



**Wycombe District Council**

**Residential Design Guidance SPD**

**Consultation Report**

Results of Public Consultation and  
Summary of changes made to the SPD  
June 2017

## Contents

1. Introduction .....	3
2. How we engaged the community .....	4
3. Summary of written responses .....	6
4. Summary of changes to the SPD .....	10
Appendix 1 Response Summaries .....	12
Typos and other errors: .....	24
Appendix 2 Summary of comments made at Agents Panel Meeting.....	25

## 1. Introduction

- 1.1 Wycombe District Council formally consulted on the draft Residential Design Guidance Supplementary Planning Document (SPD) over eight weeks from 25 July to 16 September 2016
- 1.2 This guidance updates and replaces the current residential design guide contained within Appendix 1 of the Adopted Local Plan (as amended July 2013). It applies to all new residential development in the District and aims to ensure that all new residential development we build is designed well, contributes positively to the area and is great to live in for years to come.
- 1.3 It is underpinned by national policies in the National Planning Policy Framework and Planning Practice Guidance and further guidance provided in design publications including: Manual for Streets 1 & 2 (2007 & 2010); Building for Life 12; Urban Design Compendium Vol. 1 & 2 (Homes and Communities Agency) and BS5837 (2012) Trees in relation to design, demolition and construction.
- 1.4 It aims to show in detail how to achieve the design quality required from Policy DM35 Placemaking and Design Quality in the emerging new Wycombe District Local Plan.
- 1.5 Before the new Local Plan is adopted, this SPD will also relate to policies contained in the Delivery and Site Allocations Plan, Core Strategy and Local Plan which relate to residential development. In particular it follows key principles contained in Policies CS19 and G3.
- 1.6 Once the new Wycombe District Local Plan is adopted the references in this SPD will be updated to refer to the new Wycombe District Local Plan and the Delivery and Site Allocations Plan only.
- 1.7 This report
  - Provides an overview of how we sought to involve people in the formal consultation and information about previous consultations undertaken in the preparation of the SPD (section 2)
  - Sets out an overview of the written responses we received to the SPD (section 3)
  - Briefly summarises the proposed amendments to the SPD made in light of these comments (section 4)
- 1.8 The Council received 36 responses to the consultation which equated to 350 individual comments on a range of issues.

## **2. How we engaged the community**

### **Before the Draft SPD Consultation**

- 2.1 This first draft of the guidance was prepared following a review of the current guidance and drew on the principles contained in a number of key national guidance documents which were referenced throughout the guidance.
- 2.2 It also drew on workshops, a tour of recent developments and a resident's survey:

### **Workshops**

- 2.3 The Council carried out a series of workshops with members, officers and stakeholders in the spring and summer of 2013. The issues focused on were:
  - parking
  - amenity space
  - what the new guidance should cover

### **Quality Counts Tours**

- 2.4 The 2013 'Quality Counts' tour focused on residential design, visiting a number of recently completed residential schemes in Wycombe and Aylesbury Vale.
- 2.5 The 2014 'Quality Counts' tour focused on architectural design visiting a number of schemes in Wycombe District
- 2.6 The 2015 'Quality Counts' Tour focused on design and layout issues of major housing developments visiting four sites in South Oxfordshire.
- 2.7 The 2016 'Quality Counts' Tour focused on contemporary residential design visiting a number of sites in Cambridge

### **Residents Survey**

- 2.8 In 2013 the council carried out a survey of approximately 1000 residents of recently completed developments in the district.
- 2.9 Details of the workshops, Quality Counts Tours and survey are available on our website

### **During the draft SPD consultation**

- 2.10 The consultation ran from 25<sup>th</sup> July 2016 to 16<sup>th</sup> September 2016 and we engaged with people through asking for comments on the draft SPD.
- 2.11 People were made aware of the consultation through:

- Notifying all statutory consultees and everyone on our consultation database including parish councils, residents associations, other local groups and planning agents principally by email.
- Including information about the consultation in the Weekly Bulletin which goes out to interested individuals and organisations
- Placing hard copies of the SPD in local libraries and area information offices. All the consultation material was made available on the Council's website.

