

APPENDIX A2 – Full list of unedited comments with councils’ response included

Part 5: Introduction sections

Question 3: The Introduction sections of the website aim to provide you with information on how to use the draft Joint Design Guide and about the districts, to give yourself the best chance of securing planning permission with a high-quality development. How clear (easy to understand) do you think these sections are?

	Comments	Council’s response
1	<p>Too many words.</p> <p>Too many pages.</p> <p>Too many concepts.</p> <p>Too much everything.</p>	- Noted.
2	<p>The information is clear but the information itself is crazy. Is the Council seriously suggesting that all applicants undertake a Design Competition? Does the Council understand the costs that are associated with such a contest?</p> <p>Why would a consultancy that provides planning and architectural advice ever consider a contest against its own in-house architect? Why would a regular average householder care to run a competition for an architect to provide a rear extension and a porch, in fact, what architect would even bother to submit an application?</p> <p>Again, the same can be said for public consultation. No householder application requires a public consultation aside from an informal chat with the neighbours. Even a small scale development such as a replacement dwelling or an infill plot would likely need to more discussion outside of the immediate neighbours and the parish council. The design guide fails to acknowledge the nuance of different applications and this needs to be made clearer.</p> <p>In any case, the flow chart suggests to applicants that if a design review occurs and results in an improved design then planning permission would be forthcoming. Such a suggestion is obviously wrong and even the most beautiful development would be inappropriate in the wrong location. This again needs to be clearer.</p>	Noted, we will explain and clarify when this flow chart needs to be followed.
3	This has no purpose. As a resident I should not have to be asked about the design of promo material.	This is not promotional material but a Supplementary Planning Document
4	The flow chart makes it appear that Planning Permission is inevitable. You just need to go through the loop enough times and you’ll get it.	Noted, we will explain and clarify when this flow chart needs to be followed.
5	Clear to understand	- Acknowledged
6	No major issues with this	- Acknowledged
7	Please add a search engine so that the document can be searched for key words.	- Noted and in review

8	Not clear that responses to this survey will be acted upon.	A consultation report will summarise the responses received and appendix of raw data will be attached. A section within the consultation report will explain how we have dealt with the main issues raised prior to the guide being adopted.
9	The existing Vale design guide is very clear, and yet in Faringdon we see multiple large developments being approved which skip the guidance . A cursory look at multiple exits and entry suggestions, space for growing food, movement framework, etc. shows there is little point in making new guides, if the implementation of existing guides is so poor. If the same people and processes are at work in the approval process, there is no point in investing in new guidelines.	· Noted.
10	I have not read the guide in detail as I wish to make some specific comments which I hope will find space in the next pages.	· Noted.
11	I haven't got to section yet so how can I ascertain if easy to use . Stupid question	· Noted.
12	I found the whole package very easy to access and understand.	· Acknowledged
13	will you be having a display in council offices so that many members of the public , who do not have access to internet can also get involved ?	Copies of the guide were accessible in all the main 20mbat2me across both districts. A pdf copy of the guide was distributed to those that requested within the consultation period.
14	This guide is well written, and clear without being prescriptive. As an individual who lives in a small village, I can easily relate to all the sections and I particularly like the built environment section. You have done a good job on behalf of people like me. I hope that individuals, architects, builders and larger developers take good note and use the spirit of the guide when building the much-needed houses for young people and those with modest incomes.	· Acknowledged

15	<p>There is still a tendency to use professional jargon which is not easily understood by most of us, e.g. "permeable hierarchy of streets" and "inclusive design" .</p>	<p>We have tried to avoid technical language wherever possible. A glossary of terms can be found on the website which define such concepts.</p>
16	<p>Very clear If I added points might be to strengthen as far as possible need to meet the guideline criteria firmer than "good if you do" and that priority to go to developments that consider likely transport needs /CO2 emissions of occupiers</p>	<p>· Noted.</p>
17	<p>The document has very little to do with the planning process. It could be used to support any planning decision; somebody decides to build a couple of 18 storey block of flats opposite Didcot station (which are out of kilter with the 2 and 3 storey environment – but makes a lot of money for the developers – and creates a dangerous fire risk and criminal hotspot). The Joint Design Guide would green light it. If developers wanted a link road every 200 metres down the Didcot – Milton/A34 instead of one links road from Milton Island (McDonalds) to Didcot – Harwell road (zig zagging?), then 10 link roads snarling up road communications would be green lighted even though this 2 mile piece of road is also the first part of the proposed Didcot – Clifton Hampdon (& on to M40?) link road. Therefore the Guide does not at present take account of the wider environment. The Guide is fine for reviewing the building a Church with crypt in one of the villages, but is not 'fit for purpose' for million pound projects. I suggest the inclusion of two or more of the following: PESTLE analysis, risk analysis, SWOT. PROVE. P.S. When I was asked to input into the discussion about the 18 storey block of flats opposite the station was a major fire risk and crime hotspot, the fire brigade wrote to me to say that I was mistaken, and the Police rep said I was also mistaken even though I gave examples. Perhaps Grenville Flats changes his/mind? And regarding the crime hotspot perhaps somebody could ask why multi story flats were build in Cowley and Blackburn Leys and not Headington and North Oxford; and compare the crime levels using Gov.uk?Thames Valley statistics?</p>	<p>The design principles outlined in the design guide are applicable to all scales of development. Will review.</p>
18	<p>it makes it seems as though is you can resolve the design you will get pp. that is very far from the case. It also suggests everyone needs a design review. The flow chart is just wrong. By failing to use numbered points the introduction is useless. On a web page how on earth can it be referenced?</p> <p>design guides are really very rarely 'full of complex phrases and terms' literally everything is in plain 3ombat3 in older design guides. This one refers to 'blue infrastructure' quite early on which is so plainly unexplained jargon it is 3ombat3ment3. This guide is not doing what it sets out to do.</p> <p>the introduction cites a 'well designed hospital helps patients recover quicker'. That is lovely but it is of almost no consequence whatsoever for the rest of the design guide which is heavily biased towards residential development. It is like the authors don't even understand why they are writing this guide and who they want to influence by its. It is off beam.</p> <p>the spider diagram (that i cannto reference of course) doesn't even cite health as an issue for design.</p>	<p>The design principles are numbered but the remaining text was limited and adding a numbering system to it would affect the overall formatting and appearance of the website. The section on value of good design has been updated. Further reference to health and placemaking has been made throughout the guide. Will review landscape character links.</p>

	<p>this is a mess of ideas rather than true clarity of vision</p> <p>the landscape character links don't work? Are they supposed to? Who knows? How can one comment when it doesn't seem to do what one expects?</p>	
19	<p>Does not seem to take into account the need for a good infrastructure, water, gas, electric supplies, medical needs, drainage etc. Or to take into account the needs of parents with children in buggies, people with mobility issues, good access to all areas, ie dropped kerbs, and pathways not ateps.</p>	<p>Some of the issues need to be considered at the outset of the design process and with the relevant authorities (County Council).</p>
20	<p>In design brief says Garages will be built to dimensions of 3m x 6m for single and 6m x 6m for Double. Its about time local planning took control to update these dimensions for the modern word and vehicles.(I have a 1998 built detached house with garage these internal dimensions and its completely useless apart from storing tools an junk. With the doorside facias taking up c35cm of door entrance-width further....cant even get a small car in it or get out of one once inside garage.)Modern cars espec 4 x 4 's and even new Evs are around 2.02m wide and a shade over 5.0m long if you research.IF THE VALE STIPULATED MANDATORY MINIMUM WIDTH AND LENGTH WHICH WERE PRACTICAL TO PUT A CAR IN AND WIDE ENOUGH SO YOU CAN OPEN A DOOR then a number of substantial benefits: 1. New Owners of Garages would be lot happier2. Whole Community would welcome the reduction in the number of cars outside peoples houses in streets and on drives3. Second Cars formerly 'on drive' would be put in garages probably reducing thoughtless useage as have to be 'got out'4. Planning could better use community space around dwellings...wider verges/trees and no parking bays specially built on roads.5. Environment benefits in less-cluttered appearance and more space as less parking-courts made, less tarmac areas.6. Eyesore of Wheeliebins reduces as can put in garage....(especially if planners force house-builders to 4ombat4m houses have internal-door access into these garages).7. Less cars on streets means better access for Emergency Services and Waste Disposal rounds etc.8. Less road-surfaces needed mean savings on maintenance, drainage, more space in community devoted to open community use near homes eg play and walking spaces, bike paths.Serious issue and simple to sort now. Will provide a better future in design aimed at a drive to improve peoples' surroundings rather than let builders build what they want as long as they pay 'community/infrastructure planning charges'.Please consider as standard for the areas builds..thank you.</p>	<p>The design guide follows guidance set out by County Council regarding garages. Some of these matters are beyond the remit of the design guide. Other aspects will be reviewed.</p>

21	<p>There is a need to prioritise the brief. The aspirations are laudable, but I doubt whether they will be realized. Many of the aspirations will be vacuous unless and until Climate Change is both successfully arrested (both in this country and globally) and protected against. The latter may require very high investment infrastructure (including drainage for especially high run-off drainage, hurricane protect and land slides).</p> <p>It is not enough to publicise improved design guidelines. Successful sustained developments call for a partnership between Local Government and Developers. Along with the upgraded Guide there should be a public Charter which commits Local Government to provide the essentially well designed and sustainable infrastructure and services required by all users of the proposed development. Infrastructural provisions should be made in tandem with the building and landscape development rather than subsequently. The need for priority to be given to the creation of successful and sustainable COMMUNITIES needs to be highlighted as a development priority.</p> <p>It should be emphasised that Developments should either directly provide or be linked to green energy generation/conservation and re-cycling; in situ or nearby. Measures for combatting the impacts of prolonged heat-waves should be required, covering both buildings and the surrounding landscapes.</p>	· Noted.
22	<p>I like the clear use of headings/subheadings and introductory sentences that can give meaning without having to read the full detail – different levels of information are good. A minor formatting point: bullets under the heading 'Additional guidance and frameworks beyond our guide' are in a slightly different font because they are links – I think a consistent font would look better. Generally the look and feel of this section and throughout is really user friendly and attractive.</p>	· Acknowledged
23	<p>the structure of the document as a whole was extremely clear and excellent overall, i enjoyed reading it. The introduction was the only part I felt somewhat confused – particularly the measures of quality which did not link to or reflect the goals within the document. I am also not sure what is meant by ""landscaping""</p>	Noted. The introduction section will be reviewed to reflect the overall goals of the guide. A definition of 'landscaping' has been added to the glossary of terms.
24	<p>They are all fine in principle. Providing a less prescriptive approach might result in better outcomes for all, and in teh case of small developments like house extensions that's fine. But once a commercial supplier becomes involved there is a danger that with their well-resourced legal departments they will run rings around the guide and exploit ambiguity to build more of the same crowded developments with nowhere to put the bins, nowhere to park, and basically as many homes as possible in as small a space as they can get away with.</p>	· Noted.
25	<p>I need to see the following pages before I am able to answer this.</p>	· Noted.
26	<p>Sorry, perhaps I'm very slow, but I had no idea I was expected to click on a chain of coloured dots to find the detailed content.</p>	· Noted and in review
27	<p>I found the sections clearly labelled, and the main text was clear and easy to understand. The use of graphics helped enormously.</p>	· Acknowledged

28	While the introduction sections declare that the guide is for all, they do not make it clear that the the first sections are for major developments and that it is only the Built Environment and Climate Change sections that are truly directed at small scale and infill development, extensions or conversions. As the major developers should all be employing specialist consultants familiar with the main urban design themes, and it is the smaller-scale designers who will be most in need of help, I suggest this is an omission. By the time readers have found out by trying to work their way through the guide they could be forgiven for losing patience.	· Acknowledged
29	Too long winded – interest runs out before reaching end of document.	· Noted and in review
30	While coverage is intended to apply to large scale developers and individual householders, the impression comes across as focussing on major developments	· Noted and in review
31	The language is still technical or formal. Is it meant for am architect, a builder or someone who wants a house built? To a householder like me it sounds too idealised; too a cynic like me it sounds like an impossible dream, When I look at the development in our area, though, it should have been available a good while ago.	· Noted and in review
32	Ref:- The introduction section website page is very clear and concise in its content. The only comment I would like to make is the following point: 1. To put a 'date notification' as to when the website page has been updated e.g this Web page last modified on 1/03/22 etc.... This will enable the viewer to be informed on accurate and up to date Planning information	· Noted and in review
33	There needs to be a key/ labelling of the coloured dots that are hyperlinks with the main body of information. It is easy to miss these.	· Noted and in review
34	This JDG is composed in such a way that it is accessible for the average member of the public; as it states, it is written to break the mould of the typical design guide which are often too long, detailed and strict and full of complex design terminology- I would definitely agree that it breaks that mould.	· Acknowledged

35	too much information	· Noted.
36	The Menu option at the top right of the web page needs to be made much clearer. It took me a while to work out how to access the information in the guide. I liked the Translate option – but it's hidden at the bottom.	· Acknowledged
37	Not really applicable for a small rural Parish Council. It is useful as guideline for Planning.	· Noted.

38	<p>1. the text appears in 2 (un-numbered) columns. It's not clear whether you should read down the page (i.e. the left-hand column) until you reach the bottom of the page, and then go back up to the top of the right-hand column. Paragraph numbering would remove this confusion.</p> <p>2. The diagram in the "About the guide" section is confusing. It's not a flow-chart since some "legs" do not link back to other "Activities" and it's not an "Inputs" diagram since the direction arrows do not always point from the input to the process. Basically it's a mess.</p> <p>3. In the paragraph where readers are advised to "please contact us or visit our website here South or Vale" the link word South and Vale are not highlighted and thus do not stand out as being "click-on" points.</p> <p>4. Some paragraphs are verbose and not necessarily correct i.e. where you say sustainable development is: "Development that meets the needs of the present without compromising the ability of future generations to meet their own needs." Since the particular requirements of future generations is not known, how can you say when a given development is compromising or not? The document then goes on to say: "Simply stated, the principle recognises the importance of ensuring that all people should be able to satisfy their basic needs and enjoy a better quality of life, both now and in the future". Well, if the principle can be simply stated why bother with less-simple explanation in the first half of the paragraph? You then go on to give an even simpler, one sentence, definition which is better and is really all that is needed.</p> <p>5. It is verging on a tautology to say "A well-designed hospital will help patients recover quicker;" since it implies that a hospital where patients don't "recover quicker" is by definition "not well designed" which is obviously not the case. It would be more correct to say "Should" rather than "will help". Ditto for the other example of "will" in that section.</p> <p>6. Some of the propositions stated are not valid. i.e. that "A well-designed residential development ..will .. enhance the existing character and appearance of the area, resulting in a win-win situation for both existing and future residents and developers." There are plenty of instances where "green field" vistas around small villages are being spoiled by red-brick developments, be they ever so well-designed, to the regret of the occupants. Another case where "Will" should be "Should". My general feeling is that the opening section, down to "How to use this guide", is unnecessarily verbose with the same thing being repeated in various ways. It could be made more simple (i.e. concise and to the point) and less idealistic more pragmatic with some stringent editing.</p>	<ul style="list-style-type: none"> - Noted and in review
39	<p>The Guide is clear and concise</p>	<ul style="list-style-type: none"> - Acknowledged
40	<p>The definition of 'high quality' is vague ("beautiful places where people want to live, work and visit"), and there is still quite a lot of use of jargon (e.g. "a well-defined network of green and blue infrastructure" – I had no idea what that referred to until later on in the guide, and "creating a positive relationship between fronts and backs of buildings" is an example of constant uses of phrases that designers might use but other people will struggle to interpret).</p> <p>It also seemed odd to me that the page started with a diagram of the process described as the one "that we would strongly encourage all applicants to follow" and yet the process didn't seem to involve using the guide at all. I couldn't see a stage in which the guide was actually supposed to fit (and I was initially expecting the process to be an outline of the guide itself, so that this guide took people through the process recommended).</p>	<ul style="list-style-type: none"> - Noted and will review

41	<p>Response manually entered, submitted in an email format. I have only read the “easy to use website” so far but in relation the that wish to make three points.(1) it uses admirably plain language – excellent!(2) there are some solecisms in the “key design objectives” section: 3rd bullet incorporates and/or linkS; 9th bullet 9ombat9ment9 mixed uses; 10th bullet complementS the scale.(3) “• is sustainable” Earlier you define this as “without compromising the ability of future generations to meet their own needs.” How can you possibly square this with the fact that, by using vast areas of agricultural land you are, as a fact, doing the exact opposite! By converting this land to built uses you are depriving future generations of the ability to grow crops on that land. With an ever-increasing population and dwindling proportion of UK-produced food this results in increased imports, all requiring energy to be transported here from their places of origin (and incidentally reducing food security in an increasingly insecure world). You are also removing some of the many benefits of land being in agricultural use – carbon storage of grassland soils, hedges for wildlife and attractive landscapes, footpaths through green uses that promote mental health..... I know that you have to “tow the government line” on what “sustainability” actually means but it would be nice to see some honesty occasionally!! hope to make some substantive comments on the Guide itself in due course.</p>	<p>· Acknowledged</p>
42	<p>We are pleased that good quality design is important to the Council and welcome the publication of the draft Design Guide for South Oxfordshire and Vale of White Horse. However, we do have some concerns over the content and design of the document.</p> <p>Whilst it is encouraging that the guide is interactive and digitally accessible, it is difficult to navigate and the menu is hard to find. The guide would benefit from a contents page at the beginning of the document with sign posting and links used throughout the document.</p>	<p>· Noted and will review</p>
43	<p>Response manually entered, submitted in an email format. For reporting purposes additional text is marked as “xxx” and deleted text as *xxx*. The original submission is attached to this comment form for reference.</p> <p>South Oxfordshire and Vale of White Horse (South and Vale) are exceptionally beautiful districts, rich in architecture of different periods, styles and materials and rich in landscape quality with a large proportion of the districts being designated as an Area of Outstanding Natural Beauty (AONB). As well as respecting and enhancing the existing natural and built environment of South and Vale, the Councils expect the design of new development to be similarly outstanding for the benefit of local residents, visitors and future generations. “In the AONB’s any proposed development must demonstrate that it conserves and enhances the special qualities of that AONB.”</p> <p>Justification: To reflect the AONB’s status.</p>	<p>· Noted and will review</p>

44	<p>Response manually entered, submitted in an email format. I have had a look at the Design Guide and having no experience of planning so it all sounds wonderfully idealistic. It states – Research and national guidance have all demonstrated the link between good design and improved quality of life, equality of opportunity and economic growth. It suggests that a well designed hospital or school will contribute to the wellbeing of those who use the facilities they provide. However there is no mention of the importance of good design in the houses/homes that are built. Good design in houses has been demonstrated to be important to the mental health and wellbeing of its inhabitants. I imagine your remit does not extend to minimum space standards for dwelling places but it should. However beautiful and well designed the external features of a development if the rooms inside are cramped and poorly designed then that building is not fit for purpose. People buying or renting homes deserve flexible space to cook, to entertain, to be private, to store 'stuff', to have room for bikes and wellingtons as well as high tech. Such homes require imaginative design and surely this should be a vital part of new developments.</p>	<p>· Noted and will review</p>
45	<p>Response manually entered, submitted in an email format.</p> <p>About South and Vale</p> <p>1. To be properly navigable the map of 'Settlements & designations map for South and Vale' needs to have some more place names inserted.</p> <p>2. The Oxford Green Belt is referred to incorrectly as 'Greenbelt' (which is the name of a place in Maryland USA), and, particularly in the post-Covid era, the enormous value of easy access to it for city dwellers, as well as for the many village communities located within it, for the improvement of their mental and physical health, has not been emphasised sufficiently. Reference to the NPPF (July 2021) could usefully be added.</p>	<p>· Noted and will review</p>
46	<p>Response manually entered, submitted in an email format.</p> <p>9. Reference should be made to Neighbourhood Plans and taking them into account, so that they can influence the design process at an early stage. It is often too late to take local wishes into account once planning applications are fully developed, and then found to be in conflict with a Neighbourhood Plan. Early recognition of a Neighbourhood Plan should prevent a planning officer having to raise queries with a developer. Development should not take place where it is found to be in conflict with a Neighbourhood Plan.</p>	<p>· Noted and will review</p>
47	<p>Response manually entered, submitted in an email format.</p> <p>About South and Vale</p> <p>•The Councils "expect the design of new development to be similarly outstanding for the benefit of local residents". The Committee do not currently see much evidence of this approach here in Didcot.</p>	<p>· Noted.</p>

48	If the website is to exist for awhile (and not solely for the duration of the consultation) there are some grammar problems that could be fixed.	- Noted and will review
49	<p>The Design GuideThe Guide is very clear but it fails to acknowledge up front the impact of the SODC and Vale carbon reduction targets on all developments. Its PurposePlease add text after 'To improve the standard of design in all developments in South and Vale and ensure that only developments of the highest quality and sustainability are delivered.' – South and Vale are also both signed up to the carbon reduction targets of the Oxfordshire Energy Strategy, which committed to a 50% reduction in carbon emissions by 2030. To achieve this, the imperatives of climate change will be addressed throughout the Guide. The development of smaller homes is encouraged, both to address the local shortage of affordable homes and to build dwellings with a smaller carbon footprint. Inform you design: Add after 'For example, surveys that assess the quality of trees, landscape, or geology, identify the presence of a particular habitat or species or identify transport and movement information' – alongside technical studies to show how the carbon footprint is minimized during construction and use, how to encourage local production of food and living walls be incorporated to absorb CO2, check that flood risk is mitigated and that adequate drainage is available.</p>	- Noted and will review
50	Landscape Character map could be interactive – very difficult to match up with key.	- Noted and will review
51	There is so much detail that it's easy for fundamental principles to get lost – e.g. ""can't see the wood for the trees"". Consultations need to be very well publicised, easily accessible with a good distribution of venues where proposals can be viewed and explained , and stretching over a period of several weeks in order to elicit good responses. There should be a set minimum percentage of responses from the population which, if not achieved, should lead to an investigation into how the consultation was advertised, and with an extended period of consultation publicly and clearly announced.	Noted, the consultation stretches over a period of 8 weeks. Those who requested to be informed were put on a database and got made aware of the consultation via email or letter. Document was available at main libraries to view for those who did not have access to the internet. Surveys were also made available. Pdf of the document were provided to those who requested one.

52	<p>The comment “well designed developments led to lower crime and higher property values” isn’t true in practice. Just take Upton in Northampton as an example. Very well designed with all the great and the good with “secure by design” strategies but has a reputation for being a place of high crime rates. Better to state a whole range of KPIs e.g. low energy consumption, high rates of cycling/walking, onsite renewable energy generation, high life expectancy, good air quality, improved on-site biodiversity and local food production from allotments etc etc.</p>	<p>· Noted and will review</p>
53	<p>CONTENTS PAGE -</p> <p>Officers asked for a separate clearer contents page, to ease navigation. The three lines in the top right corner were not clear/obvious enough. A contents page needs to be interactive and link directly to the location of the ‘Principles’ boxes, which are used for assessment. Linked to this Officers commented that the small navigation circles on the right hand side were not easy to use. The website felt like a continuous scroll to reach the information needed. A clear navigation panel on the side which set out the different chapters, sections, subsections and principles should be incorporated.</p> <p>LABELLING OF CHAPTERS/ REFERENCE POINTS NEEDED -</p> <p>Officers commented that there needed to be a point of reference of chapters, rather than just the paragraph numbers. The design guide is often referred to in delegated reports, emails with agents, appeal statements. It is easier to do this with the current design guide at the moment (e.g. Chapter 10 – Householder Development > Principles DG103/104/105). Could this be incorporated into the JDG. (e.g. Chapter 5 – Built Form > DG5A – General Built Form, DG5B – Apartments etc.)? Officers also queried the text alignment in some of the ‘Principles’ boxes and questioned whether the paragraph points could be labelled 5.01, 5.02, 5.10 etc. rather than 5.1, 5.2 etc).</p> <p>AUDIENCE –</p> <p>Officers commented that the wording of the design guide seemed aimed at planning professionals who know what they would be looking for and what guidance would be applicable to the scale of the development proposed. It may not come across as well to a citizen who is completely new to planning. Officers noted that some of the wording/planning jargon used did not have a link to a glossary definition for someone who is new to planning. For example, ‘green / blue infrastructure’.</p> <p>NO DIFFERENTIATION BETWEEN SCALE OF DEVELOPMENT -</p> <p>Officers note that an all-inclusive approach has been taken for the design objectives/principles. From an Officers perspective – we can differentiate between principles relevant to Majors, Minors and Householders/Others but this may not be immediately obvious to those who are new to planning. For example, Officers expressed preference for how the current Vale Design Guide had a separate Householder Extensions Chapter. For example, making it clearer for Mrs Bloggs (who is visiting the website because she would like to know more about guidance on Householder Extensions). In this instance a lot of the Majors design guidance wouldn’t apply, but this isn’t immediately obvious.</p> <p>NEIGHBOURHOOD PLANS –</p> <p>Under “Additional guidance and frameworks beyond our guide” – Officers</p>	<p>· Noted and will review</p>

recommended having some wording encouraging people to check whether their local area has a Neighbourhood Development Plan. Perhaps a link could be provided to the relevant section on our website with a list of all the made/adopted neighbourhood plans, as we have to give these weight in decision making:
<https://www.whitehorsedc.gov.uk/wp-content/uploads/sites/3/2022/02/Feb-2022-Neighbourhood-Planning-VALE-hyperlinks-Master.pdf>

54	The whole section is easy to follow and well set out.	· Acknowledged
55	Please refer to Bloor Homes' comments in response to Questions 9 to 13 below, which raise specific comments in relation to each section of the Design Guide SPD.	· Noted.
56	The 13ombat13me of the Plan structure of NPPF tp LP etc isn't clear and there is no mention of adopted Neighbourhood plans.	· Noted and will review

57	<p>The guide, we understand, is intended to cover design principles for any planning application. From a sizable estate of new houses at one extreme to a small alteration to an existing dwelling. However, the introduction focuses almost entirely on issues relating to sizable developments most of which have no bearing on minor applications. We feel that for such applications, applicants are likely to be confused or overwhelmed. It may be appropriate to clarify and simplify the guide for smaller applications.</p>	<p>· Noted and will review</p>
58	<p>Response manually entered, submitted in an email format</p> <p>Design and Planning</p> <p>The diagram indicates there is public consultation after a design review, but this is usually only locally publicised. Full public consultation comes after the submission of the planning application.</p> <p>Amendment needed: The box that follows on from Design Review should say – local public consultation.</p> <p>Why is design important?</p> <p>The aim of the guide includes the intent to ‘provide a simple set of design criteria that applications should meet and are easy to follow’.</p> <ol style="list-style-type: none"> 1. The document is not easy to navigate and lacks page numbers and paragraph numbers for easy reference and location of guidance. 2. The interactive document lacks the ability to search, for example, guidance on light pollution or other common aims that appear in more than one section of the guide. 3. The guide needs an index. <p>Amendments needed: The document needs to be a single searchable, downloadable version of the guide. It needs an index with page & paragraph numbers.</p> <p>Delivering high quality, sustainable & beautiful development</p> <p>The guide treats sustainable and beautiful development as being of equal importance. Sustainability is required to counter an existential threat, a lack of beauty is undesirable but does not pose the same threat to health and well-being that climate change does. Amendments needed: This section should emphasise that sustainability takes precedence and should not be sacrificed or traded off against beauty – a subjective judgement.</p> <p>Key Design Objectives – For all developments</p> <p>This section lists 19 key objectives. Although each singly has value as a set it is far too many. Amendments suggested. Objectives should be grouped under headings which might include, for example, enhancing the natural environment, layout and access, heritage and safety.</p>	<p>· Noted and will review</p>

What does the key objective 'creates healthier places by providing opportunities to transform lifestyles for the better' mean and how will it be assessed?

The key objective 'has access to local services and facilities and, where needed, incorporate mixed uses, facilities and co-located services as appropriate with good access to public transport; should provide a wide range of house types and tenures' is two objectives. Amendment needed. The objective should be split into

i. has access to local services and facilities and, where needed, incorporate mixed uses, facilities and co-located services as appropriate with good access to public transport;

ii. Should provide a wide range of house types and tenures;

About South and Vale

Settlement & designations map

In The Oxford Green Belt the pop-out link to Oxford City Council for more information on the Oxford Green Belt needs replacing as it is out of date.

Replace the pop-out link with: https://www.cpre.org.uk/wp-content/uploads/2019/11/Oxford_factsheet_2018.pdf

Landscape Charters

Should this be Landscape Characters not Charters?

Landscape character map

The key & map do not appear to be interactive. Referring to the South Oxon Landscape Character Assessment 2017, this map seems to show Landscape Types rather than character.

Amendments suggested:

-An interactive map which highlights the associated area linked to each landscape type, when a specific landscape type in the key is clicked on.

- A line separating the two districts would be useful, as would an interactive link on the white areas to confirm which settlement they are.

- This section needs to link with Section 4, Natural Environment, Natural features & resources

59

Response manually entered, submitted in an email format. I was going through the design guide and I didn't realise it didn't just continuously scroll any more. So I couldn't work out where to find the technical bits at first. I was wondering if you're able to put one introductory paragraph saying you can move through the guide using the buttons on the left or go directly to specific sections via the menu option at the top or something? That might be obvious to anyone who didn't see an earlier draft maybe but I wasn't aware at first how to find the other parts or that I could skip specifically to building conversions for example.

· Noted and will review

60	<p>The navigation is cumbersome. There should be a contents list after the introduction so people know where they are, not on a separate page. The layout requires a large, wide screen to read it and one section is not clearly defined from another.</p> <p>It is difficult to know where you are. The Additional guidance and frameworks beyond our guide: is missing Neighbourhood Plans which gives local people some say in developments and which the volunteers involved work very hard on.</p>	<p>· Noted and will review</p>
61	<p>Response manually entered, submitted in an email format.</p> <p>Section 1 – About the Guide</p> <p>The introductory section explains the background to the guide, and how applicants should use the guide, but it does not explain precisely how the guide will be applied by the District Councils. Section 1 does note that the Joint Design Guide SPD will be an important material consideration once it has been adopted by the Councils, and later on in Section 1, there is reference to the Council using the 'criteria' in the design guide to assess schemes.</p> <p>Will all schemes be assessed by the Councils against all of the criteria relevant to a particular development, using some form of checklist? How will the Councils apply those criteria that are more aspirational, as opposed to being Local Plan policy requirements?</p> <p>The next version of the Joint Design Guide should be clearer in terms of how, precisely, the Councils propose to use the Guide when assessing planning applications.</p> <p>The introductory section refers briefly to the National Design Guide (2019) and National Design Code (2021), under the heading 'Additional guidance and frameworks beyond our guide.' There ought to be reference here also to Building for a Healthy Life (2020). Indeed, given the myriad of different design guidance available to applicants, it would be very helpful if the Joint Design Guide could be clearer in relation to the overlap between the guidance set out in the Joint Design Guide, and other guidance and frameworks referenced. So for example, will proper use of the Joint Design Guide ensure that the ten characteristics of well-designed places, as set out in the National Design Guide, are achieved?</p> <p>Finally in relation to Section 1, the flow diagram could be misinterpreted (and should therefore be amended), as it suggests that if you follow the stages outlined, you secure 'Planning Permission!'. That may be a more likely outcome, but of course there will be many other factors at play. The flow diagram should also be amended (or a footnote introduced) to clarify that not all schemes will need to be subject to Design Review.</p> <p>Section 2 – About the South and Vale</p> <p>The interactive map showing settlements and designations has a clickable button for the Oxford Green Belt. The first paragraph of the text that sits behind the clickable button states:</p> <p>"In common with all other Green Belts, the primary planning purpose of the Oxford Green Belt is to prevent urban sprawl into the countryside and the coalescence of settlements. It is also intended to protect the setting of the historic City and to</p>	<p>· Noted and will review points individually</p>

	<p>encourage the re-use of derelict land (brownfield sites)</p> <p>within it. It also serves as an opportunity for City dwellers to have ready access to the countryside, particularly obviously where the Green Belt to the South of Grenoble Road benefits residents of The Leys to the North. (The five purposes of Green Belts are set out in section 1.5 of Planning Policy Guidance 2: Green Belts)”</p> <p>Planning Policy Guidance 2: Green Belts, has of course long since been superseded by the NPPF, and there have been some subtle changes to the defined purposes of the Green Belt. The quoted paragraph above should be updated to reference the NPPF (2021), paragraph 138 (not to PPG2: Green Belts), and the defined purposes of the Green Belt updated as necessary.</p> <p>The text in relation to the Oxford Green Belt could also helpfully refer to the more recent changes to the Planning Practice Guidance (PPG), which make reference to the concepts off-setting and compensation, where an authority propose releasing land from the Green Belt for development.</p> <p>In relation to the landscape character map for South and the Vale, this is quite difficult to follow, as there is no base mapping behind the colours, and some of the colours are quite similar. It would be very helpful if the landscape character map could be made interactive.</p>	
62	<p>Response manually entered, submitted in an email format. This evening I had another go at the Joint Design Guide consultation. Starting from the SODC website it is straight forward to get to https://data.southoxon.gov.uk/JDG/Guide.html by putting Joint Design Guide consultation in the search box. However, having read this section numerous times I sometimes struggle to find the actual content. Then I remember that Anne Marie told me to look for the 3 bars in the top right! I gather that 3 bars in the top right means Menu. Do you think that all those wishing to access the Guide know this?</p>	<p>· Noted and will review</p>
63	<p>There needs to be clear language, and distinction (where necessary) between, for example, design principles and criteria (see ‘Design Principles’ blue box in the draft guide) and design objectives (listed later in the guide). There is no commentary on different requirements for different scale of developments, nothing about non-residential design; no commentary on differing requirements for outline or detailed, or conservation area / AONB / listed buildings. However we note the caveat that ‘not all criteria are relevant to all proposals’ which needs to remain, with the addition that the level of detail required will also vary depending on the nature of the proposals. The Guide would benefit from more detail in line with the principles of the National Design Guide (NDG), while providing more detailed guidance relevant to the local area which is reflective of adopted policy.</p>	<p>· Noted and will review</p>
64	<p>Please see submitted letter for full comments.</p>	<p>· Noted</p>

65	<p>Clear – yes; likely to deliver the goals – no. The authors wish to “break the mould” of design guides, but have in our opinion aimed it at householders who might not choose to use professional designers. However, these applicants are not the main problem with the quality of development. It’s generally the large-scale developers, who won’t read this new Guide, who are lowering the standards. They know all too well what is hoped for, but choose for mainly financial reasons not to follow the acres of guidance that are already out there. This new guidance seems to be aimed at the ordinary person, aiming to simplify what are often quite difficult and technical issues, but it ends up in some areas being rather patronising.</p>	· Acknowledged
66	<p>Additional guidance and frameworks section should include:</p> <ul style="list-style-type: none"> - Defra Rights of Way Circular (1/09) https://www.gov.uk/government/publications/rights-of-way-circular-1-09 (specifically section 7. Planning permission and public rights of way) - Oxfordshire Rights of Way Management Plan - emerging Oxfordshire Local Transport and Connectivity Plan (LTCP) 5 	· Noted and will review
67	<p>Sustainable Development should go much further than the original definition. Any development should be zero carbon and should enhance nature.</p>	· Noted and will review
68	<p>1. While the aims of the Design Guide appear reasonable for larger, new developments, the introduction is almost guaranteed to frighten the ‘house extension’ applicants. The standard of English is poor (sloppy) and the text is full of jargon terms that are not defined, despite what the introduction states. Many of the phrases or terms used will not be clear – they will either not mean anything relevant to the experience of an average householder or will have a wealth of meaning to a design specialist only. The document needs a thorough proof reading to put errors right.2. I am supportive of the aim to ‘break the mould’ but do not see the mass of jargon in the document as the way to do it. The Draft Design Guide (DDG) is not short and concise. It does not define the meaning of relevant design phrases and terms adequately and I assume that the Local Plans (including any Neighbourhood plans) are those that “must be read in conjunction with other statutory plans”. If they ‘must be read in conjunction ...’ then they must be defined in a list that is a complete list that should appear in this document – otherwise you are creating uncertainty rather than clarity. You must state that the Local Plan policies have to be followed as the primary requirement – they have supremacy over the DDG and act as the starting point in the planning application process. 3. The document seems to be less ‘breaking the mould’ and more ‘changing one mould for another’ – in this case producing the BHL version of the mould as the standard.4. Do you intend to re-structure the Planning Dept to create a large team of pre-application designers to advise applicants? The Design Process flowchart starts with ‘appoint your design team’. Is this appropriate and proportionate for the majority of small, simple house extensions?5. How many/what proportion of applications are for relatively simple and small house extensions? Do you expect (as the document suggests) that an applicant for a small extension should do a ‘contextual analysis’ of the area, or ‘incorporates and/or link to a well-defined network of green and blue infrastructure’ or ‘creates healthier places by providing opportunities to transform lifestyles for the better’ etc etc? The section that explains (a little) about ‘Householder extensions and outbuildings’ is buried in the Built Form section towards the end of the Guide. I suggest this is referenced near, or in, the Introduction sections and possibly put in a separate section if the proportion or numerical number of applications is highest in this category.6. The flowchart follows through pre-application, design review to a public consultation. What is this public consultation? What ‘public’ will be consulted – there will have been no knowledge of the pre-application as far as the local public are concerned (unless they have been involved in a Placecheck exercise, which may only have been notified to a limited number of people). Will the planning process now inform local residents and other bodies (statutory or otherwise) about all pre-application requests?7. Who will ensure that a design review takes account of all the comments and decides which feedback will result in what changes to the initial design?8. I am amazed that there are no references to artificial lighting guidance and standards in the document, both external lighting schemes and internal lighting within buildings that may have an adverse effect on the external local environment. This is particularly important across the whole range of developments from town centres, through housing developments (large and small) and commercial and employment hubs to suburban and rural areas – especially in AONBs (and potential dark sky zones). Street, service area and road lighting is also important to be integrated into any development design. The potential adverse effects of artificial lighting on humans and wildlife, flora and fauna is a major field of design consideration that MUST be considered accurately and effectively. It applies to each and all of the sections in the design guide. Why is there no mention, let</p>	· Noted and will review

alone references, at all in any of the sections to either the requirements for the design process or to the wealth of guidance (national – ILP, AONB, design professionals, research organisations etc) available? I suggest that the references that should be included in all categories should be :- Institution of Lighting Professionals Guidance Note GN01 (2021) THE REDUCTION OF OBTRUSIVE LIGHT;- Dark Skies of the North Wessex Downs AONB – A Guide to Good External Lighting (2021);- Institution of Lighting Professionals Guidance Note GN08 (2018) Bats and artificial lighting in the UK. It is possible that the GN08 document reference could be included in the Biodiversity section (Support your design) only. Even the section 2 (Natural Environment) starts with a ref to LVIAs but makes no mention of the requirement to present design documents that consider both the daytime analysis of the various factors to be considered AND ALSO THE EFFECTS OF THE LIT ENVIRONMENT. For at least half the year (Autumn-Winter-Spring) the lit environment is critical to creating places and areas that people will occupy (live in), work in and travel through during their daily activities. There are also significant adverse effects of too much of the wrong sort of light on a range of wildlife activity, breeding, migration and feeding habits (resulting in a serious decline in a whole range of species, not just bats). The impact of poorly designed lighting is severely detrimental to the natural, human wellbeing and energy-conscious environment and must be considered properly. Too often in the past, lighting has not been considered in planning applications at all or only to a minimal degree. This results in some appalling errors and adverse results for local residents. It is clear that officers in the planning department do not have a clue about many aspects of lighting and its effects. Too often, planning applicants (and their advisors, including development designers) also have little idea of the negative impacts of external lighting schemes, particularly in AONB areas. They frequently err on the side of providing far too much light (to be on the 'safe' side) or feel that 'you can't have too much light'. I will be happy to help you put forward some additional content/headings/references if you are 19ombat19m to listen.9. Overall, the DDG contains a wealth of design guidance, but does not meet the stated purpose.10. The purposes of the design guide include the term 'bespoke' – what does this mean?11. The 'we aspire to' list includes ""provide a quicker and easier process that all applicants can follow"" – the DDG adds a pre-application step and a public consultation, so I fail to see how it will be quicker. The initial documentation includes ""A contextual analysis, an opportunities and constraints plan with a clear key, a concept plan with a clear key, a regulating framework plan and associated technical"" – this does not look to be an easier process since the format of these documents is neither indicated or specified.12. Who will decide whether the 'design' is acceptable, good or bad – a design specialist or the planning officer?13. What voice will local residents have and how will their views be considered?14. Who will decide what additional documentation is required (if any) and in what format? How does the documentation in point 11 above fit in with existing documentation requirements (EIA, D&A Statements, LVIAs etc etc)?15. How do you intend to persuade applicants who do not want to 'communicate' their design aims/constraints/goals to follow this process? How do you get the level of detail or sufficient information to fully define the development – what standards will be applicable?16. What role does the Enforcement section undertake if what is put in the design is changed or not provided? What if a re-design is needed or a change in design is not notified?17. The intro states that you want to deliver high quality, sustainable and beautiful development – who decides what is 'beautiful'. I am sure that the more people you ask, the more different answers you will get. So who will decide?18. I ask that in your Key design objectives, you include something on lighting eg for people, communities, wildlife and ecology get external lighting right – The right amount of light, where wanted, when wanted, controlled by the right system.

