 24 out of 41 applications for garden land development. Only five of these applications were allowed at appeal out of a total 11 contested decisions. This demonstrates that the Council has been supported by the Planning Inspectorate in its approach to refusing permission for garden land development that it considers inappropriate.</p> <p>A new section of Part D is therefore proposed and generally applies guidance that can be found elsewhere (such as Local Plan policy H10 and H8) and in the document to the specific context of garden land in order to strengthen the Council's position in regards to this type of development.</p>
Further information box	<a href="http://www.communities.gov.uk">www.communities.gov.uk</a> changed to <a href="http://www.gov.uk">www.gov.uk</a>	To reflect recent changes to the government web site.
9.7.2 (m)	The Council will require that all healthy trees and hedges with amenity <u>and ecological</u> value be retained.	Ecological dimension is added after the public consultation. It is considered that Part B of the Biodiversity, trees and landscape SPD has more information regarding biodiversity.
9.7.2 (c)	<del>it is unlikely that</del> 'tandem developments' which are also known as two tier developments will <u>be discouraged as they are unlikely</u> improve the quality of an area. 'Tandem development' is where one house is built	Additional information added for clarity regarding the Council's position.

	<p>directly behind another and shares the same access....</p> <p>....Such development often results in a detrimental impact on the character of an area (<u>where the development would appear to be cramped or where large areas of hardstanding are introduced for example</u>), residential <u>amenity (where harmful levels overlooking is introduced)</u> and highway safety (<u>through long narrow accesses and small plot sizes where there is insufficient space within the site for vehicular maneuverability</u>).</p>							
9.7.2 (d)	<p>...It is unlikely to improve the quality of an area, <u>through the introduction of uncharacteristic patters and forms of development</u> and...</p>	<p>Additional information added for clarity in response to public consultation representations.</p>						
9.8.1	<ul style="list-style-type: none"> <li>Is safe for pedestrians <u>and vehicles</u>;</li> </ul>	<p>To clarify vehicular safety, on request of Herts Crime Prevention Officer.</p>						
(9.8.2 a)	<p><del>Residential and Non-Residential Parking Standards Supplementary Planning Guidance</del> <u>The Parking Standards SPD</u> provides more information on the requirements of off-street car parking provision.</p>	<p>The altered text signposts the Council's Parking Standards SPD, which was updated in June 2010.</p>						
(9.8.2 b)	<p>The current <u>maximum</u> requirements for parking for new residential developments are tabled below. These will be reviewed as <u>necessary part of the production of the LDF</u>.</p> <table border="0"> <tr> <td><u>Dwelling size</u></td> <td><u>Maximum number of car parking spaces</u></td> </tr> <tr> <td>Studio flat / bedsit</td> <td>1.75 spaces per unit</td> </tr> <tr> <td>1 bedroom flat/house</td> <td>1.75 spaces per unit</td> </tr> </table>	<u>Dwelling size</u>	<u>Maximum number of car parking spaces</u>	Studio flat / bedsit	1.75 spaces per unit	1 bedroom flat/house	1.75 spaces per unit	<p>The altered text reflects the revised content of the Council's Parking Standards SPD, which was updated in June 2010.</p>
<u>Dwelling size</u>	<u>Maximum number of car parking spaces</u>							
Studio flat / bedsit	1.75 spaces per unit							
1 bedroom flat/house	1.75 spaces per unit							



	<p>2 / 3 bedrooms <del>flat/house</del> 2.25 spaces per unit  <del>Flat/house with 4 bedrooms or more</del> 3.25 spaces per unit  <u>5+ bedroom</u> 4 spaces per unit</p>	
(9.8.2 c)	<p><del>In some locations, such as those that are well served by public transport, or where a range of services are available for trips made by foot, or on bicycle, it may be appropriate to provide parking at a lower ratio than those set out above</del> <u>Within accessibility zones (as set out within the Parking Standards SPD) the Council may allow a lower level of car parking provision. The maximum standard will constitute the starting point for negotiation and an</u> The onus will be on the applicant to justify this <u>any</u> lower provision.</p>	The altered text reflects the revised content of the Council's Parking Standards SPD, which was updated in June 2010.
(9.8.2 d)	<p><del>Major</del> <u>Larger</u> developments (as set out within the <u>Parking Standards SPD</u>) will be expected to provide parking spaces for disabled users, <u>motorcycles</u> and <u>other</u> powered two-wheelers.</p>	The altered text reflects the revised content of the Council's Parking Standards SPD, which was updated in June 2010.
(9.8.2 g)	<p>Developments should provide safe and secure storage areas for bicycles in accordance with the standards set out in the <u>Parking Standards SPD</u>. <del>County Council Cycle Parking Standards contained within the County Structure Plan Policy 25 Supplementary Planning Guidance on Parking Provision at New Development.</del></p>	The altered text reflects the revised content of the Council's Parking Standards SPD, which was updated in June 2010.
(9.8.2 h)	<p>...The applicant will need to check with the Council's</p>	The change in text reflects the most appropriate channel

