

## Consultation Summary for new South Oxfordshire Design Guide

### Appendix C: Most common remarks

#### Presentation, structure and style: 17

Respondent ID/Organisation	Comments	Council's response:
1	The graphics are good and the document is not too wordy.	<p>Noted.</p> <p>We are seeking to update the images to ensure they are relevant.</p> <p>A low resolution version will be available to download and we will break up the file into different parts if necessary.</p> <p>It is possible to view the document at different scales online and zoom in and out.</p> <p>The checklists are numbered but the remaining text was limited and adding a numbering system to it would affected the overall formatting and appearance of the document.</p>
4	I liked the format and found it to be a very accessible document.	
South Vale Building Control	Really easy to read, very concise (always welcomed) and exciting document	
7	First impression is promising, relatively jargon-free and user-friendly!	
Historic England	Historic England welcomes the Council's initiative in the production of this generally excellent, comprehensive and attractively presented Design Guide.	
JPPC	Some of the images are meaningless/valueless. The table on page 17 cannot be read as a PDF version The very high file size of the document (80mb!!) will have put many off using it and is not at all user friendly. Pdfs are great as they allow a search facility, but taking 5 minutes to download is far too high.	
15	The new Part 1 and Part 2 are very clear and attractively presented.	

Louise Moreton	50 pages and 80MB!!! Can I suggest you rethink the format of this document.	
28	I found the document difficult to read on screen, perhaps a website presentation would be better. The green print used for headings did not stand out and was difficult to read. The illustrations are reminiscent of a book for children - I presume that this is a reference for professionals?	
Oxford Brookes University	<p>I think it is great that you have mixed graphics so that the first impression is of a friendly and engaging document. The structure is very clear and the balance between text and graphics is also really good and provide a good way to understand the 'message' either by reading or by looking at the 'how to' process that the graphics show.</p> <p>The hand drawings give an impression of openness and friendliness which is great. The fact that it is condensed and mostly focused on design principles rather than on very detailed mandatory codes is a fantastic feature. The guide feels exciting.</p>	
Persimmon Homes	<p>Document does not include a numbering system.</p> <p>Size: It is ridiculous that a 50 page document is over 80mb, surely a low resolution on line version can be made available. This makes the document inaccessible.</p>	

	The Council have made the document inaccessible through the very size; and should ensure the final version is available in a low resolution format.	
33	It would help if the design guide was easier to download.	
Rachel Aldred	The structure of the document works very well, however, when reading it on-line it is not as easy to grasp how the document is structured. I therefore think it would be useful to have a graphic at the start that more clearly explains the structure that I am able to refer back too. Could pages of the pdf be bookmarked to facilitate this?	
SODC Planning Policy	The text is quite small. P32 & 33 – Figures need references and also details of where these places are.	
Swyncombe Parish Council	Compliments to the author(s) of this document. It is clear, concise, comprehensive and will be a most useful supplement to the NPPF and the Chilterns Buildings Design Guide.	
Watlington Parish Council	The appearance of the document is appealing and invites closer examination, but it is not clear who the intended audience is.  It seems too elementary to be aimed at professional developers / designers, but they are the people who will be doing the real design work and so are the people that the Guide should be trying to influence. On the other hand it is pitched at about the right level for parish council planning committees or groups preparing Neighbourhood Plans. As far as Neighbourhood Plans go it provides ideas that could be incorporated as	

	<p>policies, but is not going to be that easy to reference because of its relaxed structure and style.</p> <p>The checklist approach in both the Guide and the Technical Documents is good, but there is not always enough supporting text to make the checklist clear. It would also be useful to have more explicit references to these Technical Documents in the Design Guide – some references are included, but others are not. Only four out of eight of them are referenced in the body of the Guide although a further one is referenced in the introductory text.</p> <p>The use of illustrations is not as clear as it might be with a tendency to borrow illustrations from the old Design Guide without making it clear what the relationship to the text on the page is.</p>	
Chilterns Conservation Board	The Board supports making the document more user friendly and interactive.	