### **After the draft SPD consultation**

2.12 After the consultation we met with the Agents Panel to discuss the draft guidance. A summary of the comments made during that meeting can be found in Appendix 2

### **3. Summary of written responses**

- 3.1 This section sets out the overall written responses to the consultation and provides an overview of the issues that received most responses.
- 3.2 Overall the council received 36 written responses from individuals and organisations which equated to 350 individual representations. Detailed summaries are set out in Appendix 1 organised under the section headings of the SPD

#### **General comments**

- 3.3 33 individual representations were made covering the general aspects of the guidance.
- 3.4 There was general agreement on the need for the guidance. There was concern that the guidance as presented was too prescriptive and would not allow for flexibility and innovation. It was seen as being more suited to green field sites rather than sites within existing residential areas and there was concern that smaller sites would be less able to meet the standards.
- 3.5 More reference to national and local design documents was requested ensuring that these were not duplicated in the guidance itself.
- 3.6 To make the guidance more readable, summaries of each section were requested, as were more illustrations and a glossary.
- 3.7 Some concern was expressed that not all the planned topic areas are included in this edition of the guidance.
- 3.8 Minor suggestions/ corrections and additional references were suggested to be added to the guidance.

#### **Suggestions for additional sections/ guidance**

- 3.9 33 Individual comments were made regarding additional guidance areas
- 3.10 Several subject areas were suggested for future sections of the guidance including:
- 3.11 Context; legibility; designing in existing residential areas; guidelines to meet needs of older residents & disabled residents; design guidance for other building types; design guidance for rural areas; design in conservation areas; self-build; lighting; bin storage and public art; sustainable construction and adaptation to climate change; design details; preparation of development briefs and outlining the design process and pre application discussions.

- 3.12 It was suggested that a series of case studies to show how the guidance is applied would be of benefit.
- 3.13 Other suggestions included; providing areas to grow food; inclusion of parking reduction methods; using planning obligations to encourage employment and training of local people in the construction of the developments; designing interiors to facilitate adaptation and subdivision.

## Character

- 3.14 46 individual comments were made on the character section.
- 3.15 More clarity was sought on whether this section advocated reflecting the prevailing existing character or would allow the creation of areas with their own identity.
- 3.16 Most comments on this section were regarding how to judge and respond to existing character, how to respond to the varied topography of the district and the selection of materials. More simplicity and flexibility was advocated for the Character Traits Checklist while others thought this aspect was already covered through the Design and Access Statement and wanted to avoid the need for any other additional information. The position regarding materials was supported, but some wanted a more restrictive palette in areas covered by the Chilterns AONB and in Conservation areas, while others wanted more consideration of low carbon and recycled materials and those that are locally sourced. Topography was regarded as important in terms of views; building heights and the buildings making best use of it.

## Connections and movement

- 3.17 46 comments
- 3.18 The guidelines attracting the most comment were those addressing walking and cycling and the pattern of development. There was support for the approach taken to encourage good and close connections between development and facilities albeit with some amendments to the distances quoted and clarification over how these would be calculated. There was some comment that the guidance was too restrictive regarding perimeter blocks and that cul-de-sacs should not be discouraged.

## Green Infrastructure

- 3.19 70 comments
- 3.20 This section had the highest number of comments. There was general support for including GI in development and the aspects included in this section, but some were concerned with the effect this could have on delivering housing.

More clarity was sought regarding defining what GI is and there were suggestions for additional sections on soils; green roofs and walls; air quality; ground and surface water, lighting and retrofitting GI within existing residential areas. It was suggested that more reference be made to the role of sport, recreation and leisure.

