



Local Character and Distinctiveness Design Guide Supplementary Planning Document

Consultation Statement

Prepared in accordance with Regulation 12 of the Town and
Country Planning (Local Development) (England) Regulations
2012

June 2021

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1. Introduction

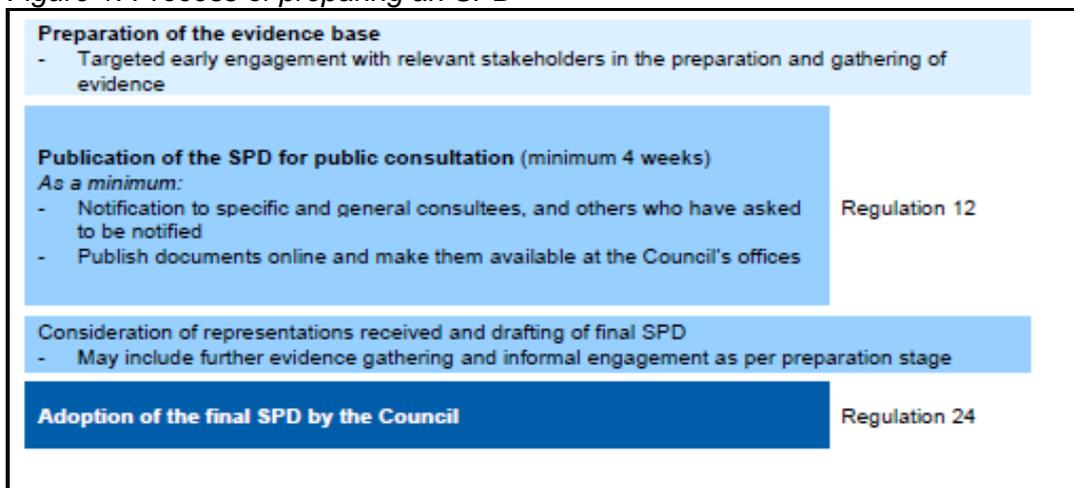
- 1.1. Following the adoption of the Council's Development Management Plan (DMP) in September 2019, the Council has revised the 2004 "Reigate & Banstead Local Distinctiveness Design Guide" Supplementary Planning Guidance (SPG) to reflect up-to-date national and local planning policy and more recent development styles/ types and trends.

- 1.2. This Consultation Statement has been prepared to accompany the revised Local Character & Distinctiveness Design Guide Supplementary Planning Document (SPD). It has been prepared in accordance with Regulation 12 of the Town and Country Planning (Local Planning) (England) Regulations 2012 and it sets out:
 - Who the Council has consulted with when preparing the SPD;
 - A summary of the main issues raised; and
 - How those issues have been addressed in the SPD.

2. Preparing the SPD

2.1. The Local Character and Distinctiveness Design Guide SPD has been prepared in accordance with the legal requirements of the Town and Country Planning (Local Planning) (England) Regulation 2012 (Local Plan Regulations)¹ and the requirements set out in the Council’s Statement of Community Involvement in Planning (SCI) (April 2019)². The SCI summarises how the Council will engage its communities in its planning functions, including in the preparation of SPDs. The process is summarised in Figure 1 and Table 1 below.

Figure 1: Process of preparing an SPD



Source – Reigate & Banstead Statement of Community Involvement (2019)

¹ Available at: <https://www.legislation.gov.uk/ukxi/2012/767/regulation/12/made>

² Available at: http://www.reigate-banstead.gov.uk/download/downloads/id/5437/statement_of_community_involvement_in_planning.pdf

Table 1: Timeline for preparation of the SPD

Stage	Date
Early scoping and information gathering	July 2020 – August 2020
Preparation of draft SPD with relevant key individuals and organisations	August 2020 – December 2020
Consultation on draft SPD with supporting Initial Consultation Statement, Strategic Environmental Assessment and Habitats Regulations Assessment.	February 2021
Consider representations received and update draft SPD as relevant	March 2021 – June 2021
Adoption of the revised Local Character and Distinctiveness Design Guide SPD by Council’s Executive and revocation of the existing Reigate & Banstead Local Distinctiveness Design Guide	June 2021
Publish SPD with final Consultation Statement and Adoption and Revocation Statement	June 2021

2.2. In preparing the revised Local Character and Distinctiveness Design Guide SPD, we involved and sought the views of the individuals and organisations listed in Table 2 below. Their suggestions have been incorporated into the revised SPD.

Table 2: Individuals and Organisations involved in preparing the draft SPD

Person/ organisation	Issues/ comments raised
RBBC Senior Conservation Officer and RBBC Development Management	Remote workshop/ meeting to discuss emerging Local Character and Distinctiveness Design Guide SPD. Issues discussed include: <ul style="list-style-type: none"> • Emerging Design Process Chapter • Tall buildings/ higher density schemes in areas of high accessibility • Need to add additional guidance on issues such as positioning of solar panels, development in Residential Areas of Special Character (RASCs), window design, importance of green corridors and soft edges and redevelopment of farm buildings in the countryside. • Overall structure of the document and in particular, the key design principles section

Person/ organisation	Issues/ comments raised
RBBC Senior Conservation Officer and RBBC Development Management	Series of emails in addition to wider workshop/ meeting above discussing: <ul style="list-style-type: none"> • Tall buildings/ higher density schemes in areas of high accessibility • Relevant case studies • Provision of comments and suggested amendments to existing Local Distinctiveness Design Guide SPG. • Recommendation of suitable case studies and/or recommended wording. • Provision of additional guidance on issues such as positioning of solar panels, development in RASCs, window design, importance of green corridors and soft edges and redevelopment of farm buildings in the countryside. • Provision of revised details for table of native Surrey trees in the Appendix to correct errors in the existing SPG. • Comments sought and provided on draft document.

Person/ organisation	Issues/ comments raised
RBBC Development Management Advisory Group (DMAG)	<p>Remote workshop/ meeting to discuss the emerging Local Character and Distinctiveness Design Guide SPD.</p> <ul style="list-style-type: none"> • Issues raised include • Backgarden schemes – importance of good access arrangements including landscaping and integration into existing residential areas. • Creating green networks/ links between developments, particularly backgarden schemes. • Importance of contemporary/ innovative design • Bicycle storage on new developments that is usable and convenient

3. Consultation on the draft SPD

- 3.1. Following the executive approval on 28th January for public consultation on the draft Local Character and Distinctiveness Design Guide SPD, in accordance with Regulation 12(b) of the Town and Country Planning (Local Planning)(England) Regulations 2012, the Council understood a statutory public consultation on the draft SPD between 1st February and 1st March 2021.
- 3.1. During this consultation we wrote to all interested parties³ and we made the documents available on our website.
- 3.2. In accordance with Regulation 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012 we accepted all representations received during the consultation period.

4. Representations Received

- 4.1. Following the formal consultation stage, the Council has reviewed the responses received and made amendments where necessary. Section 23(1) Planning and Compulsory Purchase Act 2004 states that:
The local planning authority may adopt a local development document (other than a development plan document) either as originally prepared or as modified to take account of:
 - any representations made in relation to the document;
 - any other matter they think is relevantRegulations 11(2) and 14 of the Town and County Planning (Local Planning) (England) Regulation 2012 state that an adoption statement must be provided to clarify any modifications made. A summary of the representations received and how they have been taken into consideration in finalising the SPD is detailed in Appendix 1.

³ Specific and general consultees, prescribed bodies for the Duty to Co-operate and other individuals and organisations registered on the Planning Policy database for such purpose

- 4.2. Prior to finalising the necessary amendments, the summary of the responses and the Council's proposed approach/ amendments to the draft SPD has been circulated to all members of the Overview & Scrutiny Committee for feedback. No major amendments were made to the SPD as a result.

5. Adoption of the SPD

- 5.1. Following adoption, the Local Character and Distinctiveness Design Guide SPD will become a material consideration in the determination of planning applications and appeals and will therefore need to be taken into consideration in the preparation of planning proposals within the borough.
- 5.2. Upon adoption in accordance with Section 25 of the Planning Act 2008 and Regulation 15 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) the Council's current Local Distinctiveness Design Guide SPG (2004) will be revoked. We will bring this to the attention of people living or working in the borough.