69

Response manually entered, submitted in an email format.

· Acknowledged

I am just starting to look through this and found a spelling mistake on the first page with a diagram using script writing...Could you just check the word response...I think you have written response. Otherwise, what I have looked at is looking great so far! Well done.

The spelling mistake is right at the beginning of the document on the page with About this Guide and Design and Planning and is part of the diagram in script writing...it says 'Refine your design in response to feedback'

70

Response manually entered, submitted in an email format. Introduction Sections Additional guidance and frameworks beyond our guide • Reword 'Local Plans for South Oxfordshire' and 'Local Plans for Vale of White Horse' to 'Local and Neighbourhood Plans for South Oxfordshire' Local and Neighbourhood Plans for Vale of White Horse', to reflect role of Neighbourhood Plans. Key design objectives • These could be missed (given their location at the bottom of this section) but are a fundamental part of the guide – we would suggest either placing them in their own chapter or visually increasing their importance, for example by placing them in a box. • 'ensures a sufficient level of well-integrated and imaginative solutions for car and bicycle parking and external storage including bins.' – Bins and cycle storage can be an afterthought in developing proposals, which results in poor design. In order to create attractive facilities for cycling (relevant for decarbonisation and promoting healthy active lifestyles), ideally bins would be located separately from cycle storage and cycles should be equally or more accessible than car parking spaces. About South and Vale • Good infographics – informative and simple Settlements and designations map • Crowmarsh is in the wrong place. It needs to be further west adjacent to Wallingford, and probably better to refer to it as 'Crowmarsh Gifford'. Also is it worth putting the district boundaries on the map? Landscape Charters Graphic • This may benefit from an explanation of what the graphic is based on, i.e., the character assessments. Maybe these could be explained a little and/or linked? And/or links to recommendations for Open Dipslope etc.

• Noted and will review

71

Response manually entered, submitted in an email format. ""The Parish Council supports the principle of updated design guidance for the district. LACK OF CONTEXTIt is noted that the guide refers to additional guidance and frameworks: (i.e. The National Planning Policy Framework (NPPF, 2021) Local Plans for South Oxfordshire, Local Plans for Vale of White Horse, National Design Guide (2019), National Design Code Part 1: The Coding Process (2021), National Design Code Part 2: Guidance Notes (2021)). However the Parish Council is concerned that it does not explain the specific role of these documents and whether they have influenced the guidance in the document and whether they should also be consulted by those using the guide to develop development proposals. In addition the guide does not refer to the role of Neighbourhood Plans (NDPs), whether existing or in preparation, where these provide local design guidance or design codes for their neighbourhood. Eye and Dunsden Parish Council are currently preparing an NDP and this includes a character appraisal of the parish with accompanying design guidance. The draft NDP is expected to be published for consultation later this year 2022. This guidance will form an integral part of the suite of relevant planning documents in force in our parish as it will provide specific local guidance in design matters.ERROR IN AONB MAPPINGIt is noted that the geographical boundary of the Chilterns AONB within the Parish as shown on a plan in the design guide is inaccurate. It does not currently extend across the entirety of the southern parishes. Our parish is part of a consortium pressing Government for AONB enlargement to include the area you have shown, and together with the AONB board, we are looking to SODC for support in this matter.""

- Noted and will review

72	<p>Response manually entered, submitted in an email format. 'About the Design Guide' The draft Design Guide is purportedly "...relevant for all scales of development...", however, Thakeham would note that the requirements throughout appear to have been drafted with strategic-scale development in mind and Thakeham would question whether they are transferable to smaller-scale sites, given it would not be accurate to suggest that there is a 'one size fits all approach' to design. To save protracted discussions at the application stage, Thakeham suggest that it is important to be clear on the application of the requirements set out in the draft Design Guide, particularly where there may be, or indeed should be, a graduation in relation to the scale of a site/development. 'About South and Vale' The draft Design Guide notes that "As well as respecting and enhancing the existing natural and built environment of South and Vale, the Councils expect the design of new development to be similarly outstanding for the benefit of local residents" (our emphasis). The term 'outstanding' is considered subjective and imperatively is noted within the National Planning Policy Framework 2021 ("NPPF") at paragraph 80 – referring to design 'of exceptional quality' regarding the acceptance of isolated homes in the countryside, and paragraph 134 – referring to the weight to be applied to 'outstanding or innovative designs'. Thakeham would therefore suggest that the councils should be clear on the definition of 'outstanding' within the draft Design Guide or justify why they 'expect' development to be designed to a level which the NPPF describes as 'exceptional'. The draft Design Guide submits that "In Planning terms the quality and nature of the land within a Green Belt is irrelevant". Thakeham would note that often the quality and nature of the Green Belt plays a key role in assessing whether land should be included in, or removed from the Green Belt. Such considerations may include agricultural land value, previously developed land, biodiversity opportunities and defensible boundaries. Whilst the NPPF defines the five purposes of the Green Belt, Thakeham is of the view that it is incorrect to state that the quality and nature of current or proposed Green Belt land is 'irrelevant' within planning considerations and suggest this is reworded. For example, Thakeham would suggest the following is more accurate: 'In planning terms, the quality and nature of land proposed to be included in or removed from the Green Belt can play an important role in assessing its suitability. In terms of the ongoing functionality of land included within the Green Belt, it is the five purposes contained within the National Planning Policy Framework (NPPF) that Green Belt land is tested against'. Notwithstanding the quoted text above, in the following paragraphs the draft Design Guide suggests that the Oxford Green Belt is "...almost entirely of high environmental value". Moreover, it suggests that "Agriculture is an important aspect of this Green Belt, with a relatively high proportion being 'Best and Most Versatile' (Grade 1 or 2) quality land". Having consulted the Natural England Agricultural Land Classification map for the Oxford region¹, there are only two areas of Grade 1 ('Excellent') agricultural land within the Green Belt: at the far eastern edge near Great Milton and at the far southern edge near Berinsfield. Whilst there is a presence of Grade 2 ('Very Good') agricultural land elsewhere within the Green Belt, it is overwhelmingly dominated by Grade 3 ('Good to Moderate'), Grade 4 ('Poor') agricultural land and land classified as 'other land primarily in non-agricultural use', particularly around Oxford and other key settlements. Thakeham therefore consider the draft Design Guide is misleading with this assertion and suggest that this statement is either amended or qualified with evidence i.e., with regard to the Natural England Agricultural Land Classification map for the Oxford region¹.</p>	<p>· Noted and will review points individually</p>
73	<p>There needs to be clear language, and distinction (where necessary) between, for example, design principles and criteria (see 'Design Principles' blue box in the draft guide) and design objectives (listed later in the guide).</p> <p>We note the caveat that 'not all criteria are relevant to all proposals' which needs to remain, with the addition that the level of detail required will also vary depending on the nature of the proposals. It would be helpful if the SPD confirms that there will be different requirements for different scale of developments (and what those requirements are likely to be). There is no commentary on differing requirements for outline or detailed proposals, or conservation area / AONB / listed buildings guidance; and it is unclear what might be required in relation to reserved matters applications. There is only a very short section of specific guidance for non-residential design.</p>	<p>· Noted and will review points individually</p>
74	<p>Response manually entered, submitted in an email format.</p> <p>As shown in the key flowchart diagram CEG notes the inclusion of Design Review and whilst the exact form of Design Review is undefined, CEG does question the need for this on every proposal.</p>	<p>· Noted and will review points individually</p>

75	<p>Response manually entered, submitted in an email format. PresentationThe online, interactive presentation has benefits offers some benefits over a simple printed document but can be difficult to navigate, in particular to find relevant material. An index would be useful. The landscape character map adds very little to the document – it has too many colours that are difficult to relate to the index – it would have been helpful if it was interactive – with the ability to click on or hover over a colour to produce a pop-up identifying the character. It is also difficult to relate the map to locations – the option for an overlay of the main towns and villages would be helpful. Scope of the design guideDespite recognising that most of each district is rural in nature and largely covered by two areas of outstanding natural beauty (AONB), the design guide is focused mainly on urban development. There is no mention of the specific issues relating to development within an AONB. Whilst issues such as tree planting and biodiversity are covered, these have a particular significance in the context of an AONB, where National Policy and Policies in local plans require development to conserve and enhance the AONB. Despite the statement that South has four towns and Vale has only three, almost every diagram shows large developments in or on the edge of a town, eg the diagram showing the benefit of tree planting shows 3 and 4 storey buildings in what is clearly a town environment. Much of the terminology relates to urban areas – street scenes, town squares, tree lined streets, etc. The first mention of a village development is in section six on space and layout. The guide claims to cover all development from house extensions to large scale developments but is biased toward larger scale development. There is a modest section on extensions and no mention of small developments of, say, 3 or 4 houses or infill development. Many of the design requirements for open spaces, movement are not relevant to smaller developments or are difficult to implement.</p>	<p>· Noted and will review points individually</p>
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Part 6: Key Design Objectives

Question 4: Considering all of the key design objectives at the outset of a proposal will help you to deliver high quality sustainable development. How clear (easy to understand) do you think the key design objectives are?

	Comment	Council's response
1	<p>Too many words.</p> <p>Too many pages.</p> <p>Too many concepts.</p> <p>Too much everything.</p>	<p>· Noted.</p>

2	<p>As before, the guide is clear in the points that it is making but totally useless when it comes to acknowledging the nuance between a householder/small scale application and a large scale development. No householder application requires consideration of a large number of the objectives yet the wording of the design guide suggests it does.</p> <p>- There is no need to include the objective relating to heritage assets as this is covered by other legislation. This should be removed to avoid duplication.</p> <p>- The section ""respects the local context working with and complementing the scale, height, density, grain, massing, type, details of the surrounding area;"" is unclear, what is 'type' and 'details' in this context? It doesn't make sense, there is no such thing as a local type or local detail. The type and detail is the cumulation the scale, density, massing etc.</p>	· Noted and will review
3	The Guide omits a key objective. Oxford Council is supposed to represent the Public Interest. The Guide ignores that.	· Noted.
4	<p>Too jargon-based.</p> <p>What does ""well-defined network of green and blue infrastructure"" even mean?</p> <p>and the:</p> <p>""respects the local context working with and complementing the scale""</p> <p>It reads as if the author is trying to impress rather than be clear.</p>	· Noted and will review
5	Easy to understand	· Acknowledged
6	The objectives are clear and adequate as long as the actual is the same as the proposal and not diminished in any way because of financial constraints driven by the developer	· Noted.
7	It's a lot to take in.	· Noted and will review
8	The existing Vale design guide is very clear, and yet in Faringdon we see multiple large developments being approved which skip the guidance . A cursory look at multiple exits and entry suggestions, space for growing food, movement framework, etc. shows there is little point in making new guides, if the implementation of existing guides is so poor. If the same people and processes are at work in the approval process, there is no point in investing in new guidelines.	· Noted.
9	See above	· Noted.
10	Ditto	· Noted.
11	<p>key objectives should be sustainability and access. At present neither Wantage or Didcot have road access to support any more development. All day Saturday it is impossible to get through Didcot as the bottleneck at the rail bridge is chaos.+</p> <p>All of the old buildings ned to be levelled on the lower Broadway, this is the best opportunity to clear this area and improve transport.</p> <p>The best site to access another Harwell village development at Milton interchange where there is a vast un development area to start for some large food supermarkets. .Not tesco or sainsburies as there are plenty of these in the area.</p>	· Noted.

12	The design message seems to me to be one of 'fitting in' and I find that is what I want.	- Acknowledged
13	Might include the desirability of designs which allow de commissioning and resource reuse at end of anticipated life expectancy.	- Noted.
14	See previous comments and suggestions.	- Noted.
15	<p>this is far from clear and will 250m lead to better designs or better DASs.</p> <p>it really needs to be clearer about what proportionality you expect. It seems as though all this guff is needed for all levels of development when it isn't.</p> <p>this needs a much clearer route map to follow for the scale of development one is putting forward.</p> <p>i work in planning every day</p> <p>the place and setting section is not helpful at all.</p> <p>experienced practitioners know more 250m information than this is seeking to draw out. I don't see what help it is</p>	- Noted.
16	Very general...more specifics needed on materials....must retain Medieval Market Town appeal of Wantage...or it turns into concrete Didcot.	- Noted.
17	I am not convinced that within the existing frameworks, public-private partnerships are capable of (a) either agreeing on key design objectives or delivering them. It just isn't possible to please everyone all of the time. Realism needs to caveat high idealistic objectives, in order to gain public respect and support.	- Noted.
18	They are all simple statements and not too many to be overwhelming.	- Acknowledged

19	<p>The design standards are contradictory. You say you want sustainability, but say nothing about increasing the square feet used per existing footprints. And yet surely this is more sustainable than new developments. Or if not why not?</p> <p>You do not seem to encourage residents to get solar panels when having extensions built. The positive environmental aspects of extensions are not explained</p>	- Noted and will review
20	OGT would like to see reference to registered parks and gardens in 'conserves and wherever possible enhances....historic parks and gardens especially registered sites in the key design objectives	- Noted and will review
21	the quality element i thought was the weakest part of the whole document – as the measures of quality did not reflect the goals.	- Noted.
22	Great in principle. But how are you going to demonstrate to someone whose job is to work around the rules, that vague principles have or have not been met?	- Noted.
23	no comment	- Noted.
24	There is no mention in the key design objectives of the preservation of sound heritage or the creation of a positive sound environment to support ecological sustainability alongside supportive and positive living conditions.	- Noted.
25	These are highlighted, making them stand out on the page. Each objective is short and precise.	- Noted.
26	On the grounds of looking at what builders & developers do rather than what they say, I strongly object to the use of the word ""sustainable"" in your guide. To date, around Wantage, Grove and surrounding areas, the provision of thousands of new houses over the past 10 years has been accompanied by a reduction in public transport and the absence of infrastructure development (roads, medical care provision, schools). Your guide, if it is intended to be truthful, should replace the offending word with ""unsustainable"".	- Noted.
27	Lots of rather subjective terminology very open to interpretation	- Noted.

28	Easy access to the site plan before any written report would be more useful to more people.	· Noted.
29	No problem here, but again focus seems to be on major developments. Will individual householders or single dwelling builders even consult the guide, let alone pay any attention to it.	· Noted and will review
30	The language and the length need attention.	· Noted and will review
31	Good in terms of principles, but seem subjective when evaluation whether achieved	· Noted.
32	I don't think this section could have been made any clearer if I'm honest!	· Acknowledged
33	The comment on landscape character and biodiversity is clear 'uses land efficiently whilst respecting the existing landscape character and delivers a net gain biodiversity' – however, I feel this should also include a reference to ensuring that any important protected areas, such as ancient woodland, remain intact and are not impacted by the development.	· Noted and will review
34	Talk about ""contextual analysis"" and ""respecting the local context"" for example are unclear and overly technical. Also ""complementing the scale, height, density, grain, massing"" uses terminology which isn't accessible to a lay person e.g. what is grain? What is massing? And how does a building or structure (which is inanimate) complement anything? In short if the object is to have written in plain simple language then I consider that the guide has failed.	· Noted and will review

35	<p>What is missing from the Design guide is any reference to Neighbourhood Plans – these should be drawn from when any pre application advice is sought as well as during the whole of the planning process, especially for any new development build.</p> <p>The points around the “High Quality Sustainable Development” vary; “Variety of choice” would only apply to developments of more than one dwelling and is already a well-established practice, “Well-connected and walkable”, “Low carbon”, “Available to all users” and “attractive outdoor spaces” are fairly measurable while “Beautiful architecture”, “Character and identity” are subjective and “Can adapt well” seems to me to be completely impossible to quantify or even to aim for.</p> <p>Under the bullet points for “Key Design Objectives” headings are satisfactorily detailed, adaptable for all types of applications, but “understands and addresses the needs of all potential users to ensure inclusive design” is subjective (see above comments for “Can adapt well”).</p>	- Noted and will review
36	Not really applicable for a small rural Parish Council. It is useful as guideline for Planning.	- Noted.
37	<p>Clear and easy to understand? You must be joking!</p> <p>1 Take the line “is informed by a contextual analysis of the area” which, put more simply means “Includes a outline of the essential features of the area in which the development is to be situated.</p> <p>2 Consider “and delivers a net gain biodiversity’. In simple-speak this would be “increases biodiversity”</p> <p>3 Consider “link to a well-defined network of green and blue infrastructure;” I think “well-Defined” adds nothing and should be replaced by “supporting”. I have not yet come across any reference to what “green and Blue infrastructure” might be!</p> <p>4 Take “provides a clear and permeable hierarchy of streets, routes and spaces to create safe and convenient ease of movement by all users;”</p> <p>permeable means porous so what is a “porous hierarchy”? You might have a hierarchy of permeable streets but a route is “a course taken” (presumably over permeable streets and/or rights of way) and so is superfluous in this context.</p> <p>5 Oh, this one’s a corker! “has streets and spaces that are well overlooked creating a positive relationship between fronts and backs of buildings;” . I suspect what is meant is “has streets and spaces where the fronts and backs of the buildings that overlook them have a common architectural theme.”</p> <p>I haven’t got the time nor the inclination to go through this section of the document detailing, line by line, the corrections which I think are required to clarify what it is attempting to set out. However I will combat with:</p> <p>6 “ensures a sufficient level of well-integrated and imaginative solutions for car and bicycle parking and external storage including bins.” Which I think means “includes 28ombat28m parking facilities for cars and bicycles and external storage including bins.”</p>	- Noted.

38	<p>if you wish to say something it is always best to keep it simple and highlight the most important points.and don't make a song and dance of something that can be.said simply</p>	<p>- Noted.</p>
39	<p>Many Planning applications do not even include a Design and Access Statement .Even if they do include a D&A statement that does not address the criteria in the Design Guide should Parish/Town Councillors object to the application as a result?</p> <p>Though this may sound harsh for a small development such as an extension if design information is not included then an application cannot be adequately assessed.</p>	<p>- Noted.</p>
40	<p>As commented on already, the language here is not lay-person friendly. 'contextual analysis', 'permeable hierarchy of streets' as well as the ones I've already mentioned are all examples of phrases designed to 'sound nice' to those in the know, but for this kind of guide, a clearer language would be much more helpful. For example 'ensure the proposal is informed by a contextual analysis of the area' presumably means 'ensure that the new structures you are proposing fit in with the area appropriately – which means you need to show that you have thought about both the natural and man-made features of the surroundings'.</p>	<p>- Noted.</p>
41	<p>Response manually entered, submitted in an email format. For reporting purposes additional text is marked as 'xxx' and deleted text as *xxx*. The original submission is attached to this comment form for reference.CCB points in support and justification of these amendments and/or additional details:uses land efficiently whilst respecting the existing landscape character, "which enjoys nationally protected status in the AONBs" and delivers a net gain biodiversity. Justification: To reflect the AONB's status.</p>	<p>- Noted and will review</p>

42	<p>Response manually entered, submitted in an email format.</p> <p>In general, the Key Design Objectives are supported. However, it is recommended that an additional bullet point is added to the list of objectives, in order to emphasise that, firstly, the movement of pedestrians and cycles is supported, favoured and prioritised over vehicles movements. As a secondary point, the Key Design Objective should favour public transport over vehicle movements.</p> <p>Therefore, it is suggested that the following wording is added to the Key Design Objectives:</p> <p>“Prioritises movement on foot and bicycle first, and then by public transport, with movement by private car being given the lowest priority.”</p> <p>In addition to this, it is recommended that the following Key Design Objective is edited as follows:</p> <p>“Ensures (add ‘an appropriate’) (remove ‘sufficient’) level of well-integrated and imaginative solutions for car and bicycle parking and external storage including bins”</p>	· Noted.
43	Please change ‘is sustainable and resilient to climate change, minimises carbon emissions and mitigates water run-off and flood risks;’- to: is sustainable and resilient to climate change, minimises carbon emissions from materials, construction and use and mitigates water run-off and flood risks.	· Noted and will review
44	Planning is a very complex topic and it is challenging for a layman to understand and factor all aspects of the design objectives into a project. The website does well in explaining each aspect but sometimes the explanations are convoluted and still long-winded. It is difficult to see how a layman would factor in all aspects when planning a project.	· Noted and will review
45	The terms “Sustainable development” & “high quality design” needs to be explained in a little more detail and be less vague.	· Noted and will review
46	<p>NO DIFFERENTIATION BETWEEN DIFFERENT SCALE OF DEVELOPMENT</p> <p>“For all developments” – The listed design objectives, seem geared towards major developments. This is clear for people who understand planning. But for someone new to planning there’s no differentiation for different applications, as it is quite generalised. Use of jargon which may not be understood by some. If jargon is used, a link should be provided to the glossary for easier use.</p>	· Noted and will review

47	<p>Whilst the key design objectives are clearly written, it is important that the Councils ensure that they are written in compliance with the National Planning Policy Framework (NPPF), and as such it is recommended that each key design objective is reviewed in that regard. For example, the draft 'key design objectives' seek to ensure that a proposal "conserves and where possible, enhances the significance of heritage assets, e.g. listed buildings, archaeological remains and historic features, spaces, routes and views." That does not, however, reflect the policy tests set out within the NPPF; particularly paragraphs 199 to 202. Thus, this key design objective should be updated to require a proposal to "consider its impact on the significance of heritage assets (e.g. listed buildings, archaeological remains and historic features, spaces, routes and views) in accordance with the NPPF."</p> <p>Moreover, the SPD should clearly set out how each of those overarching key design objectives would be applied in the determination of planning applications. Within that, it should make clear that the role of the SPD, and thus those key design objectives, are as guidance, rather than planning policy.</p>	· Noted and will review
48	I hope the definitions of public and private space are defined in a pop up.	· Noted and will review
49	<p>It would be good to see more emphasis on the visual aspects of development. For larger developments the ambition to avoid excessive uniformity of construction materials and design. Also the need to consider the vernacular aspect, especially in rural areas and conservation areas by using appropriate materials which blend with the existing building landscape. We think that places that are high quality are beautiful places where people want to live, work and visit. They allow us to carry out daily activities with ease and offer us choice as how to do them. In short, high-quality places enhance our lives and wellbeing.</p>	· Noted and will review
50	<p>The relative legibility is very clear. However, as noted in the submitted representations, we consider that some design principles (including 2.1 and 4.41) should be re-worded. For example, we consider that the wording of design principle 2.1 is amended to be more specific than simply referring to 'adverse effects'. Accordingly, we consider the wording "without adversely affecting them" is replaced with "without acceptable adverse effects".</p> <p>In addition, design principle 4.41 seeks to ensure open space/s is integrated as part of the natural landscape features of the scheme and located so that residents can access them easily and directly to provide instant 'maturity' as well as creating windbreaks, visual screening and shelter. However, we consider that there is an error in the wording of this principle and thus we propose that design principle 4.41 should instead be worded as follows:</p> <p>'Integrate the existing natural landscape features as part of the scheme so that residents can access them easily and directly; this will provide instant 'maturity' as well as creating windbreaks, visual screening and shelter.'</p>	· Noted and will review
51	But do we agree with them? You don't ask. Missing from the list is being in keeping with surroundings. This is extremely important and consultations for our Neighbourhood Plan have shown that houses out of keeping with surrounding are extremely unpopular, but seem to be promoted by SODC Planning Officers.	· Noted and will review

52	<p>The key design objectives are clear, but they are an incomplete replication of the National Design Guide (NDG), and not completely in accordance with the NDG. The SPD should ensure that National Design Guidance is not replicated, but that the SPD adds a layer of relevant local detail that does not conflict with the NDG and is reflective of adopted policy. The key design objectives replicate the National Design Guide (NDG) to some extent, but are not completely in accordance with the NDG. The SPD should ensure that National Design Guidance is not replicated, but that the SPD adds a layer of relevant local detail reflective of adopted policy. The key design objectives replicate the National Design Guide (NDG) to some extent, but are not completely in accordance with the NDG. The SPD should ensure that National Design Guidance is not replicated, but that the SPD adds a layer of relevant local detail.</p>	<p>- Noted and will review</p>
53	<p>Please see submitted letter for full comments.</p>	<p>- Noted.</p>
54	<p>These seem to be a fair and comprehensive set of general principles.</p>	<p>- Acknowledged</p>
55	<p>The sustainability angle is not clear. Mitigation of climate change means reducing greenhouse gases. Resilience is about adaptation. Mitigation requires development to be zero carbon in construction and Passivhaus in operation. Resilience means safe from hot summers (70,000 died in a few days in 2003 across Europe) through shade, exceptional insulation, and usable ventilation. It means safe from flood which means nowhere near a floodplain or where surface runoff could happen. Safe from extreme storms means in a sheltered place. There should be consideration of the future-world of non-private ownership of cars, with access to world-class public transport, and shared car clubs. Walking and cycling should take precedence over motorised transport and be completely safe. EV chargers should be available for the shared cars.</p>	<p>- Noted and will review</p>
56	<p>The design guide is understandably oriented towards the most common types of planning applications. But given the tidal wave of (screening) applications for solar power stations, often on good quality agricultural and and/or green belt Council 320m the design guide should also address applications of this type, including their cumulative effects</p>	<p>- Noted and will review</p>
57	<p>Get external lighting right – the right light, in the right place, at the right time, for the purpose required.</p>	<p>- Noted.</p>

58	<p>Response manually entered, submitted in an email format.</p> <p>o Example: The section on key design objectives starts with noting the requirement for a contextual analysis of an area. It goes on to include references to green and blue infrastructure, permeably hierarchies of streets, uses terms such as density, grain, massing, etc. All of these terms are meaningless to most of the public and new Councillors.</p>	<p>Noted. Terms will be added to glossary of terms as necessary. We have tried to move away from jargon and make the guide accessible and easy to understand for all audiences.</p>
59	<p>The key design objectives are clear, but they are an incomplete replication of the National Design Guide (NDG), and not completely in accordance with the NDG. The SPD should ensure that National Design Guidance is not replicated, but that the SPD adds a layer of relevant local detail that does not conflict with the NDG (or Local Plan policy requirements).</p>	<p>Noted and will review. The Design Guide is aligned with the National Design Guide. Further detail and design principles that go beyond the National Design Guide can be found throughout the sections of the Design Guide.</p>

Part 7: Maps, graphics and pictures

Question 7: We have used pictures, graphics and interactive maps throughout the draft Joint Design Guide. How helpful do you think they are?