3.21 Some respondents wanted stronger measures to encourage biodiversity and a clearer way to measure biodiversity gain, while others expressed concern on the impact of the measures on viability and housing delivery. There was fear that the protection of existing trees was too weak while concern that the 25% canopy cover requirement will further limit housing delivery.

3.22 There were many comments suggesting minor changes to wording and the detail of the guidelines.

### **Parking Design**

3.23 30 comments

3.24 Some felt there was an over emphasis on cars and wanted more recognition of potential future trends in work and household composition that could reduce or change parking demand. Some suggested there should be more emphasis on on-plot parking and less emphasis on on-street parking. Some suggested limiting the size of communal parking and there were mixed views on the role of rear parking. Suggestions were made to improve security. More clarity was requested on the position regarding rear parking and integral garages.

### **Building Relationships**

3.25 25 comments

3.26 There was concern that the guidance in this section was too onerous and could discourage innovation. It was considered by some that the privacy gap requirements were high compared to other local authorities. There was both support and criticism of amenity space requirements. Some respondents wanted just qualitative standards instead of quantitative ones, finding the depth of garden and sunlight requirements too restrictive.

### **Flat Design**

3.27 11 Comments

3.28 This section had the least number of comments. There was both support and disagreement regarding restrictions on single aspect flats. Concern was expressed over individual entrances for ground floor flats and the requirement for private amenity and balconies was seen by some as being too inflexible. It



was suggested that bin and cycle storage should be encouraged to incorporate green roofs.

## 4. Summary of changes to the SPD

- 4.1 Some of the comments made will be taken forward in the next iteration of the new local plan as they are beyond the scope of this guidance (for example the 25% tree canopy requirement).
- 4.2 Due to resources it is not going to be possible to bring forward the outstanding sections of the guidance as advocated by some respondents. It is planned they will be prepared before the new Local Plan is adopted in 2018.
- 4.3 The existing Housing Intensification SPD remains in force and provides much of the guidance requested in the comments regarding developing within existing residential areas, more reference will be made to it in this guidance.
- 4.4 The wording of guidelines will be reviewed to ensure they allow for flexibility in approach.
- 4.5 More reference to national and local design guidance will be included
- 4.6 Summaries at the start of each section and a glossary at the end will be added
- 4.7 Illustrations will be reviewed to ensure they are clear. More will be added where necessary.
- 4.8 The guidance will include more references regarding security and the needs of older residents.

### **Character**

- 4.9 It will be made clearer when proposals should reflect existing character or create new character
- 4.10 The character traits checklist will be reviewed so it is easier and simpler to use and that it does not duplicate requirements of Design and Access Statements.
- 4.11 References to further guidance regarding the selection of materials in Conservation Areas and the Chilterns AONB will be provided.

### **Connections and movement**

- 4.12 Sections on perimeter blocks and cul-de-sacs will be reviewed to ensure there is some flexibility in approach to layout.
- 4.13 The section on people friendly streets will be expanded / revised to give guidance on corners and special buildings

### **Green Infrastructure**

- 4.14 A better definition for Green Infrastructure will be provided

- 4.15 More reference will be made to the role of sports, recreation and leisure in Green Infrastructure.
- 4.16 The biodiversity section will be amended to make clearer how biodiversity gain is measured and ensure there is balance between biodiversity requirements and viability of developments.

### **Parking Design**

- 4.17 The guidance will be amended to clarify role of rear parking and integral garages.
- 4.18 Some key dimensions will be added to the plans
- 4.19 More guidance will be given on security and the balance of on-street vs on-plot parking will be clarified.

### **Building relationships**

- 4.20 The privacy gaps given in the guidance are long established being also in the precursor to this guidance (appendix 1) which was first adopted in 1996. Therefore it is not considered appropriate to reduce them as some respondents suggested.
- 4.21 However the new standards on the depth of garden and sunlight requirements will be reviewed to ensure they are not unduly restrictive.