6. Appendices

Appendix 1: Consultation responses from specific and general consultees with resultant changes made to the SPD where relevant and any other matters

Representor	Summary of Main Issues Raised	Council’s Response (How the issues raised have been addressed in the SPD)	Changes made to the final SPD?
General consultee	<p>Issue 1: Is the SPD applicable to commercial development?</p> <p>Most commentary in the SPD is in respect of residential or mixed use including residential development. Is this SPD also expected to be applied to commercial development?</p>	<p>Although the SPD is directed at residential and mixed use developments, it is also applicable when designing commercial developments, particularly in terms of the use of local building materials and native trees and shrubs in landscaping. A statement to that effect has been added within the introduction of the final SPD. The emphasis on residential developments of this SPD stems from the original SPG which it is to replace. Further design guidance relating to non-residential developments will be provided in the future Reigate & Banstead Design Code, which will supplement the guidance provided by the National Design Guide and National Model Design Code (see paragraph 127 of the January 2021 proposed changes to the NPPF) https://www.gov.uk/government/consultations/national-planning-policy-framework-and-national-model-design-code-consultation-proposals.</p> <p>On adoption of the Council’s Design Guide / Code, this SPD will be revoked.</p>	<p>YES</p>

Representor	Summary of Main Issues Raised	Council's Response (How the issues raised have been addressed in the SPD)	Changes made to the final SPD?
Chipstead Residents Association & another general consultee	<p>Issue 2: Design process Previous planning decisions should also be taken into account when conducting the Context Appraisal. The Design Process chapter should make it clear that not all evidence is required for every type of application.</p>	<p>PPG (Paragraph: 010 Reference ID: 21b-010-20190315) states that the planning history of a site may be a relevant consideration in the determination of an application. It is therefore advisable to check the history of the site and a history of any relevant sites nearby, when conducting the context appraisal. A statement to that effect has been added under the 'Planning Policy Context' bullet point under paragraph 2.4.</p> <p>Paragraph 2.4 of the SPD states that 'The level of detail required in each context appraisal will depend on the scale of development and the sensitivity of the site or location'. Statement has been added within the 'Phase 2: Design' section that masterplans will only be required for major developments. Paragraph 2.9 within the 'Phase 3: Formal Planning' section of the SPD directs the applicants to the Planning practice guidance and the Council's Local Validation List for detailed list of specific requirements. A statement has been added that the range of supporting documents required as a part of planning application will vary based on the type and complexity of the proposal.</p>	YES
Chipstead Residents Association & Kingswood Residents Association	<p>Issue 3: How much weight is to be given to the SPD in decision making process? The SPD has insufficient weight to be binding on Council and Planning Inspectorate decisions. The current wording can be an invitation to consider the guide's content and ignore it. The SPD should be redrafted to make its provisions binding policy. Will the SPD equally influence any enforcement action where development has been commenced without planning permission and an application then becomes a retrospective application as there have been occasions where this does not appear to have happened and using the retrospective application approach has been used as a way to avoid taking account of the current SPD.</p>	<p>The role of an SPD is clearly defined in the National Planning Policy Framework which states under the Annex 2: Glossary, that Supplementary Planning Documents are "documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan." The Council therefore cannot amend the wording to make the SPD a binding policy. Local policies are set through the Local Development plan. Reigate and Banstead has an up to date development plan, consisting of the Core Strategy (adopted July 2014, reviewed July 2019) and the Development Management Plan (adopted September 2019). The SPD status of this guidance is considered suitable to supplement Development Management Plan (2019) design policies DES1, DES2, DES3, DES4, DES5, DES7, DES8 and DES9. It provides clear guidance on issues such as development in RASCs and it will be applicable for all relevant planning applications, including retrospective.</p>	NO

Representor	Summary of Main Issues Raised	Council's Response (How the issues raised have been addressed in the SPD)	Changes made to the final SPD?
General consultee	<p>Issue 4: Who was involved in the preparation of the SPD? Who assisted the Council in preparation of the 2004 Local Design Guide or the draft SPD? Given the importance of the document and need to ensure Good Design in accordance with latest Government Guidance it would seem a misstep not to carry out a full review. This should include more recent examples of high quality design, hopefully local. If not, they should be sourced from other modern designs. Why not liaise with local architects, planners, the Reigate Society and LABS to pick the best recent designs and showcase them in this SPD?</p>	<p>The currently adopted 2004 Local Distinctiveness Design Guide SPG states within the introduction (p. 4) that "This Guide has been produced by the Borough of Reigate and Banstead in association with Atkins Consultants. The process has been a collaborative effort involving Councillors, Residents Associations and Amenity Groups." A statement to that effect has been added within the Introduction of the revised SPD.</p> <p>This revised SPD is considered to be required now because of the local and national policy changes since the Council adopted its 2004 SPG. However, the Council acknowledges that as many more changes in national policy and guidance are proposed, in particularly the proposed introduction of the National Model Design Code, further work will be needed to provide up to date, comprehensive local design guidance that is consistent with the proposed new national policy . However, as the National Model Design Code and a number of proposed changes to the NPPF were only in draft at the time the SPD was being prepared and had not been published in their final version. It was therefore considered that a revision of the existing guidance would be the most appropriate solution in the meantime, given the need to reflect up to date local plan policies after the adoption of the Development Management Plan in 2019. As stated in the Consultation Statement that accompanied the consultation of the draft revised SPD, the Council's Senior Conservation Officer and a representative from the Council's Development Management team have been heavily involved throughout the preparation of the revised SPD. This included the selection of good quality design examples of most recent developments. There are several examples within the SPD on p. 51 - 52 under the '2000 – Most Recent Trends' section as well as number of examples within the relevant Case Studies on p. 89 - 106. This approach is deemed appropriate given the nature of document as a revised SPD rather than new SPD. All those on the Council's Policy database were also asked for any comments on the draft SPD. This includes the Reigate Society, and local developers, etc.</p> <p>Further work will be undertaken to produce local design codes, which will involve further community engagement, as required by the proposed changes to the NPPF, and there will be opportunities to discuss examples of high quality design with the local community, once the final changes to national policy and guidance have been published.</p>	YES

Representor	Summary of Main Issues Raised	Council's Response (How the issues raised have been addressed in the SPD)	Changes made to the final SPD?
Surrey County Council & another general consultee	<p>Issue 5: References to the National Design Guide and other useful documents Figure 5 refers to the 10 characteristics contained in the National Design Guide however, it would have been beneficial if these characteristics were reiterated and followed throughout the LCDDG. Reference should be made to other useful documents, such as Living with Beauty (Building Better, Building Beautiful Commission, 2020) which provides further guidance relating to good design.</p>	<p>Several references to the National Design Guide have now been added to the final SPD. Within the Policy Context section, references have been made to 'Living with Beauty (Building Better, Building Beautiful Commission 2020, Sport England & Public Health England Active Design Guide (Oct 2015) and Homes England's Building for a Healthy Life (2020). Within the Landscape Character section, references have been made to the Surrey Character Assessment 2015 and the Surrey Hills AONB Management Plan 2020-2025.</p>	YES
Surrey County Council	<p>Issue 6: Heritage Assets In order to ensure that important information is easily accessible and not buried within the document, we would suggest that key heritage information and guidance is made more prominent within the document.</p>	<p>As Conservation Areas and Historic Buildings and Locally Listed Buildings are subject to change , the Council considers it more appropriate to refer to online, up to date sources, as reference in the document can only be a snapshot of a moment in time and not current dataset. See website links https://www.reigate-banstead.gov.uk/info/20084/conservation</p>	NO
Various general consultees	<p>Issue 7: Figures, maps & links Figures should be numbered sequentially and be provided with a text commentary/ reference to precede and introduce the specific figure. Some maps are out of date and should be replaced. Photographs should be taken without resorting to Google Streetview. Within the case studies, links to the applications would be helpful.</p>	<p>Figures, maps and links have been updated where appropriate.</p>	YES