	Comments	Council's response
1	<p>Couldn't access them on my ipad!</p>	<p>· Noted and will review</p>
2	<p>Too many pictures, graphics and interactive maps</p>	<p>· Noted</p>
3	<p>Interactive maps are useful for those who do not have the suitable IT access. Aside from this, helpful.</p>	<p>· Noted and will review</p>

4	Really rather childish. Be clear with your descriptions and gimmicky little pictures and interactive graphics should not be necessary.	· Noted
5	It would be nice not to have spelling mistakes in your presentation!	· Noted and will review
6	It highlights important areas if you want more information	· Acknowledged
7	Give a good understanding of what is meant to happen	· Noted and will review
8	It's much better designed and presented than most of the developments around here.	· Acknowledged
9	The existing Vale design guide is very clear, and yet in Faringdon we see multiple large developments being approved which skip the guidance . A cursory look at multiple exits and entry suggestions, space for growing food, movement framework, etc. shows there is little point in making new guides, if the implementation of existing guides is so poor. If the same people and processes are at work in the approval process, there is no point in investing in new guidelines.	· Noted
10	Your graphics are amateur they remind me of small child writing z Christmas list no chance of achieving any but wrote down regardless	· Noted
11	none of the above replace a static design with models and for the public to view	· Acknowledged
12	I found the use of pictures from outside our two districts disappointing and unnecessary. There were at least a dozen, mainly in the built environment sections, of which 4 were from the same village in Northampton!	· Noted
13	No comment.	· NA
14	<p>the interactive maps don't work though so i am only really guessing here that if fully functional then they will be helpful.</p> <p>i don't know why the maps don't then also also links to conservation area apprasials and neighborhood plans</p> <p>if they don't this is only half the point isn't it.</p> <p>thoroughness is 34ombat34me isn't this supposed to be a one stop shop?</p>	· Noted and will review

15	<p>some of the layouts show cars having to reverse out of drives – contrary to the highway code -</p> <p>The air source heat pump picture next to figure 58 is appualling design.</p> <p>A lot of the pictures showing timber cladding show the buildings after recent construction – there is a need to maintain timber cladding which doesn't really happen causing the building to look tired very quickly two good examples is the Law school building Durham university – when built looked great – it now looks tired and uncared for. The same for the Queen Alexandra College of the Blind sports hall – now looks unkempt due to the lack of maintenance of the timber cladding. NB you need to clean the cladding with high pressure water (and chemicals) not very eco friendly.</p> <p>The pictures on the whole give a white middle class feel.</p>	· Noted and will review
16	The first map of the area was far too small, could not see it at all	· Noted and will review
17	Dont work on tablets that well	· Noted and will review
18	Thank You	· Acknowledged

19	Really like the look and functionality of the graphics.	· Acknowledged
20	The basic drawings aid nothing on the extensions, they give far too much leeway for planning officers to reject based on their own bias. There should be more photos of architectural aspects that will be treated more favourably/ unfavourably. There should be more detailed advice so that decisions are objective and not subjective	· Noted and will review
21	Overall design, layout and structure – excellent	· Acknowledged

22	Where is the draft design guide?	· NA
23	Too much text is overwhelming, and difficult to understand. The use of graphics helps show things in a simple, clear way. I appreciate them , and think they are essential.	· Acknowledged
24	Working through the guide was not clear – the buttons on the side were not obvious.	· Noted and will review
25	The little logos and symbols that occur every now and then are frankly irritating – they don't yet tie in with any of the arguments or provide any key. If clearer, explained, and used as a key to help identify strands of argument, they would be more useful. The maps are very good, as in the old SODC guide, but the interactive labels don't always make a particularly useful point. The captioned photos are helpful – would it be possible to keep to examples within the districts so as to maximise relevance?	· Acknowledged
26	keep them clear and simple not complex; they don't need to be 'arty ' ; font size 14 or 16 so they can be read!!	· Noted and will review
27	Haven't found them yet – Didn't open when requested,	· Noted and will review
28	The images provided a useful context to associated sections of the document, and provided some interesting relief to what would otherwise be a purely textual presentation.	· Acknowledged
29	Certainly worth including.	· Acknowledged
30	Comments put forward for consideration. To trial and test the practicalities on the new drawing design elevations and the interactive mapping process:- 1. How does it work when submitting planning applications? Is there a step by step guide for applicants to follow? 2. Do applicants simply forward on their drawing elevations (normal format followed as in previous in years) to the Vale's Planning Team. The team will convert the static drawings plans received into an interactive format? Or will it be the	The Design guide itself is an interactive guide, with drawings and diagrams that can be interacted with to provide additional information. This is a feature of the design guide website. We are not suggesting applicants submit interactive drawings or content as part of a planning application.

	responsibility of the applicant/applicant's agent before proposed plans are to be submitted to the Vale Planning Team?	
31	It's really beneficial to be able to see not only the maps of South and Vale to identify all of the different settlements, designations and landscape charters, but also what that might look like within the context of a town (e.g. figure 1, place and setting). The definitions of, for example, flood zones and conservation areas on the interactive parts of the maps would certainly be beneficial to anyone looking into where to develop.	· Acknowledged
32	Some of the pictures and drawing need some text to explain the icons used – its not always clear what they mean	· Noted and will review
33	There are some good bits but much of the material is pedestrian.	· Noted
34	The diagrams, pictures using captions would be a good way to present if they included the right things	· Noted and will review
35	Subject to their relevancy. There are different dynamics in rural areas.	· Acknowledged
36	Some of the diagrams need rationalising. The pictures are nice but help much to the understanding of the document.	· Noted and will review

37

I have missed them but all that stuff helps

- Noted

38	A picture is worth 1000 words!	· Acknowledged
39	A joy to use, in spite of some hiccups here and there....will be ironed out eventually	· Acknowledged
40	Even after reading the instructions I forgot I could click on crosses on the interactive maps. I think maybe the icon needs to be red? Also a 'X' to close them would be more intuitive than a Back arrow.	· Acknowledged

41	For those of us not contributing as build and design professionals a caption is worth a great deal.	· Noted and will review
42	I think you are in danger of making it a bit over simplistic. There is a fine balance to be attained in what is fundamentally a topic that requires some expert knowledge.	· Noted and will review
43	The navigation isn't intuitive. I thought it ended at one page. Now I see the coloured dots on the right help me navigate. Now that I see the whole thing, very impressive.	· Acknowledged

44	<p>1. A map is required of the likely flooding area from a weather event in the Thames Valley similar to that experienced in 2021 in North Germany.2. Diagrams of living walls should be included alongside diagrams of trees.</p>	<ul style="list-style-type: none"> · Noted and will review
45	<p>All plans need to show not only the particular site of the proposal but also its impact on surrounding areas...and developments not yet included but which will be consequent on the proposal. Pretty pictures of shrubberies lining walkways rarely give realistic impressions of how tawdry such places can become. The presentation of development and design proposals has become a skilled art, into which large sums of money are invested with PR companies. These plans and displays can be as misleading as they are helpful, and so Local Authorities should establish clear codes as to how these must be composed.</p>	<ul style="list-style-type: none"> · Noted
46	<p>Some photos were excellent e.g. Swales at Upton that demonstrate how SuDs can contribute towards biodiversity gain in larger developments. However, some of the drawings and diagrams although clear were in fact contrary to sustainable development e.g. diagrams showing dormers that apparently enhance the building ascetics but have a devastating impact on building energy efficiency and ability to install solar panels on roofs.</p>	<ul style="list-style-type: none"> · Noted and will review
47	<ul style="list-style-type: none"> - Diagrams are helpful to cut and paste to applicants and agents as examples - Officers liked the red, amber, green diagrams – but the key needs to be underneath or more clearly outlined so it cannot be missed - Photos are helpful, but it would be good to have more examples from across both Districts. Officers felt that the photographs provided were very South-heavy - Photos of more contemporary design would be helpful (like Photo 3 under BUILT FORM) - Some of the infographics (for example under 'About South & Vale') seem to take up a lot of space. Is there a different way to present these? 	<ul style="list-style-type: none"> · Acknowledged
48	<p>This is a much clearer way of setting out the guidance than using a printed report. It is easy to focus in on the key issues that apply to a development.</p>	<ul style="list-style-type: none"> · Acknowledged

49	<p>Whilst the interactive maps are helpful, it should be made clear where interactive maps represent guidance, and where they are demonstrating how the design principles could be applied within a live development scheme. Using Figure 3 within the 'Natural Environment' section as an example, it is not clear whether Figure 3 is seeking to highlight how a potential applicant could respond to a site's constraints and the design principles, or whether the responses highlighted (i.e. "retain characteristic hedgerows where possible and Important Hedgerows") should be taken as guidance in itself. Whilst it would appear in relation to Figure 3 that those annotations are seeking to demonstrate how the guidance could be applied when analysing opportunities and constraints within a site, that should be made clearer within the captions to each figure. If it is the case that the annotations are guidance, however, then they should be included within the main body of the text, rather than within the interactive graphics where they may be overlooked.</p>	<ul style="list-style-type: none"> · Noted and will review
50	<p>The pop up texts should be accurate and concise.</p>	<ul style="list-style-type: none"> · Noted and will review
51	<p>It was not entirely clear that much of the information provided in the maps, drawings etc were really relevant to someone wishing to understand the Design Guide in order to try to comply with it.</p>	<ul style="list-style-type: none"> · Noted and will review
52	<p>We consider that some of the maps could be more interactive. For example, we consider the landscape character map for South and Vale would be clearer/easier to understand if it were to include the key settlement locations on the map. The graphics within the document are generally clear and show good examples of what developers and consultants should be aiming for.</p>	<ul style="list-style-type: none"> · Noted and will review

53	Need to use local examples of high density developments. So many developments are for individual householders, but most pictures shown are for large scale developments.	· Noted and will review
54	The pictures, drawing and diagrams could be helpful if better explanation were given on what they are supposed to represent and what we are supposed to glean from them. There is not enough explanation. Interactive maps, are not very interactive. Again could be greatly improved and more useful.	· Acknowledged
55	It should be made clear when the interactive elements are providing guidance (or referencing national guidance), or are referring to adopted policy.	· Acknowledged
56	Please see submitted letter for full comments.	· Review supporting document

57	When one can locate these, they are very helpful! However, there need to be titles against the bullets on the righthand side of the front/header page of the Guide (one has to hover the cursor over them before realising they actually ARE links, and not simply a graphic embellishment of the page!) The link titles should be clearly visible at all times, not just when the cursor is over the bullet.	· Noted and will review
58	should have more pictures of good design rather than the current emphasis on interactive 45ombat45ment4545nal drawings	· Noted and will review
59	It should be made clear when the interactive elements are providing guidance (or referencing national guidance), or are referring to adopted policy. The comments are potentially confusing as some seem to introduce new policy, whereas others provide guidance (see below).	· Noted and will review. The text provided within the interactive plans are only providing further clarification or information on what needs to be considered as part of a development proposal. We will clarify this in the introduction.

Part 8: Design Principles

Question 8: Place and setting [Click here to see the 'Place and setting' design principles section in the guide.](#) If you'd like to comment on them, please use the space below:

Comment	Council's response
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1	<p>Too many words.</p> <p>Too many pages.</p> <p>Too many concepts.</p> <p>Too much everything.</p> <p>You get the idea.</p> <p>The guide is too elaborate and lengthy.</p> <p>Nice concept.</p> <p>Poorly implemented.</p>	<p>· Noted.</p>
2	<p>The vast majority of applications do not require an opportunities and constraints plan, nor a concept plan nor a regulating framework plan. The design guide should reduce the workload of officers by ensuring that applications are acceptable when submitted, not increasing their workload by forcing them to review more useless information. Further, this has nothing to do with small scale development such as householder/minor applications and this is not made clear within the design guide.</p>	<p>Noted. We believe good design no matter the scale requires an understanding of the context. A constraints and opportunities plan gives the applicant to consider all of the issues before developing a design rationale.</p>
3	<p>The context should be viewed as the limited natural environment that surrounds the city of Oxford; the heavy pollution generated by the desire to build new homes; the waste and damage to nearby locations and villages during construction; the provision of adequate local infrastructure and the damage to local roads from heavy lorries...the list is endless. Your document addresses none of this. None of this is new development should be undertaken on Green Belt; the views of local people are being ignored.</p>	<p>· Noted.</p>
4	<p>Although setting and context are mentioned, there is no mention of proximity, effect on the neighbours and neighbourhood, or overcrowding and over development,</p>	<p>· Noted.</p>
5	<p>Yes, here's the problem with ALL your efforts when trying to provide a plan. There is no clear way to identify what one is looking at. Overlay a street map and it might be meaningful.</p>	<p>Noted. The plans provided are an example and not specific to a location.</p>
6	<p>Very clear and thorough</p>	<p>· Acknowledged</p>
7	<p>These are all well and good on paper but it is the longer term infrastructure of the site that really needs consideration. The potential changes to existing and surrounding housing stock is just as important as the development – ie building on flood plain or not giving due consideration to future matters is not something you will see on any place and setting design principles.</p>	<p>Noted. The Design Guide cannot go beyond the framework of the Local Plans.</p>

8	<p>One factor often overlooked is the impact of pets on the local environment. Where developments are near SSSIs measures should be imposed to limit this impact.</p>	<p>Noted. This is beyond the remit of our design guide.</p>
9	<p>The existing Vale design guide is very clear, and yet in Faringdon we see multiple large developments being approved which skip the guidance . A cursory look at multiple exits and entry suggestions, space for growing food, movement framework, etc. shows there is little point in making new guides, if the implementation of existing guides is so poor. If the same people and processes are at work in the approval process, there is no point in investing in new guidelines.</p>	<p>· Noted.</p>
10	<p>I like the ideas that you are promoting but know that developers will find all the loopholes and mercilessly exploit them to maximise their financial return. Don't be discouraged.</p>	<p>· Noted.</p>
11	<p>we are still building red brick homes that look like “an army camp” The rest of the world have moved away from bricks and old designs. We need homes to reuse rain water , have solar panels and perhaps community orchards and allotments for people to grow produce.</p> <p>when a group home for the elderly is built , please make sure there is a 47ombat47m outlook for them to see outside their windows. Not shops schools and busy traffic interchange as GWP Didcot</p>	<p>· Noted.</p>
12	<p>There is no reference to guidance contained in Neighbourhood Development Plans or the importance of Registered Historic Parks and Gardens or Undesignated Heritage Assets. These are all important elements of place and setting and should be integrated with the text.</p>	<p>· Noted and will review</p>
13	<p>Many villages and towns have local and neighbourhood plans. These should surely be the basic reference point for developers. I looked in vain through this document for any references to them.</p>	<p>· Noted and will review</p>
14	<p>Please see previous comments.</p>	<p>· Noted</p>
15	<p>To keep devopments in keeping with other local houses</p>	<p>Noted. Understanding the context and drawing from the local vernacular is an important part of this section.</p>

16	<p>it needs breaking down to the scale of the development. if you are building single house this section is really not helpful it needs more clarity of direction of the sections to use dependent upon the proposal it is far too one size fits all. One size fits none at all in terms of this section.</p>	<p>- Noted.</p>
17	<p>concern that the principles may be used by officers without an ability to discern intuitive and skilful design innovation</p>	<p>Noted. Officers will receive training once the Design Guide is adopted.</p>
18	<p>I think it would be good to include sport England's Active Design Guidance in this document: https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design</p> <p>Active Design is a combination of 10 principles that promote activity, health and stronger communities through the way we design and build our towns and cities. That's why we, in partnership with Public Health England, have produced the Active Design Guidance which works as a step-by-step guide to implementing an active environment.</p> <p>This guidance builds on the original objectives of improving accessibility, enhancing amenity and increasing awareness, and sets out the 10 principles of Active Design.</p>	<p>- Noted and will review</p>
19	<p>Ensure any development preserves the natural environment as much as possible</p>	<p>- Noted.</p>

20	<p>New developments should not spoil views.</p>	<p>Noted. Both place and setting and natural environment sections of the guide have regard to views beyond the red line plan.</p>
21	<p>Seems to be slightly negative attitude to hedgerows....'worthy of retaining' and 'low quality 49ombat49me' marked. Should attitude be 'save all hedgerows where possible' and 'hedgerows to make premium by planting to provide wildlife bird/bat corridors'.</p> <p>Hedges should be kept on estates between house not just bulldozed before estates built like Vale developers being allowed to do.</p>	<p>· Noted and will review</p>
22	<p>The Guidelines are good, concerning how to go about the identification of visual/physical assets and detractors. They should help developers to progress their proposals on how to enhance those assets where possible and to diminish/possibly eradicate the constraints/detractors (some are not possible, e.g. existing pylons!). Again the search of perfection can be the enemy of the 'good' or even the 'better' this time.</p>	<p>· Acknowledged</p>

23	Seem comprehensive.	· Acknowledged
24	Biased towards developers, create a summarised version for householders	· Noted.
25	please add in under For All Developments reference to registered parks and gardens and their settings Second para Developing a Design Rationale please add in in reference to registered parks and gardens	· Noted.
26	Excellent – really clear and easy access to relevant documents	· Acknowledged
27	The design principles indicated should; enhance appearance of the area. Provide an attractive place for the inhabitants to live inside the buildings and in the area around. Provide opportunities for folk to exercise and enjoy the outside. Adequate parking and play space.p	· Noted.
28	Would like to see reference to Neighbourhood Plans	· Noted and will review
29	well i think to houses being build we need primark in didcot more carpark	· Noted.
30	There is no mention of the sounding environment; how sound heritage can be preserved; how sound pollution and noise is experienced in the settings. More experiential data is required.	· Noted and will review
31	I am fully in agreement of characterizing the local area before making a definitive plan for new developments. Everything in the guide makes sense and should help to ensure developments are appropriate for the location and enhance the area rather than being detrimental to existing communities.	· Acknowledged

32	Vital – a good example of importance is how the new development in Benson completely fails – too many similar design that don't enhance the village. Creating a very separate an unintegrated community.	· Noted.
33	Not naming roads or area doesn't help identify areas intended for greening or development.	· NA.
34	Overwhelmingly directed towards major greenfield development.	· Noted.
35	Excellent	· Acknowledged
36	fine	· Noted.
37	The new Barton estate off the northern by pass certainly does not come anywhere near design principals. The whole development is an insult to the historic city of Oxford.	N/A. Barton Park sits outside our districts.

38	<p>People will need garages close to there house to be able to charge electric cars in the future.</p>	· Noted.
39	<p>It is important to consider whether previous designs, such as a bypass should continue in order to e.g. prevent congestion or pollution within an existing built community. It is important to consider whether removal of this aspect will be detrimental to the community.</p> <p>It is important to recognise the unique aspects of a rural community; it should be treated differently from that of towns and cities. The unique character of a rural community should not be changed.</p> <p>It might be preferable to write the principles in bullet points and/ or emphasise key words in bold or italics.</p>	· Noted.

40	These design principles are signposted and set out clearly- it packs in very nicely what must be considered for a contextual analysis.	· Acknowledged
41	It is good to see that the guide mentions protecting important views and landscape character, avoiding building in prominent places or ridge-lines and emphasises that development must fit in with the local area.	· Acknowledged
42	no reference found to the role of neighbourhood plans in place and setting	· Noted and will review

43	<p>““The density of a development must reflect the character of the surrounding area. Densities should vary across the site, with lower densities towards the countryside edge. This can help to provide a transition between existing built-up area and the open countryside.”” I think this is in this section although since the document which cannot easily be searched, I'm struggling to relate my comments to the appropriate parts of the document. The above sounds sensible but where a relatively low density has been provided for this reason, that lower density should be protected. I cannot find anything in this policy which makes this point clear.</p>	<p>· Noted.</p>
44	<p>We agree that emphasis should be on local rather than national. Plus to take account of the fact that South and Vale are predominantly rural in nature which has to take precedence over the National Design Principles.</p>	<p>· Noted.</p>
45	<p>Probably appropriate for a large-scale housing development (54ombat54m it's still overly complex and wordy – more suited to drawing up an outline of futuristic science-fiction novel) but not very applicable to an application for an extension.</p>	<p>Noted. Note that all principles in the design guide are applicable to all scales of development.</p>
46	<p>I do not go much on rowen atkinsons .the comedian/mr bean. Place near ipsden.to me a traditional Manor House would be a much better building for the countryside.the Italians have buildings that are as old as the hills with all new tech inside.thats what you need</p>	<p>· Noted.</p>

47	The design should enhance the character of its setting.	- Noted.
48	<p>Sunningwell Parish Council's comments on the proposed Joint Design Guide 2022 are as follows;The author of the new design guide is not referred to in the document although it appears to have been written in a way that makes it difficult to understand for anyone other than maybe a town planner or possibly architect/designer; it is not user friendly for Applicants, Councillors or those not directly involved in the planning process. Key design objectives uses words such as contextual analysis, green and blue infrastructure, net gain biodiversity, clear and permeable hierarchy, positive relationships between front and backs of buildings, design complimentary to 'grain'. Most people won't know what this means or how to apply it to a design.Design is required to 'adapt to the changing requirements of occupants'. Is that possible or is it an idealistic view?There will be no differentiation between open market and affordable housing; if developers aren't going to achieve the same value for affordable as they might do for open market housing then it is very unlikely they can build affordable housing to the same quality and design. Has this point been discussed with housebuilders and developers to get their view?In the council's opinion the document makes a number of unnecessary assumptions, and statements without supporting examples or evidence, such as 'good design of hospitals helps people recover quicker', 'good design of schools improves educational achievement', 'good design of open space affects people's mental health', and 'good design of a department store improves turnover'.The section on 'Built Form' referring to extensions being sensitive to character and appearance of original dwellings and street scene and being aware of the impact of a proposal on existing adjacent property [Neighbouring Amenity]. This is already well documented in the existing design guide published in 2015 as are most other issues mentioned in this latest draft document;In summary there doesn't appear to be a great deal of difference between the 2022 draft Design Guide and the existing one which is more user friendly and straightforward; it therefore should be questioned why it is deemed necessary to go to the cost and time of producing a completely new design guide when the existing one would suffice but with a simple Addendum to update the 2015 Design Guide on changes that have taken place between then and now.Sunningwell Parish Council 24 February 2022</p>	- Noted.

49	All very laudable and it would be good to see this implemented.	· Noted.
50	My only comment is that there was one map....interactive conservation area map.... which when I clicked on Drayton it came up with an old map. Eg. It missed out certain buildings, like garages or extensions, and included land in some gardens which are inaccurate.	· Noted and will review
51	At the bottom of this section it suggests using various documents to 'support your design', including conservation area appraisals. There is no mention of neighbourhood development plans, where these are adopted (and there are many throughout the Vale and SODC). These NDPs have already done much of the specific work that the design guide is asking for, so should definitely be mentioned as a source of information.	· Noted and will review
52	We have no specific comments to raise in this section which follow well established principles of good design.	· Noted.

53	<p>Again, some of the language is too 'high'. What does 'move away from notional character areas.' Mean? It doesn't mean anything to me! ' Create a narrative around place-identity' sounds to me like you are encouraging people to make up fanciful types of justification for their designs rather than actually understand the history of a site. 'Narrative' is, I think, the dangerous word in this sentence as it implies storytelling as opposed to true use/incorporation of historical or important local features. I would say you probably need to get someone who is used to writing for the lay public to sit down and help put this into more useful language for the site as at the moment I think it's in danger of encouraging the kind of faux marketing that you probably want to discourage as much as everyone else hates it (where things get called 'the old dairy' etc even when it never was a dairy!)</p>	<p>· Noted.</p>
54	<p>Response manually entered, submitted in an email format. For reporting purposes additional text is marked as 'xxx' and deleted text as *xxx*. The original submission is attached to this comment form for reference.</p> <p>In the table we recommend the addition of the "Chilterns Buildings Design Guide" "Fig 1 'typo' " views towards the site from the "AONB."</p> <p>Any statutory designations such as National Nature Reserves, AONBs, Green Belt, and SSSIs amongst others, and non-statutory designations such as Ancient Woodland, Dark Skies "valued landscapes" and Registered Battlefields, amongst others; Justification: landscape as mentioned in the NPPF and new guidance produced by the Landscape Institute (2021).</p>	<p>· Noted and will review</p>

55	<p>Response manually entered, submitted in an email format. Space and Layout Plots and Amenity A number of amenity parameters are set out in the Draft Joint Design Guide, including proposed back-to-back distances of 21m, distances of 12m for back to side distances, and 10m front to front distances. Such specific requirements are very restrictive and could preclude the delivery of higher density, well designed developments. In some cases, it may be necessary to reduce the distance between front-to-front distances down from 10m, for example. This would assist in creating high quality and attractive environments for pedestrians and cyclists. In such circumstances, consideration would of course have to be given to the distances between the windows of habitable rooms for privacy and amenity reasons. In addition to this, it is noted that 21m offset distances from back-to-back of dwellings is excessive, as often residential gardens do not exceed 10m in length in a typical medium density development. Accordingly, our views are that the inclusion of back-to-back, back to side and front to front offset distances between dwellings in the Draft Joint Design Guide is too prescriptive. Such requirements are likely to limit the delivery of higher density areas within a development and would also limit the ability to deliver innovative and high-quality designs. The offset distances should be removed, so that a more flexible approach can be adopted enabling applicants to put forward high quality and innovative designs, which should be considered on a site-by-site basis.</p> <p>Design Principles – Private Amenity Concerns are raised about the prescriptiveness of the standards outlined, but also the fact that there does not appear to be a logical increase in the minimum garden space based on the increase in the size of the dwellings. Consequently, it is recommended that the following amendments are made:</p> <ul style="list-style-type: none"> • For detached, semi-detached and terraced dwellings, it is recommended that the standard should be amended for gardens to be a minimum of 50% of Gross Internal Area (GIA). • For apartment buildings, it is unclear as to whether the 40sqm proposed is per apartment. It is recommended that this is amended to be a total of 10% of the GIA per apartment, which can be provided either through balconies or through a mixture of balconies and communal spaces where necessary. It is important to retain flexibility to enable and promote a high-quality design approach. <p>Parking Strategy and Solutions It is acknowledged that Oxfordshire County Council are considering parking standards for new developments, particularly for the edge of Oxford sites. The proposals contained within the Draft Joint Design Guide need to be assessed against and prepared in conjunction with emerging standards. This is necessary to ensure that the Draft Joint Design Guide moves towards lower car usage and ownership, in accordance with emerging policy.</p> <p>Storage, Servicing and Utilities Whilst the Draft Joint Design Guide refers to the need for cycle and bin storage for dwellings, it does not provide any clarification on the standards required (size of storage, specification), or the desired location of such storage arrangements for various types of dwellings. This section would benefit from providing additional clarification and advice to assist applicants when preparing future planning applications.</p>	<p>· We are seeking to update the images to ensure they are relevant.</p>
56	<p>Response manually entered, submitted in an email format.</p> <p>4. The Guide should allow local features such as the vernacular to be included.</p> <p>7. The Guide should recognise the impact of flooding including:</p> <ul style="list-style-type: none"> - need for water absorption to reduce fast run-off (eg reducing tarmac area; water butts; individual house rain soakaways) - need to retain existing waterways and flood areas to continue to serve built development. 	<p>Select:</p>
57	<p>This is very important to preserve the character of the local area, especially as we live in arguably one of the most beautiful areas in the country. Any design and planning principles should ensure we preserve while also making it possible to develop and plan for the future. This is a very general section and is an excellent starting point, however it would be really useful to have more detail on the areas that are really critical and important to the local area. Please see comment on next section around the installation of solar panels in homes or large scale solar farms.</p>	<p>· Noted and will review</p>

58	<p>I'm unsure where to place my overall comment. It's about design and therefore setting of renewable energy facilities, such as solar farms, eg can they be sited in Green Belt land? If we could include that subject in the appropriate sections of the design guide, it will help in the medium to long term, but also immediately as applications for solar panel sites are coming forward. Heritage)</p>	<p>- Noted and will review</p>
59	<p>Place and setting: Inform your design: Please change: 'Technical studies including (but not limited to) surveys on landform, watercourses, trees, habitats, species, flood risk mitigation and drainage.' – to: Technical studies including (but not limited to) surveys on landform, watercourses, trees, habitats, species, production of food, natural carbon sequestering, flood risk mitigation and drainage. Design principles - Please change the following: 1.0 Existing networks of natural features, including land used for agriculture, watercourses, trees, woodland, hedgerows, green spaces, field patterns, habitats and public rights of way (footpaths, bridleways, etc.); 1.4 Any statutory designations such as National Nature Reserves, AONBs, Green Belt, and SSSIs amongst others, and non-statutory designations such as Community Led Plans, Ancient Woodland, Dark Skies and Registered Battlefields, amongst others; 1.5 Potential barriers to development such as railway lines, major roads, utilities, pipelines, noise, pollution, land contamination, flooding, lack of drainage capacity etc., and any resulting easements including those specified in the Local Plan(s);</p>	<p>- Noted and will review</p>

60	<p>Whilst generally comprehensive, there does not appear to be any specific mention of the significance of the wider landscape setting of the City of Oxford, which extends into both the Vale of White Horse and South Oxfordshire District Councils. Key views into the city, and from the city out into its wider surrounding green setting are available to both the south and west, including the western hills including Harcourt Hill and Boars Hill. To the south, the wider setting on Nuneham Park provides views into the City from the South. Due to its high sensitivity, the wider green setting should be specifically mentioned to ensure it is identified and highlighted as an area of significance and extra protection. Reference should also be made to undesignated heritage assets, as these can also be important buildings that could positively influence the setting of new development.</p>	<p>- Noted and will review</p>
61	<p>As the Guide says, the contextual analysis is essential, both within the site and beyond its boundary. It must be sensitive to history, but also honest about possible future implications. Designs must clearly indicate further expected developments which would impact the wider neighbourhood, which are probably consequent on permission being obtained although not yet included specifically within the permission sought. These may be their own development plans, but also plans being promoted by other developers.</p>	<p>- Noted.</p>

62	<p>Most of this section is To date, planners have favoured attempts to proposals being “in-keeping” with the architectural character of the surrounding settlements/buildings. All this means in the Chilterns, is that flint stone material is predominantly imported from France which demonstrates how visual design overrides both common sense and environmental impacts. Materials that were used hundreds of years ago might not necessarily be the best material to use today and this needs to be reflected in the design guide. Why not favour new materials or new biophilic design that promote both biodiversity and/or low embodied energy and/or zero cars? Where are the photos etc that provide examples of this more environmentally orientated approach to development? If developers are having to create all their new developments so that they vaguely resemble the historic surrounding architecture with fake chimneys etc, how will this help the region have new developments that actually address climate change and lost of biodiversity? This won't be achieved with fake chimneys made from fibreglass!</p>	<ul style="list-style-type: none"> · Noted and will review
63	<p>FORMATTING: Needs a chapter number for reference. Could an interactive mini contents list be included under each chapter title/heading for easier navigation? Principles should really be first, and then follow up with explanation text, diagrams and helpful links below.</p> <p>DIFFERENTIATION: Would be good to highlight that principles are perhaps more appropriate for Majors & Minors applications, rather than householder development?</p>	<ul style="list-style-type: none"> · Noted and will review
64	<p>Very clearly explained.</p> <p>We agree that the emphasis should be on local rather than national design issues. It is essential that the rural nature of the Chilterns and its setting are fully taken into account in planning decisions.</p>	<ul style="list-style-type: none"> · Noted.
65	<p>No comments.</p>	<ul style="list-style-type: none"> · Noted.
66	<p>No mention of Neighbourhood plans where place and setting information will be in much greater detail. Topography might have to be explained in a pop up.</p>	<ul style="list-style-type: none"> · Noted and will review
67	<p>We felt this section captured very well the ambitions for Place making</p>	<ul style="list-style-type: none"> · Acknowledged

70

- Noted and will review

It would be useful to have a form for the Character Assessment, so all the relevant aspects can be properly considered and included. The City of Oxford has a proforma for this with scores. This is very helpful and should be included in the guide. Much more emphasis must be placed on the character of other houses/buildings nearby so it can be in keeping and sympathy and not an eye sore that clashes.

71

- Noted and will review

Response manually entered, submitted in an email format. The approach to place and setting is logically presented, and outlines the main matters to be considered as part of any contextual analysis. We do note that this section is not as detailed as corresponding guidance in the National Design Guide, and as highlighted above, it would be helpful to understand how the Councils propose to use the Joint Design Guide (and potentially other national design guidance) when assessing schemes.

72	<p>The Place and setting chapter is better in that it does take note of existing green areas within and around a site. It also makes reference to Extended footpath links through the development and integrating pedestrian and cycle links although there is no mention of how these routes might connect with the wider world. This comes in the Movement and connectivity chapter. (One of the main faults with the preliminary Chalgrove strategic site designs I saw which had cycle and pedestrian routes within the site but no provision for cycling to anywhere else useful.) So I am really pleased to see these points:1. Provides direct pedestrian and cycle links to local services and facilities that follow natural desire lines and uses the features identified in the opportunities plan to create visually interesting and attractive routes;2. Maintains priority for pedestrians and cyclists, designing people-friendly spaces;3. Locates facilities and services within a short walking distance of homes (800 m) and provides easy access for existing and new residents;4. Provides bus stops within a five-minute walk (400m) of homes, is preferably 600m from a primary school and 1500m from a secondary school, and where possible, close to local services and facilities;Actually most of the points highlighted in this chapter look pretty good to me so it will be interesting to hear what others say about them! I would just add one more point, 3.32, from a sustainability point of view to the section on 1. Ensure that public art commissioned in any new development:2. 3. And that is to make sure there is a maintenance programme in place for whatever is put in. I have noted the sorry state of some pieces of public art (eg pieces on the Phoenix Trail and those in the Sculpture park in Cowleaze Wood) whose installation I can remember in the 1990s.</p>	<p>- Noted and will review</p>
73	<p>Response manually entered, submitted in an email format.</p> <p>Place and Setting (Design Principles – (Place and Setting) This section of the Design Guide requests that a document setting out the contextual analysis is prepared to identify the local character and wider context of the application site which considers the settlement, landscape, biodiversity, streets etc.</p> <p>Gladman do not object to the principle of this document, or the steps proposed. However, it is considered that this information is often included in other application documents including 'Design and Access Statements'. Therefore, it may be prudent to provide further flexibility within this guidance to also allow for the contextual analysis to be delivered and undertaken through other documents which support an application.</p>	<p>- Noted and will review points individually</p>

<p>74</p>	<p>As this is a SPD and not policy (and should therefore clarify the policy, rather than adding further policies) the document should state that development schemes which seek to follow the principles set out will be supported, rather than stating that applicants should “ensure” that a scheme adheres to specific principles. GOAL: Identify the site’s features and its context The text is helpful in identifying some of the issues that might be relevant in assessing a site’s features and its context. It is helpfully made clear that the assessment will vary depending on the site and the proposals, except for one sentence. ‘This should consider the structure and history of the settlement and landscape within which it is located or relates to, the character of the landscape, biodiversity, the streets and spaces and the built form (all of these elements constitute local character)’. This sentence should be moved towards the end of the third paragraph and re-phrased to say ‘The contextual analysis is likely (amongst other issues) to consider the structure ... local character’. GOAL: Use the site’s features and context to shape your design This section provides clear advice. The sentence ‘Do not tightly define character area boundaries but make sure to have a gradual transition between them. Focus on the character of the streets/area as a way of creating attractive and defined space’ should be removed as this is unnecessarily prescriptive. STEPS: Communicate your design A sentence should be added to at the start to indicate that requirements will vary depending on the proposals. We suggest ‘the communication of your design will depend on the extent of your proposals, but is likely to include the need for: -An opportunities and constraints plan; A concept plan An illustrative layout Other drawings might include (for example) cross sections or a regulating framework plan for larger proposals. A clear Key is required for each drawing.’</p>	<p>· Noted</p>
<p>75</p>	<p>Please see submitted letter for full comments.</p>	<p>· Noted and will review</p>

76	<p>This section fails to mention the existence of neighbourhood plans, many of which have policies – often quite detailed – on design of new developments. We think it is a serious omission that applicants are not asked to look carefully at what their local community has adopted as policy on design. Can you please add something to the final draft?</p>	<p>· Noted and will review</p>
77	<p>Additional references for ‘Support your design’:</p> <ul style="list-style-type: none"> - Oxfordshire Definitive Map and Statement (the legal record of public rights of way) - Oxfordshire County Council (OCC) Rights of Way Management Plan - OCC Local Transport & Connectivity Plan <p>The DESIGN PRINCIPLES – PLACE AND SETTING section 1.6 should read: “1.6 The settlement structure of the site and surrounding area: this includes studying the historical development of the settlement, its townscape; structure and hierarchy of streets, spaces, facilities, existing connections (including public rights of way and cycle routes), gateways, nodes, density, plot and block sizes. Figure ground diagrams can help explain a settlement structure;” This is because the principle should apply to ALL FOUR categories of PROW (i.e. bridleways, restricted byways and byways open to all traffic, in addition to footpaths)</p>	<p>Noted.</p>
78	<p>On Site B in Wallingford, the ancient groundscape was torn apart. It had historical value in its makeup. Fields should not be restructured as this was. This guide seems to say that that would not happen in the future. Thank you.</p> <p>Not sure why this part does not speak more of connectivity into existing settlements and the ‘15min city’ concept?</p>	<p>· Noted. We refer to 20 minute neighbourhood in the movement and connectivity section and define it in the glossary.</p>
79	<p>Good design respects place and setting. Poor design often claims all sorts of benefits for place and setting without actually achieving either</p>	<p>· Noted.</p>
80	<p>Agree with most of them although jargon in places is not defined.</p> <p>Needs statement on external lighting (including ILP GN01 and AONB guidance).</p>	<p>· Noted and will review</p>
81	<p>Response manually entered, submitted in an email format. Understanding the site’s features and its setting & developing a design rationale • It would be good to mention what an opportunities and constraints plan is in this body text as this is an important requirement of South Local Plan Policy DES3</p>	<p>· Noted and will review points individually</p>

Response manually entered, submitted in an email format.

The draft Design Guide states within Figure 2 (Development access) that “Successful development depends on good access and connections. Make sure to provide more than one access point to provide one way in and one way out. This would result in an overall well connected development”. Thakeham agree that good access and connections are vital to a successful and sustainable development, however, two vehicular access points are neither required, suitable or achievable on all developments; particularly when taking into consideration the scale of development proposed. Thakeham would suggest therefore that the councils are clear on the access requirements they expect and from what scale of development; ideally supported by technical guidance. It is imperative that this is clear and not left to interpretation at the application stage, to ensure consistency.

Furthermore, within Figure 2 (Future links) it is suggested that future links should be provided “...to neighbouring land that could be developed in the future...”. Thakeham support the need for a holistic approach to masterplanning, however it would be unreasonable for a proposed development to make allowances for future connections without a level of certainty that neighbouring land will come forward. This would also require the engagement of neighbouring landowners/developers/promoters, which has the potential to stall or delay an application. Thakeham therefore consider that the councils should be clearer in the application of this requirement and would suggest that only if neighbouring land parcels are part of an allocation, or there is an equivalent degree of certainty that both parcels will be developed, should connection allowances be required.

The draft Design Guide suggests that to inform the design developers should “Agree the scope of a landscape and visual impact assessment/appraisal with the local authority”. Thakeham suggest that further clarity on this should be included, in relation to whether it will therefore be possible to engage with landscape officers ahead of a Pre-Application submission, so any landscape assessments produced at the earliest stage are based on an agreed scope.