### **Flat Design**

- 4.22 Some aspects of the guidance in this section will be clarified to avoid any apparent contradictions.
- 4.23 We will review the guidelines for single aspect; private amenity and individual entrances for ground floor flats to ensure they are not unduly restrictive.

## Appendix 1 Response Summaries

### Responses received:

36 people or organisations made written comments during the consultation period:

David & Diane Angus  
Ralph Briars  
Julie Cherry  
Ken Cooke  
Brian Gilbert  
Rebecca Griffith  
Sarah Lewis  
Edward Ley  
E. McKenzie  
J.McKenzie  
Alina Neagoe  
Gary Odell  
Jerry Unsworth  
Richard Rivett  
Daniel Scharf  
Robert Yates  
Alan Wright  
Anthony Wright  
I.L. Beeks (HW) Ltd  
Berkshire Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT)  
Buckinghamshire County Council  
Chilterns Conservation Board  
The Chiltern Society  
DP Architects  
Flackwell Heath Residents Association  
Highways England  
Historic England  
MSC Planning Ltd  
Natural England  
Thames Valley Police (Crime Prevention Design Advice,)  
Savills on behalf of Bloor Homes  
Sport England  
Wolf Bond Planning on behalf of Persimmon and Redrow Homes  
Wycombe District Council (Niki Huijer; Charles Power and Charles Brocklehurst)

## General comments about the SPD:

- Support for the guidance and need for high quality standards
- This guidance should be examined by independent inspector
- Allow for more flexibility & innovation by avoiding “will not” and “must not” statements
- Support for using the guidance on green field sites
- Use context to determine which guidelines apply to individual sites
- Standards adopted will have an impact on viability that may affect deliverability of some sites
- Guidance is too prescriptive and tick box orientated
- Guidance will stop development within existing areas
- Some guidance is contradictory and should be revised
- Over emphasis on privacy that reduces sense of community
- Include better reference to crime prevention measures and Secured By Design
- Refer to more to national guidance documents such as By Design, Manual for Streets, Secured by Design, Safer Places, or future best practice guidance
- Better reference and explanation of the Chilterns AONB and the Chilterns Buildings Design Guide
- Too focused on broader issues and not enough on details
- Don't duplicate guidance given elsewhere
- Further sections of guidance should be included now rather than in future editions
- Further sections added in the future should have the same level of consultation
- Include hyperlinks to reference documents
- Better and more illustrations and include photographs of best practice
- Provide summaries for each section
- Reduce text to bullet points so quicker to read
- Less words more pictures
- Use less jargon and explain those that are used through use of glossary and explain acronyms
- Include summary of amendments from previous policy
- Ensure that there are relevant policies in new local plan to cover all aspects of this guidance

## **Suggestions for additional subject areas the guidance should cover:**

- Understanding context
- Legibility of developments for visitors
- Designing in existing residential environments
- Design guidelines to meet needs of older residents and dementia friendly communities both for the building and the external environment / green spaces
- Design guidance for other building types
- Design for small scale rural situations
- Design in conservation areas
- Self-build
- Design of lighting
- Guidance on refuse/ recycling bin storage and refuse lorry access requirements
- Public art
- Sustainable construction & adaptation to climate change – orientation, rainwater storage, energy conservation
- Disabled access provisions (e.g. Lifetime Homes)
- Design of interiors to allow flexibility and subdivision
- Parking reduction methods – car clubs, charging points
- Provision of areas to grow food
- Details of building design
- Detailed design considerations such as conservatories; satellite dishes; aerials; solar panels; wind turbines; storage and garden sheds;
- Housing density guidance
- Inclusion of case studies to show how the guidance is applied
- Use of planning obligations to require developers to employ and train local people
- Development brief / site specific guidance – when, how & who should produce it
- Process of design & pre-application discussions