	<del>Transport Planner</del> whether there is capacity within the CPZ for additional vehicles.	for enquiries.
(9.8.2 i)	<u>Perpendicular car parking</u> S spaces should be a minimum of 2.4 x 4.8 metres. <u>Parallel car parking spaces</u> should be a minimum of 2.0 x 6.0 metres. Where lifetime homes are provided as part of a development car parking spaces should be capable of being enlarged to 3.3 metres wide...	The Council does not currently have a guidance for parallel car parking space, which has resulted in some applicants making inadequate proposals. The guidance is adapted from Manual for Streets.
(9.8.2 j)	Car parking layout and design is to be carried out in accordance with the standards set out in the guidance issued by the Highway Authority (the County Council) and Local Plan <del>LDF</del> documents.	The deletion of LDF reflects that the NPPF refers instead to Local Plans.
9.8.1 Objectives	Bullet point three amended to read: <ul style="list-style-type: none"> <li>• Is safe for pedestrians <u>and vehicles</u></li> </ul>	Recommended change from the crime prevention officer.
(9.8.2 m)	The design of any paved parking, garages or vehicle access areas should be integrated into the streetscape and should not be visually dominating <u>or detract from the appearance of the development frontage. Off-street car parking should be located either to the rear, to the side, underneath or above of buildings. Off-street car parking to the side or rear of buildings should be broken up into small groups of no more than 6 spaces to avoid large, concentrated areas of car parking and should be well overlooked with and appropriate lighting scheme. Any on-street car parking should be also be broken up into small clusters of spaces, separated by areas of pavement,</u>	This is a clarification and expansion of the existing guidance, which is considered necessary based on officer experience. It is adapted from the Urban Design Compendium.  Since the public consultation this has been changed to include

	<u>street furniture and / or planting.</u>	
(9.8.2 r)	Parking can be provided underground or through an under-croft design in order to achieve more efficient use of the site. <del>Access driveways for</del> <u>The design of underground and under-croft car parking should:</u>	This is a clarification and expansion of the existing guidance, which is considered necessary based on officer experience.
D-25	Information box under figure 19:  <u>Last sentence to read 'Consideration should be given to achieving the ACPO Park Mark award where communal car parking is proposed.'</u>	The Park Mark scheme is a white tick where communal car parking areas are assessed in terms of its safety and security.
D-21 (9.6.2 aa and bb)	Service areas should usually be located to the rear of a development with access roads being as short as possible to minimise the distance travelled in close proximity to buildings. <u>[New paragraph].</u>  <u>Further guidance, including volume requirements, can be found within the Council's technical note on waste storage provision requirements for new developments.</u>	The change signposts the Council's technical note on waste storage provision requirements for new developments, which is updated regularly and available from Hertsmere's website.
(9.8.2 dd)	...This standard is equally applicable where it is proposed to install gates on a private driveway. <u>[New paragraph].</u>  <u>Garages and garage doors should not dominate the appearance of new developments. The front</u>	This is a clarification and expansion of the existing guidance, which is considered necessary based on officer experience.