- Noted and will review points individually

83	<p>As this is a SPD and not policy (and should therefore clarify the policy, rather than adding further policies) the document should state that development schemes which seek to follow the principles set out will be supported, rather than stating that applicants should 'ensure' that a scheme adheres to specific principles. The SPD provides guidance and not policy – that should be made clear in the document / online guide. GOAL: Identify the site's features and its context. The text is helpful in identifying some of the issues that might be relevant in assessing a site's features and its context. It is helpfully made clear that the assessment will vary depending on the site and the proposals, except for one sentence. 'This should consider the structure and history of the settlement and landscape within which it is located or relates to, the character of the landscape, biodiversity, the streets and spaces and the built form (all of these elements constitute local character)'. This sentence should be moved towards the end of the third paragraph and re-phrased to say 'The contextual analysis is likely (amongst other issues) to consider the structure ... local character)'. The second and third paragraphs related to this goal would therefore read: -A contextual analysis identifies the context within which the application site is set. (*remove text*) *This should consider the structure and history of the settlement and landscape within which it is located or relates to, the character of the landscape, biodiversity, the streets and spaces and the built form (all of these elements constitute local character).* The level of detail in the analysis should be proportionate to the scale and complexity of the development proposals. Every site feature identified provides an opportunity to shape your design, even where they may initially appear to limit what you are able to achieve. Imaginative solutions to incorporate off-site and on-site features can give developments a unique character and form the basis of your design rationale. You need to identify and take account of the off-site and on-site features at the outset of the design process as they are very rarely successfully retrofitted into a design at a later stage. There should be a clear drawing trail showing how the design of the development has evolved. The contextual analysis is likely (amongst other issues) to consider the structure and history of the settlement and landscape within which it is located or relates to, the character of the landscape, biodiversity, the streets and spaces and the built form. GOAL: Use the site's features and context to shape your design. The sentence 'Do not tightly define character area boundaries but make sure to have a gradual transition between them. Focus on the character of the streets/area as a way of creating attractive and defined space' should be removed as this is unnecessarily prescriptive. STEPS: Communicate your design. A sentence should be added to at the start to indicate that requirements will vary depending on the proposals. We suggest 'the communication of your design will depend on the extent of your proposals, but is likely to include the need for: -An opportunities and constraints plan; A concept plan An illustrative layout Other drawings might include (for example) cross sections or a regulating framework plan for larger proposals. A clear Key is required for each drawing.'</p>	<p>- Noted and will review points individually</p>
84	<p>Response manually entered, submitted in an email format.</p> <p>The JDG identifies that a key goal in developing a design rationale is to "use the site's features and context to shape your design". Whilst CEG agrees that an understanding of context should be an embedded component of any design rationale, the vision of what is sought to be created should also be a key driver that shapes the approach or rationale to a design approach. This is particularly relevant for larger developments where, for example, the vision may be to create a connected, forward-thinking development that promotes sustainable living.</p>	<p>Noted.</p>

Part 8: Design principles

Question 9: Design principles – Natural environment [Click here to see the 'Natural environment' design principles section in the guide.](#) If you'd like to comment on them, please use the space below:

Comment	Council's response
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1	<p>Too many words.</p> <p>Too many pages.</p> <p>Too many concepts.</p> <p>Too much everything.</p> <p>You get the idea.</p> <p>The guide is too elaborate and lengthy.</p> <p>Nice concept.</p> <p>Poorly implemented.</p>	<p>- Noted.</p>
2	<p>Show where natural environment will be lost.</p>	<p>- Noted.</p>
3	<p>Again the vast 70ombat70m of applications do not require a landscape strategy. Section 2.0 states that a LVIA is required for every single application? This is ridiculous and totally over-the-top, the design guide needs to be clear as to when this is, and is not required. Not just state something that would be helpful. This totally defeats the point of the guide. This is repeated again at section 2.9 where the design guide simply states numerous documents should be provided 'where applicable'. The design guide should state when these are required and applicable not leave it up to the judgement of the applicant, that is the entire purpose of the design guide. Section 2.8 has nothing to do with the natural environment and relates entirely to pollution, this should be dealt with in another section. The requirement to provide a biodiversity net gain under the environment act 2021 dosnt come in for another 2 years. This should be referenced. Nothing within this section references TPO's or conservation area protection for trees?</p>	<p>- Noted and will review</p>

4	Natural environment should be given priority over new development.	- Noted.
5	The result of overdevelopment is the removal of trees, hedges and natural barriers, therefore the elimination of wildlife corridors so vital to the environment and quality of life.	- Noted.
6	See above	- Noted
7	Could building not just accommodate and allow for but positively integrate trees and other planting, so that each space is unique and not just a bland copy of another off the peg development?	- Noted.
8	As with the above. Design on a plan is fantastic (no one is going to do a poor design) but having full consideration of the natural environment and the impact on existing stock and infrastructure is vital to ensure good living and good quality of life.	- Noted.
9	See answer to 8	- Noted
10	The existing Vale design guide is very clear, and yet in Faringdon we see multiple large developments being approved which skip the guidance . A cursory look at multiple exits and entry suggestions, space for growing food, movement framework, etc. shows there is little point in making new guides, if the implementation of existing guides is so poor. If the same people and processes are at work in the approval process, there is no point in investing in new guidelines.	- Noted.
11	find suitable areas for joggers and dog walkers. Many people today use dog walking as their form of exercise and if people live alone they rely on a dog for company. Conversely there should be a limit on too many dogs in social housing. If people cannot afford to work and pay for home then to have several dogs which need finance is not acceptable	- Noted.
12	I think that it is brilliant that you place so much emphasis on this. And on the importance of trees and increasing biodiversity. However, I imagine there will be a large gap between your ambition and the actual result. Is it possible to help planners by mentioning here things like incorporating bat bricks, swift, swallow and martin boxes and hedgehog highways at the build stage? It is so much easier to add them then. We are very lucky in our area to have swifts, even though they are declining nationally. I like your emphasis on hedgerows. Brick garden walls should not be allowed; not only do they cut up the land into unconnected parcels inaccessible for hedgehogs and other wildlife, they also do not let the sun in for the unfortunate humans who will use the gardens.	- Noted and will review

13	Connective nature corridors should be 72ombat72ment72 into plan including crossing hard features such as raods via bridge or tunnel	· Noted.
14	<p>better than place and setting</p> <p>still no numbering to allow ease of navigation or explanation</p> <p>also it is just as bad as the NPPF which is really brief and then requires people to look through umpteen different documents, 72ombat72 knowing their relevance and doesn't even refer to existing SPD like CAAs or NPs.</p>	· Noted and will review
15	concern that the principles may be used by officers without an ability to discern intuitive and skilful design innovation	Noted. Officers will receive training following the adoption of the Design Guide.
16	see above	· Noted
17	Any larger scale development should be tied to the need to make spaces for nature – developers should have to pay a tax towards creation of new nature reserves	· Noted.

18	Landscape features should be preserved. Development in Areas of Outstanding Natural Beauty and Green Belt must not be allowed.	· Noted.
19	Noise impact on wildlife never considered. 20 yrs ago ols used to hunt around Mably Way all the time but in last 10 years never hear as driven out by car noise to seek 73ombat73 areas.	· Noted
20	They are good in general. However, I don't see any thought being given to public participation in either the design, establishment or long-term management phases. Thought needs to be given to ensure continuity of 'green cover and visual features' in perpetuity. That requires sufficient space to permit age diversity , eg. Double or treble avenues planted with species of different ages, compatible characteristics etc. Rotational management to sustain age diversity calls for Management Plans that span several decades, if not hundreds of years. That calls for constant education of – and communication with and between – successive generations of residents/users. The choices of climax species of trees for any one area will be vitally important.	· Noted.

21	Good to see emphasis on trees and biodiversity.	· Acknowledged
22	Biased towards developers, create a summarised version for householders	· Noted.
23	<p>In the box Support your Design, please add in Oxfordshire Gardens Trust website www.ogt.org.uk</p> <p>There is much useful information about registered sites and sites of local interest as well as records of research projects on walled kitchen gardens, recreational parks, tercentenary of Capability Brown (CB300) research applicable to both council areas</p>	· Noted and will review
24	<p>Excellent format. General comments – new planting should consider existing planting, particularly if native species are present.</p> <p>Landscaping is a very incongruous term (often used to describe titivating around buildings with some green bits – a bit like a garnish of parsley on a substantial meal. Hopefully those days of thinking /use of greenery are long gone.</p> <p>The term landscape proposals provides more clarity.</p> <p>Maintenance / management- could provide more information. How is quality to be determined at this stage (the longest stage).</p> <p>Time is the 4th dimension to design. Landscapes are not static but change & evolve with time – more so than the built environment.</p> <p>Perhaps consider short, medium and long term management considerations for all aspects of the natural environment.</p>	· Noted and will review
25	Very important to consider the impact of the natural environment.	· Noted.

26	Respect for the local environment and indigenous flora and fauna. Enhancing the local area's appearance and allowing walks or 75ombat75me to local facilities.	· Noted.
27	Would like to see reference to Neighbourhood Plans	· Noted and will review
28	There is no mention of the natural environment as a sound-making and receiving entity. The focus is entirely on spatial and visual aspects of the 75ombat75ment. Not enough experiential data referenced.	· Noted and will review
29	I fully commend taking account of natural features – too often these have been bull dozed in the past with little consideration to natural features. It will be good to see development that enhances the natural environment.	· Acknowledged
30	We are the custodians of the very rare chalk streams in our area – it would be amazing to see plans that that do not disturb these. Ditto respect for the current patterns of local flooding eg Chalgrove	· Noted.
31	Nature does not grow in straight lines – the delopment should reflect this	· Noted.
32	Trees planted in pedestrian walking and seating areas – market squares, children's play/activity grounds and wide roads : if correct type of tree can be kept at a reduced height (for maintenance) which will provide thick shadow in high summer – as in squares and public places in Continental Europe where they have been using this form of public shading for centuries.	· Noted and will review
33	Again, of little relevance to minor householder developments.	Noted. Applies to all scales of development.

34	<p>The term 'ecological interest' is used whereas I would suggest 'ecological impacts'. The term 'interest' implies interesting to a particular group or subjective interest or rarity whereas ecological impact is the necessarily wider picture. For example something might not be rare and therefore not be 'of interest' and unremarked but if four or five developments all take place impacting the same type of ecology at similar times it could become quite rare</p>	<p>· Noted and will review</p>
35	<p>In general, despite the fine words, the natural environment is undervalued. Once destroyed in the interests of "development", it is very seldom restored. I would like to see greater relative value placed on the natural environment and nature conservation. I think this contributes substantially to quality of life.</p>	<p>· Noted.</p>
36	<p>Could you specifically add a reference to creating hedgehog highways to allow movement</p>	<p>· Noted and will review</p>
37	<p>Net gain in biodiversity- should be seeking a substantial improvement.(to 76ombat Climate Change)</p>	<p>· Noted.</p>

38	The new estate off Fogwell Road in Botley does not meet the principals, the ugly flats can be seen for miles, the plans may look alright when you look at a flat architects drawing, but when viewed from the normal street scene the buildings look a right jumbled mess. There is not a single tree or flower anywhere. It already looks like an instant slum.	· Noted.
39	It might be preferable to write the principles in bullet points and/ or emphasise key words in bold or italics.	· Noted and will review
40	All good here, sets out clearly what needs to be considered for a scheme.	· Noted and will review

41	Excellent to see the Natural Environment and biodiversity receiving centre stage	- Acknowledged
42	no reference found to the role of neighbourhood plans in natural environment	- Noted and will review
43	You say that “Developments that result in net losses of biodiversity are not acceptable.” In reality much of the development in the District (South Oxfordshire in my case) DOES reduce biodiversity. For example NE Didcot has seen hedges removed, which reduces the population of nesting birds and which has eliminated a local murmuration of starlings. If you are serious about not reducing biodiversity you need to sharpen up your act. The aim is ok but honouring it in the breach sends out the wrong signal.	- Noted.

44	As far as we can tell, the Draft Design Guide should take more note of the rural characteristics of South and Vale as in our view the entire Design Guide has a distinct urban bias.	<ul style="list-style-type: none"> · Urban design is a discipline that relates to the design of our cities, towns and villages. It is a collaborative and multi-disciplinary process of shaping the physical setting of where we live, work and socialise. It is the art of making places no matter the context. Therefore the word 'urban' is not be taken literally but rather as a way of describing a discipline.
45	See comment in the section above.	<ul style="list-style-type: none"> · Noted
46	yes this is good the Italians would agree	<ul style="list-style-type: none"> · Acknowledged

47	very informative.	- Acknowledged
48	This section suggests preparing a landscape strategy using various LPA and nationally-approved landscape character assessments. Why not refer developers/applicants to the landscape character assessments ALREADY commissioned by every area with an adopted neighbourhood development plan? This seems to be a glaring omission.	- Noted.

49	<p>We have no specific comments to raise in this section which follow well established principles of good design.</p>	<p>- Acknowledged</p>
50	<p>I was surprised not to see a link to the MAGIC maps (https://magic.defra.gov.uk) which allow people to see habitat designations, including priority habitats. I was glad to see it specifically stated that irreplaceable habitats cannot be 'offset'.</p> <p>I think it's a shame not to give a few more examples of the types of biodiversity improvements that can easily be included into designs, such as swift bricks, bat boxes and bird boxes for appropriate species (e.g. sparrow and starling as well as the more common blue tit and robin boxes, and sometimes a barn owl box might be appropriate too). Many people are unaware of some of these features and just mentioning them could help encourage their uptake (as they are very low cost – although they need to be used in the right circumstances – e.g. at the right heights and with appropriate surrounding habitat)</p>	<p>- Noted and will review</p>

51	<p>Response manually entered, submitted in an email format. Admin note: The original email submission is attached for reference at the end of this comment form. Thank you for your consultation request on the above dated and received by Natural England on 18th January 2022. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Our remit includes protected sites and landscapes, biodiversity, geodiversity, soils, protected species, landscape character, green infrastructure and access to and enjoyment of nature. While we welcome this opportunity to give our views, the topic this Supplementary Planning Document covers is unlikely to have major effects on the natural environment, but may nonetheless have some effects. We therefore do not wish to provide specific comments, but advise you to consider the following issues:</p> <p>Green Infrastructure This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area. The National Planning Policy Framework states that local planning authorities should 'take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure'. The Planning Practice Guidance on Green Infrastructure provides more detail on this. Urban green space provides multi-functional benefits. It contributes to coherent and resilient ecological networks, allowing species to move around within, and between, towns and the countryside with even small patches of habitat benefitting movement. Urban GI is also recognised as one of the most effective tools available to us in managing environmental risks such as flooding and heat waves. Greener neighbourhoods and improved access to nature can also improve public health and quality of life and reduce environmental inequalities. There may be significant opportunities to retrofit green infrastructure in urban environments. These can be realised through:</p> <ul style="list-style-type: none"> • green roof systems and roof gardens; • green walls to provide insulation or shading and cooling; • new tree planting or altering the management of land (e.g. management of verges to enhance biodiversity). <p>You could also consider issues relating to the protection of natural resources, including air quality, ground and surface water and soils within urban design plans. Further information on GI is included within The Town and Country Planning Association's "Design Guide for Sustainable Communities" and their more recent "Good Practice Guidance for Green Infrastructure and Biodiversity".</p> <p>Biodiversity enhancement This SPD could consider incorporating features which are beneficial to wildlife within development, in line with paragraph 118 of the National Planning Policy Framework. You may wish to consider providing guidance on, for example, the level of bat roost or bird box provision within the built structure, or other measures to enhance biodiversity in the urban environment. An example of good practice includes the Exeter Residential Design Guide SPD, which advises (amongst other matters) a ratio of one nest/roost box per residential unit.</p> <p>Landscape enhancement 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. Landscape characterisation and townscape assessments, and associated sensitivity and capacity assessments provide tools for planners and developers to consider how new development might make a positive contribution to the character and functions of the landscape through sensitive siting and good design and avoid unacceptable impacts. For example, it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed so to do, and where mature trees are retained on site, provision is made for succession planting so that new trees will be well established by the time mature trees die.</p> <p>Other design considerations The NPPF includes a number of design principles which could be considered, including the impacts of lighting on landscape and biodiversity (para 180).</p> <p>Strategic Environmental Assessment/Habitats Regulations Assessment A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance. Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again. Please send all</p>	- Noted and will review
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planning consultations electronically to the consultation hub at
consultations@naturalengland.org.uk

52	<p>Response manually entered, submitted in an email format. For reporting purposes additional text is marked as 'xxx' and deleted text as *xxx*. The original submission is attached to this comment form for reference. The site layout should respect its physical features and those of its adjacent land including its "landscape character", topography, orientation, landform, geology, drainage patterns, field patterns/boundaries and vegetation cover, for example. Justification: links to Local Plan evidence base, for example the LEPUS study for SODC. The North Wessex Downs and the Chilterns Areas of Outstanding Natural Beauty (AONB) cover large areas of land within the districts. Their Management Plans and associated documents should be "applied to any proposals" *referenced for sites* within the AONB or their setting. Justification- "sites" might be misconstrued here and design within the AONB covers refreshment, renovation and not just new build proposals, which will be limited in any event. We recommend the addition of the "Chilterns Buildings Design Guide and Supplementary Technical Notes on Materials, Roofing and Flint."</p>	- Noted and will review
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53	<p>Response manually entered, submitted in an email format. 1. There are two significant omissions from consideration in this section: wildlife corridors and agricultural land for local food production, including allotments2. In the “Support your design” box there could usefully be a reference to the Oxfordshire Nature Recovery Network, Defra’s 25-year Plan, and the Oxfordshire Local Nature Partnership.</p>	<p>· Noted and will review</p>
54	<p>Response manually entered, submitted in an email format.</p> <p>Natural Environment</p> <ul style="list-style-type: none"> • “Retain characteristic hedgerow pattern where possible” – this has frequently not happened in the past. • Design principle 2.2 “ensure the scheme....does not negatively impact on the benefits enjoyed by neighbouring properties and spaces”. In a built-up area everything impacts on neighbouring properties. • The Committee agrees with the Biodiversity Net Gain proposals. 	<p>· Noted.</p>

55	<p>This is again a good start, but again quite general. I would be keen to see something included on the installation of solar panels – be this in existing or new developments, and in particular with respect to any large scale solar farms on agricultural land which will have a huge impact on the character of the environment. There will also be a huge impact on the ecosystem which should be taken into account.</p>	· Noted and will review
56	<p>How can we best maintain the beauty and openness of the natural environment and also allow renewable energy sites? How they can gently co-exist? Is there potentially a use of flood zones for elevated solar panels?</p>	· Noted and will review

57	<p>Goal: Last paragraph. Please change “proposed features such as public open spaces, community orchards, structural planting, and Sustainable Drainage Systems (SuDS)..” –to: ‘proposed features such as public open spaces, allotments, living walls, community orchards, structural planting, and Sustainable Drainage Systems (SuDS). Inform your DesignPlease change Technical studies..... to ‘Technical studies will show you whether there are any elements that need protecting, as well as physical features – this should include views, local production of food including the preservation of existing farmland, carbon sequestering vegetation, water features, existing vegetation, ecological interest, heritage value and setting.’Support your design:Include Campaign for the Protection of Rural England OxfordshireDesign Principles:Please change the following:2.2 is designed to maximise the benefits of natural resources (utilising landform, orientation, geology, natural carbon sequestering vegetation and natural drainage patterns) and does not negatively impact on the benefits enjoyed by neighbouring properties and spaces;2.5 has a joined-up network of gardens, living walls, open spaces and allotments which form an integral part of the development and are located where existing and new residents can access them easily, not just located on the edge of the development (or where there is left over space) and must be useable;Main Heading – Please change ‘The value of trees within the built environment ‘ – to: The value of trees and living walls within the built environment. Add an explanation of Living Walls: Examples of living walls have been shown to remove CO2 equivalent to 275 trees in 1% of the space. Relatively small ‘benches’ in urban areas have been shown to remove 240 tons of CO2 from the atmosphere per year and 250 grams of particulate matter per day. The inclusion of living walls within a development can make a significant positive impact on the carbon footprint of the development. For more detail on living walls, go to ideal homes living walls: https://www.idealhome.co.uk/garden/garden-ideas/living-wall-ideas-280720 Throughout this section please change ‘Trees’ – to Trees and Living Walls. Please include diagrams and pictures of living walls.</p>	<p>- Noted and will review</p>
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58	<p>Again, the wider setting of Oxford should be included within this section, whilst this is generally Green Belt areas, it is significant due to the role it plays in long term views and should be given a high level of protection. A number of Oxford View Cones are also located within the area covered by the Joint Design Guide and these should be identified as areas of high sensitivity to any proposed change. The Oxford View Cones Study (Assessment of the Oxford View Cones) 2015 jointly produced by Oxford Preservation Trust and Historic England should be included within the list of 'support your design' documents.</p>	<p>- Noted and will review</p>
59	<p>Fig 5 – “Trees can provide an attractive noise buffer” – we have previously been told that trees do not act as a buffer so would question this.</p> <p>Bug hotels – these do not count towards the habitat calculation (Defra metric) however there could be scope to recognise more biodiversity enhancements that are not part of the Defra metric (bug hotels, bat boxes, bird boxes) before biodiversity offsetting is applied.</p>	<p>- Noted and will review</p>

60	<p>I want to emphasise as strongly as possible the undesirability of any building intruding into the Green Belt – and any reduction in the Green Belt. Whatever may have seemed bearable ten years ago, has been overtaken by the escalation of climate change and the erosion of so much natural life and biodiversity with many species (animals, birds, insects, flora) moving to the brink of extinction. There is so much interdependence in nature that damage to one aspect now very quickly impacts others. The Prime Minister has repeatedly assured questioners in the House of Commons that all necessary housing can be built on brownfield sites. Biodiversity proposals to compensate for unavoidable impacts (2.15) must not be perfunctory. There is no equivalence between the destruction of ancient woodlands and hedgerow, with long-established wildlife corridors, by planting new copses somewhere unrelated to that. It takes many years for trees to grow and for all the associated wild growth to take place which invites forms of natural life to make their habitats and pathways there. A few scattered trees and some shrubs are no replacement whatever. Nature requires as much diversity as possible. Token shrubberies, with manicured lawns, bordering concrete expanses from which many will drive cars or to which delivery vehicles will come, are no substitute for proper wildness of countryside.</p>	Select:
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61	<p>This section could have had more photographic examples of best practice with green walls/roofs and wildflower (Chalk) meadows in order to promote a greater impact within the actual development site rather than developers paying for biodiversity off-setting somewhere else. The diagrams showing tree planting are probably too generic to be that useful. There should be a greater emphasis on planting indigenous trees like oak and using other indigenous plants with the landscape. The 20% limit on tree species may not be appropriate since it would be better for developers to plant more expensive but slower growing oaks than to plant a wide range of cheap fast growing exotic plant species. The design guide should place more emphasis on the long term quality of the natural environment rather than on pointless tick-box survey requirements that are normally promoted for compliance rather than creating improvements. We must move away from developers being allowed to chuck up a few bird and bat boxes.</p>	Select:
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62	<p>FORMATTING: Needs a chapter number for reference. Could an interactive mini contents list be included under each chapter title/heading for easier navigation, to avoid scrolling? Principles should really be first, and then follow up with explanation text, diagrams and helpful links below.</p> <p>DIFFERENTIATION: Would be good to highlight where principles are perhaps more appropriate for Majors or Minors applications, and where they may be more appropriate for householder development. Diagrams all refer to major sites, but no examples of smaller minor scheme provided. If the principles are genuinely meant for smaller development, these examples are needed of how to implement the principles at smaller scale, including for single dwellings.</p> <p>INFOLINKS: Where the information links are provided for "Support Your Design" – could a link be provided to Nature Space and information about Great Crested Newts? This is dealt with a lot. Would it be useful to have a link to help citizens identify protected species (for example; amphibians).</p> <p>PHOTOGRAPHS: Officers commented that the pictures are lovely! – but weren't sure if they added anything to the section. Officers queried whether it would be more helpful to have photographs of some protected species, but more of e.g. bat boxes, bird boxes, hedgehog holes, which are often asked for on applications as part of biodiversity mitigation.</p>	Select:
63	<p>The only additions that could be made would be an increased emphasis on the setting of the Chilterns AONB (in accordance with the 2021 NPPF) and a specific refence to the Chilterns AONB Management Plan and Chilterns Building Design Guide to provide more specific guidance for the AONB.</p> <p>The Design Guide must be able to deal with design in rural areas as well as focussing on the needs of the urban areas.</p>	Select:

64	<p>The Role of an SPD: Whilst BHL recognises the majority of the ‘natural environment’ design principles as being appropriate and clearly written, it is important that the Design Guide Supplementary Planning Document (SPD) does not seek to introduce new requirements for developments that have not already been established within the Councils’ adopted planning policy. Indeed, the introduction of new development requirements falls outside of the remit of an SPD. That has been established within the National Planning Policy Framework (NPPF), the Government’s Planning Practice Guidance (PPG), and recent case law. The NPPF clearly sets out that the role of SPDs is to “add further detail to the policies in the development plan” by providing further guidance on particular issues. Thus, the appropriate role for an SPD of this kind is to provide additional guidance that was not included in policies within the NPPF and PPG themselves, adopted local plan(s), or the National Design Guide. It should, therefore, not seek to repeat those documents, and instead should only provide guidance that adds to their content. However, the Government’s PPG has reiterated that SPDs should not go beyond that by seeking to introduce new development requirements that have not yet been set out in adopted policy. That PPG states that, as SPDs “do not form part of the development plan, they cannot introduce new planning policies into the development plan” and that “they should not add unnecessarily to the financial burdens on development” (PPG Reference ID: 61-008-20190315). That is particularly important where SPDs seek to introduce new development requirements that would have a financial implication on a development scheme. That matter has been considered in recent High Court judgements (such as William Davis Ltd & Ors v Charnwood Borough Council [2017] EHC 3006 (Admin) (23 November 2017)), that have highlighted that the introduction of specific development requirements that have financial implications does not fall into the scope of an SPD, and that this should be considered in local plan reviews where the full impact on viability can be considered. In general, therefore, it is suggested that the wording used in the ‘design principles’ sections is softened to reflect the nature of an SPD as a guidance document, rather than planning policy. For example, rather than stating that applicants should “ensure” that a scheme adheres to specific principles, the document should instead state that development schemes which seek to follow the principles set out will be supported. Moreover, a review of each individual design principle should be carried out with reference to the relevant adopted development plan(s), as well as the NPPF; to ensure that the SPD does not introduce new requirements and is consistent with the NPPF’s provisions. For example, the origin of the reference to providing “a mix of [tree] species with no more than 20% of any genus and no more than 10% of a particular species on the site” is unclear, and does not appear to be derived from any existing policy contained within extant plans. Moreover, setting specific targets for each tree species is unduly restrictive and does not allow for sites to flexibly respond to their setting, and also could limit the ability of sites to achieve an efficient use of land. That design principle should be amended accordingly or removed.</p> <p>Biodiversity Net Gain: The above guidance is particularly relevant to the proposed approach that is being taken to Biodiversity Net Gain (BNG). Indeed, paragraph 2.13 of the draft SPD states that schemes should ensure that they “deliver at least 10%” BNG, citing the 2020 Environment Bill. However, such a requirement for a 10% BNG is not yet a policy requirement that is included in national planning policy or the adopted local plans of either authority, nor is the secondary legislation in place to support the Environment Bill. Rather, the adopted plans of both authorities require developments to deliver a net gain (i.e. any net gain, not 10%). As such, it is outside of the remit of the SPD to refer to any requirement of this kind, as there is not a policy basis on which to base any guidance. Rather, a more suitable mechanism through which to introduce any specific BNG percentage requirement would be the emerging Joint Local Plan that is currently under preparation; and in any event that would only be appropriate once the necessary secondary legislation is in place to support the Environment Bill. Paragraph 2.13 of the emerging Design SPD should, therefore, reflect the adopted policy position of both authorities by supporting developments that “aim to deliver a Biodiversity Net Gain in accordance with the relevant local planning policy.” It would also be prudent to clearly specify that net gains should be delivered on-site where possible, but that off-site mitigation / compensation would also be acceptable where that is not achievable. That has been recognised as being an appropriate approach in the January 2022 ‘Consultation on Biodiversity Net Gain Regulations and Implementation’ that was carried out by the Government’s Department for Environment Food and Rural Affairs (DEFRA). Moreover, the Councils should ensure that</p>	Select:
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	<p>mechanisms are in place to allow for off-site mitigation / compensation (such as specific compensation schemes), and the Design Guide SPD should clearly set those out. Figure 3: It is also noted that comments have been made in response to Question 7 in relation to Figure 3. Those comments note that, as currently drafted, it is not clear whether some interactive figures (including Figure 3) represent guidance or whether they are demonstrating how the design principles could be applied in a live scheme. That should be clarified in relation to Figure 3.</p>	
65	Good coverage	· Acknowledged
66	Again for larger developments this section – especially the Design Principles – capture well the key issues. It may have been improved by particular reference to Community Orchards and Tiny Forests	· Noted.
67	Please refer to submitted representations.	· Noted

68	<p>Response manually entered, submitted in an email format</p> <p>Design principles – Natural Environment, Ensure the scheme</p> <p>2.0 Greater emphasis should be placed on the weight attached to complying with the design guides of the AONBs in the district</p> <p>2.1 Strongly support the requirement to ‘retain and create views out of the sites’ and recommend that great weight be placed on this in the AONBs.</p> <p>New development should look at landform, landscape & associated settlement patterns</p> <p>Design principles – Planting in a development proposal</p> <p>This section focuses on trees. In the Chilterns hedgerows are a strong, characteristic feature and the design guide should emphasise the retention of existing hedgerows.</p> <p>Planting in a development proposal</p> <p>Goal: Use planting to help a development integrate into the landscape with its own character and sense of place</p> <p>The text under this goal says that ‘It is essential that all landscaping is designed in coordination with all of the above and below ground utilities infrastructure including lighting’. Given the increasing prevalence of, and dependence on, telecommunications, designs would be improved by placing all telecommunications cabling underground.</p> <p>Developers should work with district & county councils, and utility companies to find out what future infrastructure plans are proposed so that there is no need for the installation of telegraph poles at a later date. This will also aid resilience as the climate becomes less stable.</p> <p>Design principles – Biodiversity</p> <p>Strongly support but with greater emphasis on avoidance of loss</p>	Select:
69	Again would be useful to have a form where each feature can be considered.	Select:

70	<p>Response manually entered, submitted in an email format. The Design Principles in relation to biodiversity (paragraph 2.13) state that applicants should ensure their schemes aim to deliver at least 10% Biodiversity Net Gain (BNG). We do not believe there is any robust basis for this 'requirement' at this time. The Joint Design Guide references the Environment Bill, which is of course now the Environment Act, but the mandatory requirement for biodiversity net gain is not anticipated to come into force until 2023. The relevant Local Plan policies are ENV3: Biodiversity (in the South Oxfordshire Local Plan) and Core Policy 45: Green Infrastructure (in the Vale of White Horse Local Plan). Both of these policies seek a net gain in biodiversity, but not a 10% gain in biodiversity. The Joint Design Guide should be amended to reflect the Local Plan policies that the SPD sits under (i.e. schemes should ensure a net gain in biodiversity). The SPD cannot introduce new policies into the development plan, and it cannot amend existing development plan policies.</p>	Select:
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71	<p>Response manually entered, submitted in an email format. Natural Environment (Design Principles – Biodiversity)The SPD sets out how new development schemes should aim to deliver at least a 10% net gain in Biodiversity. At present the Councils' Local Plans do not contain policies which seek to deliver a minimum 10% net gain in Biodiversity. In line with guidance set out in the NPPF, the Councils should not be using the SPD as a means to rewrite Local Plan policies but rather to provide further guidance to existing policies. In this regard, it may be more appropriate for the Council's to not include specific reference to ensuring new development schemes deliver at least a 10% net gain in Biodiversity and leave the requirement mechanism to be delivered through the Environment Bill.</p>	Select:
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72	<p>GOAL Working with and enhancing the natural features and resources of the site in relation to Woodland buffers, the goal specifies a minimum offset of 15m for ancient woodland. This kind of information is helpful, but needs to be rationalised (see previous comments). The Design Policies in South and Vale, and the SPD, need to be clear what is guidance and what is policy, and the SPD should add further clarification to policy. Paragraph 2.2 expects that any scheme will not negatively impact on the benefits enjoyed by neighbouring properties and spaces. This wording should be softened to ‘... minimises any negative impacts on the benefits enjoyed by neighbouring properties and spaces’. Design often requires that small compromises are needed for the greater benefit of a wider area: the design process is in fact one of balancing impacts to ensure that benefits are optimised. Paragraph 2.5 refers to the need to deliver open spaces for existing and new residents. This may be clearer just stating ‘residents’. GOAL Planting in a development proposal Paragraph 2.11 does not seem to be derived from a policy nor may it be appropriate in all situations. The references to the mix of species should be phrased as a suggested mix not a requirement. Alternatively, the policy could be framed to advise that schemes that identify such a mix will be supported. GOAL Working with and enhancing biodiversity for future generation Paragraph 2.13 of the draft SPD states that schemes should ensure that they “deliver at least 10%” BNG, citing the 2020 Environment Bill. However, such a requirement for a 10% BNG is not yet a policy requirement that is included in national planning policy or the adopted local plans of either authority, nor is the secondary legislation in place to support the Environment Bill. Rather, the adopted plans of both authorities require developments to deliver a net gain (i.e. any net gain, not 10%). It is therefore outside the remit of the SPD to refer to any requirement of this kind, as there is not a policy basis on which to base any guidance. Rather, a more suitable mechanism through which to introduce any specific BNG percentage requirement would be the emerging Joint Local Plan that is currently under preparation; and in any event that would only be appropriate once the necessary secondary legislation is in place to support the Environment Bill. Paragraph 2.13 of the emerging Design SPD should, therefore, reflect the adopted policy position of both authorities by supporting developments that “aim to deliver a Biodiversity Net Gain in accordance with the relevant local planning policy.” It would also be prudent to clearly specify that net gains should be delivered on-site where possible, but that off-site mitigation / compensation would also be acceptable where that is not achievable. That has been recognised as being an appropriate approach in the January 2022 ‘Consultation on Biodiversity Net Gain Regulations and Implementation’ that was carried out by the Government’s Department for Environment Food and Rural Affairs (DEFRA).</p>	Select:
73	<p>The public rights of way network is an important part of the heritage and landscape of this part of the county, therefore the ‘Support your design’ section here should also include</p> <ul style="list-style-type: none"> - Oxfordshire Definitive Map and Statement (the legal record of public rights of way) - Oxfordshire County Council (OCC) Rights of Way Management Plan 	Select:

74	<p>This is really great! It could be clearer on allowing large belts of landscape and waterscape passing through the development for wildlife to move unhindered. This might mean introducing new wildlife belts rather than just relying on what was. The Environment Act demands 10% biodiversity net gain. This should be emphasised, with a suggestion that a much higher net gain would be desirable. How can we get people to keep their gardens permeable to wildlife? Could there be insistence on hedges and no fences between gardens? SuDs have failed in parts of Wallingford (bone dry during flood-periods). Is this the place to insist that a management scheme goes in to ensure SuDs works and will be maintained into the future? Thank you for the tree section. Could it be bolder on keeping as many mature trees as possible? It takes so long for them to grow back! Thank you for emphasising maintenance of trees. It is something that has failed within a year in two Wallingford developments. Please ask too for trees to be varied and of a native species. Orchards are nice for the community too. Please make mention of plants other than trees. Wildflower patches and boggy parts add to the interest and help provide the continuous corridors that wildlife needs. Perhaps too you could bring in reducing the OPPOSITE of natural areas: reducing areas of hard paving. Flood control is far better achieved by absorbent surfaces.</p>	- Noted and will review
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75	As the global climate emergency demonstrates the natural environment needs to be protected and enhanced. But all too often in planning claims of protection and enhancement are hollow – the words being used to mimic those of the LPA rather than actually describing what the applicant really wants to achieve	· Noted.
76	Needs additional lighting guidance – ILP GN01 and GN08/18.	· Noted and will review

77	<p>Response manually entered, submitted in an email format. Design Principles • Identify the character of new spaces, such as 'parks', 'woodland', 'allotments', 'wildflower meadows' rather than 'P.O.S.'. Be more specific about the function and character of public open spaces • Strong levels of natural surveillance with well-overlooked public open spaces Natural features and resources • This section covers many different issues, this could be confusing/overwhelming for some. Some of the issues also link to other sections of the design guide, for example there is a clear link to the Space and Layout section on open space design – should this link be recognised/signposted in some way? • Para 3 focuses delivering benefits for future occupiers, but wondered whether opportunities to deliver benefits for nature/wider environmental gains should also be highlighted? • Para 4 says about contributing to green infrastructure, but should this be a bit clearer about multifunctionality/multiple benefits and networks/connectivity? Biodiversity • The diagram highlights that habitats don't start and finish at the site boundary, but this doesn't really come across in the main text. Should there be something in the main text about connectivity/corridors, with a thought to ensuring longer term resilience? General • The intro says that this guidance is relevant for all scales of development, however whilst this is true for some of the guidance, there are parts that would only apply to larger scale developments. • Could there be more images/diagrams in this section that show the principles applied to different scales of development? For example, provide an example of what SuDS might look like on a householder development? • Noticed quite a few grammar issues/typos – for example "agricultural barn are common nesting sites" and "working with and enhancing biodiversity for future generation". There are also some typos in the diagrams for example Figure 7 – "dont" instead of "don't". There is also inconsistent use of 'water courses' and 'watercourses' in this section. • There a few phrases that could be a bit unclear, for example what is a 'meaningful green space'?</p>	• Noted and will review
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78	<p>Response manually entered, submitted in an email format. At paragraph 2.5 the draft Design Guide requires open spaces to be part of a 'joined-up network which form an integral part of the development'. Thakeham would note that the open space requirements for a site are driven by good masterplanning, having consideration of the wider opportunities and constraints of each site. Thakeham suggest that it is too prescriptive to suggest every site should have open space within its centre and all open spaces should be joined-up. This may not be suitable, appropriate or achievable on all sites, therefore Thakeham suggest some flexibility should be added to this requirement. The draft Design Guide also notes that "Development proposals should provide a net increase in tree canopy cover where this is possible, having regard to other considerations...". Thakeham appreciate that there is flexibility within this wording however Thakeham do not consider tree canopy increases should be the baseline. It is important to ensure that any site enhancements are mutually beneficial, and Thakeham therefore suggest the councils consider whether this wording is appropriate. At paragraph 2.11 the draft Design Guide states, regarding trees and the proposed layout of a development, that "A mix of species is required with no more than 20% of any genus and no more than 10% of a particular species on the site". Thakeham would note that this is an unusual requirement, and our priority is to focus on Biodiversity Net Gain as the main metric. Therefore, Thakeham suggest that some flexibility is needed in relation to this requirement, to allow for site-specific considerations. Additionally, Thakeham suggest that the councils also consider whether it is appropriate to introduce non-native trees into a local area. This could have unforeseen negative consequences on existing biodiversity; therefore, a high percentage of native trees is often favoured.</p>	Noted. Will review.
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79	<p>GOAL Working with and enhancing the natural features and resources of the site Paragraph 2.2 expects that any scheme will not negatively impact on the benefits enjoyed by neighbouring properties and spaces. This wording should be softened to '2.2 is designed to maximise the benefits of natural resources (utilising landform, orientation, geology, and natural drainage patterns) and (*remove text*) *does not negatively impact* minimises any negative impacts on the benefits enjoyed by neighbouring properties and spaces'. Design often requires that small compromises are needed for the greater benefit of a wider area: the design process is in fact one of balancing impacts to ensure that benefits are optimised. GOAL Working with and enhancing biodiversity for future generation Paragraph 2.13 of the emerging Design SPD refers to policies at a national level that are not yet in place (although they soon will be). The Local Plans for the Districts will incorporate these requirements as they are updated. The SPD should, therefore, reflect the adopted policy position of government or the authorities by supporting developments that 'aim to deliver a Biodiversity Net Gain in accordance with the relevant statutory requirements.'</p>	Noted. Will review.
80	<p>Response manually entered, submitted in an email format.</p> <p>Cala Homes (Midlands) have reviewed the draft guide and have the following comments:</p> <ol style="list-style-type: none"> 1. While the value of trees expressed in the Natural Environment section is supported, house builders are often restricted in their ability to place trees within residential developments by the approach taken by Oxfordshire County Council, which essentially sterilises the 10m radius around street lights within the adopted highway. 2. Clause 2.11 in the Natural Environment section of the draft proposes maximum numerical restrictions on the genus and species of trees. While a good variety of trees is supported, it is considered that the provision of trees on a site should be considered on a site by site basis. It is considered that it would be restrictive to require compliance with a notional requirement, where there may be reasons to provide a range of trees of the same genus and/or species. If a maximum percentage must be included in the condition, it should be a recommendation or aspirational range, which can be varied where it can be demonstrated appropriate to do so. 	Noted. Will review.