## **Comments made about Section 0**

- Include details of quality counts tours attendees
- Clarify that non-compliance with these guidelines will result in refusal
- Include a summary of best practice design process
- Make clear the need to engage qualified professionals

- Questions on when the outstanding sections will be delivered
- Unrealistic to use this as so many sections are still to be completed
- More relevant to larger scale developments rather than small scale
- Review wording to allow more flexibility and more clarity
- Greater reference to national guidance to avoid duplication
- Explain acronyms used in this section

## Comments made about Section 1 Character

### General comments:

- Support for the content of this section
- Make greater reference to historic environment
- Include that character will change due to nature of low/zero carbon measures
- Clarify aim: is it about creating areas with their own identity or creating areas that reflect prevailing character of the area.
- Include more references to topography
- Too generalised to say topography affects the whole of Wycombe District
- Reduce built footprint in AONB by using green roofs and underground car parks

### C1 Improving and reinforcing existing Character

- No specific comments made

### C2 Character Traits

- Simplify the character traits to allow more flexibility and coordinate better with requirements of Design and Access Statement for larger sites.
- Reflect better the Urban Design Group's Capacity Checklist.
- Upgrade the importance of views and landmarks in the checklist
- Include more flexibility so areas of new character can be created
- Include guidance for sites that cross multiple neighbourhoods
- Include graphic images instead of a table
- Include more detail in the glossary regarding building features such as hipped ends; window proportions; eaves; brickwork

### C3 Character reference

- Need more local character studies
- Various suggestions for links to further information
- Make clear how it is decided which documents are relevant to a specific site

- Additional information requested here (character studies) is not proportionate

#### **C4 Roof design**

- Support for avoiding flat roofs
- Clarify terms used and reword some phrases
- Clarify diagrams

#### **C5 Sloping sites:**

- Support for the importance of considering topography
- Support that development should minimise retaining walls and terraces by using split levels
- Replace diagrams with photos
- Include how to provide amenity space on sloping sites
- Encourage use for basements for storage and ancillary uses where topography facilitates it
- 100m limit is arbitrary and should be revised

#### **C6 Views**

- Support for native landscape and tree planting to protect sensitive views
- Emphasise need to retain existing mature trees due to biodiversity
- Views from the development are also important
- Building heights following underlying topography creates monolithic and uniform development
- Include information requested on validation list

#### **C7 Materials**

- Agree with position regarding flint but need for more guidance on where it would be appropriate
- Support for flexibility in material choice to aid viability and sustainability and modern methods of construction
- Be more restrictive in AONB and Conservation Areas
- Concern over maintenance of wood
- Include reference to using recycled materials or low carbon materials and modern methods of construction
- Encourage local sourcing of materials such as timber



## **Section 2 Connections and movement**

### **General comments**

- Support for principles adopted
- Make reference to Historic England's advice in "Streets for All"
- Make reference to Sport England Active Design Guidance
- Section is too prescriptive/ pedantic
- Provide guidance on gated developments
- Does not address traffic capacity issues

### **M1 Understanding existing connections and movement**

- Use same site in diagram for this and in M2
- Include green infrastructure in movement analysis
- Over emphasis on assessment of existing movement routes

### **M2 Connect and integrate new development**

- Include green infrastructure connections
- Include street hierarchy, significant views and destinations
- Question the requirement for more than one access point.

### **M3 Facilitate walking and cycling**

- Support for encouraging walking and the approach taken to provide facilities close to development
- Support as follows guidance in Sport England's Active Design Guidance
- Clarify if these are straight line walking distances
- Recommend footbridges to cross busy roads
- Increase bus stop walking distance to 800m
- Include preferred options for cycle routes – e.g. tree lined, interconnected, facilities to lock cycles
- Acknowledge that some barriers cannot be overcome – railways/ watercourses
- Clarify guidance regarding segregated footpaths
- Advocate straight and wide overlooked footpaths
- Clarify references