Relevance to small-scale development: 8

<b>Respondent ID/Organisation</b>	<b>Comments</b>	<b>Council's response:</b>
1	Could do with more guidance for small infill sites (1-5 units) where a small developer may need to be convinced to improve the environment and setting through good design.	The principles outlined in the design guide are applicable to all scales of development. We have emphasised this message throughout the document as a result of the consultation. An example of how

Chilterns Conservation Board	The new Design Guide itself appears to be a generic and basic introduction to Urban Design for major developments, rather than containing advice on architectural design appropriate to the South Oxfordshire area.	to apply these principles to small scale development has been added at the end of the guide.
Goring Heath Parish Council	It is completely silent on the reality of nearly all planning applications that are actually submitted.  It is noted that all principles and criteria are relevant for all scales of development. We believe that this is over-prescriptive.	
15	I think that part 1 + 2 should have an explanation about application to smaller sites for the benefit of the public. Many sites are of up to 10 dwellings.	
Historic England	The intended wide applicability to audience and scale is ambitious and, we feel, not entirely successful. Whilst we accept that many design principles are applicable at any scale, we feel that for more complicated and large scale applications the guide provides a comprehensive approach but for single dwellings, extensions and other householder applications it may be an intimidating and lengthy document.  Suggest providing individual documents including only those sections of the design guidance that are relevant to make use the document more helpful in guiding applicants through the assessment and design process and/or examples of how to apply the principles in the Guide at a smaller scale of development.	

JPPC	<p>The draft design guide states that all proposals should be tested against the Guide. However, it is clearly intended for larger developments and will be of very little use for smaller scale developments.</p> <p>Smaller scale developments are the vast majority of planning applications. If this is intended to replace the previous guide in total, then it will be little used which will undermine its purpose and it might as well say ‘all proposals must respond to their surroundings and will be scrutinised by professionals’.</p> <p>Design review not appropriate for smaller schemes.</p>	
SODC Planning Policy	<p>P22 – We should explain that this applies from both strategic sites, to small infill developments and an extensions to dwellings.</p> <p>Overall – the design guide is good for large scale residential schemes however, it seems to be based largely on residential development rather than commercial or other uses and doesn’t provide much information on how it would be used by a layperson or; how a small scale scheme should consider good design.</p>	
Swyncombe Parish Council	<p>We similarly approve of the goals stated in chapter 8 (pages 44 &amp; 45), both in the setting of design codes and choice of materials, but which should apply equally to single dwellings and minor developments (up to 4/5 dwellings).</p>	

There is too much of an urban emphasis to the guide: 6

Respondent ID/Organisation	Comments	Council's response
Benson Neighbourhood Plan Steering Committee	The guide appears in essence to be a manual for urban design with a loosely-connected section on the character of South Oxfordshire. The main emphasis appears to be on a generic urban context and gives little weight or space to the largely rural nature of the District or the character of its village communities.	<p>Part 1 of the guide refers to the rural character of South Oxfordshire. We are aware of the predominant rural nature of the district and have reviewed all the principles in the guide to make sure that these are applicable to all scales and context of development. A section on how the principles of the guide can be applied to a small scale development has been added at the end of the guide.</p> <p>Urban design is a discipline that relates to the design of our cities, towns and villages. It is a collaborative and multi-disciplinary process of shaping the physical setting of where we live, work and socialise. It is the art of making places no matter the context. Therefore the word 'urban' is not be taken literally but rather as a way of describing a discipline.</p>
Brightwell cum Sotwell Parish Council	The guide is written almost entirely from the standpoint of good urban design. It requires a further section directed specifically at the rural environment. The Guide recognises the importance of context, but its more detailed guidance will often conflict with it in a rural environment.	
7	Although the intro talks a lot about countryside and villages, most of the detail is about urban or suburban development. Maybe a few of your drawings or comments could be changed so that they portray villages rather than suburbia?	
Goring Heath Parish Council	Appears to wholly address issues of design in an urban setting, despite South Oxfordshire being a predominantly rural area.	
Kidmore End Parish Council	The guide is biased towards urban and suburbs rather than rural areas.	
Swyncombe Parish Council	It is almost exclusively relevant for urban developments and does not take adequately into account the need for 'high quality rural developments'. This is particularly	

	important for South Oxfordshire, which is predominantly rural and will, therefore, present specific infrastructure, building design, housing development and connectivity challenges.	
--	---	--