Representor	Summary of Main Issues Raised	Council's Response (How the issues raised have been addressed in the SPD)	Changes made to the final SPD?
General consultee	<p>Issue 8: Character areas The draft SPD has lost some of the key elements along the way such as the Character Map setting out specific character areas in the borough which is probably the most useful map in the current LDDG as it dovetails neatly with the brief assessments of those areas. The Case Studies in the 2004 LDDG clearly identified which Character Areas they would be most attributable to, but this is lost in the Draft LCDDG.</p>	<p>The character area map was not included in the draft SPD as it needed to be updated. It has been replaced with an up to date map in the final SPD. The most relevant character areas have been cross referenced in the case studies section of the final SPD under paragraph 7.1.</p>	YES
General consultee	<p>Issue 9: Gated developments Page 53 Figure 59 – current issues should include the issue of gated developments as per the adopted guidance as this is still a problem. <i>'Gated developments are a common form of backland development, often impermeable and should be resisted – gates are a response to car security, garages and multi-occupancy.'</i></p>	<p>The guidance on gated developments was removed from the revised SPD, as based on the Council's more recent experience, it was felt no longer a common problem. However, as the guidance is still valid, the Council has reinstated it within the SPD.</p>	YES
Gatwick Airport	<p>Issue 10: Aerodrome Safeguarding Could the aerodrome safeguarding requirements be mentioned in the 'Local Character & Distinctiveness Design Guide' so that people will be aware.</p>	<p>The following paragraph has been added after para 3.5 within the 'National Policy Context' section. <i>'Applications for development within the identified aerodrome safeguarding zone must consider aerodrome safeguarding requirements. These requirements cover a number of aspects including tall structures building/structure heights/crane heights, wind turbines and solar installations, blue and green infrastructure, and lighting, taking account of the Town and Country Planning (Safeguarding Aerodrome, Technical Sites, and Military Explosives Storage Areas) Direction (2002). More information is available on the Gatwick Airport website.'</i></p>	YES

Representor	Summary of Main Issues Raised	Council's Response (How the issues raised have been addressed in the SPD)	Changes made to the final SPD?
Various general consultees	<p>Issue 11: Intensification Not every part of the borough has a special character, or a character that should necessarily be preserved, especially in the context of a national housing crisis and the need for intensification and making the best use of available land. The design considerations for 1930-50 Suburbia on p. 46 should highlight that these large suburban estates may be less sensitive to change and are the type of location suitable for increased densities. Similarly, the town centre areas should be the main areas for intensification, and the design considerations for Town Centre development on p. 35 should therefore not have to echo the historic plot widths.</p>	<p>Case Study 7 – ‘High Density Urban Intensification’ within Part 7 of the SPD is specifically dedicated to urban intensification and higher density schemes. It states that development should make optimal use of land, particularly in areas of high accessibility, such as town centres. To strengthen the message on urban intensification, reference to paragraph 127 of the NPPF has been included within the part 3 of the SPD ‘Policy Context’. With regards to the design considerations for 1930’s – 1950’s suburbia, the following has been added to the final SPD. <i>‘Some of these areas, specifically those from the post war era, might be less sensitive to change, offering opportunities for increased densities.’</i> In relation to historic plot widths, large areas of town centres, such as Reigate and Redhill, are Conservation Areas or historic sites in the borough and historic plot widths are important part of that character.</p>	YES
Surrey Wildlife Trust/Surrey Nature Partnership & another general consultee	<p>Issue 12: Green corridors, parkways and soft edges What is the source for the size of the buffer under the heading ‘Green Corridors, Parkways and Soft Edges’ (p. 85) and the Case Study 6 (p. 101)? Why is only woodland shelterbelt mentioned as a buffer under paragraph 6.77? Any natural space is useful and variously appropriate in different circumstances. This is not guidance, it is prescriptive and therefore contradicts paragraph 1.7 of the SPD stating that the SPD is not intended to be prescriptive. Could the parkways & green corridors feature panel be clearer about who would be responsible for continuous maintenance of the parkways?</p>	<p>The size of the buffer is based on the Council’s experience and examples such as those in the Horley area as to the effectiveness of landscaping to screen development from the public road. Langshott Lane south side is an effective screen for example. The purpose of woodland buffer is to provide a visual screen. Open space would therefore be ineffective in screening development from the countryside and as such would result in urbanisation. The tone of the guidance is deemed appropriate for the purpose of this SPD in terms of providing useful guidance, using words like ‘should’ and ‘will be encouraged’. In terms of maintenance of the parkways, this would generally be held by the management company for the estate, unless where adopted as highway land or public open space. A statement to that effect has been added within the final SPD.</p>	YES

Representor	Summary of Main Issues Raised	Council's Response (How the issues raised have been addressed in the SPD)	Changes made to the final SPD?
General consultee	<p>Issue 13: Development within the Green Belt It is unclear as to whether there are any plans to build on green belt.</p>	<p>The SPD does not allocate any new development within the Green Belt or set any new policies governing the development within the Green Belt, rather it is about achieving good design in developments across the borough. Development within Green Belt is strictly governed by the National Planning Policy Framework and the Council's adopted Local Plan (Core Strategy, adopted 2014, reviewed 2019 & Development Management Plan, adopted 2019).</p>	<p>NO</p>

Representor	Summary of Main Issues Raised	Council's Response (How the issues raised have been addressed in the SPD)	Changes made to the final SPD?
<p>Natural England; Surrey Wildlife Trust/Surrey Nature Partnership; Environment Agency</p>	<p>Issue 14: Green & Blue infrastructure, biodiversity net gain and landscape enhancement</p> <p>The SPD could consider making provision for Green Infrastructure within development. This should be in line with any Green Infrastructure Strategy covering your area.</p> <p>There is no mention of the rapidly advancing area of designed biodiversity options and solutions in modern building design. The SPD could consider incorporating features which are beneficial to wildlife within the development. Biodiversity enhancements to provide measurable net gains from all developments is now a policy aim and the SPD should reflect this.</p> <p>The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through green infrastructure provision and access to and contact with nature.</p> <p>River corridors and networks of wildlife habitats should be included and assessed as part of Green Infrastructure provision. The SPD should include details of the riverbanks buffer zone requirements and enhancement and protection of water related biodiversity. It should contribute to helping wildlife adapt to climate change and reducing its adverse impacts. The SPD should also mention flood risk areas within the borough, particularly in Redhill Town Centre and Horley Riverside Green Chain, and potential solutions.</p>	<p>Paragraphs 6.50, 6.51 & 6.52 of the draft SPD highlighted the importance of biodiversity, green & blue infrastructure and landscape protection. These paragraphs have been amended and extended (now paragraphs 6.54 – 6.60) to reflect the NPPF and the National Design Guide, including measures for green infrastructure provision and water management. This level of detail is deemed sufficient for the purposes of this SPD.</p> <p>The Council has an adopted Green Infrastructure Strategy 2017 (see weblink provided) and the adopted Development Management Plan (2019) contains specific policies with regards to landscape protection, biodiversity enhancement and green and blue infrastructure provision as well as flood risk (Policies CCF2, NHE1, NHE2, NHE3 and NHE4). Furthermore, the Council's emerging Climate Change and Sustainable Construction SPD contains further details and examples on integration of green and blue infrastructure into developments. The Council is also currently in early stages of preparing a Biodiversity SPD which will include further details on biodiversity net gains.</p> <p>https://www.reigate-banstead.gov.uk/downloads/download/2035/green_infrastructure_strategy</p>	<p>YES</p>