Part 8: Design principles

Question 10: Design principles – Movement and connectivity [Click here to see the 'Movement and connectivity' design principles section in the guide.](#) If you'd like to comment on them, please use the space below:

	Comments	Council's response
1	<p>I agree with the principles. It's vital to minimise any interaction between vehicles and pedestrians / cyclists, by ensuring that main routes DO NOT run through new developments, but bypass them. Additionally, there must be dedicated facilities for cyclists and pedestrians connecting directly to cycle networks.</p> <p>It's vital that developments are located as close as possible to the national rail network or bus routes with direct links to the to main urban centres. important</p>	<p>· Noted.</p>
2	<p>Too many words.</p> <p>Too many pages.</p> <p>Too many concepts.</p> <p>Too much everything.</p> <p>YOu get the idea.</p> <p>The guide is too elaborate and lengthy.</p> <p>Nice concept.</p> <p>Poorly implemented.</p>	<p>· Noted.</p>
3	<p>Show realistic conjection and places that are more than 2 k from a bus stop / route etc</p>	<p>· Noted.</p>

4	<p>Again - the vast majority of applications do not require a transport plan or transport statement.</p> <p>Public art has nothing to do with movement and connectivity. To be honest, this is so tone deaf to the realities of development. I cannot even name a single development anywhere in the south east that has included public art commissions. Come on..</p>	<ul style="list-style-type: none"> · Noted.
5	<p>Intensive development curtails wildlife connectivity and changes the quality of life in rural and small town areas.</p>	<ul style="list-style-type: none"> · Noted.
6	<p>Too much use of jargon. This is meaningful to town planners but quite difficult for the rest of us.</p>	<ul style="list-style-type: none"> · We have used Plain English language as far as possible. Any technical concepts are defined in the glossary.
7	<p>With the houses on Dunmore road for example - access to Southbound A34 is not being completed at Lodge Hill. This will cause untold congestion in both Abingdon town centre (for traffic heading in Newbury direction) as well as further congestion and traffic in local villages such as Wooton for traffic trying to fight its way into Oxford. Having this type of connectivity is vital. We have excellent bus services to Oxford but most people have cars (whether electric or not)</p>	<ul style="list-style-type: none"> · Noted.
8	<p>People will take shortcuts if they can which may degrade the environment. Needs to be taken into consideration.</p>	<ul style="list-style-type: none"> · Noted.
9	<p>The existing Vale design guide is very clear, and yet in Faringdon we see multiple large developments being approved which skip the guidance . A cursory look at multiple exits and entry suggestions, space for growing food, movement framework, etc. shows there is little point in making new guides, if the implementation of existing guides is so poor. If the same people and processes are at work in the approval process, there is no point in investing in new guidelines.</p>	<ul style="list-style-type: none"> · Noted.
10	<p>Developers of new housing should provide funds to extend public transport between their developments and town centre, transport hubs (railway and bus stations etc)</p>	<ul style="list-style-type: none"> Select:
11	<p>Too much on-street parking. The taxpayer pays for roads, not places for people to store their personal possessions.</p>	<ul style="list-style-type: none"> · Noted.

12	I like the emphasis on active travel!	· Acknowledged
13	Please see previous comments, Question 3.	· Noted
14	i don't actually think this is very helpful. it is exceptionally vague and yet is really only copying parts out of other documents. why not just refer to them? from this i have no idea at all what the Council's preference will be for a given situation	· Noted.
15	concern that the principles may be used by officers without an ability to discern intuitive and skilful design innovation	Noted. Training will be offered to officers once the design guide is adopted.
16	See above	· Noted

17	Include footpaths and cycle routes	Noted. We believe we already mention this in this section.
18	For these design principles there must be local services and facilities, and frequent cheap local transport. These are never supplied at the beginning of a development and sometimes not at all. Developers must be required to provide the agreed infrastructure, services and facilities at the start of a development.	· Noted.
19	<p>Design brief says dont do Cul-de-sacs on estates as confuses and inefficient use of space...and not to restrict road traffic by putting unnecessary expensive road-traffic restricting constuctions!!</p> <p>Just built both in Grove.....cul-de-sacs losing delivery drivers in Grove Airfield and ridiculously dangerous road speed chicanes next to Grove Rugby field just built! So does anybody read what you write in design briefs?!</p>	· Noted.

20	Good	· Acknowledged
21	Like last section very good use of graphics.	· Acknowledged
22	Biased towards developers, create a summarised version for householders More should be done to ensure traffic calming for existing roads. If new roads have 20mph, but more residents drive through existing roads at speed, it won't make local councils popular	· Noted.

23	<p>Really good thinking about movement and development within the development - but to make development sustainable it needs to connect to and be part of the existing context -where are existing bus stops train stations cycle routes ! How does the development connect to these ?</p> <p>I think this section could be strengthened by asking developers to consider existing networks and showing how the development plugs into those.</p>	· Noted.
24	<p>All great in principle. But how you going to GUARANTEE that we don't end up with more of the current cycle-paths-no-nowhere-with cars-parked-on-them? Just get on a bicycle and cycle around the south end of Grove where teh new junction has been put in. Imagine being a schoolchild emerging from the new school exit road. What were you thinking about?</p>	· Noted.
25	<p>It is vital that we move away from the car dependency. I think some developments could be designed so that the discourage car use. It seems absurd that it is assumed that all houses need a certain number of parking spaces even when the development is in a 15 minute neighbourhood like all of our market towns. People are lazy and reach for car keys even to go 1 mile down the road.</p> <p>Quality paths need to be intrinsic in the design and routes should be well signposted.</p>	· Noted.
26	<p>If a development is not near to essential facilities-i.e. shops and schools doctor's surgeries, public transport would be needed to prevent families being car-dependant.</p>	· Noted.
27	<p>Would like to see reference to Neighbourhood Plans</p>	· Noted.
28	<p>How do transport networks impact the sounding environment? idling buses; tyres on asphalt; the drone of passing aircraft; proximity to RAF or other heavy sound-making devices eg helicopters (Benson etc). How are road and pavement surfaces designed to change the sounding environment? How can a development be designed to sound healthy and create auditory health alongside visual and spatial health?</p>	· Noted and will review
29	<p>Adding cycle ways to existing routes doesn't make for the best solution. Ensuring all types of transport (wheeled or by foot) is considered at the beginning of a development will ensuring long term sustainable solutions to movement of people and traffic.</p>	· Noted.

30	The statement looks good, but in practice it doesn't seem to be followed. For example, there is no provision for improved traffic flow resulting from the Bayswater Brook development. Bayswater Road is already overloaded during rush hour. These statements are worthless if they are not followed through in practice	· Noted.
31	Yes - safe walking and cycling routes paramount. Access to transport is such a big issue for villages where there is none, and unlikely to be any unless subsidised.	· Acknowledged
32	As above nature and the natural environment does not grow, develop in straight lines - man made developments to reflect this.	· Noted.
33	Nothing related to Wallingford - a County Town - or its satellite villages	Noted. This guide and its principles cover both South Oxfordshire and Vale of White Horse District Councils
34	And again, only relevant to major, probably greenfield, developments.	Noted. Principles in this section are relevant to all scales of development.
35	These are good but ruling out cul de sacs may not be as beneficial as a cul de sac for cars to reduce 'rat runs' but with through ways for pedestrians and cyclists to encourage use of non vehicular transport	· Noted.
36	fine	· Noted.

37	Walking and cycling to be priority. Connection to existing residential and business areas	· Noted.
38	if you can provide a safe pathway for pedestrians and pram pushers this would be good. Essentially not shared with bicycles and E scooters.	· Noted.

39	It might be preferable to write the principles in bullet points and/ or emphasise key words in bold or italics.	· Noted.
40	Same as above, clear and concise.	· Acknowledged
41	no reference found to the role of neighbourhood plans in movement and connectivity	· Acknowledged

42	<p>You say of secondary routes that ""As these streets will be lightly used by vehicular traffic pedestrians should feel comfortable moving freely across the street. In some instances, the use of shared surface treatments may be appropriate. The design of the street should limit vehicular speeds to 20 mph, without the need for excessive traffic calming measures."" This is too permissive about shared use surfaces, which are a fad which rarely works. They frequently do not prioritise walking and cycling (e.g. The Avenue, Great Western Park, Didcot, which strongly favours motorists and encourages them to drive too fast.) If you said that they may occasionally be appropriate but include a warning about the hazards they can cause, it would be better.</p>	<p>· Noted.</p>
43	<p>As a rural Parish we have no streets but only footpaths. Pedestrian and cycle routes do not apply. This is symptomatic of this urban bias in a predominantly rural county. eg: Provision of public transport is immeasurably more important than designing a network of paths and streets. We note the absence of a rural network. We need public transport.</p>	<p>· Noted.</p>
44	<p>A briefer section - and all the better for it. But it still states the obvious and is more verbose than it needs to be.</p>	<p>· Noted.</p>

45	<p>this is not so good this is public school hippy bull.all of this sounds good if your not dealing with working class villains I AM WORKING CLASS people like security.cul-de-sacs provide Security allies ect.do not .new ally with lights wonderful.ten years later lights smashed a muggers paradise.we are not living in belgravia.security is peace of mind . peace of mind is paradise</p>	<p>· Noted.</p>
46	<p>As a rural parish where for safety the vast majority of residents have to rely on cars to move around this has limited impact.</p>	<p>· Noted.</p>
47	<p>This section could also benefit from a reference to neighbourhood development plan (NDP) village character area appraisals. Every area with an adopted NDP will have one of these, and any developer/applicant should show that they have read these documents and demonstrated how their development responds to historic lanes etc</p>	<p>· Noted.</p>

48	<p>We have no specific comments to raise in this section which follow well established principles of good design.</p>	· Acknowledged
49	<p>This seems better written than most sections, for the lay reader (although there are some exceptions, like the image title ""Swale frontages as part of a street (Upton)"" which doesn't help the uninitiated understand what a Swale frontage is). Also all those pictures under 'street design' highlight horrible-looking developments, to my mind! All I could think was that at least the trees might grow to cover up the terrible buildings... I don't know where 'Tadpole Garden Village' is but by the photos in this guide it looks like the worst bit of design for a rural area that I've perhaps ever seen in my life.</p> <p>Is the image labelled ""Public seating in open space, benches (Chinnor)"" really of seating? It looks pretty weird seating!</p>	· Noted.

50	<p>Response manually entered, submitted in an email format. 1. Although the creation of routes for walking are emphasised, there is no specific reference of the need to actually provide footways or pavements of adequate width for pedestrians, pushchair and wheelchair users, if necessary within the road frontage of new buildings if the roadway is too narrow to include these safe routes for active transport.</p>	<p>Noted. We do mention with all users in mind which includes pedestrians, prams and wheelchairs.</p>
51	<p>Response manually entered, submitted in an email format.</p> <p>Creating a Network</p> <p>It appears that the "Creating a Network" section, is inconsistent with the overarching principles of low car neighbourhoods which are being promoted in Oxford.</p> <p>Whilst we agree with the commentary on cul-de-sacs in general, the layout of a proposed development needs to avoid residential streets becoming car dominated. The layout of a proposed development should not create too much car permeability, as this is likely to encourage car usage, particularly for short trips. It is recommended that the emphasis here should be amended to focus on permeability by non-car modes.</p> <p>If you could confirm safe receipt of this representation, it would be appreciated.</p> <p>Should you have any questions, please do not hesitate to contact me.</p>	<p>· Noted.</p>

52	Response manually entered, submitted in an email format. 3. The Guide should recognise that private travel by vehicle will still be needed even if the County Council's Transport Plan reduces the volume.5. The Design Guide should recognise increased working from home and an increase of commuting perhaps only on several days a week rather than every day	- Noted and will review
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53	Response manually entered, submitted in an email format. Movement and Connectivity• Tertiary streets need to allow for on-street parking as there is never enough provided on-site. • Tertiary and secondary streets should have road surfaces designed to show a clear way out for visitors. • The Committee endorse avoiding cul-de-sacs.	• Noted.
54	Some good points are made in this section. The other key point to highlight will be to provide better and more public transport. Currently there is very little incentive for most people to use the park and ride facilities as its just as cheap to drive into town and park in the many parkign facilities in town. The appraoch should be to make the public transport - ie buses - free to use so it provided an incentive.	• This comment raises issues that fall outside the scope of the design guide.

55	<p>As our land becomes more crowded, it seems more and more important to allow for non-car movement in our settings. Pavements are being taken over by parked cars, so alternative placement of pavements relative to roads might be innovative. I also think larger developments might have car parks located in various places, with pleasant walking paths to get to the individual houses. (Although, how would we unload shopping and then how would deliveries take place?) Could places with public rights of way be used for solar panel farms? I'd think there would be room for landscaped trails that also held solar panels. Could we use the extant road networks in any way to also generate renewable energy?</p>	<p>· Noted.</p>
56	<p>Please include living walls in street diagrams.</p> <p>Please add to principle 3. 9: --The Layout and hierarchy of streets and provision of cycle and pedestrian routes needs to ensure that cyclists and pedestrians have the shortest possible journeys to access facilities, employment, shops and buses, inside and outside the site. It is preferable and acceptable to have fewer direct primary car routes to achieve direct safe routes for cyclists and pedestrians.</p> <p>Please change principle 3.10 to: includes trees, living walls and soft landscaping that create character and distinction between street types.</p> <p>Please add new Street Design principle: include living walls in areas of high emission from vehicles in order to improve air quality.</p>	<p>· Noted and will review</p>

57

The majority of the suggestions of natural traffic calming are not supported through the Section 38 process, which would mean that roads cannot be adopted. It is very important that the financial burden to future homeowners of private roads is avoided.

- Noted and will review

58	<p>Building true community, to embrace all ages, requires irregularity and not too many straight lines. It must be accepted that many will continue to drive, however many walkways and cyclepaths are provided. Therefore to avoid congestion and traffic fumes, there need to be multiple exits and entrances from estates, rather than subsidiary roads all channelling into one. People will go on needing their cars to get as close to their homes as possible, for various purposes - particularly the elderly and frail and families with young children. What looks clean and tidy on plans can quickly become a soul-less wasteland. Large green areas are essential, but stocked with a wide variety of shrubbery and plants, serving different species, not long regimented rows of the same plant. Shops and spaces where communities interact are needed at frequent and readily-accessed intervals.</p>	· Noted.
59	<p>The design guide doesn't go far enough in encouraging walking and cycling. With the possible trend of more people working from home and less commuting , residents will probably need to be more reliant on walking and cycling in the future. Most towns and cities in Germany are now car-free and are serviced with networks of cycle highways. This design guide doesn't promote this required level of change of emphasis that will be required in the future. Why is the guide still encouraging developers to start with a street plan designed for cars? Why are there no examples of centralised car parking areas with car-free streets?</p>	· Noted.

60	<p>FORMATTING: Needs a chapter number for reference. Could an interactive mini contents list be included under each chapter title/heading for easier navigation, to avoid scrolling? Principles should really be first, and then follow up with explanation text, diagrams and helpful links below. [3.0-3.31] OCC STREET DESIGN GUIDE: Officers raised concern that OCC are planning to adopt a Street Design Guide soon and queried how much overlap there would be between the Districts Design Guides and the County's Design Guide.</p>	- Noted and will review
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61	Clearly set out. The Guide needs to address issues of public transport in rural areas, both for residents to move about and for visitors to key 'honeypot' areas like the Chilterns.	Noted. This issue falls outside the remit of the Guide.
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62	<p>Movement and Connectivity Design Principles</p> <p>Whilst the intention and general scope of the 'Movement and Connectivity' section of the draft Design Guide SPD is recognised, some of the draft design principles should be amended or removed to ensure compliance with national and local planning policy, and to appropriately reflect the purpose and role of an SPD. Indeed, that general matter was discussed in Bloor Homes' response to Question 9, which highlights the position of the NPPF, PPG and recent case law that SPDs should not seek to introduce new development requirements or have any additional cost implication, and instead that their scope is to provide additional guidance in relation to existing policies in adopted documents. Therefore, to reflect the scope of SPDs, the SPD should not state that applicants should "ensure" that a scheme adheres to specific principles, but instead should state that development schemes which seek to follow the principles set out will be supported. Moreover, each design principles should itself be considered in line with the NPPF to ensure that they are consistent with national policy. For example, paragraph 3.0 states that schemes should have "a network of streets, paths and integrated cycleways that connect with each other and create an attractive network of routes for all users and all modes of transport", referring to the principles of a 20-minute neighbourhood in that regard. Whilst the underlying principles of 20-minute neighbourhoods are recognised in terms of promoting sustainable development and connectivity, that is not a requirement that is set out in the adopted plans of each authority. Moreover, those principles are not always achievable in all circumstances. However, sustainable development should nonetheless be realised in suitable locations, and should not be prohibited as a result of the application of those principles. Indeed, that is recognised by the NPPF, which states that "opportunities to maximise sustainable transport solutions will vary between urban and rural areas" (paragraph 105) but that, despite that, rural development should be pursued to enhance and maintain the vitality of rural communities and support their services and facilities (paragraph 79). Seeking to implement 20-minute neighbourhood principles would not only be introducing a new policy, therefore, but would also overlook the importance of supporting sustainable development in rural areas. Thus, design principle 3.0 should be removed. That is similarly the case in relation to design principles 3.6 and 3.7, which seek to ensure that new homes are located within 800m of facilities and services, 400m of a bus stop, and preferably within 600m of a primary school and 1500m of a secondary school. Again, those design principles do not appear to have been predicated on the basis of an existing policy in an adopted plan, and could effectively negate any development in otherwise sustainable rural areas. Again, that does not reflect that both Districts are largely rural in nature, as is recognised in the SPD. As such, design principles 3.6 and 3.7 should also be removed. Street Hierarchies</p> <p>Bloor Homes welcomes the inclusion of illustrative street hierarchies that include design principles relating to street widths, boundary treatments, street planting, pathway / cycleway design and arrangement, surface treatments, etc.; all of which are considered to be appropriate. With that said, however, the Design Guide SPD should allow for flexibility within that, allowing for schemes to incorporate departures from those principles to reflect site-specific characteristics or where it can be demonstrated that an alternative design is more appropriate. Figure 8As set out in Bloor Homes' response to Question 7, it is not clear whether some interactive figures are included as guidance in themselves or whether they are demonstrating how the design principles could be applied in a live scheme. The position and status of Figure 8 should be clarified in that regard.</p>	<ul style="list-style-type: none"> - Noted and will review points individually
63	<p>Perhaps segregated cycle, pedestrian and vehicle routes if possible.</p>	<ul style="list-style-type: none"> - Noted.

64	We liked this section. Perhaps improved further by emphasising opportunities for vehicle free areas especially close to community and retail. Also provision of cycle racks. Not sure that Public Art fits neatly into this section on Movement and Connectivity.	· Noted and will review
65	Please refer to submitted representations.	· Noted

66	<p>Response manually entered, submitted in an email format</p> <p>Creating a network</p> <p>We recommend that when developments are proposed on greenfield sites which may incorporate a public right of way, developers consider the increase in the status of a public footpath to allow cyclists, or if it links bridleways or provides a safe route for equestrians, then an increase in status from public footpath to bridleways, with a suitable multi-user surface.</p> <p>There is a need to reference vulnerable road users, such as equestrians where there is access to public bridleways.</p> <p>Design principles - Movement and connectivity</p> <p>No reference is made to car parking. New developments should incorporate adequate parking to remove the need for cars to park on the road.</p> <p>Design principles - Street design</p> <p>3.22 ensure the amount of street furniture is kept to a minimum –</p> <p>We strongly suggest the provision of telecoms services via underground links – improve the street scene by removing telegraph poles and improve resilience in the face of climate change.</p> <p>Public realm, lighting, art & furniture</p> <p>3.25 this section rightly requires the design to ensure that lighting avoids causing light pollution in rural/darker areas. However, this misses the point that the majority of light pollution in rural and darker areas comes from light reflected and scattered from the towns.</p> <p>In addition, no mention is made of the light pollution from large windows in new homes. Reference should be made to ensuring that light pollution from within buildings is reduced by appropriate shielding and the use of window material that reduces light pollution.</p> <p>We recommend the inclusion of a reference to the Institute of Lighting Professionals (ILP) documents for good lighting and the adoption of their recommendation for only downward outside lights on dwellings, and the use of shields on low- and high-level lighting to reduce light spillage onto hedges, trees, bedrooms etc.</p> <p>A diagram showing the types of light pollution must be included, together with links to:</p> <p>the ILP - https://theilp.org.uk/resources/ and The Commission for Dark Skies - https://britastro.org/dark-skies/ ;and examples of good lighting design to help both householders and developers reduce the acknowledged damage from light pollution particularly in a district with substantial areas of AONB.</p> <p>Resources</p> <p>The Oxfordshire County Council Street Design Guide, must be included as a resource.</p> <p>https://www.oxfordshire.gov.uk/residents/roads-and-transport/transport-policies-and-plans/transport-new-developments/transport-development-control</p>	<p>· Noted and will review points individually</p>
67	<p>Need to look at local traffic flow numbers and whether there is congestion and do a transport infrastructure model</p>	<p>· Noted</p>

68	<p>Response manually entered, submitted in an email format. The design principles in relation to movement and connectivity are generally supported, and will assist in encouraging more sustainable modes of travel. In relation to paragraph 3.7, whilst we support the aspiration of locating new homes within 400m of bus stops, this 'requirement' should be presented as a target, in a similar way to the target for being within 600m of a primary school and 1,500m from a secondary school. The design principles for streets and spaces are quite detailed. CEG feel it is essential that principles such as these are worked up in close consultation with Oxfordshire County Council as highways authority, to ensure that the views of the District and County Council are aligned, and that applicant's don't work up schemes on the basis of the principles set out in the Joint Design Guide, only to find that the County Council has a different design view. Subject to when the next version of the Joint Design Guide is prepared, and depending upon the final publication date of the new Manual for Streets, the Councils should ensure that the Joint Design Guide reflects the latest guidance in Manual for Streets (and that the new Manual for Streets is referenced in the Joint Design Guide). Finally in relation to this section, it is surprising that there is no parking advice or reference to parking standards. It would assist if, at the very least, the section on movement and connectivity included a cross reference to the relevant parking standards that the Councils will apply.</p>	<p>- Noted and will review points individually</p>
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69	<p>Response manually entered, submitted in an email format. Movement and Connectivity In the 'steps' to creating a network a number of documents are highlighted to support the applicant's design, including Manual for Streets 1. This document provides guidance on 'Walkable Neighbourhoods' stating: "Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes' (up to about 800 m) walking distance of residential areas which residents may access comfortably on foot. However, this is not an upper limit and PPS13 states that walking offers the greatest potential to replace short car trips, particularly those under 2 km" Meanwhile The Institute for Highways and Transport (IHT) have also published guidance which offers suggested acceptable walking distances to various locations. Table 3.2 in the IHT's Providing for Journeys on Foot document proposes distances which are greater than those proposed by the SPD in the Movement and Connectivity design principles. It is proposed that the Councils' SPD should align with advice set out in the Manual For Streets document and provide further flexibilities within the guidance.</p>	<ul style="list-style-type: none">- Noted and will review points individually
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70	<p>GOAL: `A place that is easy to get to and move through for all usersThe SPD refers to various cycling and parking requirements. In a short SPD of this format, it is not possible to do justice to the multiple variations of cycling and parking that could be appropriate in a scheme. These sections of the guide should be removed as they do not add any further clarity to the National Design Guide, Local Plan Policies or the documents (such as LTN 1/20) referenced in the SPD.Design principles 3.6 and 3.7 seek to ensure that new homes are located within 800m of facilities and services, 400m of a bus stop, and preferably within 600m of a primary school and 1500m of a secondary school. These design principles do not appear to have been predicated on the basis of an existing policy in an adopted plan, and could effectively negate development in otherwise sustainable rural areas. These paragraphs do not reflect the fact that both Districts are largely rural in nature. Design principles 3.6 and 3.7 should be removed.To reflect the status of the SPD, it should not state that applicants should 'ensure' that a scheme adheres to specific principles, but instead should state that development schemes which seek to follow the principles set out will be supported.</p>	<p>- Noted and will review points individually</p>
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71

Please see submitted letter for full comments.

- Noted

72	<p>This is very much centred on roads at present and the lack of reference to Public Rights of Way (PROW) is a significant omission. PROW are public highways, and it is important to identify (a) the likely impact of the development on existing PROW and (b) the opportunities for improvement of the local PROW network as part of the development proposal - not least because PROW form a valuable part of the local Active Travel network. Oxfordshire has a high population of horses (nearly 22,000 registered to addresses in the county, representing a conservatively-estimated value to the local (and predominantly rural) economy of over £121 million/year), but the network of off-road equestrian routes is fragmented, making it necessary for riders and carriage drivers to use roads as links between PROW. The safety of equestrians on Oxfordshire's roads is a significant and growing concern as traffic speed and volume has increased in recent years. Horse riders and carriage drivers are legal road users ranked alongside cyclists and immediately below pedestrians in the new Highway Code hierarchy of vulnerability. They have to use roads (though they would much rather not) and to cross them in order to gain access to off-road routes. The BHS keeps a record of road incidents involving horses. In Oxfordshire from November 2010 to December 2021 there were: • 110 road incidents reported • 7 horse fatalities • 15 horses injured • 2 human fatalities • 20 humans injured Research indicates that only around 10% of incidents are reported to the BHS. In 2021 ALONE, in Oxfordshire there were: • 55 road incidents reported • 2 horse fatalities • 2 horses injured • 3 humans injured. In the interests of improving road safety, there should therefore be a default principle that horse riders at least have access to all Active Travel routes that are available to other vulnerable road users, unless there are well-evidenced and clearly-stated reasons why they should be excluded. Horse-riders already share PROW (excluding footpaths) and roads with pedestrians and cyclists, and horses are routinely ridden and driven through villages and other residential areas, often specifically because they are areas where the traffic is slower and less frequent. Design principle - Movement and connectivity 3.0 should therefore read "...has a network of streets paths and integrated cycleways that connect with each other and create an attractive choice of routes for all users and all modes of transport (20-minute neighbourhood); prioritising the needs of ALL vulnerable road users - including pedestrians, people with disabilities, cyclists, public transport users and equestrians over the needs of motorists within the network;" This will support 1) development of a well-connected, maintained and clearly signed Active Travel network for walkers, horse riders and cyclists 2) mitigation for the adverse effects on vulnerable road users (walkers, cyclists and equestrians) of increased traffic flow on local roads as a result of the development Key references should include: Oxfordshire Definitive Map and Statement (the legal record of Public Rights of Way) OCC Rights of Way Management Plan 2015-25 (https://www.oxfordshire.gov.uk/residents/environment-and-planning/countryside/countryside-access/rights-way-management-plan) OCC emerging Local Transport and Connectivity Plan 5 (https://letstalk.oxfordshire.gov.uk/ltcp) Defra Rights of Way Circular 1/09</p>	<p>- Noted and will review points individually</p>
73	<p>I'd suggest cycleways should be wide enough to take mobility scooters. These in themselves could become rainproof mini-electric vehicles for non-disabled folk. I imagine little pods like these taking over from use of the car for short journeys. You mention street-lighting in this. Oxfordshire County Council is working on a dark skies principle for street lighting. Can we manage without lighting at all? Some say this is (surprisingly) safer. Otherwise lights might be such that they come on only on motion-detect. There are street lights in Richmond, London, that can differentiate (and photograph) bats and not turn the lights on (according to OCC officers, if I understood them correctly). Pedestrianised settlements should be required, with the cars on the outside (or car clubs rather). This works fine in Pontevedra in Spain (https://www.theguardian.com/cities/2018/sep/18/paradise-life-spanish-city-banned-cars-pontevedra). And for those areas that do go near to homes, surely 20mph if fast? Shouldn't it be 10mph? (NB I like the home zones - but safer still to ban cars).</p>	<p>- Noted and will review points individually</p>

74

Needs some principles for lighting since for half the year places will become lit environment for half the 24 hr period possibly.