Consultation: 6

<b>Respondent ID/Organisation</b>	<b>Comments</b>	<b>Council's response</b>
Henley Society	On p.13, it is surprising that, in the list of organisations that should be consulted by developers, town and parish councils are at the bottom of the list - they should be much higher up. Also the list should local civic societies such as the Henley Society.	Town and Parish Councils have been elevated in the list.
JPPC	Two-stage consultation process not relevant to minor proposals.	We cannot insist on this approach but recommend it as best practice.
Mobility Issues for Goring and Streatley	Under "who to consult", should the list also include someone with expertise on needs of disabled and/or elderly?  Should the list of statutory authorities and organisations also include "equality", "equal opportunity" and/or "diversity" officers of local authorities?	We have added this to the list.
Oxfordshire County Council	Could Public Health be added to the list of example areas covered by OCC for consultation?	Added.
Persimmon Homes	Design Review: The document sets out a statement in relation to Design Review process. It is unclear how the Council expects this to be utilised. The Council should	We agree and recommend it as best practice.



	also be aware that Design Review is a process that can take place at any stage and should ensure that site allocations in their own Local Plan are considered through a Design Review process.	
Swyncombe Parish Council	Who to consult' (page 13): we note that no mention is made of the Chiltern Society, nor the CPRE.	

There should be more reference to the Chilterns AONB: 5

<b>Respondent ID/Organisation</b>	<b>Comments</b>	<b>Council's response:</b>
7	You need to add Chilterns AONB to the list of relevant bodies near the beginning (not just North Wessex). All relevant bodies should be consulted, eg CPRE. AONB must be sacrosanct.	We have added the Chilterns Conservation Board to the list of consultees and we make reference to the Chilterns Design Guide.
Chilterns Conservation Board	There is no reference to the Chilterns Buildings Design Guide which has been adopted by SODC as SPG (see South Oxfordshire Core Strategy para 15.27), or its supplementary technical notes on Chilterns Brick, Chilterns Flint and Roofing Materials. Please add reference to these documents within the new Design Guide to signpost where to find detailed advice on designing in the Chilterns AONB.	
Goring Heath Parish Council	The guidance in the Design Guide could be applicable anywhere in the UK, it makes no reference to the character of the district and fails to mention Chilterns AONB.	

Henley Archaeological and Historical Group	We are very glad that the Chilterns AONB Management Plan, Chilterns Buildings Design Guide and Shopfront Design Guide remain part of the foundation blocks of the new SODC Supplementary Guide.	
22	Include reference to the prevention of light pollution in the Chilterns AONB if nothing else.	

### Internal space standards: 3

Respondent ID/Organisation	Comments	Council's response
19	There is no reference to the design of internal space standards	We have made reference to the Government's guidance on space standards.
Rachel Aldred	Space standards- I feel some aspiration ought to be included in Part 2: 7, or at the least some reference to storage requirements.	
39	There is no mention anywhere of minimum room sizes. UK has the smallest sqm spaces in the EU for dwelling of all types. We do not want to live in tiny boxes. There is plenty of land. Something like the Parker Morris standard SHOULD BE INCLUDED.	

### Respecting the existing context and character of the district: 3

Respondent ID/Organisation	Comments	Council's response:

<p>Benson Neighbourhood Plan Steering Committee</p>	<p>In defining distinctive character, it would be helpful if the list of building materials on page 17 could be more readily associated with the character areas identified on pages 15-16, and if more detail could be given about the distinctive use of the materials and e.g. the poor quality of the clunch.</p> <p>We suggest that it would be helpful to give more visual emphasis to the prime need to identify what is locally distinct before arriving at the design.</p>	<p>We have defined what we consider to be high quality development and high quality materials.</p> <p>We have emphasised the importance of context and respecting existing character and promoting design that complements and adds positively to existing character throughout the district.</p>
<p>Persimmon Homes</p>	<p>Expensive materials do not equate to a high quality finish and the thrust of the statement should be revised. High quality development is more than the materials used, but the cost is not a factor that should be considered.</p> <p>The emphasis of the document should be reviewed to consider new settlements and the potential to create a new character that is not related to an existing area.</p> <p>Bullet 8 requires development to reflect the surrounding area. This runs contrary to the principle of best use of land and SODCs desire to create new settlements. Such a strict objective should not be included. The objective would also rule out taller development in urban centres, such as Didcot, where higher density taller development around a transport hub would be considered highly appropriate.</p>	

	<p>Character Areas: The assessment of Character Areas does not represent a familiar picture of South Oxfordshire. Areas around Didcot are part of the historic county of Berkshire, where the vernacular is well described in Pevsner, which includes the traditional Berkshire style with hung tile and larger roof structures.</p> <p>The Character Areas seem to be focused on landscape areas, which do not necessarily respond to architectural character. Character Areas need to be reviewed and should have regard to a recognised architectural source.</p> <p>The document sets out the requirements to look beyond a site's red line. Whilst this approach is understood and supported; the Council often allocates sites within a red line and this assessment beyond the red line should be completed by the Council in formulating a policy for the site.</p>	
Watlington Parish Council	The local materials table gives a very variable level of detail. The lack of consistency risks losing some key local characteristics.	