Representor	Summary of Main Issues Raised	Council's Response (How the issues raised have been addressed in the SPD)	Changes made to the final SPD?
Surrey Wildlife Trust/Surrey Nature Partnership; Surrey County Council	<p>Issue 15: Planting of native species Planting of native species should be more than encouraged and local sourcing of plant stock should be more than advised. Naturalised species such as Rhododendrons are notoriously invasive and damaging to the natural environment; their presence is largely a direct result of ill-advised self and assisted propagation through the past/illegal mis-management of green waste. Surely, we should no longer be encouraging the continued use of non-native invasives in the landscaping industry. The inclusion of Ash (<i>Fraxinus excelsior</i>) should be removed from Table 1 as new plantings of native Ash are not currently recommended due to 'ash dieback disease', with no disease-tolerant Ash available on the commercial market. Ash is now almost universally moribund across the North Downs and until disease-resistant stock is available, planting Ash is ill-advised.</p>	<p>Although the planting of native species is encouraged, particularly in rural areas, many non-natives, such as Cedars of Lebanon and Wellingtonia, can be found within urban areas, forming part of the character of the borough. The non-native species are important for both biodiversity as well as the character of the area. Due to issues with supply of native trees such as Oak and Beech, alternative forest type trees are acceptable. For that reason, encouragement and advise, rather than requirement is deemed appropriate. Of all Rhododendrons, only Rhododendron Ponticum is invasive. There are areas of rare rhododendrons in some of the historic parks and gardens in the borough, and the Council has worked with the Royal Horticultural Society on the conservation of such species in these locations. It is recognised that invasive species are a problem that needs to be controlled but that should not preclude the use of any non- native plantings in suitable locations in the urban area. 'Ash' and 'Box' have been removed from the final SPD's Appendix 2 table of native species appropriate for planting, for the reasons of the 'ash dieback disease' and 'box caterpillar' respectively. References to these species have however remained within the main text as they are still native species to the local area and any existing trees should be kept, even though planting of new ones is no longer appropriate. A statement to that effect has been added within the text, where references to these species are made.</p>	YES
Environment Agency	<p>Issue 16: Water efficiency standards We would like to see a requirement for at least the larger developments to achieve BREEAM standards of Very Good or Excellent in respect of water efficiency, bearing in mind the serious water stress of the area as set out in our classifications Water stressed areas - final classification (2013)</p>	<p>The Local Character and Distinctives Design Guide SPD focuses on protecting and enhancing the local character and distinctiveness of the area via the use of good quality design and use of local materials. The Council's adopted Development Management Plan (2019) contains specific policy (CCF1) which requires all new development to meet the national water efficiency standard of 110 litres/person/day. Further guidance on water efficiency of developments is provided in the Council's emerging draft Climate Change and Sustainable Construction SPD.</p>	NO

Representor	Summary of Main Issues Raised	Council's Response (How the issues raised have been addressed in the SPD)	Changes made to the final SPD?
General consultee	<p>Issue 17: Symmetrical elevations Figure 83 on page 71 – The provision of symmetrical elevations is questioned. Innovative design should also be accepted.</p>	<p>Paragraph 2.6 of the SPD states that 'high quality innovative design, that respects the local vernacular could provide a welcome addition to the neighbourhood, further enhancing its character'. This also applies to the use of symmetrical and asymmetrical elevations. In some areas, symmetry is important, in other areas, asymmetry. The main issue is to respect local character to reinforce local distinctiveness. Paragraph 6.43 of the SPD discusses classical symmetry and paragraph 6.44 details the use of symmetrical features within asymmetrical elevation as those are the most common types of elevations in the local area.</p>	NO
General consultee	<p>Issue 18: Solar panels All new properties of houses and commercial developments should have solar panels on their roofs without exception.</p>	<p>The Council's Development Management Plan (2019) objective SC8 seeks to encourage new development to incorporate passive and active energy efficiency measures and climate change resilience measures and where appropriate incorporate renewable energy technologies. The accompanying DMP Policy CCF1: 'Climate change mitigation' requires both residential and non-residential development to aim for high standards of energy efficiency and the inclusion of renewable energy technologies, while providing flexibility and choice to ensure new development can remain viable. Roof mounted solar panels are one of many available sources of renewable technology and their use is not always a viable solution, other options might be more suitable. The Council's emerging Climate Change and Sustainable Construction SPD will provide detailed guidance on the use of renewable energy within development.</p>	NO

Representor	Summary of Main Issues Raised	Council's Response (How the issues raised have been addressed in the SPD)	Changes made to the final SPD?
Various general consultees	<p>Issue 19: Light and noise pollutions, satellite, TV and radio antenna installation</p> <p>Tougher rules on the external siting of items that cause light or noise pollution to neighbours. For example, powerful lights from external security or garden lights shining into neighbours' windows or noise from ground source heat pumps which current guidance does not cover well enough. Guidance for the installation of external satellite, TV and radio antenna should also be included.</p>	<p>'Other Elements' section on p. 75 of the SPD para 6.50 lists 'external lighting' as one of the elements requiring careful attention in detailed design. We have added 'Renewable energy sources' and 'Satellite, TV and radio antenna' into the list and added the following statement at the end:</p> <p><i>'Some of these elements, such as security and garden lighting, are not subject to planning controls, however care should be taken that their installation does not have a negative impact on the surrounding environment. For example external lighting should have appropriate intensity and direction of light that does not disturb others, security lights fitted with passive infra-red detectors and/or timing devices should be adjusted so that they minimise nuisance to neighbours and are not triggered by passing traffic or pedestrians. Others may require planning permission or listed building consent and/ or may be subject to building regulations. These may include installation of sources of renewable energy or satellite, TV and radio antenna. Further guidance on various building elements, such as security and garden lighting, TV/satellite antenna and ground source heat pumps can be found on the Planning Portal.'</i></p>	YES
Surrey County Council	<p>Issue 20: Mock sash windows</p> <p>The new version of the document has added a series of guidelines and principles, not all of which may be deemed to be enforceable, for example on p.73 under figure 90 where it says, "mock sashes are unacceptable and disruptive to the building form." It is questioned whether such statements are "reasonable in all (other) respects" as stated in the NPPF, especially outside of designated Conservation Areas.</p>	<p>The borough applies great weight to good standards of fenestration in new developments and it is considered reasonable that mock sashes are generally unacceptable. Given experience in the borough with such issues, it is important that good design quality is clearly defined. It should also be noted that the NPPF's requirement for "reasonable in all (other) respects" relates to the use of planning conditions, and not to reasons for refusal of planning permission. The Council however agrees to soften the statement and the final SPD has been amended from 'unacceptable' to 'disruptive to the building form and so should be avoided'.</p>	YES

Representor	Summary of Main Issues Raised	Council's Response (How the issues raised have been addressed in the SPD)	Changes made to the final SPD?
General consultee	<p>Issue 21: Promoting active travel The SPD should promote active travel (cycling, walking) and public transport connections. Connectedness is the important bit - providing a safe, direct means to cycle from the development to local school, shops, station, places of work, places for entertainment. Having cycle paths within a new development which don't connect to anywhere outside the development will only be used for leisure cycling and will not reduce car use.</p>	<p>Paragraph 6.3 – bullet point 'reduce the need to travel by car to access local facilities and work' has been changed to 'Promote active travel such as cycling and walking and public transport connections to access local facilities' Paragraph 6.16 of the SPD talks about the importance of connections between neighbourhoods and states that these links should also include cycle routes and footpaths, creating green corridors between communities. The following has been added after 'creating green corridors between communities': <i>...and providing a safe, direct means to cycle from the development to local school, shops, station, places of work and places for entertainment.'</i> Further details on sustainable transport linkages can be found in the Council's emerging Climate Change and Sustainable Construction SPD.</p>	YES
General consulted	<p>Issue 22: Car parking standards While use of public transport is encouraged and personal car use is discouraged there are areas in the borough where car use remains the most effective means. This can mean car parking in front of homes becoming problematic, taking over pedestrian walks and incumbers road traffic. More consideration should be given to car parking facilities in development areas to avoid future problems through appropriate road widths, parking space design and applying an average to the number of cars per household which reflects the local average and not a more general average number, which has no local relevance.</p>	<p>Paragraph 6.4 of the SPD states that 'Parking provision should be provided in accordance with DMP Policy TAP1 'Access, parking and servicing' which balances the need to provide adequate parking with the need to encourage sustainable transport choices. Consideration should be given to good design and implementation, including for access and servicing to minimise impact on the street scene and to protect public safety.' DMP Policy TAP1 states that car parking and cycle storage should be provided in accordance with the adopted local standards listed in the Annex 4, unless satisfactory evidence is provided to demonstrate that non-compliance would result in unacceptable harm. The parking standards set in the Annex 4 have been found sound by the Inspector during the DMP examination. The SPD also provides further guidance on design and layout of parking facilities in 'Car Parking & Access: Design and Layout' section (p.58)</p>	NO