- Noted

75	<p>Response manually entered, submitted in an email format. • The document is sound and does pick out best practice. However, there is little to suggest the document has been authored across either the South Oxfordshire or Vale area. Visual examples of best practice are presumably available from within SODC/Vale but it seems no attempt has been made to identify and use them. For example, Figures 9, 10 and 11 could use examples of poor and best practice picked from the any town or village from one of the Districts. This would enable Councillors and NDP groups to use their knowledge of areas / visit real-world examples which may help them understand better development forms – perhaps even through "Google Earth". • SODC Local Plan 2035 Policy DES10 appears to provide the only direct policy link between the Guide and either of the Local Plans. Have other opportunities to better link the guide to the local planning environment been missed?</p>	• Noted and will review
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76	<p>General comments • A little confused about how the 'streets as spaces' and 'street design' sections are different. As to me, both concern the design of the street, and it isn't too clear how the principles differ. • Reference the Oxfordshire County Council Street Design Guide https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport-policies-and-plans/DesignGuidePublication.pdf• The highway authority will not adopt car parking which is perpendicular to the highway• Note there are a number of detailed design consideration points on cycle and car parking in OCC's DG which are not set out in the JDG - It may be worth our JDG referring to this detail as well as the Oxfordshire Cycling Design Standards and Oxfordshire County Council Residential Parking Standards (and emerging new standards) or providing replicated / district specific detailed design guidelines https://www.oxfordshire.gov.uk/sites/default/files/file/roads-and-transport-policies-and-plans/DesignGuidePublication.pdf see part 3 - pages 33-44 Creating a network</p> <p>• 'This includes people with disabilities, parents, carers, pregnant women, children and older people' – not sure how differently pregnant women travel than other users? • 'Think about different users' experience as they travel through the site (e.g. blank façades in the public realm do not provide an attractive experience from a pedestrian point of view).' - It might be suitable to elaborate on this point of blank facades, including the consideration of 20-minute neighbourhoods and healthy streets, with local services and mixed-use developments provided so that residents do not have to travel – so instead of a bank façade there could be a local service to engage the community - a feature or service (book exchange, a place to stop an rest, outdoor gym for example). Consideration of place making. Communicate your design• It is worth referring to the criteria (scale of development) as to when a Transport Statement or Transport Assessment are needed? This is included in OCC's "Transport for New Developments, Transport Assessments and Travel Plans" document Appendix 1 Page 27 of 66. Support your design• Add 'Healthy Streets' Design Check guidance• Add 'Inclusive Mobility (Department for Transport, 2005)'• Reword 'Local Transport Note 1/20 Cycle infrastructure design (Department for Transport, 2020)' instead of 'Department for Transport's Local Transport Notes guidance (1/20, 2/08 [superseded by 1/20], 1/12[superseded by 1/20])' Design Principles – Movement and connectivity • 3.0 – 'Has a network of streets paths' – should state 'or paths' • 3.0 - Other modes should be at least as attractive, if not more, than using the car • 3.0 Define 20-minute neighbourhoods – potentially differentiate between urban and rural environments (particularly relevant to the districts), although this will need agreement with policy officers as would affect local plan policy. Definition/Explanation in LTCP Draft is as follows: '20 minute neighbourhoods is a new expression for a design concept that plans for essential facilities within 20 minutes' walk from home. A 20 minute walk will get most people around 1.5 km or a mile. The concept is that all essential everyday facilities should be within that distance so it is easy for people to base their lives on walking rather than using a car. Facilities should include shops, recreational opportunities, parks, community facilities, access to public transport (mostly bus stops) and such like. The concept fits in with the goals of low traffic neighbourhoods (LTNs) which minimise traffic within the neighbourhood. Another popular new concept is the 20 minute town based on a 20 minute cycle ride where a wider range of facilities is within 20 minute cycle ride, which at very moderate pace is around 3 miles or 5 km. A 20 minute town should for instance include access to public transport for interurban travel (train or coach stations), employment and comparison as well as convenience shopping.'• 3.2 after the word 'safe' examples could be provided as is in the LTCP draft, 'safe (consider surveillance, sight lines, lighting)'. • 3.2 – suggest adding 'cycle and walking paths' instead of just 'paths'. Add commas - '...and, where applicable, avoid...'.• 3.4 – could potentially add here about how these routes should be convenient i.e., minimising the need to stop and divert• 3.6/7 - Where does the 800m come from? (this doesn't fit into the 20 minute neighbourhood approach [80m/minute means that this is 1,600m]) I'm not advocating this to be changed to 1,600m but want to be clear on where this value comes from. Similarly, where have the other distance preferences come from?• Could we add an encouragement to include accessible wayfinding/signposting to be installed to promote movement on foot/bike/active travel Streets as spaces• LTCP has the following requirement which may be useful to also add to reflect inclusive design 'designed to provide an inclusive street environment that meets the needs of people from early to later life.'. • 3.15 recommend adding about gradients, in reflection of those less able (disabled/old) 'gradients should also be considered'. • Recommend adding about need for shade and shelter, under 3.17 (Healthy Streets Approach)• Figures 16 & 17, where arrows point, don't see much value added from preceding drawing: (drawing is included in the original submission attached at the end of this comment form)• Image with description 'Enclosed streets provide good definition of space' – should have a location added for consistency with other images. • 3.11 – add 'including relevant funding sources'• 3.15 – add 'To allow passing, minimum of 2m width' (Manual for Streets 2007)Street Design • Supporting text states 'If you design</p>	<p>• Noted and will review points individually</p>
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	<p>for the elderly and disabled, you are designing for all. This is inclusive design.' – what about children, women or parents etc? This is quite a sweeping statement. Inclusive design also covers age, ability, gender, race or income, this should be reflected here. • Add after 'The quality of our streets and spaces can be undermined by overly engineered traffic calming measures such as speed humps', 'and featureless build-outs such as chicanes'. • Add after '...varying the alignment of the vehicular route and use of tight junction radii', ' , while considering access for emergency services and refuse vehicles'. • Image of 'Swale frontages as part of a street (Upton)' – presume the area of planting is for sustainable drainage, if so this could be explicitly stated. • The box of design principles states 'Ensure the scheme', but then this doesn't connect to the sentences below – suggest 'the scheme' is deleted so it makes sense. • 3.22 - Maybe change street furniture to a minimum, change to say something about how street furniture should not be cluttered, only high quality designed street furniture should be incorporated, maybe examples of some. As street furniture is important for rest and social interaction, so we worry that in saying it should be minimised, applicants may not provide any. • 3.23- Expand on 'inclusive design' –Could have examples in brackets i.e. the need for shade and shelter, seating for rest, consideration of gradients, include wayfinding and signage installations, natural surveillance etc. • We would consider landscape/green infrastructure to be an important element of street design however it is not mentioned here. It is included in the picture examples but not added as a design principle. Recommend that this is added and that we potentially also add something about delivering landscape features that provide sensory richness, i.e. visual, scent and sound to the street. Planting can also be used to diffuse street lighting or noise in residential areas, these sort of things could be mentioned as well. • LTCP includes the 'Healthy Streets Approach', could add the following requirement as set out in LTCP 'New streets should be designed in accordance with the Healthy Streets Approach'. Alternatively, this could be added to the documents list.</p>	
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77	<p>Response manually entered, submitted in an email format. The draft Design Guide comments that cul-de-sacs are "...land inefficient and causes confusion and frustration". Thakeham do not agree with this generalisation and whilst cul-de-sacs for strategic scale sites may not be appropriate, on smaller sites this type of layout may better reflect the sites context and surrounding character. Thakeham therefore suggest the councils are clear on the application of the requirement and provide clarity on how this is designed to apply to sites of different scales. Moreover, linking primary streets to tertiary streets could result in rat-running, which would increase traffic in more residential areas and raise safety considerations. Thakeham therefore suggest that the councils also carefully consider the potential negative impacts of this requirement. Figure 8 of the draft Design Guide discusses the requirement for main streets to be 'lined with building frontage'. Thakeham would suggest that a 'strong building frontage' requirement is more appropriate, as a continuous frontage within a development may not always be appropriate and is subject to site-specific considerations such as scale and local context. Thakeham would note that Figures 9 and 10 are too generic and more importantly has been included as a guide for strategic scale sites with an extensive internal road network. Thakeham therefore do not consider that these principles are applicable to smaller scale sites and suggest the councils are clear in the application of these principles in relation to site size. In addition, Thakeham would also repeat the above concerns that linking primary streets with tertiary street could lead to rat-running. Paragraph 3.2 suggests that developments should "...where applicable avoid single point of access (particularly for large developments)". Thakeham are encouraged by the flexibility that appears to have been introduced, however Thakeham note that the draft Design Guide comments at length about the desire for multiple accesses – see comments in relation to the 'Place and setting' section above. Thakeham suggest that the councils are explicit on what they deem small- and large-scale development to be, and how they intend to apply access requirements accordingly. As currently written, it is considered too vague and different sections of the draft Design Guide appear to provide different levels of clarity on the same topic. Paragraph 3.3 states that developments should provide "...links to neighbouring allocated land that could be developed in the future...". Comments above in relation to Figure 2 within the 'Place and setting section' of the draft Design Guide note that a level of certainty is required in relation to the development of neighbouring land. Here, the councils allude to 'allocated land' which goes further but Thakeham still do not consider it is appropriate to plan for a neighbouring site that may or may not come forward, unless the councils are able to facilitate discussions. Moreover, Thakeham suggest that the draft Design Guide should be clear in each section – if 'allocated land' is the benchmark the councils intend to use, then this should be repeated throughout when discussing 'future connections' to provide clarity. Paragraph 3.4 of the draft Design Guide states that developments should provide "...direct pedestrian and cycle links to local services and facilities...". Thakeham is committed to providing good connections to existing services and facilities, however this is often also based on factors beyond our control where connections go beyond our site boundary, such as the suitability of the existing network. Whilst Thakeham would always aim to work with the councils, the draft Design Guide should account for this within the wording of this requirement. At paragraph 3.14 the draft Design Guide requires schemes to avoid tarmac and use 'porous materials for non-adopted roads and pavements'. Thakeham consider this is too prescriptive and any surfacing materials should be site and location specific. Paragraph 3.15 suggests developments provide "...continuous and generous footpaths to meet the needs of all users...". Thakeham suggest that the term 'generous' is subjective and either this should be clearly defined, or more appropriately linked to relevant guidance.</p>	<p>- Noted and will review points individually</p>
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78	<p>GOAL: A place that is easy to get to and move through for all users</p> <p>The SPD refers to various cycling and parking requirements, but in effect is unable to provide the comprehensive advice that is given in the documents referenced in the SPD (such as LTN1/20), and that will soon be supplemented by the updated Manual for Streets. These sections of the guide should therefore be removed as they do not add any further clarity to the National Design Guide, Local Plan Policies or the referenced documents that already provide comprehensive guidance.</p> <p>Design principles 3.6 and 3.7 seek to ensure that new homes are located within 800m of facilities and services, 400m of a bus stop, and preferably within 600m of a primary school and 1500m of a secondary school. These design principles do not reflect policy, and should be proposed as targets rather than requirements. There may for example be circumstances where it is preferable to separate bus stops by further than 400m (for example to avoid delaying fast services).</p> <p>To reflect the status of the SPD, it should not state that applicants should 'ensure' that a scheme adheres to specific principles, but instead should state that development schemes which seek to follow the principles set out will be supported.</p>	<ul style="list-style-type: none">- Noted and will review points individually
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79	<p>Response manually entered, submitted in an email format.</p> <p>Design Principles The reference to creating a 20-min Neighbourhoods (Para 3.0) would benefit from definition and whilst desirable is not always achievable due to a number of factors including site constraints/shape. The reference to locating 'services and facilities' within 800m of homes (Para. 3.6) requires some clarity in terms of the types of services and facilities and also recognition that 800m will not always be achieved due to site constraints/shape.</p> <p>Streets as Spaces The street typologies identified at Figures 14-17 would benefit from being outlined in the context of addressing OCC parking standards as part of the design of any street typology.</p> <p>Design Principles - Street Design The reference to the use of tree planting as opposed to street bollards (Para. 3.24) should be recognised in relation to other competing street demands (e.g. utilities, street lighting, visibility splays).</p>	<p>- Noted and will review points individually</p>
80	<p>Parking</p> <p>The guidance on parking, particularly on-street parking and encouragement of cycling, car pools, etc is clearly biased toward town and city dwelling and inappropriate for rural locations where there is inevitably greater dependence on cars.</p>	

Part 8 Design principles

Question 11: Design principles - Space and layout [Click here to see the 'Space and layout' design principles section in the guide.](#) If you'd like to comment on them, please use the space below:

	Comment	Council's response
1	<p>Too many words.</p> <p>Too many pages.</p> <p>Too many concepts.</p> <p>Too much everything.</p> <p>YOu get the idea.</p> <p>The guide is too elaborate and lengthy.</p> <p>Nice concept.</p> <p>Poorly implemented.</p>	<p>· Noted.</p>
2	<p>This section provides minimum amenity space requierments and property to property distances which is brilliant. But there is no reference to minum floor space requirements inline with National Space Standards? It's essential this is included to ensure good design. That said, it makes no logical sense that an apartment building requires 40sqm of amenity space but a 1 bed requires 36sqm. Further, the wording is poor and suggests that an entire apartment building can be served by a single 40sqm amenity area, it should be made clear this is multiplied per unit within the building.</p> <p>It also makes no sense that terraced housing should have reduced requirements from non-terraced housing.</p> <p>The design guide should provide advice on the design and location of garaging and parking.</p>	<p>· Noted and will review</p>

3	Space for trees is disregarded yet is the essential of a wildlife friendly site.	Noted. The natural environment section does cover minimum space that should be allowed for trees
4	Meaningless	· Noted.
5	I am not sure why gardens need to be rectilinear. Historically gardens may well not have been so, and this adds character and individuality to properties, avoiding the mass produced look of a development leads to good design.	· Noted and will review
6	As previous, looks great but the proof will be in the finished product and how it is maintained. Will these spaces be managed by the council or will residents have to pay for a management company to maintain the grass verges etc and what guarantee will be in place to prevent price hikes	· Acknowledged
7	Most new developments in this region seem to maximise the use of land resulting in high density. Creating easily accessible and preferably integrated high quality space is undervalued. For example, placing a recreational space in one corner of a development is not necessarily the best way of providing space accessible to everyone.	· Noted.

8	<p>The existing Vale design guide is very clear, and yet in Faringdon we see multiple large developments being approved which skip the guidance . A cursory look at multiple exits and entry suggestions, space for growing food, movement framework, etc. shows there is little point in making new guides, if the implementation of existing guides is so poor. If the same people and processes are at work in the approval process, there is no point in investing in new guidelines.</p>	<p>· Noted.</p>
9	<p>with much new land it is time to connect all the transport sources and make it cheaper to travel by train or bus.</p>	<p>· Noted.</p>
10	<p>Everything is about "parking". Nothing is said about the storage of mobility scooters or bicycles. Must say more about provision of secure storage for mobility scooters & bicycles. Lumping the storage of mobility scooters & bicycles alongside bins as something that unsightly is simply wrong. It should be a design principle that an equal number of "Sheffield Stand" style bike racks be provided to the number of car parking spaces. "Developers should consider the promotion of car clubs/ rural car clubs" this should be supported by a design principle to require the provision of parking spaces only for "car club" cars.</p>	<p>· Noted.</p>
11	<p>Over the past 10 year the new housing develops in Didcot have been designed to pack as many houses into a hectare to maximise profit per unit. The developers suggest that is to make the houses affordable (but unit prices remain high possibly because many buyers are subsidised by the Government). At the same time green spaces are reduced or removed. On Western Park some of the houses are so close that you can touch your neighbours if you lean out of the first floor windows. If some of the development are 3 storey, e.g. over shops (but not 4 floor or more), and some green space is incorporated; this gives a better sustainable environment, and keeps the buy in prices reasonable.</p>	<p>· Noted.</p>
12	<p>Include employment zones, retail and leisure to cut down the need for travel</p>	<p>· Noted.</p>
13	<p>Amenity parameters is the best bit of the whole doucment so far</p>	<p>· Noted.</p>

14	concern that the principles may be used by officers without an ability to discern intuitive and skilful design innovation	· Noted.
15	<p>See above plus what about playing fields and formal/informal recreational spaces? I suggest looking at our activity hubs which can be found on the above web link.</p> <p>Careful consideration is required for the long term maintenance of these areas is fundamental to ensure the spaces continue to be attractive and have longevity .</p>	· Noted and will review
16	Houses need decent size gardens	· Noted.
17	We must do better than the higgledy piggedly, bits and pieces developments currently in vogue.	· Noted.

18	<p>Never followed due to commercial drive to maximum amount can build on a piece of land. Buildings not built in brick/natural stone courtyard-styles as builders synnical about maximizing profit of space. Need views, open areas and courtyard spaces....unless these forced developers will only comply in high conservation areas like the Cotswolds.</p>	<p>· Noted.</p>
19	<p>Good, but little attention to achieving continuity of 'green cover' and visual landscape structure through age diversity. That is difficult when faced with spatial constraints.</p> <p>I need to mention LITTER somewhere. It is a national scourge! I see not reference in the guidelines as to how to overcome/minimise the problem through a combination of continual design and management education at all levels, especially in schools, colleges and universities. The threat of penalties doesn't work - how about a combination of rewards and incentives? maybe with some penalties that are enforceable ?</p>	<p>· Noted.</p>

20	Biased towards developers, create a summarised version for householders	· Noted and will review
21	page not working	· Noted.
22	Variable styles of houses preferred to allow the various types of families and the elderly to be accommodated. Meeting places such as "village Halls" to enhance life are essential.	· Noted.

23	Would like to see reference to Neighbourhood Plans	· Noted.
24	<p>This is one of the sections where you helpfully give mention to EV charging. However, the guide would I believe be much more impactful if you took this topic a stage or two deeper. For example, it's important to explain that not all EV chargers are the same (in regard to their kW capacity and rate of delivering charge) and the right chargers are needed in the right places. For example, supermarkets or short stay car parks that provide 7 or 11kW charge points are doing little more than greenwashing; on the other hand, visitors passing through our communities and stopping off to use local facilities for an hour, need a Rapid charger (50kW minimum). The rapid chargers are very valuable for on-route recharging but are more costly devices; there are charge point operators who will install them at their own capital cost (and make their return through a margin on the relatively large amount of energy they handle) but they won't invest unless the charge points are secure, well-sited and visible... These are planning and design considerations, so I suggest relevant to your Guide. We have looked into many of these aspects in Thame and Thame Green Living organisation would be pleased to share its findings and experiences.</p>	· Noted and will review
25	<p>As above, space and layout have a major impact on the sounding environment eg sound baffling measures where developments are located close to A roads or bypasses eg the Slade End development (Wallingford OX10) which is built next to the Wallingford bypass; or the development in East Didcot on the A4130 just East of the Tesco/Halfords Development. This is hard on the road with no sound baffling measures. Similarly as Great Western Park sweeps down to meet the road to Milton Park there is no sound baffling. The proximity of the road, the type of road surface, the speed limit all contribute to the auditory well-being of those living in the development. This does not seem to have been taken into consideration at all.</p>	· Noted, we consider the impact of noise to be important, however this is covered by criteria outside of the design guide.
26	I found the figures in this section to be confusing.	· Noted and will review
27	Parking policy is vital, as too many houses are built without parking, leading to an increase of on-street parking, parking on pavements, and obstructing traffic	· Noted.
28	<p>These principles are sound on paper but are very abstract - too much room for interpretation - local communities need to be able to influence these factors as part of the approval process - eg after planning agreed in principle - local communities need more authority over the designs - after all they will be living with the results. I am mindful of the proposed development in Watlington - a well integrated thriving community - what measures are used to insure this is maintained and enhanced?</p>	· Noted
29	Consider developing communities within communities.	· Noted.

30	Creative and challenging play areas for small children with seating for parents/grandparents, including trees for shade in summer and separate for adventure playgrounds for teens to be supplied in quantity by developers on ALL new development sites in proportion to the number of properties being built. ie - developments of 100 properties = one of each. Developments of 200 = 2 of each.	<ul style="list-style-type: none"> · We cannot insist on this approach but recommend as much tree planting as is applicable to each site on a case by case basis.
31	And yet again, only relevant to major developments.	<ul style="list-style-type: none"> · Noted.
32	Good	<ul style="list-style-type: none"> · Acknowledged
33	as above I would like to see a greater conservation and natural habitat preservation contribution to the use of space. Developers often produce cosmetic but unnatural space development	<ul style="list-style-type: none"> · Noted.
34	High density housing is inappropriate in rural areas/edges of small towns and villages	<ul style="list-style-type: none"> · Noted and will review
35	There is an estate on Cumnor Hill (Kimmeridge Road) that is so squashed up there is no room for the dustbin lorry to pass. The road through the estate is so narrow and there is no room for visitors to park. All the houses seem to be built on top of each other, it looks so untidy and will certainly look like a slum in a very short time.	<ul style="list-style-type: none"> · Noted
36	resist building so closely that you cannot provide garages and gardens and playgrounds for children.	<ul style="list-style-type: none"> · We agree and recommend it as best practice.

37	It might be preferable to write the principles in bullet points and/ or emphasise key words in bold or italics.	· Noted and will review
38	As above! Consistently well-formatted, with enough detail not to leave things ambiguous but easy to access from the point of view of a member of the public.	· Acknowledged

39	no reference found to the role of neighbourhood plans in space and layout	· Noted and will review
40	not enough	· Noted.
41	<p>There seem to be a lot of rigid rules in this section e.g. 4.3. Are these rules enforceable? And can they be maintained when small infill developments are proposed? I think that you may be encouraging subsequent householders to fill in gaps which may have been deliberately left to meet the design principle which you rightly regard as important. Also building which face outwards when on the edge of a development, can end up facing a massive housing estate some years later (NE Didcot for example affects the outlook of the homes on the edge of Ladygrove.) The private amenity space rules at 4.11 seem to mirror current rules. Current rules are however unenforceable, and take no account of whether the setting is designed to be lower density by virtue of being towards the countryside edge. The guide needs to ensure that space and layout at the edges of communities is safe from future development.</p>	· Yes these rules are enforceable regarding standards.

42	Again, the emphasis is exclusively urban.	· Noted and will review
43	No adverse comments. Seems clear enough.	· Noted
44	the more space between neighbours the better	· Noted.

45	<p>This section could also benefit from a reference to context, which can be found in neighbourhood development plan (NDP) village character area appraisals.</p>	<ul style="list-style-type: none"> • Noted.
46	<p>We have no specific comments to raise in this section which follow well established principles of good design.</p>	<ul style="list-style-type: none"> • Acknowledged
47	<p>The small section on 'Play space and youth provision' is quite uninspiring. I suggest looking at https://ribabooks.com/Urban-Playground-How-Child-Friendly-Planning-and-Design-Can-Save-Cities_9781859469293</p> <p>It shows how urban designers and city planners can incorporate child friendly insights and ideas into their masterplans, public spaces and streetscapes.</p>	<ul style="list-style-type: none"> • Acknowledged

48	<p>Response manually entered, submitted in an email format. 1. This section is very useful, especially on outdoor amenity space and the spacing apart of buildings.</p>	<ul style="list-style-type: none"> · Noted.
49	<p>Response manually entered, submitted in an email format.</p> <p>Space and Layout - Amenity and Space Standards</p> <p>Whilst HLM are supportive of the national space standards, the Guide must adhere to Footnote 49 of the National Planning Policy Framework (July 2021) which requires LPAs to evidence need, viability and timing to support their implementation.</p> <p>HLM do not support the imposition of private amenity standards which go beyond the scope of national standards which, where justified, relate solely to internal spaces.</p>	<ul style="list-style-type: none"> · The guide follows National space standards. It does however refer to them as a comparative measure to garden sizes. · The guide does not ask for standards beyond National space standards.

50	<p>Response manually entered, submitted in an email format. 1. The Guide should ensure that there is adequate parking as the number of vehicles should not be expected to reduce even if the number of journeys does.2. Rules on parking should ensure that there is adequate electric charging capacity available securely.8. The Guide should consider whether some developments should be laid out with housing near to small office/workshop to reduce travel to work.</p>	<ul style="list-style-type: none"> · This comment raises issues that fall outside the scope of the design guide.
51	<p>Stand alone solar farms need some guidelines as to how they will fit into their context, and how we can make sure they are safe for residents and other land users. Can we promote and encourage south facing rooflines in new development so that solar panels are possible and effective? I think we need to use all our rooftop spaces well.</p>	<ul style="list-style-type: none"> · This comment raises issues that fall outside the scope of Space and Layout. These issues are raised in other sections of the guide.

52	<p>Goal, second paragraph. Please add after 'a range of densities, building types and forms will be required.' -- The development of smaller homes is to be encouraged, both to address the local shortage of affordable homes and to build dwellings with a smaller carbon footprint. Inform your design, first paragraph after 'as well as the character of the landscape.' -- the shortage of and demand for affordable homes, Please include principles in the 4.1 series:- Dwellings should be fitted with underfloor heating to facilitate movement to heat-pump heating.- Dwellings should include storage of roof run-off to allow for garden watering or dirty water systems in the future.Principles 4.3: Include: Proposals for affordable homes will be considered where these distances are not achieved.Please add new principle: Smaller dwellings in terraces and blocks should have access to communal outdoor amenity space.Design Principles Parking, please include: Parking areas should be provided under multi occupancy blocks.</p>	<ul style="list-style-type: none"> · Noted and will review · We cannot insist on this approach (regarding heating). · Run off water is covered under sustainability. · Housing mix must be tender blind. We cannot specify requirements for affordable housing within the guide. · Parking scenarios will be reviewed.
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53	<p>4.3 - Back to boundary - it would be useful to clarify that this is back of dwelling (rear wall rather than conservatories/pods)4.11 - Amenity space - it would be useful to separate 3 and 4 beds, rather than 3+ beds, and having 75sqm and 100sqm respectively. Terraced house calculation is welcomed. West Oxfordshire also have garden to be same as the footprint of the house. Should say that the majority of the scheme is in compliance as there are often physical constraints or development block shapes.4.25 - A break of the size equivalent to a parking space seems larger than required and can cause parking spaces to mis-align with the dwelling (in front of another owners house) - a tree can be planted within a 1.5m wide area.4.30 - Porous materials for driveways - This is not practical – many sites cannot deliver porous drainage due to ground conditions and strategy should be considered on a site by site basis. 4.32 - EV charging - OCC recently adopted street design guide is more pragmatic (every plot with on-plot parking) and the guidance should correspond/refer to OCC policy.4.49 - This may be site specific and should be considered through the submission of the phasing plan and/or conditioned if required.</p>	<p>· Noted and will review</p>
54	<p>variety of frontage and roof line, rhythm, and visual interest are important and welcome - but not buildings which violently clash with those around them. Buildings which aren't obviously ""in tune"" with the locality must be of exceptional architectural merit. Energy efficiency is not, by itself, a ""get-out-of-jail"" card, if it is otherwise destructive of harmonious community.</p>	<p>· Noted</p>

55	<p>The section on parking is completely off-track for a zero carbon development. It's clear the author of this section is totally unaware of the likes of Vauban where cars are not allowed to park in street adjacent to housing. This section would therefore deter developers from creating exemplar modules of housing designed for the future. Car ownership is already on a downward trend it is highly likely that car sharing, electric bikes and cargo bikes plus new shopping and work patterns will change quite considerably in the future. Therefore, promoting car parking along streets is very irresponsible in this case.</p>	- Noted.
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56	<p>SPACE AND LAYOUT FRAMEWORK AND STRUCTURE :FORMATTING: Needs a chapter/subsection number for reference. Could an interactive mini contents list be included under each chapter title/heading for easier navigation of the sub-sections, to avoid scrolling? Principles should really be first, and then follow up with explanation text, diagrams and helpful links below. [4.3] SPECIFIED DISTANCES: Please could this principle wording specify that it would be "facing habitable upper-floor windows". The diagrams infer this, but it may be could for the wording to specify this for the avoidance of doubt. PLOTS AND AMENITY: FORMATTING: Needs a chapter/subsection number for reference. Principles should really be first, and then follow up with explanation text, diagrams and helpful links below. **Officers note that location of the principles box needs to be relocated – as currently under 'storage and facilities'. SUBTEXT FOR "Neighbouring Amenity" (above Figure 25) - 'Proposals should not give rise to any unacceptable harm.' Officers commented that it's not possible to say that there won't be any harm. Policy DP23 makes reference to significantly 'adverse' harm. Unsure of South Local Plan wording, but is Officers recommend that consistent wording is used. Perhaps the wording could be changed to: "Unacceptable impact' rather than 'harm'. [4.11] AMENITY SPACES are all included under "Detached or Semi-Detached Dwellings should have a minimum of" – the amenity space for terraced properties and apartment buildings may need to be under their own separate heading. [4.11] JARGON ACRONYM "GIA" – It is recommended that the full wording for 'gross internal area' is used [4.12] GARDEN SHAPES - Without an accompanying definition, Officers consider that the sentence "Awkward shaped gardens should be avoided" could be left open to interpretation. It is recommended that the wording is changed to include "Awkwardly shaped, or unusable, garden areas should be avoided". This could also then capture unusable garden space located under huge trees. [4.16] BOUNDARY TREATMENTS – Please could the wording at the end of this sentence be strengthened more? For example; changing it from: Visible boundary treatments in public areas need to have cohesive treatments and strongly avoid close board fencing; to: Visible boundary treatments in public areas need to have cohesive treatments. Close-boarded or panel fencing is generally not an appropriate boundary treatment for prominent location, such as street frontages". STORAGE, SERVICES AND UTILITES :FORMATTING: Needs a chapter number for reference. Principles should really be first, and then follow up with explanation text, diagrams and helpful links below. [4.18-4.22] INFOLINK vs PRINCIPLE WORDING Please could the bin size standards/ waste storage be included in the principle wording . Perhaps along the lines of "that the relevant waste storage methods are in accordance with current District standards" (and include those standards within the wording if possible?) There is a link in the "Supporting Your Design" section, but this makes reference to outdated policies. PARKING STRATEGY AND SOLUTIONS ~FORMATTING: Needs a chapter/subsection number for reference. Principles should really be first, and then follow up with explanation text, diagrams and helpful links below. **Does the title need to be written in bold purple too? [4.24] PARKING: Policy CP35 of Local Plan 231 Part 1 refers to the standards in the current Design Guide, so reference could also be made to the Oxfordshire County Council parking standards. [4.31] GARAGES: The Garage standards referred to in 'BUILT FORM', should really be included here if possible. Could the link to current on-plot car parking standards be included within the principle wording? Officers are mindful that most people will be looking at the principle boxes for the main sources of information. [4.23-4.34] OCC STREET DESIGN GUIDE: Officers raised concern that OCC are planning to adopt a Street Design Guide soon and queried how much overlap there would be between the Districts Design Guides and the County's Design Guide</p>	<p>- Noted and will review points individually</p>
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57

Clearly set out, so no comments

- Acknowledged

58	<p>The Role of an SPDAs highlighted in Bloor Homes' response to Question 9, the NPPF, PPG and recent case law have clearly established that the role of an SPD is to provide guidance in relation to existing policies in adopted local plans, and that it is not within the remit of an SPD to introduce new policy requirements. Rather, they have highlighted that the introduction of new policy requirements should be deferred to local plan reviews, where impacts on viability can be considered. To reflect the scope of SPDs, therefore, the Design Guide SPD should not state that applicants should "ensure" that a scheme adheres to specific principles, but instead should state that development schemes which seek to follow the principles set out will be supported. DensityBloor Homes welcomes the reference within design principle 4.0 that, in achieving an effective use of land, increased densities may be utilised in appropriate locations, and that higher density sustainable developments are encouraged by the Councils. That is a wholly appropriate approach to ensuring that schemes utilise the land available in an effective manner (as is required by NPPF paragraph 199). Separation DistancesBloor Homes also notes the proposed minimum separation distances as set out within the draft Design Guide SPD, which seek back-to-back separation distances of a minimum of 21 metres between facing habitable rooms, back to boundary distances of a minimum of 10.5 metres, back to side distances of a minimum of 12 metres, and front to front distances of a minimum of 10 metres. Whilst those separation distances appear to be reasonable as a starting point, Bloor Homes welcomes the flexibility provided within design principle 4.3; which allows applicants to "demonstrate how the design proposals ensure that privacy is maintained" when those separation distances are not met. That is an entirely sensible and appropriate approach that allows some flexibility for schemes to respond to site-specific considerations; for example by incorporating areas of higher density development where reduced separation distances could be sensitively accommodated whilst still maintaining the privacy and amenity of new and existing dwellings. Moreover, the inclusion of Figure 27, which demonstrates how appropriate separation distances may be achieved between dwellings at differing ground levels, is also useful guidance and is therefore welcomed. Internal Amenity SpaceIn relation to internal amenity space, it is noted that the Design Guide SPD makes reference to developers and applicants having regard to the space standards set out in the Nationally Described Space Standards (NDSS). Whilst it is noted that the adopted Local Plan Part 2 for the Vale of White Horse District and the South Oxfordshire Local Plan require one and two-bedroom market homes and all affordable housing to be in accordance with NDSS Level 1 (as per Development Policy 2 in the Vale's Plan, and Policy H11 in South Oxfordshire's Plan), that is not made sufficiently clear within that passing reference. External Amenity SpaceThe minimum private amenity spaces that are set out in design principle 4.11 are also noted. As above, Bloor Homes welcomes that the design principle / guidance provides some degree of flexibility where those areas cannot be achieved, subject to the applicant providing robust justification for that departure from the guidance. With that said, however, Bloor Homes does have some comments on the suggested private amenity spaces set out in design principle 4.11. Whilst the suggested private amenity spaces for 1-bed houses (+= 36m²), 2-bed houses (+= 50m²), 3+ bed houses (+= 100m²) and terraced houses (+= 80% of the GIA) appear sensible, those suggested external amenity spaces will inevitably have an impact on the site layout, the ability to achieve an efficient use of land, and the viability of the scheme. It would be sensible, therefore, for the Design Guide SPD to clearly allow for flexibility within schemes, reflecting that the SPD is, by its nature, a guidance document rather than planning policy. Moreover, there is some confusion in relation to the suggested standard for apartment buildings; which refers to += 40m² or shared space. In the first instance, it is currently not clear whether that relates to a standard of 40m² per apartment, or whether that is a standard for the entire apartment block. The approach that is being taken by the Councils will need to be clarified to ensure that the guidance is clearly written and unambiguous, as required by NPPF paragraph 16d. If the former approach is taken (i.e. a per unit standard), that would appear counter-intuitive in that; (i) a standard of 40m² for a 1-bed apartment would exceed the 1-bed house standard (36m²), (ii) a blanket standard for all apartments, regardless of their size, would not be appropriate for schemes with larger apartment units. Conversely, however, if the latter approach is taken, a combined standard of 40m² for each apartment block may not be appropriate. In the instance of a 3-storey, 6-dwelling block, for example, that would clearly not be a sufficient amount of amenity space for the residents of the block. Therefore, it is suggested that, rather than seeking to set external space standards for apartment blocks, the SPD seeks to ensure that apartment blocks are served by "adequate outside amenity space". That would provide the flexibility required to ensure that the quantum and type of external amenity space responds to the needs of its residents. Front gardensSimilarly, the wording of design principle 4.14 is unclear as currently drafted, and gives rise to some concerns in relation to the practical application of this guidance. Currently, that principle states that schemes should</p>	<p>- Noted and will review points individually</p>
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	<p>have front gardens with "planted or permeable areas" of "no less than 1m in depth on higher order streets, increasing in size in line with the street hierarchy, density and sense of enclosure." However, that wording could be read in a number of different ways, and thus should be re-written to provide clarity and appropriate flexibility. However, whilst the wording of the design principle should be made clearer, it should also allow for some flexibility in any event. It would be incorrect, for example, to suggest that garden lengths alter in line with the street hierarchy, which appears to be the suggestion in design principle 4.14. Rather, flexibility should be given to allow for a bespoke response to plot designs (and specifically front garden sizes, in this instance). For example, at larger sites that have a range of streets across the hierarchy, it may be more appropriate for dwellings on higher order streets to have very shallow front gardens, with garden sizes then increasing when heading down the hierarchy where the density of development becomes lower (i.e. in fringe locations). In other sites, however, the garden length may reduce further down the street hierarchy. For example 'mews' style areas may incorporate much smaller gardens (or no garden at all) in order to create a specific sense of character in those locations. Therefore, to suggest that garden sizes should increase / decrease linearly to reflect the street hierarchy would not be accurate. As such, considerably more flexibility should be built into design principle 4.14 to allow for front gardens to respond to the site, the sense of character that is being pursued, and the nature of the street typology. Parking and Electric Vehicle Charging It is noted that "in the absence of County Council standards", design principle 4.32 recommends "one (on plot) EV charging point per dwelling" and that, where parking is provided communally (courtyards and flats) "at least two EV points are recommended." That is not, however, a requirement that is included in the adopted local plans of either authority, nor is it a County Council standard. As such, design principle 4.32 effectively seeks to introduce a new development requirement, which is outside of the remit of an SPD. Indeed, that is discussed in Bloor Homes' response to Question 9, which highlights the position of the NPPF, PPG and recent case law that SPDs should not seek to introduce new development requirements or have any additional cost implication (over and above adopted policy requirements), and instead that their scope is to provide additional guidance in relation to existing policies in adopted documents. That is particularly prevalent in relation to recommendations for EV charging, given that the Department for Transport's 'Electric Vehicle Charging in Residential & Non-Residential Buildings' in October 2019 set out the Government's proposals to implement a nationally standardised approach to EV charging through a new functional requirement under Schedule 1 to the Building Regulations 2010. To seek to implement such a standard through an SPD (contrary to the role of SPDs) ahead of that would, therefore, be in opposition to the Government's intentions in that regard. From a point of principle, therefore, the introduction of EV charging standards should be deferred, at the very least, to the emerging Joint Local Plan, or be deferred to an update to the Government's Building Regulations.</p>	
59	<p>No mention of neighbourhood plans. Building to edge of boundary and neighbouring buildings not included. Street boundary not emphasised.</p>	<p>· Noted and will review</p>

60	EV charging points should be available for all vehicles (cars, cycles etc) and not just consideration given to this. Otherwise a good section.	- Noted and will review
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61

Please refer to submitted representations.