### **M4 Logical routes**

- Legibility is about design of street and landmarks rather than the block itself
- Include example of diagram in para 47

### **M5 Perimeter blocks**

- Perimeter blocks create bland and uniform developments – not the only solution.
- Diagram only includes detached dwellings
- Include benefits of perimeter blocks - perimeter blocks ensure well fronted streets and secure private rear gardens, therefore this increases surveillance over the street and reduces the opportunity for crime and disorder to occur.
- Dimensional guidance to be only a recommendation not a must
- Do not apply this guidance to existing residential areas
- Ensure trees are included in the block to enhance quality of life
- Too prescriptive to advocate one layout type instead use design principles

### **M6 Connected streets**

- Cul-de-sacs and similar forms of streets do have a role to play and should not only be used in limited situations
- Shouldn't use street pattern as a reason for rejecting a development just need to be safe and accessible

### **M7 People friendly streets details**

- Improve legibility of text in diagrams
- Minimising of radii at junctions is invalid as many junctions in Buckinghamshire have crossing points on radii
- Avoid tabled crossings on vehicular crossings
- Any details for rural/ semi-rural situations
- Manual for streets is expensive to purchase – include more detail here and examples of good practice

### **M8 Streets that have a positive sense of place**

- Approach is too prescriptive and does not take account of function of the route
- Encourage taller buildings to add variety and legibility

## **Section 3 Green Infrastructure**

### **General comments**

- Support for role GI plays in residential development
- Definition for GI; mention existing GI networks/ strategies, include measures to create and make provision for new GI
- Section on green roofs; green walls; air quality; ground and surface water; soils; lighting

- Reference The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "Good Practice Guidance for Green Infrastructure and Biodiversity".
- More reference to sport, recreation and leisure
- Parts of section are too onerous and restrict ability to deliver housing
- Biodiversity best served by not developing green field
- Question benefits claimed about GI
- Support for benefits of GI (climate change; species and habitats; movement corridors; public health; quality of life)
- Support for GI that includes sports facilities
- Refer to NEP GI Principles
- Support for retrofitting GI into existing residential areas
- Consider also protection of natural resources eg soils;

### **GI1 Open Space**

- Support for this guidance
- Conflict between GI and open space – not all open space is GI
- Diagram is too simplistic, photographs needed
- Clarify that open space should be overlooked by active rooms
- Include biodiversity rich areas within open space

### **GI2 Biodiversity**

- Support for guideline
- Both questioning and support for bat boxes/ roosts
- Reference to layout design (connectivity) and retaining better areas of habitat
- Use a metric to quantify net gain (e.g. biodiversity Impact assessment calculator)
- Emphasise that biodiversity also about creating a much better environment for people, and also about wider "ecosystem service" benefits to people.
- Include increasing connectivity of habitats
- Preference for features with highest ecological value and connectivity
- Define reasonable depth of back garden
- Avoid hard standing in front gardens Incentivise homeowners to maintain planning rather than replace with hard features
- Reference to biodiversity action plan targets
- Refer to NPPF para 118

- Adopt Exeter guidance of one roost/ bat box per unit
- Guidance for larger sites to ensure viability and developable area is not impacted
- Reconsider in light of scarce land availability.
- Replace “think about” phrase with need to or should so that it is clear what expectations are regarding biodiversity and to accord with NPPF
- Biodiversity not just about wildlife but also creating a better place for people
- Clearer and stronger biodiversity standards

### **GI3 SuDs**

- Support for this guidance
- Sustainable Drainage Systems not sustainable urban drainage systems
- Concern that designing suds features with lowest ongoing maintenance cost will reduce aesthetic quality of the features
- Provide good & bad examples of SUDs
- SuDs need to be integrated with rest of GI
- Some minor wording changes
- Explain what source control measures mean
- Exclude water butts as do not give any rainfall storage after they are full
- Mediate potential conflict between SuDs and ecological and amenity benefit – flood risk should take priority.
- Ecological and amenity benefits cannot both be maximised at the same time
- Include references to wildflower rich grassland for swales, detention areas and parking