Sustainable development: 3

<b>Respondent ID/Organisation</b>	<b>Comments</b>	<b>Council's response:</b>
Persimmon Homes	Para 2 sets out that well designed places are sustainable development. This statement is not correct and the	We have now provided a definition in line with the NPPF.

	Council should review this particularly given the weight the Council wishes to attach to this document. The document will be cited in appeal discussions with inspectors where the golden thread of the presumption in favour of sustainable development is key. This document will allow disconnected well designed development to be allowed at appeal.	
SODC Planning Policy	P7 – <i>Sustainable Development</i> : Differs from the definition provided within the NPPF. It is important that the whole document is NPPF compliant. No mention made of the environmental role of sustainable development.	
Tetsworth Parish Council	The term “sustainable” was too vague and not clearly defined what it would require from developments to be considered to be sustainable.	

### The historic environment: 3

<b>Respondent ID/Organisation</b>	<b>Comments</b>	<b>Council’s response:</b>
Benson Neighbourhood Plan Steering Committee	The section on Historic Features and Heritage on page 18 mentions only designated heritage assets and does not refer to the local value of non-designated assets. We are concerned that this does not tally with the NPPF, and could result in lack of regard for the historic but unlisted buildings that contribute to the character of Benson.	We now refer to non-designated heritage assets and they can be found within Conservation Area Appraisals.
Historic England	The guide underplays the importance of the historic environment in successful, sustainable design which the NPPF includes.	

Watlington Parish Council	The section on archaeology only mentions 'known' archaeological remnants or deposits. Surely it is necessary to discover if there are any previously unknown archaeological remains prior to development of a site in those cases where development is taking place in areas where there is potential for prior use of the land to left valuable archaeological remains.	We have a section on the historic environment and make links to relevant publications throughout.  This would be established through the pre-application or planning application process.
---------------------------	--	---

Amenity: 3

<b>Respondent ID/Organisation</b>	<b>Comments</b>	<b>Council's response</b>
Environmental Health	I think it would be useful to include guidance regarding the placement of vents from kitchen extractor fans, i.e. that consideration is given to neighbours and that extractor fans do not blow directly into a neighbours garden (noise, smell and appearance).	Noted and updated.
Paul Butt on behalf of Croudace Homes and the University of Reading	<p>The purpose of the draft Design Guide, I note is to "improve the standard of design in developments" and "break the mould of the standard design guide", although the draft Design Guide maintains the minimum back-to-back to distance guide line of 25 metres (pages 42 and 43).</p> <p>I would suggest that 21m back-to-back distance (common planning practice in relation to the consideration of mutual overlooking of dwellings) rather than the suggested minimum of 25m is progressed as I</p>	Noted and the checklist provides the opportunity for justifying a shorter distance where it is not possible to achieve 25 metres.

	<p>can't see a justification for a minimum distance of 25m in all circumstances.</p> <p>The only other 'standards' approach I've picked up on that is contrary to the stated intention of breaking the mould are also on page 42 in relation to: (i) the provision of adequate amenity space for each residential unit, including apartments (1 bed = 35sqm, 2 bed + 50sqm, 3 bed+ = 100sqm); and (ii) back to side minimum distances of 12m, front-to-front 10m, and back-to-boundary 10m.</p> <p>I note that, unlike the existing 2008 Design Guide, there are no caveats to either the 21/25m minimum back-to-back distance, or the amenity space, or the back-to-side and front-to-front and back-to-boundary distances.</p>	
Persimmon Homes	<p>Amenity Space: The minimum distances set out are overly prescriptive and are not based on any urban design best practice. This is further reinforced by the stated distance on page 43 of 21m back to back (compared to the 25m proposed on page 42). This is repeated in criterion 7.14, which should be amended.</p>	

Benefits for the existing community: 2

<b>Respondent ID/Organisation</b>	<b>Comments</b>	<b>Council's response</b>
Benson Neighbourhood	Step 4 specifies provision of shops and other facilities within a development. In Benson, however, there is	We have updated the value of good design to reflect the broader benefits. The guide seeks to

Plan Steering Committee	considerable community support for avoiding this in the interests of maintaining or improving the viability of existing shops part of a more sustainable commercial centre at the heart of the village. We feel that in this and other respects the draft guidance should perhaps consider the well-being of the community as well as the well-being of the development that will hopefully be part of it.	secure well designed schemes for existing and future residents.
Rachel Aldred	Some consideration of how the new development will benefit the existing community. What is there to draw in neighbours and knit this new development into its surroundings?	