- Noted

62	It is vital that Oxfordshire County Council as Highway Authority are full on board with the parking solutions especially integrating on-street parking and street trees. Adoption standards need to be reconciled fully with District urban design aspirations.	- Noted
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63	<p>Response manually entered, submitted in an email format</p> <p>The picture of Tadpole Garden Village This picture with its large expanse of glazing shedding light over the countryside is not appropriate and should be replaced with one creating less light pollution.</p> <p>Design principles - Space and Layout Framework and structure</p> <p>4.0 Space is a finite resource and maximum effort must be put into obtaining the highest densities. This includes rural areas and villages where the tradition of terraced cottages provides both lower cost housing and a solution to the challenge of density.</p> <p>Suggested addition: Provide links to resources showing good high-density developments in rural & urban settings.</p> <p>Storage, servicing and utilities</p> <p>In the Steps section – Communicate your design it says "Prepare a plan showing the routes for service vehicles to access each building/dwelling, also known as a Swept Path Analysis or Vehicle Tracking Plan.</p> <p>Service vehicle access is often obstructed by parked vehicles causing them to mount, and damage, paths or green boundaries. Designers should be encouraged to devise means of preventing such parked vehicle obstructions noting that parking restriction markings are often ignored through lack of enforcement. Good design does not rely on human behaviour.</p> <p>Design principles - Open space</p> <p>We would like to see open & greens spaces incorporate pathways suitable for wheelchair users and pushchairs – such as bound gravel.</p> <p>Design principles – play space & youth provision design</p> <p>Spelling correction: 6.64 should read quiet space, not quite space.</p> <p>Resources</p> <p>The Oxfordshire County Council Street Design Guide, must be included as a resource.</p> <p>https://www.oxfordshire.gov.uk/residents/roads-and-transport/transport-policies-and-plans/transport-new-developments/transport-development-control</p>	<p>- Noted and will review points individually</p>
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64	Needs to give examples of good high-density developments within South & Vale districts, especially examples in rural areas in addition to the example of the Tadpole Garden Village in Swindon. For example, Farm Place, Henton, OX39 4AD - P90/N0765.	· Noted and will review
65	Should also include any design guides in the Neighbourhood Plan - Neighbourhood Plans are missing from this guide.	· Noted and will review

66	Response manually entered, submitted in an email format.No comments.	· Noted
67	<p>The Space and Layout chapter also makes no reference to climate change.</p> <p>This is not a matter of complying or not with pollicies in the existing Local Plans. It is an attempt to deal with the climate emergency (and the ecological emergency but that is better catered for in the Natural Environment chapter although I would like to have had more references to the need for continuous nature corridors in that.</p>	· Noted and will review points individually

68	<p>Response manually entered, submitted in an email format.Space and Layout (Design Principles – Space and Layout Framework and Structure)The principles proposed are effectively a continuation of the standards included within the Vale of White Horse Design Guide (March 2015).Gladman welcome the flexibility proposed in the design principles for space and layout framework, namely in criterion 4.3 which allows for applicants to demonstrate that design proposals still ensure privacy.It is considered that Criterion 4.10 should be reworded for greater clarity, Gladman propose the following text for your consideration:"4.10 avoids awkward/vulnerable corners within the design proposal arising from left over space, ensuring safety, land efficiency and a clear definition of public and private space"Space and Layout (Design Principles – Private Amenity)Again, the suggested minimum amenity space sizes are a continuation of the guidance provided in both the South Oxfordshire Design Guide (2016) and the Vale of White Horse Design Guide (March 2015). In this respect, we also welcome the ability for these to be approached on a case-by-case basis, where needed, as there may be some instances where deviation from the proposed guidelines is required.</p>	- Noted and will review points individually
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69	<p>Space and Layout Framework and Structure</p> <p>Bloor Homes welcomes the reference within design principle 4.0 that, in achieving an effective use of land, increased densities may be utilised in appropriate locations, and that higher density sustainable developments are encouraged by the Councils. That is a wholly appropriate approach to ensuring that schemes utilise the land available in an effective manner (as is required by NPPF paragraph 199).</p> <p>Separation Distances</p> <p>Bloor Homes also notes the proposed minimum separation distances as set out within the draft Design Guide SPD, which seek back-to-back separation distances of a minimum of 21m between facing habitable rooms, back to boundary distances of a minimum of 10.5m, back to side distances of a minimum of 12m, and front to front distances of a minimum of 10m. Bloor Homes welcomes the flexibility provided within design principle 4.3; which allows applicants to 'demonstrate how the design proposals ensure that privacy is maintained' when those separation distances are not met. There are many award winning schemes where these standards are not met (for example, Goldsmith Street in Norwich and Barton Park in Oxford). Where higher density development is appropriate and the use of land needs to be optimised, a reduction in the back-to-back distances in particular will be necessary. Reduced separation distances to those set out can be sensitively accommodated in most developments whilst still maintaining the privacy and amenity of new and existing dwellings.</p> <p>Internal Amenity Space</p> <p>In relation to internal amenity space, it is noted that the Design Guide SPD makes reference to developers and applicants having regard to the space standards set out in the Nationally Described Space Standards (NDSS). Whilst it is noted that the adopted Local Plan Part 2 for the Vale of White Horse District and the South Oxfordshire Local Plan require one and two-bedroom market homes and all affordable housing to be in accordance with NDSS Level 1 (as per Development Policy 2 in the Vale's Plan, and Policy H11 in South Oxfordshire's Plan), that is not made sufficiently clear within that passing reference.</p> <p>Private / External Amenity Space</p> <p>Bloor Homes welcomes the flexibility in these suggested standards where those areas cannot be achieved, subject to the applicant providing robust justification for that departure from the guidance. In some cases, in particular where higher densities would optimise the use of the land, these standards are likely to impede good design. There are already a number of higher-density award winning schemes across the county that would contravene these standards. Whilst the suggested private amenity spaces appear sensible, they will inevitably have an impact on the site layout, the ability to achieve an efficient use of land, and the viability of the scheme. It would be sensible, therefore, for the Design Guide SPD to clearly allow for flexibility, reflecting that the SPD is a guidance document rather than planning policy.</p> <p>Front gardens</p> <p>The wording of design principle 4.14 is unclear as currently drafted, and gives rise to some concerns in relation to the practical application of this guidance. It is incorrect to require that garden lengths alter in accordance with the street hierarchy (which is required in design principle 4.14). Rather, flexibility should be given to allow for a bespoke response to plot designs (and specifically front garden sizes, in this instance). For example, it may be appropriate to have larger gardens on primary streets where a sense of openness is sought, and on lower order streets, 'mews' style areas may incorporate much smaller gardens (or no garden at all) in order to create a specific sense of character in those locations. Therefore, to suggest that garden sizes should increase / decrease linearly to reflect the street hierarchy would not be accurate. As such, flexibility should be built into design principle 4.14 to allow for front gardens to respond to the site, the sense of character that is being pursued, and the nature of the street typology.</p> <p>Parking and Electric Vehicle Charging</p> <p>It is noted that 'in the absence of County Council standards', design principle 4.32 recommends 'one (on plot) EV charging point per dwelling' and that, where parking is provided communally (courtyards and flats) 'at least two EV points are recommended.' That is not, however, a requirement that is included in the adopted local plans of either authority, nor is it a County Council standard.</p> <p>Design principle 4.32 effectively seeks to introduce a new development requirement, which is outside of the remit of an SPD. The NPPF, PPG and recent case law indicate that SPDs should not seek to introduce new development requirements or have any additional cost implication (over and above adopted policy requirements), and instead that their scope is to provide additional guidance in relation to existing policies in adopted documents. That is particularly relevant in relation to recommendations for EV charging, given that the Department for Transport's 'Electric Vehicle Charging in Residential & Non-Residential Buildings' in October 2019 set out the Government's proposals to implement a nationally standardised approach to EV charging through a new functional requirement under Schedule 1 to the Building Regulations 2010. To seek to implement such a standard through an SPD (contrary to the role of SPDs) ahead of that would be contrary to the Government's intentions. The introduction of EV charging standards should be deferred to the emerging Joint Local Plan, or an update to the Government's Building Regulations.</p>	- Noted
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70

Please see submitted letter for full comments.

- Noted and will review points individually

71	<p>High density, one and two-bed units should be emphasised. We know these are what we need, and these can be arranged to maximise social interaction. The Bioregional development in Brighton (by the station) is highly social (judged by the number of neighbours people know), has no cars and has high density. Importantly, there needs to be space for air sourced heat pumps, which are ugly and can be noisy (if they are cheap). Better still, community air sourced heat pumps should be provided (district heating) and heat sold to each home rather than fuel. Thank you for mentioning car-free developments. These should be pushed much harder. An external (or underground) carpark can be put in to provide car-access. Such a space can be repurposed if we ever get to a car-free or car-low society. Ensure there are many (not just two) EV charging points in carparks. Such a lot of hard-surfaced space is wasted on cars sitting unused on forecourts and roadsides. Point 4.42 should refer to blue networks too. There should be a bit more emphasis on waterways - people love water and so does wildlife. On play spaces - today we were planting trees at Wilding Rd green in Wallingford. It has been a desert of grass with no features save for one tree that all the children run to. The community are thinking of natural play facilities such as adding a couple of old tree trunks and willow tunnels. These should be considered as an option.</p>	- Noted
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72	Lighting important again - not just external but also light coming out of buildings or attached to buildings.	- Noted and will review points individually
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73	<p>Response manually entered, submitted in an email format. Framework and structure</p> <p>Suggest new wording added to this sentence as follows - The appropriate size for a perimeter block should strike a balance between adequate provision for amenity space and parking, while allowing a permeable and walkable street pattern for all modes</p> <p>Suggest wording is added to this sentence as follows: 'Increased densities should be focused on key movement intersections where public transport facilities are provided...'</p> <p>Suggest wording is added to this sentence as follows: 'The quality of our streets and spaces can be undermined by the clutter of bins, bikes and services if these are not properly designed into the building. Screening and enclosures which add to the character of a street frontage can be a useful tool in providing waste storage without detracting from the street scene.'</p> <p>Communicate your design box – the content of this box appears to be the same as the place and setting design box – is this intentional?</p> <p>Image of Tadpole Garden Village as an example of a countryside edge development – not sure this is a great example image. It isn't sympathetic in design for a countryside edge due to large areas of glazing causing light spill, white render likely to be too visually strong, not recessive in landscape, and homes too uniform, large high and of a repetitive design. Suggest this image is swapped for something more sympathetic. Storage, servicing, and utilities</p> <p>Suggest sentence added after last sentence in paragraph, as follows: 'When considering bin storage, think of imaginative solutions that incorporate storage as part of the front façade and visually screened from the street scene. When designing cycle storage, consider ease of access, as well as bicycle security, to ensure the facilities are used as intended'.</p> <p>There are lots of great images and examples of innovative cycle parking design, however it is not mentioned in the principles. This may not be the most appropriate place for cycle storage/parking to be added as explained by previous comment about bike and bin storage being located separately. However, the above sentence addition and a principle about cycle parking should be added in the most appropriate place in the guide – example of potential principle: 'creative solutions for attractive, convenient and safe (secure and overlooked) residential and on street cycle parking'.</p> <p>Figure 28 - Are the garden sheds for cycles? And bins in the front? How does the top shed get their cycle out? (if the answer is between the 4 parked cars on the left, this is very narrow and not ideal for potential scratches to cars).</p> <p>Image of 'cycling storage' – expand and state these are folding bike lockers and Sheffield stands or something similar.</p> <p>Communicate your design</p> <p>Suggested new wording – 'Prepare a plan showing the location of bin storage areas and collection points and the access provided between the two. Include adequate accessibility to bin storage for those occupiers with mobility issues and impairments;' - (it sounds a little like we needed the bin store to be accessible to waste collection personnel with poor mobility).</p> <p>Design Principles – Private Amenity</p> <p>4.11 – '+=' is a little unclear, could we potentially simplify it to 1 Bed = 36 sqm etc.?</p> <p>Design Principles – Storage, services and utilities</p> <p>4.18 – this should read 'recycling, diversion from landfill and restrict the level of residual...' Or volume could be used instead of 'level'.</p> <p>4.20 - is there a maximum drag distance for waste collection personnel? If so this should be referred to.</p> <p>Parking Strategy and Solutions</p> <p>Suggest add the following wording to the end of the first paragraph of the accompanying text '...this challenge. Developments should be future proofed to ensure expensive retrofitting isn't required in the future (electric charging points).'</p> <p>Regarding the third paragraph here - this accompanying text portrays the message that there is a preference for on-street parking (unlike 4.23 later on), it would be good to provide more text on the other types of parking here.</p> <p>A range/variety approach would be much better than on-street only. Terraced houses for example, would allow for just 1 parking space per unit (which maybe suitable) but would also result in all resident frontages having parking in front, and no opportunity for planting or breaks in on-street parallel parking (or may cause overspill parking on neighbouring streets), this also causes issues for emergency vehicle passing, and passing in general, if the road width is narrow. Equally we do not want too many vehicle crossovers to garages or forecourts where conflict between pedestrians and vehicles can occur. This then allows DM planners to make the decision of appropriateness on a case-by-case basis.</p> <p>The accompanying text in this section states how parking courts are not successful parking solutions yet Figure 31 illustrates this type of parking. Perhaps it could be explained that, if other types of parking aren't possible parking courts should be designed like this (could link this and 4.28 together).</p> <p>Image of 'Electric charging point (North West Bicester, Oxfordshire) – this isn't a great example of a electric charging point. The actual charging point is concealed by the bush – could a clearer image be used?</p> <p>Design Principles – Parking</p> <p>4.24 – Recommend adding 'Local Plan(s) and County level car parking standards'.</p> <p>4.25 – should be 'driveway parking' or 'private forecourt parking' as 'frontage parking' could have meant on street until reading 4.27</p> <p>4.32 – Recommend adding 'until the emerging OCC parking standards (which will consider EV charging requirements) are adopted we recommend...'</p> <p>4.33 - development should attempt to screen parking, without creating potential target areas for</p>	<p>- Noted and will review points individually</p>
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	<p>unsociable behaviour• 4.34 as per 4.25, please keep consistent with term used across the two points</p>	
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74	<p>Response manually entered, submitted in email format. Figure 20 (Block Structure) of the draft Design Guide states that "The structure/layout of a proposal must create or contribute to a grid form (be it regular or irregular) or perimeter blocks...".</p> <p>Thakeham consider this type of layout requirement is only suitable for strategic scale sites and suggest that the councils provide clarity on how this is to be interpreted for smaller scale sites. Paragraph 4.2 also requires the use of 'perimeter blocks' and Thakeham would echo the above comments in relation to this requirement. Paragraph 4.10 of the draft Design Guide requires developers to ensure a scheme "incorporates awkward/vulnerable corners into the proposal arising from left over space in order to ensure land efficiency, and a clear definition of public and private space". Thakeham agree that all sites should be designed holistically. Paragraph 4.11 prescribes minimum amenity space requirements; however, it is not clear what standards these are based on and Thakeham would therefore suggest the evidence is provided in support of these requirements so they can be better understood. Notwithstanding this, Thakeham consider these requirements to be generally onerous and are unable to support them. For example, Thakeham note that the draft Design Guide requires 3 Bed homes (or greater) to have a minimum of 100 sqm of amenity space; 16% larger than the Nationally Described Space Standard for a 3 bed, 2 storey dwelling. Thakeham query whether it is reasonable to expect a development to provide more external space than internal space standards. Paragraph 4.12 requires "...gardens that are rectilinear and in the orientation of the buildings flank walls. Awkward shaped gardens should be avoided". Thakeham consider that this requirement should be flexible and related to each individual site. In many instances sites can be irregular in shape due to land forms and features and it would be unreasonable to expect developments to provide rectilinear gardens in this instance – it would also appear to conflict with the draft Design Guides comments at paragraph 4.10 (see commentary above), in relation to incorporating 'awkward/vulnerable corners into the proposal'. Additionally, paragraph 4.13 states that "The size of private amenity space should reflect the prevailing character of the area. These are the general/minimum standards for amenity space...". Thakeham therefore consider that it is unclear whether the amenity space requirements are set by paragraph 4.11, or by the 'prevailing character' as noted in paragraph 4.13. Moreover, in instances where there is a conflict it is also unclear which takes precedence. Thakeham suggest that the councils are clearer in their requirements for amenity space, along with the evidence in support. Paragraph 4.28 of the draft Design Guide suggests that rear parking courts should be avoided and "These should be a last resort once all other options have been exhausted". Thakeham would note that good masterplanning requires strong and active frontages that are also attractive to the user. In some instances, it can therefore benefit the development to introduce rear parking areas to relieve the pressure on the streetscene. This is again something that will ultimately be site-specific. If the councils are specifically opposed to this design solution, Thakeham suggest that the rationale should be clearly explained within the draft Design Guide. Moreover, Thakeham would note that providing easy access to cars, i.e., locating them to the front of properties, promotes their priority in sites and undermines the focus in relation to sustainability/climate change and the need to promote sustainable forms of transport. Thakeham therefore consider that the focus should be on ensuring better access for pedestrian and cycle use.</p>	<p>- Noted and will review points individually</p>
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75	<p>The space and layout principles give the most concern in the guide. We note the reference within design principle 4.0 that, in achieving an effective use of land, increased densities may be utilised in appropriate locations, and that higher density sustainable developments are encouraged by the Councils. That is a wholly appropriate approach to ensuring that schemes utilise the land available in an effective manner (as is required by NPPF paragraph 199). However, this does not go far enough to meet the requirements, particularly of the South Oxfordshire Local Plan, which requires higher densities in those development on the edge of Oxford in order to optimise the use of this former Green Belt land. This issue was discussed at length in the South Oxfordshire Local Plan Examination, and evidence was presented by a number of parties (including Barton Willmore, that shows densities of greater than 50dph are difficult to achieve, and up to 70dph are not possible to achieve with the back-to-back and 'amenity space' parameters identified in the guide. The Inspector specifically identified in the Examination that the current South Oxfordshire Design Guide (which has the same requirements as the new guide) would become outdated due to the requirements for higher densities on (for example) STRAT 11 Land South of Grenoble Road. The requirement for densities in excess of 70dph are not deliverable whilst complying with the standards set out in the SPD. Proposals that do not 'ensure' the parameters set out in the SPD do not necessarily result in poor quality development. On the contrary, many schemes with smaller back garden lengths and smaller garden sizes, and smaller back-to-back distance than those identified in the guidance have won design awards. Locally, Barton Park is an RTP1 award-winning scheme that does not wholly comply with the proposed design principles. Goldsmith Street in Norwich has also won design awards including the Stirling Prize, and does not comply with many of the proposed SPD requirements. We have attached to these representations an appendix with our evidence to the South Oxfordshire Local Plan Examination. This sets out where examples of development already consented in South Oxfordshire (such as at Great Western Park) do not comply with the guidance; and examples of existing development (such as East Street, Thame) that comprise good quality development, but have small gardens or reduced back-to-back distances. The appendix also provides diagrams that show in order to achieve higher density developments (such as those required by SODC Policy STRAT 11m section 3.iv) will need to contravene the proposed SPD guidance in order to achieve the densities set out by the policy. The guidance should therefore specifically recognise that the proposed 'rural' requirements as set out will not apply to developments delivering the higher densities needed to optimise the use of land in strategic, edge of town (or city) sites, including land south of Grenoble Road, STRAT 11 of the South Oxfordshire Local Plan. Separation Distances SOSP notes the proposed minimum separation distances as set out within the draft Design Guide SPD, which seek back-to-back separation distances of a minimum of 21m between facing habitable rooms, back to boundary distances of a minimum of 10.5m, back to side distances of a minimum of 12m, and front to front distances of a minimum of 10m. We refer to the comments made in relation to 'Space and layout' above, and the attached evidence as prepared for the South Oxfordshire Local Plan Examination. Private / External Amenity Space Where higher densities would optimise the use of the land, and where they are required by policy (for example South Oxfordshire Local Plan Policy STRAT 11, which requires densities in excess of 70dph) the standards will not be achievable in all locations. We refer to the comments made in relation to 'Space and layout' above, and the attached evidence as prepared for the South Oxfordshire Local Plan Examination. Front gardens The wording of design principle 4.14 is unclear. Garden lengths should not necessarily alter in accordance with the street hierarchy (which is required in design principle 4.14). Rather, flexibility should be given to allow for a bespoke response to plot designs (and specifically front garden sizes, in this instance). For example, it may be appropriate to have larger gardens on primary streets where a sense of openness is sought, and on lower order streets, 'mews' style areas may incorporate much smaller gardens (or no garden at all) in order to create a specific sense of character in those locations. Flexibility should therefore be built into design principle 4.14 to allow for front gardens to respond to the site, the sense of character that is being pursued, and the nature of the street typology.</p>	
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76	<p>4. The proposed back to back distance standard of 21m is in 4.3 of the Space and Layout section is supported, but it is considered that some flexibility should be allowed where circumstances mean that privacy concerns could be addressed satisfactorily by other means. flexibility for side to rear is also recommended.5. Concern Is raised in relation to draft clause 4.28 which states that parking courts should be a last resort once all other options have been exhausted. At the same time the guide suggests that a range/variety of car parking solutions are provided, which relate to the street order. Parking courts often provide a clear function for apartments and act to remove parking from the streetscape. It is considered that parking courts can provide opportunities for safe and conveniently located parking for apartments. Good design and landscaping can ensure that they are attractive spaces with opportunities for good passive surveillance</p>	
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Part 8: Design principles

Question 12: Design principles - Built form [Click here to see 'Built form' design principles section in the guide.](#)
If you'd like to comment on them, please use the space below:

	Comment	Council's response

1	<p>Too many words.</p> <p>Too many pages.</p> <p>Too many concepts.</p> <p>Too much everything.</p> <p>Y<u>O</u>u get the idea.</p> <p>The guide is too elaborate and lengthy.</p> <p>Nice concept.</p> <p>Poorly implemented.</p>	<p>- Noted.</p>
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2	<p>- Section 5.35 should read 'has been informed...!' - Points 5.38, 5.33 and 5.32 all say essentially the same thing. - 'Potentially acceptable in principle' means nothing? if something is acceptable in principle its acceptable, or its not. There is no half-way-house The design guide should provide details on set in and drop down distances etc. - The entire section should accord for permitted development rights and development that can be built without planning permission. For example, the two RED box dormers can likely be constructed under permitted development. - The design guide should state where landscape plans and 3d models are required. Also why is it written as 'three dimensional'???- Section 5.62 has nothing to do with design and solely relates to planning policy, should be removed from the design guide. - Development principles of mixed-use development has nothing to do with built form and mostly talks about the location and mix of development rather than its details.</p>	<p>- Noted and will review</p>
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3	Height restriction in line with existing structures should be maintained to preserve the character of an area, therefore also its value and quality of life.	- Noted
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4

1: What is Built form? Do you mean the eventual shape of the structure? If so, say so.2: Predominant Scale and Massing. What?3:Clear Rhythm of Fenestration? Do you mean matching windows? Who came up with "Rhythm of Fenestration"?

Built form is a standard term that encompasses everything 'built' ie the design of all buildings or structures.
Scale and massing are standard term, these relate to the size and bulk of a building or structure in relation to surrounding buildings.
Rhythm of Fenestration is a standard term that relates to the openings in a building's facade.

5	The landmark feature need not be one of the developments buildings but could be some other public building - a pub, church, meeting place, that draws the eye and creates a centre of common activity	- Acknowledged
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6	The build quality will be essential. Proper roof drainage and a strong cement mix will be required as this is where corners are often cut. They look good but damp and mould ensue in a very short timeframe.	· Noted
7	Built form appears to have been abandoned in this area judging by some of the new developments.	· Noted

8	<p>The existing Vale design guide is very clear, and yet in Faringdon we see multiple large developments being approved which skip the guidance . A cursory look at multiple exits and entry suggestions, space for growing food, movement framework, etc. shows there is little point in making new guides, if the implementation of existing guides is so poor. If the same people and processes are at work in the approval process, there is no point in investing in new guidelines.</p>	<ul style="list-style-type: none">- Noted- The new guide will be delivered with training for officers to ensure the guide is more closely followed.- The more accessible online form of the guide will allow greater clarity around expectations and its use as a tool to review development proposals.
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9	all look like little boxes from the 1950,s Get real and use no brick houses with sustainable wood and well insulated structures, which will cost less and use collection of water to recycle and solar panels will save energy	· We cannot insist on this approach but recommend aspects if it as best practice regarding sustainable materials.
10	These are very helpful.	· Acknowledged

11	"Respect the local context". Local context = The neighboring houses are faceless characterless red brick boxes, so please build more faceless characterless red brick boxes.	· We provide information on what the authority expects as regards a 'character assessment'. Where there is a lack of local character applicants are expected to propose a scheme that has its own design merits.
12	See 11.	· Noted

13	I would like to see bungalows in all developments to support an ageing population, and buildings to incorporate nature friendly bird bricks	· This would be established through the preapplication or planning application process.
14	I feel that the renovations of old buildings instead of demolition and rebuild should be favoured as environmentally beneficial as well as keeping some of our lovely local buildings	· We cannot insist on this approach but recommend it as best practice.

15	<p>it is fundamentally wrong to say that an line side extension is not acceptable in principle there are many cases where that will be an acceptable design solutionfigure 42 is far too dictatorial and will be misused and misinterpreted. it does nto flow from the logia of oether elements of the guide.'do what is right for the particlxlar situaion'this section refers to a terracing affect- that only relates to development in towns. detached countryside houses have no danger of terracing. this doesn't even relate to the local context. figure 43 suffers the same problem the red boxes are actually showing two perfectly acceptable design solutions. the lean-to (larger) bieng more appropriate than the top right small green.this is wrng and must go. never before has a design guide stated not acceptable in principle i am gravely worried about this section(dormers i agree with however)the red imge on figure 46 is inappropriate and wrng and fails to recognise context of development. do not use these colours codes so definitively. i can show you bad cases of what you show as green.on shopfront design why not just use the traditional shop front guide that worded perfectly well 10 years ago. However this draft guide does nto distiguish between Didcot and Henley- clealydiffertns sop fronts will work in each case</p>	<ul style="list-style-type: none"> · Noted and will review. · The Shopfront design guide is incorporated within the joint guide, this will be made clearer.
16	<p>concern that the principles may be used by officers without an ability to discern intuitive and skilful design innovation</p>	<ul style="list-style-type: none"> · Noted and will review

17	<p>See above I think there is a missed opportunity by not expanding the non-domestic buildings - there is a photo reference to Milton Park but I think more should be done here. Milton Park has a lot of good features which could be used. Culham may not be the best example of outstanding design but it does have a lot of good points - the use of landscape of landscape is not bad and the way the buildings have been laid out. Sports and community buildings could be mentioned here. The village hall is an integral building in Vale and South and we need to raise the bar with them. Sport England have some good designs you could reference.</p>	<ul style="list-style-type: none"> · Noted and will review. · We will seek to include applicable level of guidance around Sports and community buildings.
18	<p>Should be in keeping with local building traditions - no concrete boxes or "Tesco on the hill" like was built near Ipsden/Hailey</p>	<ul style="list-style-type: none"> · Acknowledged

19	Conversions and extensions must be considered relative to the setting as well as to the individual building.	· Acknowledged
20	<p>Sounds good but the design idea of 'softening the edges of a development where it meets the countryside by spacing further apart and less dense building' is fake idea used by developers to make more money as buildings with nice views over land and more detached sell for more.</p> <p>Design already flawed in Wantage.....see high density blocks of houses/apartments opposite Wantage Firestation. Design and Materials not in keeping with town centre, density of housing too high for tiny area and too high blocking out light and oppressive.</p>	· Noted

21	<p>Comprehensive - thank you, but diversity of structures e.g. roof lines, eaves, overhangs etc, along with unity needs to be encouraged. Many of the drawings provided as examples lack diversity and thus visual interest. I am bored by continual straight lines and continuous symmetry. Diversity, within an overall design concept provides excitement, surprise, a sense of anticipation, wonder - qualities that are so often neglected. PLEASE TRY HARDER!!</p>	- Noted
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22	Biased towards developers, create a summarised version for householders Completely hypocritical. Even where all the design standards on front dormers are followed the planning officers still reject based on their own bias. And yet rear dormers are passed, even where they are visually very ugly and are visible from the street. Nice Front dormers are more attractive than plain roofs, and are more environmentally friendly as they build on the existing footprints	· Noted
23	page not working	· Noted

24	Agreed that good views from properties will improve well-being.	· Acknowledged
25	Would like to see reference to Neighbourhood Plans	· Noted and will review
26	I would like to see more notice taken of public opinion regarding the loom of buildings, after all residents live here whilst designers are just passing through !	· Acknowledged

27	<p>My comments above continue to apply - great words but how will they be measured - examples of great practice elsewhere could be useful</p>	· Noted and will review
28	<p>There is a very small reference to the Chiltern Design Guide not being superseded, but little other reference to materials or how to reflect the local vernacular. I can see that you don't want to re-state everything, but something more is needed to indicate the importance of understanding how materials and forms have been used in the past and how they give particular identity. This is a bit sad.</p> <p>I like the new direction towards simplicity as I do not think that the higgledy-piggledy variation of different house formulae used by many developers constitutes good design. Together with constantly bending streets, this doesn't make for pleasing variety - just a mess!</p>	· Acknowledged

29

Long rows of connected buildings might give more cheaper buildings for the budget but this is boring and does not give the opportunity for individuality and personal place development.

- Noted

30	Use of traditional / reclaimed materials where inserting new build between existing historic buildings or preferably use brown field sites or refurbish/ redevelop commercial buildings to residential	· Acknowledged
31	At last, something relevant for all scales of development.	· Acknowledged
32	Good	· Acknowledged

33	Whether this is achieved is subjective. Currently developers are permitted build 3 and 2.5 storey, houses in inappropriate places	· Noted
34	It might be preferable to write the principles in bullet points and/ or emphasise key words in bold or italics.	· Noted and will review · The design principles are numbered for clarity and reference.
35	More of the same here; helpful and directive to aid the design and build of the structure itself within its immediate surroundings.	· Acknowledged

36	no reference found to the role of neighbourhood plans in built form	· Noted and will review
37	<p>Concerning apartments, visually interesting should not be interpreted as fussy. Clean simple lines are needed. The arrangement of parking bays, visitor parking and bin storage all matter and are included. But provision also needs to be made for charging points for electric vehicles, and for parking for cycles and prams. And I'm not satisfied that personal security at night is adequately built in. 5.35 needs to be cross referenced to the point which I've made above about the rules at 4.11. Rear extensions need firmer guidance. 5.46 needs to say more about harm - for example a tall building north of a bungalow will have a major impact especially during winter months. The light reaching the bungalow is more than just direct sunlight and the indirect light is reduced by a tall building to the north. 5.100 refers to mixed developments. Two matters are not in my view adequately addressed. Firstly business hours for commercial buildings can be very long and the 5 am stock delivery can affect the viability of the dwelling. Secondly active surveillance needs must be met for the residential accommodation as well as for the commercial part. The shift worker coming home at 3 am needs to feel safe.</p>	· Noted and will review

38	It does not apply, as it takes no account of built form in a rural setting.	· Noted and will review
39	Suitably succinct and to the point.	· Acknowledged

40	its this simple do not build houses with short term considerations in mind build a house that will be standing albeit with new this and new that in 500 years time	· We cannot insist on this approach but recommend it as best practice.
41	I like the recognition that it is important to keep ridge lines in proportion with surrounding buildings.	· Acknowledged

42	<p>This section urges applicants to undertake a 'character assessment'. Where a neighbourhood development plan exists, this has already been done! The emphasis placed on the 'wider context of the site' ticks all the boxes that an NDP exists to fulfil...Understanding the area where you're trying to develop, what makes it special, why is it unique, how can this uniqueness or locality be protected and enhanced?? Part of the idea of a design guide like this is that you don't end up with identikit places built by identikit developers - NDP appraisals can help with teasing out local distinctiveness, so a design guide should point applicants to this information, already supplied in the process of creating neighbourhood plans.</p>	<ul style="list-style-type: none"> · Noted and will review · Note; not all areas have an up-to-date NDP or adopted NDP. Some NDP's also lack detail or a robust character assessment. A character assessment as part of a Design and access statement is strongly encouraged by the guide and should refer to the character identified within an applicable NDP where one is present.
43	<p>We have no specific comments to raise in this section which follow well established principles of good design.</p>	<ul style="list-style-type: none"> · Acknowledged

44

Some unfriendly phrases here again, such as ""Note that articulation of massing and roof line can help to present variety along the building frontage."" I have no idea what 'articulation' and 'massing' mean in this context. I'm also not convinced about the sentence ""Apartments, also known as flats, are sustainable forms of development because they increase housing density and therefore reduce the pressure for development on greenfield land."" - blocks of flats are not in themselves inherently 'sustainable'! And custom-built blocks of flats may not be appropriate in all contexts. which is not mentioned at all.

- Noted and will review.
- Apartments their design and use in relation to density and sustainability will be better defined.

45	<p>There could be more content on heritage assets; including the importance of good design in Conservation Areas and how to meet energy efficiency standards in Listed Buildings without harming their importance. It might also be useful to highlight the importance of pre-application advice in this section. It is not clear whether the shopfront/traditional shopfront design section has been lifted directly from the Shopfront Design Guide or whether this now supersedes that document, some clarification in the text would be helpful.</p>	<ul style="list-style-type: none">· Noted and will review.· Additional information will be added to the subject areas of Heritage and conservation.· shopfront/traditional shopfront design has been incorporated within the guide with modification from the previous shopfront guide. The original document will be superseded by the Joint design guide.
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46	<p>Response manually entered, submitted in an email format. For reporting purposes additional text is marked as "xxx" and deleted text as *xxx*. The original submission is attached to this comment form for reference. We recommend the addition of the "Chilterns Buildings Design Guide" Buildings in rural and lower density areas within South and Vale should be integrated into their landscape setting and site contexts in a sensitive manner. Buildings should not be located on ridgelines or exposed sites where the buildings will become a dominant visual feature to the detriment of the existing landscape character. "The introduction of light spill and glare is to be avoided." Chilterns Buildings Design Guidance (This document does not supersede the districts design guide) should be read alongside the districts design guide). Justification. The CBDG carries equal status as a supplementary planning document. Figure 49 - Those images are from Thame. We support the image referring to knapped flint and would be grateful for that to be 'hand knapped flint'. Justification. The use of flint in precast panels is best avoided in most design situations. SODC now, usefully, impose conditions to prevent this, for example the development at Highlands Park, Henley.</p>	<ul style="list-style-type: none">- Noted and will review.- We will consider the weight of guidance and benefit of information provided by the Chilterns SPD in relation to the Districts SPD.
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47	Response manually entered, submitted in an email format. 1. A wider range of the plans for extensions of houses with a variety of existing roof styles would be more helpful, as this is the most common type of building which householders undertake without specialist architectural help, and which needs more support in this Guide.	- Noted and will review
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48	<p>Response manually entered, submitted in an email format. 5. The Design Guide should recognise increased working from home and an increase of commuting perhaps only on several days a week rather than every day. The Guide should consider whether some developments should be laid out with housing near to small office/workshop to reduce travel to work. 10. The Parish Council would query whether commercial development gets included in the Design Guide? E.g. what happens about future possible development, such as a reservoir?</p>	<ul style="list-style-type: none">- Noted and will review.- Commercial development is covered under the guide in mixed-use buildings. This may be extended under non-domestic buildings.
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49	Response manually entered, submitted in an email format. Built Form• The Committee noted that parts of this section are badly written, with spelling mistakes. • ..striving for excellence in architectural quality". The Committee endorses the aspiration but thinks it is unlikely to be realised on current evidence.	• Noted and will review
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50

Can we camouflage solar panels into the built environment? I have no idea how, but I'm recalling mobile telephone towers made to look like trees. Security fencing and lighting needs to be appropriate in renewables development. Keeping residents safe and not annoying them with unnecessary light pollution. In the guide, I think this section is particularly beautiful.

· This comment raises issues that fall outside the scope of the design guide.