Representor	Summary of Main Issues Raised	Council's Response (How the issues raised have been addressed in the SPD)	Changes made to the final SPD?
Surrey County Council & another general consultee	<p>Issue 23: Use of garages With the shortage and high cost of development land, no single storey separate garages should be permitted in any circumstances. The garage should be incorporated in the building with rooms above. Potential use of a semi basement for a garage and utility area etc. could mean that a smaller plot is required for a 3 storey dwelling. Advantages of heat conservation etc are achieved. It is understood that this may not be feasible in clay soil in low lying areas but much of RBBC area is situated on the North Downs. Paragraph 6.8 on p.59 suggests that "if at all possible, an effective solution is to integrate parking into the basements of apartments." The design of basement car parks may bring development into conflict with existing practice for the preservation of archaeological remains in situ if significant remains are encountered. It should therefore not be presumed that basement parking on a site is possible unless prior archaeological assessment and evaluation has confirmed that it is reasonable to do so.</p>	<p>Large areas of the borough's settlements have a spacious character where scale steps down around a property to maintain that spaciousness and where development above single storey would be inappropriate to the local character. Basement car parking can be problematic not only in the clay Weald but generally across the borough due to surface water flooding, including the chalk North Downs where much of the surface is glacial clay. Basement car parking can also be visually disruptive in terms of the degree of excavation due to access ramp excavation, impacting on tree cover and scale of development. Narrow plots with integrated garaging such as town houses can also affect Homes for Life standards as they are less accessible with ground floor taken up with garage and stairs to upper floors as well as potential loss of parking from conversion. Paragraph 6.8 has been amended from 'if at all possible' to 'where appropriate' as there can be issues such as deep ramp access which can be harmful to local character depending on the constraints of the site. In regard to archaeology, it is rare for archaeological remains to require preservation in situ in the borough. However, where this arises, it is likely to be anticipated before the design stage or protected where uncovered during the archaeological process.</p>	<p>YES</p>

Representor	Summary of Main Issues Raised	Council's Response (How the issues raised have been addressed in the SPD)	Changes made to the final SPD?
Surrey County Council & various general consultees	<p>Issue 24: The inflexibility of RASC guidance The 'guidelines' are written as though they are policy criteria to be met by development, contrary to paragraph 1.4 of the SPD which states that the SPD does not form part of the Development Plan.</p> <p>There are no criteria for designating RASCs, and this local designation appears to be used to selectively prevent intensification of development. There are examples of RASCs or parts of RASCs that are unrecognisable from the Council's description of this type of designation. This leads to an inflexible and even illogical application of prescribed 'guidelines' that may not at all reflect the actual character of the area in question.</p> <p>At Kingswood RASC, for example, there are areas that have never been Arcadian, areas which were Arcadian but lost its character due to poor development decisions, and areas that are Arcadian. The guidance needs to differentiate its criteria particularly for the first where building design compatibility with context is important. In respect of the second and third the aim should be for criteria to create/maintain Arcadia.</p>	<p>The RASCs guidance has been added to the revised SPD in support of the adopted DMP policy DES3: Residential Areas of Special Character. This additional guidance is considered necessary in order to prevent further damage to the character and local distinctiveness within RASCs from occurring, due to the out-of-scale development, loss of tree cover and the use of slate.</p> <p>Three of the RASCs were extended and six new RASCs were designated in the Council's Development Management Plan (2019), which has been through examination and been found sound by the Inspector. Characteristics of each RASC are summarised in the Annex 5 of the DMP. The criteria for designating RASCs are set out in Figure 1 of the "Residential Areas of Special Character (RASC) Review 2018", available on the Council's website⁴.</p> <p>As with all examples in the SPD (and the former SPG), these are illustrative examples and the individual character of a particular area will have to be taken into account when applying for a planning permission. However, these examples do demonstrate what is generally sought, i.e. landscape dominated frontages, sides and green backdrops. There are several hundred houses in Kingswood and whilst there may be some breaches, the general character is still clearly evident. All areas in the Kingswood RASC are landscape dominated.</p> <p>The guidance is based on the overall general characteristics of RASCs and the Council acknowledges that there will be some inconsistencies within certain areas and individual circumstances will need to be taken into account during planning applications. The final SPD has therefore been amended to include the following statement at the beginning of the 'blue box' RASC guidance: 'Please note this is general guidance and individual circumstances of each development will be taken into account when assessing planning applications.' The tone of the guidance has also been softened, where appropriate, i.e. changing 'unacceptable' to 'generally not suitable' etc. These changes will be highlighted in our response to Issue 27 below.</p>	YES

⁴ www.reigate-banstead.gov.uk/downloads/file/6350/development_management_plan_regulation_19_residential_areas_of_special_character_rasc_review_november_2017_-_updated_may_2018

Representor	Summary of Main Issues Raised	Council's Response (How the issues raised have been addressed in the SPD)	Changes made to the final SPD?
General consultee	<p>Issue 25: The importance of landscape in RASCs</p> <p>The key to Arcadian townscape is the landscape not buildings. It is the landscape which provides the dominant and unifying theme. Houses are visually subservient to the landscape. A feature of Arcadian townscape is that individual building designs can be absorbed without undermining the overall character since the landscape contains the buildings and spaces.</p> <p>As part of a planning application, applicants should be required to submit an Arcadian landscape strategy/structure plan and that should be evaluated along with other aspects of the proposal. Moreover, if permission is to be granted, a landscaping condition should be applied as a matter of course.</p> <p>It is clear, that in many instances there has been a combined failure in past decisions to understand the key role of landscaping and its interrelationship with building footprints and plan forms. Unarticulated deep buildings and roofs with excessive built frontages combine to exclude sufficient room for Arcadian landscaping.</p> <p>“Outlawing” slate and insisting upon tiling will not resolve the problems that have been manifested from recent development. Undoubtedly better design, perhaps on occasions with less ambitious floorspaces, is needed.</p>	<p>DMP Policy DES3 states that within RASCs, planning permission will be granted for residential development, including conversion, provided that (5) the existing tree cover, landscaping, green areas and vegetation are retained or replaced, and where possible enhanced, using appropriate species; and (6) soft and hard landscaping is sensitive to the plot, its setting and prevailing plot boundary characteristics.</p> <p>As part of the design process for development, the Council expects the applicant to demonstrate that the tree, hedge and shrubbery cover is maintained and landscaping schemes are conditioned. The new guidance is intended to address the concern about excessive built frontages and deep footprints and the need for effective landscaping to maintain the arcadian character.</p> <p>Section 2 of the revised SPD highlights the importance of landscape as one of the factors to consider when conducting the site's context appraisal and using the outcome of this appraisal as a part of the design process. This section of the SPD also signposts applicants to the Council's website, detailing the national requirements and Local Validation List of documents required as a part of the formal planning process. The Council is currently undertaking a review of its Local Validation List and any requirements, such as submission of an Arcadian landscape strategy, will be carefully considered and added if appropriate.</p> <p>Landscaping on its own will not retain the character, as is evident in Sandy Lane where despite spacious plots the use of slate urbanises the environment and detracts from local geological character.</p>	NO