	<u>building line of any detached or attached garage should be set back from the main front building line. The door of any integral garage should be inset.</u>	
(9.8.2 ee)	...Garages should therefore be a minimum of 3 x 4.8 metres. <u>Garage door openings should measure at least 2.5 metres.</u>	This guideline is intended to ensure that, in line with the existing guidance regarding garage sizes, garage doors are large enough to fit vehicles through. The specified size is based on commercially available garage door sizes and the existing guideline for internal garage sizes.
(9.9)	...This Statement should clearly explain how the provisions of Part M of the Building Regulations, British Standard 83000: <del>2004</del> <u>2009+A1:2010</u> and the <del>Disability Discrimination</del> <u>Equality Act 1995 2010</u> have been met...	This text change reflects changes to British Standards and legislation.
(9.9.2 a)	Proposals should include details of how accessibility requirements have been addressed where the building is required to comply with the requirements of the <del>Disability Discrimination</del> <u>Equality Act 2004 2010</u> .	This text change reflects changes to legislation.
(9.9.2 f)	For new residential developments, the Council <del>will seek to secure</del> <u>requires</u> that new homes are constructed <del>to a in accordance with the Lifetime Homes standard</del> <u>Design Criteria</u> . This will enable new homes to be both accessible to visitors with limited mobility and capable of adaptation without undue difficulty, to fully wheelchair-accessible housing. The 'ordinary' appearance of such properties means that most lifetime homes are indistinguishable from most other properties and developers are encouraged to build all new housing to the Joseph Rowntree <del>Standards</del> <u>Lifetime Homes Design</u>	This change reflects Revised Core Strategy (submission version) November 2011 Policy CS21.

	<u>Criteria.</u>	
New information box	<u>More information can be found at Hertfordshire Building Futures Sustainable Design Toolkit (<a href="http://www.hertslink.org/buildingfutures">www.hertslink.org/buildingfutures</a>)</u>	This change has been made after consultation with the Building Futures Partnership.
9.10	<p>NEW SECTION – Residential internal guidelines</p> <p>The revised version of Part D includes a new section setting out new residential internal guidelines, including:</p> <ul style="list-style-type: none"> <li>• Overall internal space guidelines for new dwellings;</li> <li>• Space guidelines for bedrooms;</li> <li>• Guidance setting out when single aspect dwellings will be considered an acceptable form of development;</li> <li>• Guidance setting out the Council’s expectations in terms of natural ventilation;</li> <li>• Cross referencing with the London Housing Design Guide (Interim Edition – August 2010) or any replacement document;</li> <li>• Guidance explaining when the Council will exercise flexibility in relation to internal residential guidelines; and</li> <li>• Details about the type of information about internal layouts that should support applications for new residential development.</li> </ul>	<p>Members at the 8 November 2010 Overview and Performance Committee asked officers to look at the possibility of introducing guidance for room sizes in new dwellings. Officers made a commitment to look at the possibility of introducing such guidelines through the planned review of Part D of the Planning and Design Guide Supplementary Planning Document.</p> <p>The current planning system, since its establishment in 1947, has always sought to protect the amenities of those occupying buildings and land and the National Planning Policy Framework (NPPF) at Paragraph 7 is clear that the planning system should perform economic, social and environmental roles.</p> <p>It seems reasonable, therefore, to view space guidelines as a material consideration in planning, given the emphasis of central government guidance on high quality homes.</p> <p>A report (HATC Ltd, <i>Room to Swing a Cat?: The Amount and Use of Space in New Dwellings in London &amp; the South East</i> (March 2010) looking at the internal size of new homes in London and south east England –</p>

		<p>including Hertfordshire – found that, on average, the amount of space provided fell short of established good-practice and safety-net guidelines which was supported by another report commissioned by the GLA in 2006 (GLA, <i>Housing Space Standards</i> (August 2006), pp. 151-182).</p> <p>The proposed new section setting out residential internal guidelines adapts guidance set out in the London Housing Design Guide (Interim Edition, August 2010) by seeking a more flexible approach, by using only overall space and bedroom space guidelines. This will allow the market to have control over internal layouts, whilst ensuring the overall size of any dwelling is safeguarded. This is considered a reasonable approach, as it allows the Council to adopt robust guidelines without the expense of having to commission expensive research.</p> <p>The residential internal space guidelines set out in the document have been arrived at through:</p> <p>Taking a functional approach to calculate the minimum space required for each room (based on occupancy) to meet the Lifetime Homes standard and to accommodate a basic inventory of furniture that is commonly required in particular rooms relative to occupancy, as well as allowing adequate access and activity space. Additional circulation space needed in dwellings above one storey was also taken into account.<sup>1</sup></p> <p>The approach taken to arriving at the guidelines are</p>
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<sup>1</sup> Mayor of London, Draft Replacement London Plan: Examination in Public – Housing Technical Note (August 2010), p. 19