### **GI4 Existing trees & vegetation**

- Concern that statements are too weak to protect existing trees
- Ensure enough space is provided around existing trees
- Only trees graded b and above should be proactively retained

### **GI5 New Trees**

- Give guidance on sizes for woodland planting
- Advocate that species are selected that can exceed the height of the buildings
- Include succession planting to replace existing mature trees in due time
- Concern about 25% canopy cover that it will limit housing delivery
- Locate trees with final size in mind

## **GI6 Landscape**

- Have separate section for hard landscape
- Include plants for food
- Use new planting to create or reinforce character
- Define high quality
- Select materials that work from an aesthetic and a maintenance aspect
- Include requirement for management in perpetuity funded by an endowment model
- Refer to Chilterns AONB advice

## **Section 4 Parking Design**

### **General comments**

- Bucks standards a minimum more provision to be encouraged.
- No recognition that car ownership is likely to be reduced in the future
- Changes in work patterns and household composition will have an increasing impact on parking provision requirements
- Dependence for jobs outside the district means many people rely on their cars
- Over emphasis on cars
- Combine P1 & P2

### **P1 Street activity**

- Preference to on plot parking over on-street
- Rural situations important that streetscape is not dominated by cars
- Communal parking only in small groups
- Clarification on position regarding rear parking

### **P2 Parking arrangements**

- Focus on design of spaces not their location
- Highway safety an important consideration for on- street spaces
- Turning area needed for parking directly accessed from classified roads
- Rear parking can allow for more attractive street frontages

### **P3 Rear parking**

- Entry features should be set 5m back from carriageway
- Avoid visitor spaces in rear parking

- Protect rear parking with electric gates and lighting to BS 5489

#### **P4 Range of parking**

- Concern about smaller dwellings relying on on-street provision
- More consideration of future trends in vehicle use (adult children living with parents and ageing population)
- Allow residents who don't need their parking to sublet to others that have an under provision.

#### **P5 Visitor Spaces**

- Visitor parking not needed in BCC guidance for smaller developments

#### **P6 Planting**

- Use posts or barriers to stop parking on verges
- Should allow for a range of hard and soft landscape solutions, not just planting.

#### **P7 Garages**

- Size of garages to accommodate additional storage needs of dwelling
- Location of garages to also consider highway safety
- BCC garages sizes are not realistic

#### **P8 Integral and under croft parking**

- Additional measures suggested for under croft parking and underground parking to improve security
- Encourage split level parking and basement parking on sloping sites and for flats
- Define predominance of integral garages

### **Section 5 Building Relationships**

#### **General comments**

- Include guidance on turning corners
- Guidance in this section is too onerous and already covered by NPPF, and does not account for site context
- Standards here are more ambitious than other LPA's

#### **B1 Active fronts private backs**

- This requirement discourages innovation
- Exposed backs not such a problem as can now use CCTV
- Private backs will not deter determined criminal
- Include security requirements for rear access footpaths
- Cannot require which rooms are used for which purpose

## **B2 Maximum outlook**

- Parked cars can interrupt surveillance by residents
- Bay windows may be inappropriate in some areas and discourage innovation

## **B3 Direct Street Access**

- No comments

## **B4 Dwellings on both sides of street**

- No comments

## **B5 Privacy gaps**

- Use landscape along boundaries to maintain privacy
- Requirements here are high compared to other LPAs should be 20m not 25m

## **B6 Private amenity space**

- Support for amenity space standards
- Higher densities mean need to create new parks as well as private amenity space
- Reduce 12m depth to 10m and use as optimum not minimum, or remove and rely on qualitative advice
- Oppose longer north facing gardens
- Sunlight requirements too restrictive and do not take account of site context