Representor	Summary of Main Issues Raised	Council's Response (How the issues raised have been addressed in the SPD)	Changes made to the final SPD?
Various general consultees	<p>Issue 26 (1): Comments on RASCs guidelines in blue box on page 40 1. No development should be justified by other inappropriate examples, including out of scale development and the use of slate, even where a cluster has developed.</p> <p>The character of any defined area will be determined by what is included within the area. The Council should not allow inappropriate development in RASCs and should review the boundaries to exclude development that is deemed to be inappropriate.</p> <p>The outcome of this 'guidance' would, otherwise, allow wholly subjective and inconsistent decisions to be made, based on little more than whimsical subjective judgements about what is 'appropriate' and what is 'inappropriate'. Instead, decisions should be made with coherence and a clear and consistent, transparent approach.</p>	<p>As with all parts of the borough, character is important and there will always be past inconsistencies in any area of character. It is not practical to exclude individual inappropriate developments, often allowed on appeal (such as those at Forres, Eyhurst Close & Dungoyne, Warren drive – both discussed below), prior to the adoption of the DMP, but instead aim to gradually ensure greater consistency within RASCs. The character is based on objective judgements about local distinctiveness and character in Surrey. The boundaries of the RASCs were reviewed in 2017 through the RASCs Review, prepared to inform the Development Management Plan (DMP), see weblink above. This recommended some changes to the boundaries of RASCs.</p>	NO

Representor	Summary of Main Issues Raised	Council's Response (How the issues raised have been addressed in the SPD)	Changes made to the final SPD?
Surrey County Council & various general consultees	<p>Issue 26 (2): Comments on RASCs guidelines in blue box on page 40 2. Shrubbery and hedge boundaries should be maintained. Walls, fence and railing front boundaries are unacceptable as they urbanise the street. Where security is needed, railings should be set back behind the hedge line and no higher than the existing hedge.</p> <p>The new version of the document has added a series of guidelines and principles, not all of which may be deemed to be enforceable. Some of the development highlighted (e.g. such as installing fences) could be classed as permitted development subject to certain requirements and therefore would not require planning permission in any case.</p> <p>Attention is drawn the appeal decision relating to Forres, Eyhurst Close, Kingswood (LPA Ref: 12/01435/HHOLD, PINS Ref: APP/L3625/D/13/2194289). The Inspector noted that: "on The Warren there is no consistent boundary treatment for the frontages of individual properties; some have only shrubs and trees, some have wire mesh fencing with shrub planting, some have metal railings with shrub planting, some have riven oak post-and-rail fencing, some have wooden panel screen fencing augmented by shrub planting, and others have walls of varying height, again backed by shrub or tree planting. That is, there is a considerable mix of boundary treatments and low walls are not uncommon within The Warren".</p>	<p>DMP Policy DES3 (1) states that planning permission for residential development (including conversion) within RASCs will be granted, provided that plot frontages and boundary treatments reflect the existing street context. As most RASCs include hedge lined streets, it is not considered unreasonable as a general rule to say that walls, fence and railing front boundaries are not suitable as they urbanise the street.</p> <p>The special character of RASCs is being eroded through residents installing boundary walls, fences and railings, and clear guidance is needed to promote consistency. However, the Council recognises that many houses have permitted rights to erect walls, fences and railings to a certain height without needing express planning permission.</p> <p>With regards to the appeal decision noted above, the Council notes that the appeal decision has been granted prior to the adoption of the DMP, which requires the boundary treatment to reflect the existing street context (as noted above). The Council acknowledges the Inspector's findings but would also like to point out the Inspector's comments stating that 'the houses on The Warren are generally set in large plots, where the frontages are enclosed and substantially screened by trees and shrubs. This frontage screening is a marked characteristic of the area and is something which must be safeguarded in order to comply with the development plan policies.'</p> <p>As noted in our response to issue 25, this is general guidance, and individual circumstances of each street will be taken into account when making decisions. There is a consistent character to the RASCs but there will always be inconsistencies which undermine that character. It is important to try and reinforce the landscape character of the RASC. Further character appraisals for some RASCs are currently being considered by the Council as it appears that there is a need for further information on the character of the RASC so there is a better understanding of that character, including as appeal background information.</p> <p>Point 2 of the RASC guidance has been amended in the final SPD in line with our response to issue 24.</p>	YES

Representor	Summary of Main Issues Raised	Council's Response (How the issues raised have been addressed in the SPD)	Changes made to the final SPD?
Various general consultees	<p>Issue 26 (3): Comments on RASCs guidelines in blue box on page 40 5. Garage in front gardens or in front of general building line will depend on the pattern of appropriate examples in a street and the space available... No other development should occur in front of building line.</p> <p>The appropriateness of this 'guidance' will obviously depend on the nature of the area and the site in question. In some RASCs or in some cases, smaller ancillary structures would lead to no harm to, or erosion of, the character of the area. This is an example of 'guidance' that is inflexible and based on an assumption of a set character for all RASCs and all parts of RASCs, when in fact the RASCs (and in some cases parts of RASCs) can be varied and capable of accommodating various types of development without any harm. It is noted that there are several examples of triple garages throughout the RASCs.</p>	<p>DMP Policy DES3 states that within RASCs, planning permission will be granted for residential development, including conversion, provided that (4) the proposed development (including garages and other ancillary buildings) does not result in a harmful erosion of the spacing between buildings or lead to an over-dominance of the build form within the plot.</p> <p>The SPD guidance is a reasonable principle and based on general practice. It gives flexibility in stating that the development of garages 'will depend on the pattern of appropriate examples in a street and space available'. This message has been strengthened further by adding a prefix to the RASC guidance as per our response to issue 25 above.</p> <p>It is considered that triple garage with accommodation in front gardens (such as that at Dungoyne, Warren Drive, Kingswood allowed on appeal (LPA Ref: 14/01537/F, PINS Ref: APP/L3625/W/15/3006481) have undermined the character of the RASC.</p> <p>Point 5 of the RASC guidance has been amended in the final SPD in line with our response to issue 24.</p>	YES

Representor	Summary of Main Issues Raised	Council's Response (How the issues raised have been addressed in the SPD)	Changes made to the final SPD?
Various general consultees	<p>Issue 26 (4): Comments on RASCs guidelines in blue box on page 40 6. Hardstanding should be limited in extent, with a single access and set back from the front boundary so there is a substantial belt for the location of the front hedge or shrubbery and tree and shrub planting behind. Parking for no more than 4 cars should be provided on the larger sites. In and out drives are generally unacceptable.</p> <p>This guidance shows a disregard for both the existing nature, use and character of RASCs, and an inflexible approach to the actual capacity for RASCs to accommodate change without harm. It is noted that in and out drives exist throughout the RASCs and permitted development allows for hardstanding. There should be some flexibility to reflect modern living and other examples in the specific RASC.</p>	<p>DMP Policy DES3 states that within RASCs, planning permission will be granted for residential development, including conversion, provided that (8) sufficient off street parking is provided within the site and the layout of parking provision is not dominant within the site or otherwise harmful to the character of the locality.</p> <p>It is important that the landscape dominated frontages in RASCs are not undermined and that where new development is proposed that the front does not become hardstanding dominated.</p> <p>Point 6 of the RASC guidance has been amended in the final SPD in line with our response to issue 24.</p>	YES
Various general consultees	<p>Issue 26 (5): Comments on RASCs guidelines in blue box on page 40 7. Eaves lines with a gap above general window heads or arches or in the case of garages, above garage door head, will be unacceptable for the same reason.</p> <p>This inflexible guidance doesn't consider the variety and character of buildings within RASCs, not all of which conform with this stated requirement. There is a variety of designs and architectural styles in RASCs and local residents should be able to choose their own architectural style.</p>	<p>This is not about architectural style but the scale of development in front gardens. Tall eaves heights of garages have had an urbanising effect on the RASC.</p> <p>Point 7 of the RASC guidance has been amended in the final SPD in line with our response to issue 24.</p>	