**Suite of Technical Documents:**

Sustainable energy:

<b>Respondents ID/Organisation</b>	<b>Comments</b>	<b>Council's response</b>
4	The rural areas of South Oxfordshire are very attractive to developers to sell houses to commuters to Oxford, London and Reading, should the guidelines favour sites with good transport links such as nearby main roads or rail links? There is little point of having clear energy efficiency guidelines for new homes if their siting results in increased carbon emissions due to unnecessarily long commutes by car and increased road congestion.	Noted.



15	<p>The technical guide on Sustainable energy is encouraging but not encouraging enough of retrofit power generation and heat source pumps etc. There should be clear link between householder extensions and this technical note.</p> <p>The Building Conversion technical note is v restrictive and appears inflexible importance of sustainable energy should be included. Commercial buildings should all be required to include power generation of some sort. Particularly buildings with large low pitched roofs should be required to have photovoltaic panels.</p> <p>Commercial buildings should all be required to include power generation of some sort. Particularly buildings with large low pitched roofs should be required to have photovoltaic panels.</p>	<p>We have sought to provide cross links throughout the main guide and technical documents.</p> <p>Noted.</p> <p>Noted.</p>
Persimmon Homes	<p>The document does not appear to have regard to all other documents prepared. Persimmon Homes supports the creation of a homes which operate on a fabric first basis. There is no point in creating energy to be wasted within the home, and the energy in the home should be used efficiently. Building orientation should not focus solely on the potential for solar gain. Firstly solar gain is not necessarily a positive feature as this can lead to over heating of a property; secondly it disregards the contextual assessment of a site. The document appears to be trying to make energy requirements a planning consideration; however, the Government have clearly set</p>	<p>Noted.</p>

	out where a Local Authority can have control through the planning process in the PPG. These relate to accessibility; water efficiency and space standards. Energy efficiency is a requirement of the building regulations and should not be subject to planning requirements.	
SODC Planning Policy	No comments to make other than the document is very short and doesn't contain a great deal of additional information. It should be within the Design Guide to avoid duplication and integrate sustainability into the design from the start.	Noted.
42	I am very disappointed that I cannot find any reference to choosing an aspect for the new dwellings which will give south facing roofs, and that these south facing roofs should have solar panels. Nor can I find any other references to utilising energy sources where possible.	We have sought to include images and examples with the Sustainable Energy technical document.

Biodiversity:

<b>Respondent ID/Organisation</b>	<b>Comments</b>	<b>Council's response</b>
Brightwell cum Sotwell	P8. We support the first and third bullet points but the second bullet point is concerning because 'no net loss of habitat' might appear to condone removal and replacement, whereas continuity of the existing and natural evolution are more important in a rural context. This point is picked up again at p12 and we would argue that in the rural context the habitat should only be	The guidance echoes the Governments guidance in paragraph 109 of the NPPF.

	tampered with at all to the extent that is essential for a development, and only where it is then tampered with should the no net loss principle be relevant.	
Persimmon Homes	<p>Key Design Objectives bullet 2 sets a requirement for no net loss of habitat. This statement needs to be clarified, particularly in light of larger sites. Some biodiversity metrics will give a low score to an agricultural field, but due to the size of the site will require a very high level of biodiversity offsetting. In situations such as this the creation of new habitats should be accepted as offsetting, although not creating an increase based on the metric.</p> <p>The key elements of the document appears to be the 'Planning positively for biodiversity'. The document references that the Council applies a form of Biodiversity Accounting, but the details of this scheme are thin on the ground. As set out previously, where a large scale development comes forward on a green field site, the high quantity of low scoring habitats (such as arable fields) start to negatively impact upon developments. The Council needs to use a common sense approach to see mitigation and creation of habitats; but not to the level where strategic developments are required to deliver a net increase. The document sets out where planning conditions should be used. Obviously the PPG provides clear guidance on Planning Conditions and the document makes no reference to these requirements.</p>	See above.
SODC Planning Policy	Good information. Is this the correct place for it within the Design Guide?	Noted and updated for all.