		<p>universally applicable, looking at the basic needs of occupants, and not specific only to London. The basis for the assumptions about the types of furniture required and the activities that take place are based on national guidance produced by the National Housing Federation, the Joseph Rowntree Foundation and the Housing Corporation (now part of the HCA).<sup>2</sup></p> <p>Even so, it should be noted that Hertsmere borders London and has a close relationship with neighbouring areas in the London Boroughs of Barnet and Harrow, and development that takes place within these areas is subject to the London Housing Design Guide. It would not be irrational for the Council to expect that homes built within the Borough are of a similar quality to those in neighbouring locations.</p> <p>The revised version of Part D proposes guidelines setting out those circumstances in which single-aspect dwellings would be acceptable and highlights the importance of providing natural ventilation for rooms. These are also taken from the London Housing Design Guide.</p>
9.10.2 (b)	Inclusion of 1b / 1p @ 37m	In the interests of providing decent living space for single person household as a result of the public consultation process.

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<sup>2</sup> Ibid

9.10.2	<p><u>New further information box added to highlight where space standards have been taken from (The Draft London Plan).</u></p>	For clarity.
10.1.2	<p>Guidelines [New paragraph]</p> <p><u>Height and massing</u></p> <p>a. <u>The massing of a new building should respond to its surroundings, including other nearby architectural styles, relate to surrounding public spaces at a human scale and help to create a sense of identity.</u></p> <p>b. <u>The Design guidelines height of a new building should normally be guided through a careful consideration of how it will relate to the width of the street, and thus create good enclosure (see page D-5). The heights of neighbouring buildings should also help to inform the height of any new building.</u></p> <p>c. <u>In some cases taller buildings may be appropriate to line important routes, mark a gateway site, signify a place of civic, commercial or visual importance, or identify the location of a town centre or transport hub. The ground floor of a tall building should relate to surrounding streets and public spaces, through its design, detailing and use. Any tall building should also show consideration of the heights of neighbouring buildings and can step down to its neighbours or be wrapped with smaller, appropriately scaled adjoining buildings.</u></p> <p>d. <u>Buildings that are wide and / or deep should be modulated to help break up bulk. The use of varying</u></p>	This is a clarification and expansion of the existing guidance, which is considered necessary based on officer experience. It is adapted from the Urban Design Compendium.



	<p><u>materials and colours alone is not sufficient to successfully achieve this goal and the built form itself should be articulated using architectural features, such as projecting and / or recessed elements, blocks of varied heights, balconies, and roof forms. or a physical separation between blocks. In particular, breaking up large blocks with narrower vertical elements can help to soften the appearance of bulky buildings.</u></p>	
D-34 (under paragraph 10.3.2 f)	<p>i Further information: <u>'Biodiversity By Design' (Town and Country Planning Association), 'Integrating Biodiversity into Development: Realising the Benefits' (Essex Biodiversity Partnership), and 'Design for Biodiversity' and 'Building Green' (Greater London Authority), all Hertfordshire Building Futures Sustainable Design Toolkit (<a href="http://www.hertslink.org/buildingfutures">www.hertslink.org/buildingfutures</a>) and the Biodiversity, Trees and Landscape SPD gives further guidance on designing for biodiversity in developments.</u></p>	<p>This alteration signposts the Council's Biodiversity, Trees and Landscape SPD, which was adopted in December 2010.</p>
(11.1)	<p>...This guidance is applicable to developments that provide publicly accessible buildings with new public spaces <u>and should be read in conjunction with the Council's Streetscape Manual.</u></p>	<p>This alteration signposts the Council's Streetscape Manual, which was adopted in July 2012.</p>
Information box	<p><u>Hertfordshire Building Futures Sustainable Design Toolkit (<a href="http://www.hertslink.org/buildingfutures">www.hertslink.org/buildingfutures</a>) and the...</u></p>	<p>Insertion made as a result of the public consultation with the Building Futures Partnership.</p>
11.1.2 (m)	<p>The choice of lighting should be appropriate to the space being lit and avoid unnecessary energy use and light 'spillage', particularly on locations visible from the</p>	<p>Paragraph (m) to be amended to make defence to sensitive lighting where bats are/might be present although it is not the scope of the SPD to provide</p>