Representor	Summary of Main Issues Raised	Council's Response (How the issues raised have been addressed in the SPD)	Changes made to the final SPD?
Various general consultees	<p>Issue 26 (6): Comments on RASCs guidelines in blue box on page 40 8. Slate and slate colour tiles are not acceptable are out of character with the arts and crafts character of the estates. Plain tiles will be expected, of local clay or colour to match. Recessive materials are encouraged generally to maintain the landscaped dominated character.</p> <p>It is noted that there are several examples where slate has been used throughout the RASCs. Slate has been used extensively in Kingswood. It is also important to note that some of the original buildings on the Estate used slate. The LDDG and LCDDG refer at 6.36 that Welsh slates arrived with the railways and are common in Redhill and Horley. However, it is also the case the Kingswood RASC also arrived after the railway.</p>	<p>Slate undermines local distinctiveness in the RASCs and adds to the obtrusive development and therefore it is important that local distinctiveness is reinforced. A strong stand is required against the use of slate as it is the default material used by those developing sites.</p> <p>Most of the RASCs are arts and crafts areas, a reaction against the urbanising railway architecture of some Victorian development. The use of clay and other plain tiles were specifically chosen at the time as a reaction against the use of slate undermining local character. Slate was only used on a handful of properties in the Kingswood RASC and those are mostly Victorian and predate the arts and crafts development of the estate. The general character of the estate remains clay and other plain tiles yet there is a consistent undermining of this by the default use of slate without consideration of local character. Point 8 of the RASC guidance has been amended in the final SPD in line with our response to issue 24.</p>	YES
Various general consultees	<p>Issue 26 (7): Comments on RASCs guidelines in blue box on page 40 9. No part of the footprint of a development, however small, shall be forward of the front building line. Development should also be in line with the neighbouring property where set behind the building line.</p> <p>This cannot be applied in all cases, as the building line may not exist in the way that the guidance describes it or assumes it to be. This inflexible approach demonstrates an inability to accept the variety and character of buildings within RASCs. Houses in RASCs have plenty of opportunity for forward extensions given in many cases the set back from the from the road.</p>	<p>The building lines are generally evident in RASCs and there will be houses set behind that which can be extended forward if appropriate and respecting the general pattern of development adjacent. As noted in our response to issue 25, the Council acknowledges that the guidance is general and individual circumstances will be taken into account when making decisions.</p>	NO

Representor	Summary of Main Issues Raised	Council's Response (How the issues raised have been addressed in the SPD)	Changes made to the final SPD?
Various general consultees	<p>Issue 26 (8): Comments on RASCs guidelines in blue box on page 40 <i>10. The footprint of any house should not be out of character with the prevailing appropriate footprint size in the road. The footprint should be adjusted according to the plot size, for instance for an existing small plot a footprint smaller than the general street may be expected but for larger plots the length and depth should not exceed the general pattern in the street.</i></p> <p>RASCs are characterised by unique dwellings and irregular plots. Here the guidance states that footprints should be adjusted smaller for smaller plots but may not be adjusted in same way to be larger for larger plots – in those cases the prevailing pattern must be followed.</p>	<p>There is a prevailing character and pattern of plot ratios in the RASCs where there is a maximum size of footprint, the footprint does not increase infinitely with the size of the plot, there is an upper limit. However, in the case of smaller plots the footprint does reduce in relation to the size of the plot.</p>	NO
Various general consultees	<p>Issue 26 (9): Comments on RASCs guidelines in blue box on page 40 <i>11. With a street or part of a street where the road characteristic varies, the width of plot and maintaining of the general pattern of gaps between side elevations and side space between dwellings and to boundaries should be respected. The prevailing width size within a road should be maintained and reduction by subdivision less than the prevailing width is unacceptable. Equally the typical plots sizes within the road should be maintained.</i></p> <p>Each RASC has its own set of characteristics and wide range of plot sizes along building to plot width ratios making it impossible to apply these rules fairly.</p>	<p>DMP Policy DES3 states that within RASCs, planning permission will be granted for residential development, including conversion, provided that (7) the proposal does not involve inappropriate sub-division of existing curtilages to a size below that prevailing in the area.</p> <p>This SPD guidance has been based on general practice and looks at the character of the RASCs. Plot width is an important element of local character.</p>	NO

Representor	Summary of Main Issues Raised	Council's Response (How the issues raised have been addressed in the SPD)	Changes made to the final SPD?
Various general consultees	<p>Issue 26 (10): Comments on RASCs guidelines in blue box on page 40 12. Depth of footprint should not exceed the general pattern in the street and be set back or recessed from the side to provide articulation and break the length of elevation.</p> <p>One of the main components of the RASCs are the width and depth of plots enabling significant rear extensions to provide extensions to living accommodation and leisure accommodation.</p>	<p>Any decisions would be based on the general pattern of development in the street, taking into account whether there are already appropriate examples of rear extensions to provide living and leisure accommodation that don't harm the landscape character.</p>	<p>NO</p>

Representor	Summary of Main Issues Raised	Council's Response (How the issues raised have been addressed in the SPD)	Changes made to the final SPD?
Various general consultees	<p>Issue 26 (11): Comments on RASCs guidelines in blue box on page 40</p> <p>13. Generally, development will be of two storeys, accommodation in the roof being dependent on the pattern in the street, though some streets in the RASCs are of a single storey nature and this should be respected...</p> <p>If accommodation in the roof space is not utilised, this goes against the principles of good design.</p> <p>15. Floor ceiling heights should be respected so eaves heights match appropriate neighbouring properties.</p> <p>Developments should not have to replicate neighbouring properties. (this also applies to point 16)</p> <p>18. Roofs should follow the pitch, eaves height, ridge height and form within a road.</p> <p>This cannot be applied in all cases as the consistency of roof forms may not exist in the way that the guidance describes it. This inflexible approach demonstrates an inability to accept the variety and character of buildings within RASCs.</p> <p>19. The eaves and ridge heights should be in line with neighbouring eaves and ridges.</p> <p>Again, this may lead to situations where there are different ridge/eaves line to different neighbouring properties. The guidance does not resolve such issues or recognise the variety of buildings within RASCs.</p>	<p>DMP Policy DES3 states that within RASCs, planning permission will be granted for residential development, including conversion, provided that (3) the height, depth, elevation, scale and massing of development respects the form of neighbouring buildings and the character of the RASCs.</p> <p>The guidance recognises that individual circumstances will need to be taken into account when making a decision on a planning application. The scale of the development within a street is important and the accommodation in the roof would depend on the pattern in the street.</p> <p>Each RASC is unique, recognised for its individual identity and distinct character and it is right that a proposed eaves height should respect the eaves heights appropriate to neighbouring properties, so they are in scale with the street.</p> <p>All of the above guidance deals, in essence, with eaves and ridge heights and therefore the final SPD has been amended to combine those into one single guideline as per below:</p> <p><i>13. Generally, development will be of two storeys, accommodation in the roof being dependent on the pattern in the street, though some streets in the RASCs are of a single storey nature and this should be respected. Floor ceiling heights should be respected so that eaves and ridge heights match appropriate neighbouring properties. Roofs should follow the pitch, eaves height, ridge height and form within a road. Proposals should be accompanied by street scenes showing the proposal in relation to eaves and ridge heights of neighbouring development. The height of these will be expected to be verified by measured drawings or other means by the applicant. To avoid breaches of height, the eaves and ridge heights will be conditioned to match by reference to the ridge and eaves line it intends to match.</i></p>	YES

Representor	Summary of Main Issues Raised	Council's Response (How the issues raised have been addressed in the SPD)	Changes made to the final SPD?
Various general consultees	<p>Issue 26 (12): Comments on RASCs guidelines in blue box on page 40 21. The number of dormers should reflect the prevailing pattern of appropriate examples in the street. Numerous rooflights should be avoided. Solar panels and photovoltaics should be sited so they minimise impact, including in crown roof no higher than ridge, or on the rear plane of roof or screened small rear garden arrays. Side roof planes would be a secondary options and front roof planes should be avoided. Where they occur in roof planes, they should be integrated in the roof, symmetrical to the roof's axial symmetry, rectangular in layout and not stepped and with black frames. They need to consider early in the design process and not an add on. Vehicle Charging points should be unobtrusively placed, preferably black with minimal indicative lights, where they cannot be sited internally.</p> <p>It is agreed that dormers should comply with the relevant design guidance, yet this guidance is overly prescriptive as modern interpretations can achieve high quality design, or when to the rear of a building.</p>	<p>The scale of the development within a street is important and the accommodation in the roof would depend on the pattern in the street. This would include for example typical number of dormers found on properties in the street, etc and the pattern to the rear may differ from the pattern to the front plane of the roof. However, scale is important whether it is modern or traditional interpretation.</p>	NO
Transport for London	No specific comments	Noted	NO
SGN (Infrastructure provider)	No specific comments	Noted	NO

Representor	Summary of Main Issues Raised	Council's Response (How the issues raised have been addressed in the SPD)	Changes made to the final SPD?
Elmbridge Borough Council	No specific comments	Noted	NO
Highways England	No specific comments	Noted	NO
CLH Pipeline System Ltd. (Infrastructure provider)	No specific comments	Noted	NO
Canal & River Trust	No specific comments	Noted	NO
Historic England	No specific comments	Noted	NO

Any other matters

A number of other minor amendments were proposed, including grammatical and typographical suggestions. Where considered appropriate these amendments have been made.