Oxfordshire County Council	<p>In the Protected Species section should there also be some reference to Priority species in Oxfordshire such as hedgehog, brown hare and harvest mouse?</p> <p>Page 6 At this point, is it worth mentioning less frequently encountered protected species such as dormice, fish, aquatic and terrestrial invertebrates?</p> <p>Page 10 Should it also be noted that planning permission must first be secured and all conditions which are relevant and capable of being discharged, must be discharged?</p> <p>Page 11 Is it worth noting that 'proposed development' not only covers planning applications but permitted developments too?</p> <p>Page 12 Habitats: Is it worth mentioning Conservation Target Areas as some point? Other protected species associated with habitats could include fish and/or aquatic and terrestrial invertebrates. Page 13 Not all hedgerows are a priority habitat. Page 14 Should arable field margins be included as a habitat type?</p>	
-------------------------------	---	--

Landscape:

Respondent ID/Organisation	Comments	Council's response:

Earth Trust	<p>We fully support initiatives that encourage people to live in balance with the environment around them and encourage local and sustainable food practices such as reducing food miles or local food production, particularly on a community scale. We would like to see this type of advice specified and encouraged in the main Design Guide (Part 2) to encourage early consideration of such initiatives in the creation of design concepts and designs.</p> <p>We think that additional guidance should be added to the Biodiversity annex to the Design Guide to provide developers with additional guidance on how to identify biodiversity offsetting need and opportunities and the types of local organisations, such as Earth Trust, who could help them to facilitate these requirements.</p>	Noted and updated.
Natural England	<p>This SPD could consider making provision for Green Infrastructure (GI) within development.</p> <p>You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans.</p>	Noted and updated.
SODC Planning Policy	<p>What makes the landscape unique?</p> <p>Refer to Landscape and Visual Impact Assessment</p> <p>Test your design: Seems to repeat the design guide.</p> <p>Green Infrastructure: Nothing contained in this section.</p>	Noted and updated.

	<p>Play space: Mention passive surveillance?</p> <p>Insufficient weight has been given to the accepted methodology for Landscape Character Assessment.</p> <p>The description of items to be included in a landscape character assessment is confusing and limited in its scope.</p> <p>The document suggests that a Landscape Character Assessment (LCA) has been carried out but it does not make it clear whether each planning application should be carrying out a full LCA or whether applicants should refer to existing LCAs that have been carried out in the district. It would be sensible to refer to existing national guidance such as that by Natural England.</p> <p>While the 'further information' section includes the National Landscape Character Area Profiles there is no discussion about different levels of assessment. Methodologies elsewhere in the country commonly increase the level of detail to Landscape Character Types within Landscape Character Areas within National Character Areas.</p> <p>The further information section also refers to the emerging Oxfordshire County Council Historic Landscape Character but the technical document does not explain how this might fit in with contemporary landscape design.</p>	
--	--	--

	<p>The Landscape Institute and the Institute of Environmental Management and Assessment (and its predecessor the Institute of Environmental Assessment) since 1995 have published joint guidelines on good practice in Landscape and Visual Impact Assessment. Their industry recognised standards for such assessment are set out in the 2013, Guidance for Landscape and Visual Impact Assessment 3 (GVLIA3).</p> <p>GVLIA3 clearly sets out two paths, one for formal landscape and visual impact assessment (LVIA) as a necessary part of Environmental Impact Assessment (EIA) and a more informal landscape appraisal path where EIA is not required. The Design Guide technical document should ask applicants to state clearly the path that they are on and therefore whether they are providing LVIA or informal appraisal.</p> <p>Rather than selecting aspects such as topography and trees to appraise it would be better to direct applicants to the GVLIA3 guidance methodology, which has an in-depth approach to the landscape as a resource not just a collection of views.</p> <p>The use of the term 'landscape structure' to over existing and proposed features in the landscape is over simplistic. Existing landscape features should be covered adequately in LVIA or appraisal so this section should be called something like 'new landscapes' or 'design'.</p>	
--	--	--