## **B7 Activity behind rear gardens**

- Privacy is more important than overlooking when garden adjoins a public space.
- Support robust 1.8m high boundaries

## **B8 Reasonable outlook**

- Concern that guidance will not create a sense of enclosure and lead to more suburban looking schemes.
- Conflicts with M8

## **B9 Public rear or side boundaries**

- Prefer hedges in all situations due to GI benefit and attractiveness

## **B10 Front gardens**

- Advocate defensible space in every situation and boundary treatments for front gardens

## **Section 6 Flat Design**

### **General comments**

- Flats constructed recently too small for purpose
- Section does not recognise actual requirements for designing flats
- Remove section and issue separate tall buildings SPD

### **F1 Single aspect**

- Support for dual aspect instead of single aspect
- Question reasons for not allowing single aspect
- Question requirements for generous window sizes, not north facing and not facing the street on ground floor where single aspect flats are used

### **F2 Ground floor Flats**

- Individual entrances decrease sense of community in the flat blocks and creates management difficulties
- Flats not facing the street contradict B3

### **F3 Private Amenity space**

- Support for balconies for upper floors and patio gardens for ground floor units
- More flexibility to allow a minority of flats without balconies or patio space
- Preference for balconies is subjective and not evidence based

### **F4 Communal space**

- No comments

### **F5 Parking**

- No comments

### **F6 Communal waste storage**

- Use green roofs and similar materials to adjacent buildings

### **F7 cycle storage**

- Use green roofs

### **F8 Entrances and corridors**

- Include references to security and access control

### **Typos and other errors:**

37 comments on typos and grammatical errors



## Appendix 2 Summary of comments made at Agents Panel Meeting

Held in Committee Room 2 at Wycombe District Council offices on 31 October at 5pm.

### Attendees

Phil Mason – IL Beeks Ltd

Richard Clark – Richard Clark Architects

Matthew Maier – Brocklehurst Architects

Christopher Hunt – The Christopher Hunt Practice

Wycombe District Council - Alastair Nicolson; Chris Steuart; Lucy Bellinger; Charles Power; Sarah Nicholson; Rebecca Hart; Jonathan Crowhurst

### Summary of comments

Responses to questions given during the meeting shown in brackets

Concern that the wording used in the guidance is too prescriptive (the wording will be reviewed)

Concern that unlike Appendix 1 that was part of the Local Plan and subject to an independent inspector this guidance is only an SPD. (Good practice is now that Design guidance is provided as SPD to streamline Local Plan process)

Concern that SPD will impact viability and numbers of smaller windfall sites coming forward in a similar way to the HISPd may have done in the past. (The reduction in windfalls though may also have been caused by the recession)

More recognition in the guidance regarding existing character if it follows a different pattern/ approach to that advocated in the guidance to allow flexibility in approach to allow more sites to come forward.

Concerned about consistency of approach in interpreting the guidance between officers.

Questions/ comments regarding conversions/ dormers/ extensions (these aspects are covered under appendix 4 of the local plan and guidance will be updated and become part of this SPD in due course when resources allow).

Key to success of schemes is agreeing the character assessment at preapp. Consider including the character checklist during preapp discussions. (this will be considered)

Concern that some guidelines could be used by Parish Councils and members to refuse applications without understanding the need for balance and flexibility in approach depending upon the site conditions. (the guidance is an evolution of appendix 1 which has been in place for some time)

Clarification needed regarding dimensions of parallel parking provided on street as new BCC guidance seems excessive.

Concern that the guidance will add to burden of background reports needed to support applications (much of the information can be provided as part of the Design and Access Statement)

Clarification regarding space standards (WDC will be adopting the National Space Standards)

Suggest the balcony amenity space guidelines include a minimum depth to ensure they are functional

Trees in car parking areas are often disliked by homeowners due to leaf drop etc. (selecting the right species helps to avoid conflicts)