Appendix 2: Individuals and organisations consulted on the draft Local Character and Distinctiveness Design Guide SPD under Regulations 12 and 13

Specific Consultees	Specific Consultees
(aq) Limited	Marine Management Organisation
Adur & Worthing Councils	Mayor of London (Senior Strategic Planner)
Affiniti Integrated Solutions Limited	Mid Sussex District Council
Airband Community Internet Limited	MLL Telecom Ltd
Airwave Solutions Limited	Mobile Broadband Network Limited
Aqua Comms	Mole Valley District Council
Arqiva Communications Ltd	Mono Consultants
Arqiva Limited	MS3 Networks Ltd
Arqiva Services Limited	My Fibre Limited
Arun District Council	National Grid (Avison Young)
AT&T Global Network Services (UK) B.V.	NATS (En Route) PLC
Atlas Communications NI Limited	Natural England
Atlas Tower Group Limited	Natural England Sussex & Surrey Team
B4B Networks Ltd	Neos Networks Ltd

Specific Consultees	Specific Consultees
Betchworth Parish Council	Network Rail (town planning)
Bletchingley Parish Council	Newdigate Parish Council
Bolt Pro Tem Limited	NextGenAccess Ltd.
Boundless Networks Ltd	NHS Crawley Clinical Commissioning Group (CCG)
Box Broadband Limited	NHS England
Brighton & Hove City Council	NHS England and NHS Improvement South East
Britaniacrest Recycling	NHS Property Services
Britannia Towers II Ltd	Nutfield Parish Council
British Gas	NWP Street Ltd
British Telecom	Office of Rail and Road
British Telecommunications plc	Open Fibre Networks Limited (formerly Independent Next Generation Networks Limited)
Broadband for the Rural North Limited	Open Network Systems Limited
Broadway Partners Limited	Orange Personal Communication Services Ltd
Buckland Parish Council	Outwood Parish Council
Burstow Parish Council	PCCW Global Networks (UK) Plc

Specific Consultees	Specific Consultees
Call Flow Solutions Limited	Quickline Communications Limited
Cambridge Fibre Networks Limited	Ranston Farm Partnership
Central North Sea Fibre Telecommunications Company Limited	Runnymede Borough Council
CenturyLink Communications UK Limited	Salfords & Sidlow Parish Council
Chaldon Parish Council	Scotia Gas Network (SGN)
Charlwood Parish Council	SES Water
CityFibre Metro Networks Limited	Sevenoaks District Council
CityLink Telecommunications Limited	Severn Trent Retail Services Limited
Civil Aviation Authority	SGN
CLH Pipeline System Ltd	Sitec Infrastructure Services Ltd
Coast 2 Capital	Sky Telecommunications Services Limited
Coast to Capital	Sky UK Limited
Cogent Communications UK Ltd	Solway Communications Limited
COLT Technology Services	Southern Electric
Communications Infrastructure Networks Limited	Southern Gas Network

Specific Consultees	Specific Consultees
Concept Solutions People Ltd	Southern Water
Cornerstone Telecommunications Infrastructure Limited	Spelthorne Borough Council
County Broadband Limited	Sprintlink UK Ltd
Crawley Borough Council	Spyder Facilities Limited
Crawley CCG	SSE Telecommunications Limited
Development Planning Manager, Developer Services, Thames Water	Subtopia Limited
EE Limited	Surrey and Sussex NHS Trust
Eircom UK Ltd	Surrey CC (Minerals & Waste Planning)
Elmbridge Borough Council	Surrey CC Planning Consultation
Energis Communications Ltd	Surrey Heath Borough Council
Environment Agency	Surrey Wildlife Trust
Epsom & Ewell Borough Council	Sussex and Surrey Police
EU Networks Fiber UK Limited	Sussex Wildlife Trust
euNetworks Fiber UK Ltd	TalkTalk Communications Limited
FibreSpeed Limited	Tandridge District Council

Specific Consultees	Specific Consultees
Fibrewave Networks	Tata Communications (UK) Limited
FLAG Atlantic UK Limited	Telecommunications Wireless and Infrastructure Services Limited
Flood Risk & Network Resilience Assistant - Surrey County Council	Telefonica UK Limited
Fujitsu Services Limited	Telensa Ltd.
Full Fibre Limited	Telent Technology Services Limited
G. Network Communications Limited	Telewest Limited
Gamma Telecom Holdings Ltd	TeliaSonera International Carrier UK Limited
Gas Transportation Company (GTC)	Thames Water Planning Policy
Gatwick Diamond Initiative	Thames Water Utilities Ltd
Gatwick Greenspace Partnership	The Coal Authority
Gigaclear Plc	The Wireless Asset Company Limited
Glide Business Limited (formerly WarwickNet Limited)	The Wireless Infrastructure Company Limited
Government Pipeline & Storage System (GPSS)	Three
Greater London Authority	Thus plc

Specific Consultees	Specific Consultees
GTT Communications	TIBUS (trading as The Internet Business Limited)
Guildford Borough Council	Timico Partner Services Limited
Harlequin Group Ltd	Tiscali UK Limited
Head of Primary Care - Surrey Heartlands CCG	toob Limited
Headley Parish Council	Transport for London
Highways England	Transport for the South East
Highways England (Spatial & Development Control Queries)	Truespeed Communications Ltd.
Historic England	UK Broadband Limited
Historic England South East - Consultations	UK Power Network
Homes England	Ulstercom Ltd
Horley Town Council	Urban Innovation Company (UIC) Limited, (formerly Euro Payphone Ltd)
Horsham District Council	Verizon UK Ltd
Hutchison 3G UK Limited	Virgin Media Limited
Hyperoptic Ltd	Virgin Media Wholesale Limited
In Focus Public Networks Ltd	Vodafone and O2, EMF Enquiries

Specific Consultees	Specific Consultees
InTechnology Smart Cities Limited (formerly InTechnology WiFi Limited)	Vodafone Enterprise UK (formerly Cable & Wireless UK)
Integrated Digital Services Limited	Vodafone Limited
Internet Central Ltd	Vodafone Limited - Environmental and Planning Manager
Internet Connections Limited	Voneus Limited
Interoute Communications Limited	Waldon Telecom Ltd.
IPM Communications PLC	Waverley Borough Council
ITS Technology Group Limited	Wealden District Council
IX Wireless Limited	West Sussex County Council - Planning Policy
KCOM Group Plc	WHP Telecoms Limited
Lancaster University Network Services Limited	Wifinity Limited
Leigh Parish Council	Wightfibre Limited
Lightning Fibre Limited	Wildcard UK Limited
Local Plans South - NHS Property Services Ltd	Woking Borough Council
London Borough of Croydon	WPD Telecoms Limited (formerly Surf Telecoms Limited)
London Borough of Sutton	Zayo Group UK Limited

Specific Consultees	Specific Consultees
Lothian Broadband Networks Limited	Zzoomm PLC

General Consultees

Residents, businesses, registered providers and developers on the Council's Planning Policy Consultation Contacts database.