	<p>There also seems to be a lack of clarity in the artificial separation in the text between 'landscape structure', 'green infrastructure', 'topography and strategic views', 'health, well-being and recreation' and 'play space'. All of these factors overlap. The criteria selected therefore do not flow well and it is not at all clear whether the applicant should 'test the design' against all or some of the criteria. The use of 'ensure your design...' in some places gives confusing emphasis to only some criteria.</p> <p>Major omissions include:</p> <ul style="list-style-type: none"> <li>• lack of reference to the principles of water sensitive design or Sustainable Drainage Systems (SuDS), which should be an essential part of any designed landscape for developments over a certain size</li> <li>• a lack of explanation of the relationship between landscape designs and Design and Access Statement</li> <li>• no reference to short or long-term landscape management plans and</li> <li>• no reference to designing in protection of existing structures, such as trees, during the construction period.</li> </ul>	
--	--	--

Shopfronts and Signage:



Respondent ID/Organisation	Comments	Council's response
Equality Officer	<p>Shopfronts: Consideration should be given to people with visual and mobility impairments in the design. Doors should be easily distinguishable from their surrounds. Door opening furniture that is easily reached, and which provides a secure grip, is of critical importance to disabled people, including disabled children. It should be possible to operate all door opening furniture one-handed, without the need to grasp or twist.</p> <p>Wheelchair users can also find it difficult to open and close doors when door operation is not power-assisted.</p>	Inclusive design is a key principle within the design guide.
15	<p>The Shop front guide needs to be clear what is meant by natural materials. Stand alone stainless steel or powder coated letters on traditional shop fronts can be acceptable.</p> <p>The shop front technical note is much the same as the old policy and needs more revision.</p>	Noted.
Henley Society	In the supplement on Shopfronts and Signage, p.3 of on-line copy, 10th bullet point, we would suggest that the text should read " illumination of fascias and hanging signs is discouraged" rather than "...is not encouraged".	Noted.
SODC Planning Policy	SODC already has a "Traditional Shopfront Design Guide" 1995 SPG.	

	<p>Is this technical document only for traditional shopfronts as per the SPG or for all shopfronts? There are lots of examples of excellent modern shopfronts which have brought new life to town centres. Examples of very poor shopfronts that we fitted in the 60s being upgraded to modern, inspirational designs which enhance the public realm. This technical document could be an opportunity to guide the design of modern new shopfronts. We already have the SPG to protect the traditional shopfronts. Again, if it is important information, why is it not in the Design Guide itself?</p> <p><i>“A strikethrough version of the guide is appended..”</i> Why is a strikethrough version appended when the full version is still available on the SODC website?</p> <p><i>“The design details of traditional shopfronts have their roots in the display of goods in medieval market stalls, although the shopfront as we now recognise it emerged only with the expansion of commercial activity in the 18th century.”</i> I’m not sure that the above is entirely correct or adds any value to the document.</p> <p><i>Traditional shopfronts in our district are increasingly threatened by the decline of the small individual retail outlet and the rise of larger stores with standard corporate images. Is this correct? It the threat now</i></p>	<p>Noted.</p> <p>The existing shopfront guidance is an SPD so we are still referring to it.</p> <p>Noted.</p> <p>Noted.</p>
--	---	---

	<p>increasing? Why? Larger stores are not new and there is not a rise in them.</p> <p><i>However, it is possible to integrate the needs of retail units and pay regard to the character of the building or surrounding streetscape. Perhaps highlight the value that more traditional designs can add to the shops etc.</i></p>	<p>Noted.</p>
--	---	---------------

Extensions and Alterations:

<b>Respondent ID/Organisation</b>	<b>Comments</b>	<b>Council's response</b>
<p>15</p>	<p>The insistence on side extensions being subservient to the original dwelling in all cases is totally unnecessary on houses built after 1930. In the case of houses built after 1980 this is very difficult to achieve especially in small houses with low ceilings and small footprints.</p> <p>There should be more encouragement of contemporary design in house design and environmental energy efficient elements on existing and new buildings rather than designating them as unsightly add ons.</p> <p>I am very disappointed that Sections 5 and 6 guidance on buildings and extensions seem to be the same as the last very constricting and proscriptive design guide. Were these 2 sections re written? I could not</p>	<p>It depends on the site context but generally, we believe that late extensions should appear visually subservient to the main dwelling.</p> <p>We agree and have tried to use contemporary examples.</p> <p>We have sought to update this element of the guide, whilst still keeping existing relevant information.</p>