	<p>Green Belt or in other sensitive areas. Where bats are known to be present, advice on lighting should be sought from a qualified expert. In other sensitive areas, low-level bollards or footlights could be more appropriate to light footpaths than lamp columns, which could cause areas of shadow or shine into residential windows.</p>	<p>comprehensive design advice regarding lighting and bats.</p>
D-36 (under 11.1.2 g)	<p>i Further information: 'Biodiversity By Design' (Town and Country Planning Association), 'Integrating Biodiversity into Development: Realising the Benefits' (Essex Biodiversity Partnership), and 'Design for Biodiversity' and 'Building Green' (Greater London Authority), all <u>The Biodiversity, Trees and Landscape SPD</u> gives further guidance on designing for biodiversity in developments.</p>	<p>This alteration signposts the Council's Biodiversity, Trees and Landscape SPD, which was adopted in December 2010.</p>
D36 Design tip box	<p><u><i>...Further advice can be found from Hertfordshire Building Futures Sustainable Design Toolkit (www.hertslink.org/buildingfutures)</i></u></p>	<p>Insertion made as a result of public consultation with the Building Futures Partnership.</p>
D37 Further information	<p><b>ⓘ Further information:</b> <i>Consideration should be given to BS 5489-2013 when designing a lighting scheme.</i></p>	<p>For further information.</p>
D-39	<p><b><u>Glossary</u></b></p>	<p>Glossary of common terms has been added</p>
D-40	<p>Access and Design Statements - Disability Rights Commission: <u>www.planningportal.gov.uk</u><del>www.drc-gb.uk</del></p>	<p>This page has been updated to reflect changes to the resources and guidance signposted in Part D.</p>

Lifetime Homes - Joseph Rowntree Foundation;  
[www.lifetimehomes.org.uk](http://www.lifetimehomes.org.uk)

Sustainable Energy By Design - Town and Country  
Planning Association;  
[www.tcpa.org.uk](http://www.tcpa.org.uk)

~~The Home Energy Conservation Act~~

~~Biodiversity:~~

- ~~• 'Biodiversity By Design' (Town and Country Planning Association)~~
- ~~• 'Integrating Biodiversity into Development: Realising the Benefits' (Essex Biodiversity Partnership)~~
- ~~• 'Design for Biodiversity' and 'Building Green' (Greater London Authority)~~

~~Crime Reduction:~~

- ~~• [The British Parking Association](http://www.britishparking.co.uk)~~
- ~~• [www.britishparking.co.uk](http://www.britishparking.co.uk)~~
- ~~• [Designing out Crime, Designing in Community Safety: A Guide for Planning Authorities and Developers](#) - Hertfordshire Constabulary Architectural Liaison Service.~~
- ~~• [Secured by Design Focus](#) - Association of Chief Police Officers Crime Prevention Initiatives:  
[www.securedbydesign.com](http://www.securedbydesign.com) and [www.saferparking.com](http://www.saferparking.com)~~
- ~~• [Institute of Highway Engineers Guidance note:](#)~~

Additional information provision.

The word focus removed

Residential parking

- English Partnership: 'Car parking: what works where'
- University of Huddersfield 'It looks good but what is it like to live there?'

(For more information contact the Crime Prevention Design Advisor County Architectural Liaison Officer.  
Telephone: 01707 638865- 355226 or email:  
john.white@herts.pnn.police.uk  
~~michael.sibley@herts.pnn.police.uk~~  
[cpds@herts.pnn.policy.uk](mailto:cpds@herts.pnn.policy.uk)

Hertfordshire County Council:

- ~~Building Futures – A Hertfordshire Guide to Sustainable Development~~: Hertfordshire Building Futures Sustainable Design Toolkit:

[www.hertslink.org/buildingfutures](http://www.hertslink.org/buildingfutures)

- ~~Cycle Parking Standards contained within the County Structure Plan Policy 25 Supplementary Planning Guidance on Parking Provision at New Development~~
- Roads in Hertfordshire - Highway Design Guide:  
[www.hertsdirect.org](http://www.hertsdirect.org)

Hertsmere Borough Council Supplementary Planning Guidance:

- ~~Guidance Notes for Developers on the Collection of Domestic Refuse (2000, updated 2003)~~
- ~~Non-Residential Car Parking Standards (2003)~~
- ~~Recreation Provision for Residential Development~~

Generic email address added

Insertion made as a result of the public consultation with the Building Futures Partnership.

~~(2001, updated 2003)~~

- ~~• Residential Car Parking Standards (1999)~~
- ~~• The Provision of Affordable Housing – A Guide for Developers~~
- Affordable Housing SPD (2008)
- Biodiversity, Trees and Landscape SPD
- Parking Standards SPD (updated 2010)
- Planning Obligations SPD (2010)
- Technical note: Waste storage provision requirements for new developments

Other Hertsmere Borough Council publications:

- Streetscape Manual