	see anything new in them not even the illustrations which show the same mainly dull designs as before	
SODC Planning Policy	Could you provide a reference of what the 45 rule is	We will be explaining this.
Watlington Parish Council	For example Technical Document 5 twice refers to the 45 degree rule without ever explaining it. This is not a problem for design professionals who one hopes would know about it, but as the document is entitled “Householder Extensions” the rule should be explained for the benefit of lay users of the guide.  Similarly the “Roof lights should be included on rear elevations where they are less likely to be visible in the street scene” could be an instruction to use roof lights where possible, or it could be an instruction only to use roof lights where they will not be visible from the street.	Noted.
Mobility Issues Group for Goring and Streatley	The document is are largely silent on accessibility features and there appears to be no stated requirement to conduct or apply the findings of an accessibility audit nor to consider the accessibility needs of visitors, as distinct from the owner/occupier.	Noted. We have referred to the Building Regulations.
Kidmore End Parish Council	What is missing is the detail for extensions and outbuildings, which was very helpful in the old guide.	This has now been included.

Building Conversions:

Respondent ID/Organisation	Comments	Council's response
15	<p>The Building Conversion technical note is very restrictive and appears inflexible.</p> <p>The importance of sustainable energy should be included.</p>	<p>Noted.</p> <p>There is a separate technical document for this.</p>
SODC Planning Policy	<p>Need an explanation of the purpose of the document.</p> <p>Many changes of use are now permitted development</p> <p>It is too prescriptive and should not apply to "all types of conversion".</p> <p>Whether the building being converted is within the Green Belt, the AONB, a Conservation Area, is Listed etc are key factors.</p> <p><u>Retain the character of the setting:</u> This is contained within the design guide with greater detail.</p> <p>Assumption that the conversion is to residential? Retain characteristics is covered above.</p> <p>Existing internal features of interest should be integrated into the conversion where possible. Why?</p>	<p>Noted to all.</p>

	<p>No planning permission is required for refurbishment unless it is considered to be “development”.</p> <p>No structural survey is required – how will this be enforced?</p> <p>What is the legal definition of a “more historic building”? How does this differ from a “less historic building”?</p> <p><u>Additional information required (where applicable):</u> This list could be extended to include a transport assessment, noise assessment, cumulative impact assessment etc.</p> <p>Better to just refer to the validation checklist.</p>	
--	--	--

Trees:

<b>Respondent ID/Organisation</b>	<b>Comments</b>	<b>Council’s response</b>
Henley Archaeological and Historical Group	One matter of concern is the lack of emphasis on the problem of air quality in built-up areas. Should this not be dealt with in Technical Document No 4 under ‘Trees – Retaining and Planting’? All one can see is a squiggly sketch in a drawing of a street scene, saying ‘air quality’ or so it seems unless there is more in	Noted and updated.

	another part of the document which we have overlooked.	
JPPC	Size of tree pits should be 'appropriate' not necessarily agreed. A BS applies. It is not appropriate for every tree to be checked by a tree officer- it just cannot happen.	Noted and updated.
Persimmon Homes	<p>Criterion 8.12: This is not appropriate as it provides no range for the negotiations with the Council's Tree Officer;</p> <p>The document requires the use of larger tree species. This appears to be a false economy and should consider earlier planting of smaller trees to allow these to naturally grow. Matters such as management should be capable of being dealt with by condition and should not prevent commencement of development.</p>	Noted and updated.
10	Existing mature trees should be protected, on new estate sites, and further saplings planted. The latter should be adequately stated/ protected and watered. Residents can be requested to adopt your trees near their properties	Noted.

Public Art:

Respondent ID/Organisation	Comments	Council's response
----------------------------	----------	--------------------

<p>Persimmon Homes</p>	<p>The creation of art for arts sake is not something that is supported. Integration of artistic features within a development is welcomed, but if the art has an impact upon the best use of the land it should not become an over riding factor. The delivery of such initiatives should also be subject to viability assessments, the Council already seek significant contributions through CIL and affordable housing; the creation of additional costs relating to public art further dilute the ability to deliver viable schemes.</p>	<p>Noted.</p>
<p>SODC Planning Policy</p>	<p><i>Public art is art for the public specifically designed by artists for the purpose of public display (i.e. it is beyond the artist's work merely shown in public spaces). Is this the definition of public art?</i></p> <p>The images are local but a few national and international examples could also be added.</p> <p><i>Further Information: South And Vale of White Horse District Council Public Art Policy (to link)</i></p> <p>More information on how public art will be provided in relation to S106 and CIL is required. If this is to be our public art strategy then more information is needed.</p>	<p>Noted and updated.</p>