51	<p>Goal, first paragraph, please add: and play their part in reducing the carbon footprint of the district. Final paragraph' after 'explain why your solution is better', add -- and how your design will achieve a reduction in carbon footprint. Principle 5.6 after 'parking area or public space', add -- unless these are designed to be living walls. Goal for Householder extensions and outbuildings. Please change to: --To achieve extensions to dwellings, insulation of dwellings and measures to reduce the carbon footprint of dwellings that respond to the needs of the occupants in a way that is sensitive to the character of the original dwelling and street scene. Add explanation: Many householders will recognize their responsibility to respond to the climate emergency by insulating their homes and taking steps to reduce their carbon footprint. Measures to adapt existing homes will be considered even if they may change the external appearance of the dwellings.</p>	<ul style="list-style-type: none">- Noted and will review- Some of these aspects are covered under the Climate and sustainability section of the guide.
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52	<p>General principles - "good contemporary design that respects context will be welcomed" - this is ambiguous, and should also be considered in relation to specific locations. General principles - conflicts between zero carbon and other design principles - very ambiguous and no clarity on what is the priority. 5.18 - individual entrances on ground floor - should say where possible. 5.105 - Materials - There are ongoing industry-wide issues with material availability across the country. A shortage of supply results in higher costs, and some of the aspirations could impact deliverability of schemes (in terms of programme and viability).</p>	- Noted and will review
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53	Design needs to achieve a sense of particularity of place. It should not be a pastiche of new building elsewhere. Least of all, should a community be indistinguishable from many others created in other parts of the country. Sculpture in public places, too, should respond to and reflect the identity of the neighbourhood, and not be something which could be put just anywhere for no particular reason.	· Acknowledged
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54	<p>This section is both poorly written and is bad advice for sustainable building design. It is the weak point in this design guide. It is clear that who ever wrote this, has little idea of building physics nor passive design principles. The way a building looks is in any event very subjective and all this does, is to promote the development of "mock Tudor" type buildings with silly detailing (fake chimneys, twee dormers, bit of wood painted black and fixed onto external cladding etc) that add cost but do nothing for promoting sustainable design. Vauban, the renown zero-carbon, solar-powered, car-free suburb of Europe's most sustainable city, Freiburg, doesn't look anything like the historic city centre and for good reason. It was designed and developed for the community, by the community for present day zero carbon livelihoods.</p>	<ul style="list-style-type: none">· Noted and will review. There is a balance between the character, design, construction and the sustainability of a building. The guide does not seek to dictate character but provide design guidance on the composition of built form in relation to its context.· Design guidance on the incorporation of passive and active design approaches for sustainability are included in the 'climate and sustainability' section of the guide.· Some sustainable schemes have a different appearance to their local context, the balance of appearance and sustainability has to be considered among other design and planning factors.
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55	<p>ABOUT THE CHAPTERFORMATTING: Needs a chapter number for reference. Could an interactive mini contents list be included under each chapter title/heading for easier navigation, to avoid scrolling? Principles should really be first, and then follow up with explanation text, diagrams and helpful links below. GENEAL BUILT FORMFORMATTING: Needs a chapter/subsection number for reference. Officers liked the inclusion of the Principles box at the top of this sub-section. [5.12]</p> <p>BALCONIES: Really appreciated the reference to balconies with space for table and chairs and for planting/kitchen gardening. Should this wording and accompanying drawing proposed also be included in Para [4.47]? Also wonder whether this wording [5.12] should actually be included in the principles for APARTMENTS.</p> <p>APARTMENTS ~ FORMATTING: Needs a chapter/subsection number for reference. Officers liked the inclusion of the Principles box at the top of this sub-section.[5.12] BALCONIES: Should the wording for this bullet point, and proposed drawing, actually be included in the principles for this section?[5.19] AMENITY STANDARDS Link needs to be inserted for Para [4.11] , or amenity standards specified in the wording of this principle HOUSEHOLDER EXTENSIONS AND OUTBUILDINGS ~ FORMATTING: Needs a chapter/subsection number for reference. Officers were concerned that there was a lot of information under this sub-section. Would it be possible to separate Householder extensions into a separate section? Or could the JDG have the general householder extensions principles under the BUILT FORM chapter, as it is currently, but then list "Side Extensions" "Rear Extensions" "Front Extensions" etc. in bullet points underneath, with separate linked webpages for each (as a way to break it up more)? MORE VARIED EXAMPLES NEEDED: Officers asked for more successful examples/diagrams of smaller schemes, e.g. nursing homes, or more rural schemes. A lot of examples/diagrams provided are of town-based examples – so more examples relevant to the varied sites that we deal with would be good.</p> <p>HYPERLINKS NEEDED IN THIS SECTION: If the principle wording does not specify standards, there needs to be a hyperlink back to the relevant sections within the JDG for forestry / drainage / parking / amenity / ecology guidance. [5.24-5.38] "HOUSEHOLDER EXTENSIONS" – Officers suggested that this title be renamed "General Design Principles" before moving into the following subsections for the Side/Rear/Front Extensions . Or that the current Principle box for the general design principles is moved to the top of this section; so that it is underneath the section heading for "Householder Extensions and Outbuildings". [5.24-5.33] PARKING STANDARDS: For someone who is just looking to extend their property and has not thought to look at the rest of the design guide - Officers suggested that wording about the parking standards is included in the general principles here. For example; "maintains a sufficient level of well-integrated parking provision, in accordance with Oxfordshire County Council guidance"? A hyperlink could then be provided back to the relevant part of the design guide? [5.37] DISTANCES SPECIFICATION – These specs don't seem to match up with the distances specified under Para [4.3] in SPACE AND LAYOUT. Could a link be provided back to the specs of [4.3], or the same wording reiterated here to avoid back and forth/scrolling. Terminology should also match up (e.g. flank walls/side elevations etc.). Officers expressed preference for use of 'side elevations'. [5.33/5.38] 45 DEGREE RULE (& BRE Guidance) - Could the wording under para. [5.33] be changed to say; "demonstrate that it will not result in the significant loss of light (as determined by BRE calculations where deemed necessary)"? Officers had concerns with the inclusion of "set out within the BRE guidance" for para. [5.38] and recommend this is removed. The concerns stem from how this would be applied/ assessed/ the detail required to be included in every delegated report. Generally we don't apply other sections of the BRE to householder development – it is recommended that if the BRE guidance really needs to be referenced here, that the relevant section of the guidance is isolated and a link provided to it under this section. 45 DEGREE RULE DIAGRAM – Officers thought that the positioning of this was confusing. The diagram should be placed after the first written reference of the 45 degree rule is made within the principles box for "HOUSEHOLDER EXTENSIONS" Para. [5.38]. Could the wording on the diagram be updated to say "No [two-storey/multi-storey] extension should go beyond a 45 degree line taken from the centre point of the nearest habitable room window". This is because single-storey extensions can often be done using a householder's permitted development rights. SIDE EXTENSIONS ~ FORMATTING: Needs a chapter/subsection number for reference. Principles should really be first, and then follow up with explanation text, diagrams and helpful links below [5.40] SUPPORTING TEXT: "it should be set back at least one third of the depth of the dwelling." – principle wording says "significantly set back" -it may be good to make the wording between the principle and the supporting text consistent? [5.41] GAP TO BOUNDARY: does this apply to all extensions? Officers are mindful that permitted development could negate this guidance. Additionally, SUPPORTING TEXT states 1.2 metres should be the gap to the boundary, but the principle wording says 'not less than 1 metre'. Officers recommend that one value is chosen</p>	- Acknowledged
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<p>for consistency. REAR EXTENSIONS ~ FORMATTING: Needs a chapter/subsection number for reference. Principles should really be first, and then follow up with explanation text, diagrams and helpful links below [5.47] DISTANCE SPECS – The wording on distances previously written under para [4.3] should really be specified again here for the avoidance of doubt, or a hyperlink provided back to the relevant section [5.48] 45 DEGREE RULE – consistency needed with wording seen on diagram and under para [5.38]. It should be made clear that the 45 degree rule [as in 5.48] applies to two-storey (multi-storey?) extensions, and not to single-storey extensions FRONT EXTENSIONS ~ FORMATTING: Needs a chapter/subsection number for reference. Principles should really be first, and then follow up with explanation text, diagrams and helpful links below [5.49] – EXCEEDING NEIGHBOURS PRINCIPAL ELEVATION - The second to last sentence "Front extensions should not exceed any neighbouring dwellings principle elevation" is unreasonable and should be removed. Officers suggest this taking into consideration the relationship of many terraced/ semi-detached properties and what can be achieved under permitted development within a homeowner's curtilage. Officers can judge this on a case by case basis.[5.49/5.50/5.51] REWORDING OF PRINCIPLES – it is recommended that the principles for FRONT EXTENSIONS are reworded along the lines of the following so that each principle addresses 'design', 'neighbouring impact' and 'parking'? :- ""5.49 Front extensions will be resisted where they have a significant impact on the street scene or are damaging to the appearance of a dwelling. Modest front extensions that reflect the character of the existing property are more likely to be acceptable. Large, flat-topped porches should be avoided. Where the building line is staggered or where the dwelling is set well back from the road, front extensions are more likely to be acceptable""5.50 When located close to a neighbouring property, front extensions should not have a negative impact on the amount of light afforded to that property, nor should it have an overbearing impact. ""5.51 Front extensions should not reduce the space available for parking below adopted standards outlined within Oxfordshire County Council Guidance [INSERT HYPERLINK HERE TO RELEVANT SECTION IN 'SPACE & LAYOUT'?] ""LOFT CONVERSIONS AND ROOF EXTENSIONS FORMATTING: Needs a chapter/subsection number for reference. Principles should really be first, and then follow up with explanation text, diagrams and helpful links below[5.52-5.53] REWORDING OF PRINCIPLES – it is recommended that the principles are reworded along the lines of the following?""5.52 Dormer roof extensions must be set within the roof slope. They should be designed as features principally to provide light and ventilation, and should sit well above the eaves line, well below the ridge line and should be set in from the gable ends. Dormer windows should not just be used as a means of generating additional headroom. ""5.53 The size, pitch and ridge height of dormers should be informed by the character and appearance of the existing building, and the local vernacular. The chosen design should complement the rhythm of the existing fenestration and roof pitch. The position and proportion of dormer windows should respond to existing windows and doors. Single, large flat roofed, box dormers must be avoided. "" ?GARAGES, ""ANNEXES"" AND OTHER OUTBUILDINGS ~ FORMATTING: Needs a chapter/subsection number for reference. Principles should really be first, and then follow up with explanation text, diagrams and helpful links below. **Officers recommend that 'Annexes' are included in the heading of the section. DIAGRAM – Officers commented that the drawn traffic light diagrams could be confusing where the orientation of the garage/outbuilding is shown as green, and the label says 'No domestic features' with a greyed out dormer. It is recommended that this label is just included once on the first red "Not acceptable in principle" diagram - and is removed from all the diagrams where we have indicated in green that the design of the proposal is acceptable. RURAL AND LOW DENSITY DWELLINGS ~ FORMATTING: Needs a chapter/subsection number for reference – and to more clearly separate it from 'Householder Extensions' Principles should really be first, and then follow up with explanation text, diagrams and helpful links below. **Officers were glad to see reinclusion of the principles for this type of development, thank you!BUILDING CONVERSIONS ~ FORMATTING: Needs a chapter/subsection number for reference. Principles should really be first, and then follow up with explanation text, diagrams and helpful links below. *Officers recommend that the title of this section is simplified to Building Conversions. GUIDANCE NEEDED ON CONVERTING MODERN BUILDINGS – Officers commented that more design guidance/best practice principles are needed on the conversion of more modern buildings, as well as the more traditional; "Vernacular" vs "Non-Vernacular" buildings. Increasing numbers of applications are coming in for this now, with permitted development fallback. Photographs/examples of where this has been done successfully would be greatly appreciated. SHOPFRONTS ~ FORMATTING: Needs a chapter/subsection number for reference. Principles should really be first, and then follow up with explanation text, diagrams and helpful links belowCHOSEN PHOTOGRAPHS: Officers expressed disappointment that a lot of the photographs</p>	
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	<p>were based in South. Could more Vale District examples be included? Officers believe that the photographs of the Prezzo may actually be in Henley, not in Wallingford as annotation suggests. DIAGRAMS: Officers found the diagrams of the shop frontage terminology really useful. NON-DOMESTIC BUILDINGS ~ FORMATTING - Needs a chapter/subsection number for reference. Principles should really be first, and then follow up with explanation text, diagrams and helpful links below PHOTOGRAPHS – Officers commented that photographs of buildings in shade were difficult to appreciate. [5.89] USE OF JARGON - Reference to B2 and B8 uses, which should be explained as this is technical jargon. Perhaps this could be included in the glossary. *Officers thought that the specification of the use classes may need to be caveated in some way as Central Government have made changes to the use classes over recent years with little warning. MIXED-USE DEVELOPMENT ~ FORMATTING - Needs a chapter/subsection number for reference. Principles should really be first, and then follow up with explanation text, diagrams and helpful links below MATERIALS, MAINTENANCE AND MANAGEMENT ~ FORMATTING - Needs a chapter/subsection number for reference. Principles should really be first, and then follow up with explanation text, diagrams and helpful links below **Officers believe that this sub-section should be at the beginning of the BUILT FORM chapter. INCLUSION OF APPENDIX 'E' AREA ZONING AND MATERIALS - [FIGURE 54] shows some photos of materials? – but Appendix E of the Vale's Design Guide 2015 – 'Vale of White Horse Character'; Material Palettes was more detailed, area-specific. It was frequently used. Is there a way to incorporate this and the equivalent within the South Ox Design Guide into the JDG for new development?</p>	
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56

Clearly set out. This section lacks a reference to the importance of preserving the character and appearance of the existing built environment, including such issues as light and noise pollution that have a far greater relevance in a rural environment.

- Noted and will review

57

The 'built form' design principles that have been set out within the draft Design Guide SPD appear to be appropriate, and are clearly written and unambiguous.

- Acknowledged

58

Again neighbourhood plans. No mention of loss of light for PV cells.

- Noted

59

This section includes sub sections on small extensions etc (as referred to in our earlier responses) . These are somewhat hidden away and we wonder if it would be sensible to have an entirely separate Design Guide for such developments so as to facilitate the clear distinction and different approach.

- Noted and will review

60

Please refer to submitted representations.

- Noted

61

It's not particularly helpful to say materials should be attractive or built to last. What does this mean in practice? Volume housebuilders prefer cheaper and more plentiful concrete products to more durable natural materials such as slate, stone and clay tiles which are often better suited to context. How do you resolve the sustainability impacts of natural materials?

- Noted and will review

62	<p>Response manually entered, submitted in an email format. It would be really good to see in the final version some more details on specific features that can support different people's needs in the built environment - potentially through the use of case studies from the perspective of the person. From a design perspective, there are great opportunities when developing a design guide to flag the range of needs that different societal groups (e.g. age, race, gender, caregiver status, physical and mental ability/disability) have and the issues that can arise for individuals in the built environment, and then provide tangible solutions.</p>	- Noted and will review
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63	<p>Response manually entered, submitted in an email format</p> <p>General principles Goal: Respect the local context whilst striving for excellence in architectural quality and sustainability. This section contains the text 'Note that in order to design a building to be as energy efficient (as close to zero-carbon) as possible this may result in conflict with other design principles in this Design Guide. When this occurs, be prepared to explain why this happens and explain why your solution is better'. Amendment suggestion: We strongly recommend that this be altered to emphasise the overriding need for carbon neutrality and reads 'When this occurs, be prepared to justify why carbon neutrality has not been obtained.'</p> <p>Design principles - Apartments No mention is made of letter boxes or provision for parcel drops – an increasingly important consideration as internet shopping continues to increase. No mention of provision of natural drying facilities for washing, important to tackle climate change & reduce energy consumption. Amendments suggested. Designs must include provision of letter boxes & area for parcel drops. Designs must include provision of natural drying facilities for washing.</p> <p>Householder extension & outbuildings – Side Extensions Paragraph 2 line one should read 'where extending' not 'were extending'. Design principles - loft conversions and roof extensions 5.54 requires that 'Roof lights should be used sparingly and where they are less likely to be visible in the street scene'. This ignores the contribution of roof lights to light pollution and should, therefore, require that special glass be used to reduce light pollution.</p> <p>Garages and outbuildings Paragraph 1 should read 'general principles' not 'genal principles'. We welcome the inclusion of the guidance on Annexes.</p> <p>Rural and low-density dwellings Goal: Maintain a balance of local character and new development This is intended for hamlets or small clusters of dwellings within the open countryside. To encourage developers to make more efficient use of land we suggest this be reworded to "This is ONLY intended for hamlets or small clusters of dwellings within the open countryside" We also note that in many hamlets there are clusters of high density former rural workers cottages & former local authority housing. If a hamlet contains such developments, developers should be encouraged to emulate this model thus providing lower-cost homes and reducing the land take.</p> <p>Design principles – Building conservation & conversions 5.70 should read 'a building's adaptation' not 'a buildings adaptation'. Traditional shopfront design principles 5.81 should read 'for people including those with' not 'for people including with'. 5.82 The guidance seems to accept that towns and villages will be lit all night. Strongly recommend that the design requires such lighting to comply with measures aimed at reducing light pollution. We note that hours of lighting can be imposed through conditions applying to any planning permission but if measures can be taken to design-in the limitations then this reduces the need to rely on human behaviour. 5.82 should read 'late-opening' not 'late opening'.</p>	<p>- Acknowledged</p>
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64	<p>Rural and low density dwellings Hamlets and other clusters of dwellings are listed in the SODC LP2035 as 'Other Villages'. For clarity the term 'Other Villages' & the equivalent term in the Vale LP should be used in this guide. The guide should make it clear that many 'Other Villages' may contain high-density dwellings such as former farm workers cottages e.g. Clare Cottages (OX9 7HQ) and Portabello Cottages (OX49 5HU) and therefore, efficient use of land is encouraged on within these settlements, for example, Farm Place, Henton, OX39 4AD - P90/N0765</p>	<p>We make clear reference to the settlement hierarchy for both South and Vale. It is not the guides purpose to specify densities within specific locations.</p>
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65	<p>Response manually entered, submitted in an email formatAdmin note, the pictures referred to below are attached at the end of this form. I spotted the following error in the captions. In the pictures from below – it's in the shopfront bit I think - the images below are labelled Wallingford but both are actually Thame. Just FYI. I don't know how you feel about the two images that go with the descriptions marked with X's but I've got a few generic sample materials photos that might fit with your captions better? This is kind of near the bottom of the built form bit I think. Just a suggestion. I've attached a couple of pictures that might fit better. The ones named samples are from a DIS app submitted by an applicant so aren't pictures I have specifically taken but they are pretty generic. Give me a shout if there are others you need, we might have something that fits.</p>	- Noted
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66

"" Support your design"": Missing Neighbourhood Plan design policies again!

- Noted; whilst it is important to refer to neighbourhood plans. It will not be best practice within the guide to add 'refer to neighbourhood plans' under each 'support your design' subsection.

67	<p>Response manually entered, submitted in an email format. The design principles – general built form, are understandably high-level, and set out a range of broad considerations that will apply to most types of development. Towards the end of Section 7, there is guidance headed ‘Mixed use development’. We would suggest that the heading for this section is amended to ‘Mixed use centres and Neighbourhood Hubs’ as that is what the content of this section seeks to address, rather than mixed use development more generally. There will of course be mixed use development in the two District areas that is not part of a mixed use centre or community hub, and it is important therefore that the intended application of this section of the Joint Design Guide is made clearer. By way of example, the delivery of mixed use development may be aligned with main infrastructure corridors, which is a different form of mixed use development to that addressed in this section of the Joint Design Guide. We are not proposing that there needs to be a further section in the Joint Design Guide, as many of the principles outlined in the document will be relevant to mixed use developments that are brought forward outside of Mixed use centres and Neighbourhood Hubs, and it would be unworkable for the Joint Design Guide to seek to have a section covering every potential type, form and mix of development.</p>	- Acknowledged
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68	<p>In particular, the Built Form chapter seems to explicitly ignore its suggestions. The Climate and Sustainability chapter mentions: Siting / Orientation as a Factor to consider and Figure 58: sensibly illustrates Combining active and passive design approaches can reduce the carbon emissions of a dwelling, and the design principles include the use of renewable energy technologies to reduce the site's conventional energy needs; and demonstrates the use of solar technologies on roofs for applicable minor development of all types; There is no sign of this in the Built Form chapter. In fact the illustrations there seem devoid of any consideration of climate issues - not a solar PV or thermal panel in sight! The comments on roofs obviously have no thought for designing buildings to have south facing roofs to accommodate solar panels where possible. As you may know, we have a LOT of new development in Benson. I am getting surprised comments from local people that none of the new dwellings have solar panels on their roofs. Nor do they have heat pumps. Just more new gas mains. (Because planning permission for these was granted sometime ago, mostly before I got back on the council). To say the least, this is very embarrassing. The sections on extensions appear to totally ignore issues of good thermal insulation. The green illustrations almost look to me the least energy efficient designs you could come up with! I am sure this is not intentional but I would appreciate a discussion on the Built Form chapter please and on its illustrations in particular before the next edition comes out. (Nothing to do with climate but I am pretty sure that in Figure 49: Traditional shopfronts along street, the top right photo is not Wallingford - looks more like Thame to me but I stand to be corrected)</p>	- Noted
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69

Bloor Homes has not comments on this section of the guide.

- Noted

70

Please see submitted letter for full comments.

. The principles outlined in the design guide are applicable to all scales of development, urban and rural.

71	<p>There is a strong tendency in the guide towards urban forms. S.Ox and Vale have a lot of villages where a difference in scale, materials and the use of vernacular forms are key issues. Why doesn't the guide address these as equally important? Many villages are happy to encourage small-scale development and infill of the right form and quality, but this is barely recognised in the guide.</p>	<ul style="list-style-type: none">· Noted and will review· Zero carbon in construction and operation – is a holistic consideration and would not be predicated on a single housing typology.· Sustainability must be considered in relation to overall design.· The majority of extensions are too small a scale to negatively impact nature at a scale where green corridors are considered.· Extensions would be expected to meet the criteria of building regulations.
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72	<p>Zero carbon in construction and operation - not sure why this should be in conflict with other design principles. It lends itself well to sociable terraced housing (only two exterior walls), and flats. Compactness and density should be achieved to reduce land-take. I wish we would replicate the beauty of the facades of older buildings, with their intricate detailing and colours. In Wallingford we have lovely brick colours "overburnts" and white and red bricks patterned together (Reading Road) and use of flint. Vertical gardens - great idea! We have a climate emergency and must insulate our homes better. In some cases that will require external wall insulation, at the front of the building, and air source heat pumps at the front of the building. These should be allowed don't you think, even if they spoil a line of similar buildings? How can nature be protected when extensions are built? Could it be advised that green corridors should be maintained? I have made energy assessments of lovely old buildings that have received enormous modern extensions at their backs. The people then live in the rear extension and never venture again into the front part. Please emphasise that extensions should in themselves be zero carbon, and that full retrofit should be made to the older parts of the buildings. Triple glazed roof lights should be used, as heat loss is greatest at the roof. Triple glazing should be encouraged everywhere, even when it differs from existing fenestration (5.65). I don't understand 5.72. "allowing significant spaces to remain open" - not sure what that means. Cornerstone Arts Centre is not a good example of a building 'designed appropriately for their function'. It is too small to act as the concert venue intended.</p>	- Noted and will review
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73

Bulkit form should reference the most locally specific policiues as a starting point - these are often to be found in Neighbourhood Plans - reference to which seem to be absent from this proposed design guide

· This comment raises issues that fall outside the scope of the design guide.

74

Lighting again - follow guidance from ILP and AONB.

- Noted and will review points individually

75	<p>Response manually entered, submitted in an email format. Design specifics</p> <ul style="list-style-type: none">• The guidance on back-to-back, back to side and front to front distances are welcome, although disquiet was felt at the reduction of back-to-back distances from the previous guide. No reason for the reduction has been given.o However, the development adjacent to or above single-story elements that are faced by a frontage have given rise to considerable concern and neighbour disputes. A front-to-side distance is required, or exceptionally clear guidance on gable / roof heights, windows, glazing, etc. Examples of where front-to-side distances caused issues can be given.• The EV charging standard for shared, community courtyards was felt to be inappropriate as the same standard (two EV points) would appear to apply to communal parking regardless of the number of units that are served.• References to the 45-degree rule in Figure 41 do not explain that this can be applied vertically, as well as horizontally.• Side extensions – The gap between an extension and a boundary is, in paragraph 5.41 recommended to be "no less than 1 metre wide" yet in the introductory text above the minimum is given as 1.2 m wide. This requires clarification or standardization. <p>Other observations</p> <ul style="list-style-type: none">• The first photograph supporting the shopfront design guide section "Traditional shopfronts along street" is from Thame, not Wallingford.• It was felt necessary for the user to be able to enlarge all of the more complex diagrams, many are currently locked to a size limit presumably due to resolution concerns (e.g., the Landscape Character Map, Figures 3, 8, 20, etc.).• Autocorrect appears to have inserted some alternative words, a sense check is required, for example there is reference made to "loft conversations"!	<ul style="list-style-type: none">- Noted and will review points individually
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76	<p>Response manually entered, submitted in an email format. Built Form General comments</p> <p>This section is much longer than the others – could this potentially be broken up into separate sections to avoid so much scrolling? E.g. Design principles for householder extensions would make a good separate section, as would materials. We understand if this is not possible at this stage.</p> <p>Figure 38 – these homes are shown only as detached. We understand that it is showing an example of a low-density development, but we don't want to convey that low density only means large detached dwellings, as it could also include semi-detached and terraced buildings.</p> <p>If you had more time which we know you don't – We'd like to see another section with advice on how to densify the suburbs – with drawings on what kind of development we'd support in areas of different character e.g. Victorian terraces, 30s suburbs, 60s housing estates etc. so that we encourage gentle densification (we could perhaps explore this is for the future for the joint local plan) Apartments</p> <p>5.22 – We think it should be mentioned that the cycle parking should be well designed/attractive</p> <p>Figure 39 – this image appears more reflective of a very urban environment such as Manchester or Liverpool in its scale/massing/design, there are no trees etc. Understand its purpose is to show design principles, but is there any way to make it more reflective of the built environment in south and vale?</p> <p>Extensions</p> <p>It appears here that the 'householder extensions' element is the overarching design principles for all household extensions, and then there are further design principles depending on whether it is a rear, front or side extension, and these are set out below. However, there is no distinction visually or in the text between these to indicate that they are linked – think it would be helpful if there could be more of a distinction throughout the guide where design principles link like this. Maybe having them in a different shade of the main colour, or having the 'leading'/overarching' design principles title in bold? So it is easier for those who need to meet this criteria to easily see which elements apply to them, i.e. if they are building an extension they'd know easily that they need to look at the overarching extension principles and then the more specific criteria that relates to the siting of the extension.</p> <p>Figure 41 – think it would be helpful clearly labelling this drawing as being 'shown from above'.</p> <p>Sometimes the 45 degree rule also has the 25 degree rule applied – has this been considered? I.e. 45/25 degree rule.</p> <p>Figure 42 – the key on the left should be moved so it sits under the figure, it would be clearer this way.</p> <p>Non-domestic buildings</p> <p>5.91 - think it would be useful to state 'including attractive, convenient and safe cycle parking', instead of just 'cycle parking', just to really emphasise what is meant by that. Or provide a link to the area which describes how cycle parking should be.</p> <p>5.93 – would making their design simple/limit the geometric forms not emphasise the size/bulk of the building? We would have thought we would encourage what has been done in 5.16 and try and reduce the bulk of the building by breaking it down into components</p> <p>Rural and Low-Density Dwellings</p> <p>Think we need to be really carefully with what we are promoting in this section of the guide. We need to be encouraging the efficient use of land as this is required by paragraph 124 of the NPPF. The section is intended for hamlets or small clusters of dwellings within the open countryside, however design principle 5.56 refers to 'over-intensive housing development' - according to both of the Council's Local Plans housing development would not be acceptable in principle in these locations unless it meets specific criteria – these needs to be clarified.</p> <p>This section may be more appropriate to be used to guide development in smaller villages, to reflect that the design approach for Didcot/edges of Oxford, won't be appropriate in for example Woodcote or Uffington. Recommend deleting 'This is intended for hamlets or small clusters of dwellings within the open countryside.' And replacing with 'Development in hamlets and within the open countryside is strictly controlled by government policy and local plan policy. This section is intended for rural villages and the countryside'.</p> <p>Could more principles be added here? i.e. design to minimise light pollution, recommendations regarding boundary treatments, colour/materials? If this is covered in another list of principles maybe this should be clearer.</p> <p>5.58 – are we sure we want to allow front driveways here? We would also consider that the Design Guide needs to provide more guidance on how higher density development could still be designed to reflect the plot size and prevailing character of lower density areas if done creatively/well.</p> <p>The reference to the Chilterns Buildings Design Guidance states '(This document does not supersede the districts design guide)'. Suggest these words in brackets are deleted as it potentially devalues the Chilterns Design Guide and it is hopefully clear that the most recent design guide would hold the most weight in decision making.</p> <p>Materials</p> <p>Would be good to cross reference to these Technical Notes for the Chilterns AONB: Chilterns Flint (1.98Mb) Chilterns Brick (2.85Mb) Roofing Materials (2.77Mb)</p>	<ul style="list-style-type: none"> - Noted and will review of relevant exxmaples. - Noted and will review further infoamtion on examples of permitted development were to be included
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77	<p>Response manually entered, submitted in an email format.NEED FOR RELEVANT ILLUSTRATIVE EXAMPLESWith regard to the contents of the draft guide it is considered that illustrative examples of successful solutions for the integration of parking spaces and car parking areas across different densities of residential development would be helpful.With regard to extending and altering existing buildings it would be helpful if examples of permitted development were to be included or cross reference to the Planning Portal's 'interactive guides' were to be included. The design guide could include preferred design solutions which differ from those possible under permitted development rights, but failure to acknowledge that permitted development rights exist and where guidance is available, could result in confusion and a lack of confidence in planning guidance.</p>	<ul style="list-style-type: none">- Noted and will review points individually
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78	<p>Response manually entered, submitted in an email format. Paragraph 5.3 of the draft Design Guide requires schemes to "break down larger footprint buildings to comprise a number of simple, geometric forms to reduce their apparent bulk. Floor plans that necessitate flat roof sections should be avoided". Thakeham firstly consider that this is too prescriptive, however Thakeham also consider that it directly conflicts with paragraph 5.14, which states schemes should "incorporates green and/or brown roofs/roof gardens on flat roof buildings and vertical gardens. Building design should seek to integrate biodiversity enhancements wherever possible. These could be through the provision of green walls/roofs, or faunal features (bird/bat boxes). They can be discretely incorporated into structures, or made into focal points, and will contribute to the need for development to deliver biodiversity net gain". It would be difficult to comply with this requirement if larger footprints and imperatively flat roof sections are resisted. Thakeham consider the councils should therefore be clear on how these requirements are designed to be interpreted. At paragraph 5.11 of the draft Design Guide with regard to materials, it states that a scheme should use "materials that are sustainable and have been informed by the character and appearance of the surrounding area". Thakeham consider that further guidance is needed to understand what the councils consider to be 'sustainable materials'. For example, reference could be made to BRE Green Guide, BES 6001, or simply expanded to state that materials chosen should be based on a consideration of their impact across their lifecycle, balancing social, economic and environmental considerations in making responsible procurement decisions, to deliver long-term sustainable solutions. Paragraph 5.23 requires refuse areas to be provided within the main buildings of apartments 'close to main entrances'. Thakeham disagree with this approach and do not consider that an internal bin store is best placed close to the main entrance of the building, due to obvious conflicts that may arise in relation to odour and disturbance, and consequently not being desirable to the end user.</p>	<p>· We cannot insist on this approach but recommend it as best practice.</p>
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79	<p>GOAL: mixed use development or neighbourhood centres should be design as a focus for the community. There is an opportunity in this section to recognise the changing nature of large new developments as they emerge and evolve over time. Recognition should be given to the ability of meanwhile uses to assist in generating vitality and helping to grow communities and social capital (social connections and community wellbeing). OSVP suggest: -(*remove text*) *The* Development should *ensure* explore opportunities for: -5.97 ...5.103 provide meanwhile uses in emerging or evolving development areas, to maximise the short-term opportunities available to create new places, activities, social and economic functions.</p>	- Noted
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80	Response manually entered, submitted in an email format. General Principles Figures 35-38 potentially contradict with Design Principles - Parking Para. 4.28 in that each of the scenarios shown would require rear parking courtyards.	- Noted and will review points individually
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81	<p>Response manually entered, submitted in an email format. Specific points</p> <p>Built form and Apartments: We like the points about massing and avoiding flat roofs, room depths, having natural daylight and ventilation etc. These are particularly useful when considering apartments, could they be included here too?</p> <p>Materials: We do not want to encourage a huge variety of materials (see Persimmon development in Grove), keeping the palette simple in the local vernacular is more appropriate. The design guide is focussed on urban design yet most of the district is rural and we need to ensure the local vernacular is emphasised. MMC: Is MMC appropriate for all development, maybe this needs to be tailored to a specific scale of development and would not be appropriate in sensitive areas? (Para 6.11)</p> <p>Garages: Generally, we would prefer garages set more forward, rather than as illustrated (Fig 29). This will provide more animation to the street scene, waste storage could be brought through garage or provided in waste storage at the side of the building or even possibly at front (additional guidance on this welcomed). Single garages set back between houses look particularly awful.</p> <p>Conservation / Heritage: A section on conservation, heritage, including registered parks and gardens would be necessary to assist officers working on schemes in those more sensitive locations.</p> <p>Distances: The distances between 3 storey dwellings, or where there is a change in levels of gardens etc needs to be more than 21m. Orientation also needs to be considered. The diagram does not represent what we would require. We suggest that where there are level changes the distance needs to be increased to at least 25m, maybe more if there is shadowing. Similarly, the flank wall to rear should be increased where there is a 3-storey development/ level changes, at least 15m or more if shadowing. So there would be a differentiation between various building heights. This is something that has been successful in achieving good design on major developments elsewhere. Happy to talk through this point.</p> <p>Amenity space: There is an inconsistency with 1 bed dwellings and apartments. For apartments it is currently suggested that 40 sq m per dwelling is to include private amenity space (e.g balconies or ground floor terraces which can accommodate a table and chairs) and communal space. Should 1 bed dwellings be at least 40sqm? For flats and apartments we would seek clarity on this point and suggest a minimum amount of private amenity space should always be required (in balconies or ground floor gardens), with the remainder provided in communal space. It is currently worded in such a way that developers/applicants could argue all of the required amenity space can be provided in a communal space. It is important to emphasise that communal-amenity space should be accessible, and useable, this is cropping up with apartments / elderly persons accommodation in particular. Design guidance on how to achieve this would be welcome – for example by avoiding awkward shapes and sizes, convoluted routes through developments and dominance of parking and roads. Verges would not be communal amenity space for example.</p> <p>Play Areas: Please can we advise in the guide that the design of play areas should be accessible for children who are disabled and that appropriate equipment and experiences are available? On a strategic site with a community building, we should also ensure that toilets are accessible / available near to play areas for children who are disabled.</p> <p>Public Art / public realm: There is no longer a policy in the SOLP, but we want to ensure that public art, improved public realm can be achieved, particularly on larger major sites. Does the design guide cover this? Perhaps this could be included as part of a commentary/design principles of the design of shared amenity space.</p> <p>Movement: Cul de sacs are very popular (quieter, children play in street etc) - can we add an extra caveat saying cul de sacs should be avoided unless there is pedestrian connectivity that is safe, does not lead to the dominance of hard standing, parking courts and visitor parking and the area has surveillance?</p> <p>Solar Farms: At a meeting I had with Cabinet member and Adrian there seemed to be some expectation that the new design guide would cover solar farms. We don't recall anything included of that nature? Solar PV appears to be covered in the climate change section but only on dwellings. We are also not clear at this point what could be included with respect to solar farm design so this may need further input from various officers who would be happy to assist.</p> <p>Waste: Our waste team have their own guidance for communal bin storage – however, there could be perhaps some inclusion of design guidance on appearance, materials etc of bin stores for communal buildings. Apologies if this has been missed in our review.</p> <p>Oxfordshire Streets Design Guide (Sep 2021): Have you had the opportunity to input or review this document? As this is not likely to carry any weight as an SPD, there could be an opportunity to incorporate some design principles or diagrams from this document into our own to ensure it can be secured. We would envisage limited additional words beyond design principles, and the use of diagrams and layouts would assist within increasing the length of the document.</p>	
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Response manually entered, submitted in an email format. Building design There is only very limited coverage of the design of houses. There is nothing about the appearance of houses which are often bland in design. The provision of dormer windows, bay windows and porches and variation of materials can do much to improve the appearance, particularly where the designs are varied along a frontage. Building design should generally respect the character of the settlement, but poor quality design of houses built in the past should not be used as an excuse for repeating the same poor designs. New development should reflect the best of the local character. Extensions This section gives very useful guidance on the design of extensions. The section on garages suggests that domestic elements are unacceptable but there is a growing trend for the addition of offices or gyms above garages, frequently where these are detached from the main dwelling. This is not covered by the design guide.

83	<p>Response manually entered, submitted in an email format. The Council considers the joint design guide to be elegantly designed, giving a broad-brush view of the subject. The guide would do very well as a short textbook on the subject: every professional (architect, developer, planning consultant etc) would read and understand the guide, but the Council believes that, for someone starting on a planning application, the guide is long on principles and short on practical instruction. For example, a householder starting on a planning application would struggle to apply the following principle: ""The building forms used along a street should create rhythm and interest. Subtle variations in the height and width of buildings can add visual interest to the street, making it more attractive and interesting. The scale of new development should be appropriate and sensitive to its context. Heights of buildings should be informed by contextual analysis. A variety of building heights along street frontages can also help to achieve this."" The non-professional may want to know whether he or she can use tiles or slate for the roof, but is unlikely to know how to assess whether their proposed building is going to create rhythm and interest in the street. Given that the language is supposed to be simple, there are no definitions, eg what is meant by 'high quality', and what does 'realm' mean? Indeed, it seems that the guide is principally aimed at developers, and, what is more, seems only to cover urban/town development where there are local services. There is no mention of rural communities which often have very poor or limited local services. Light pollution is only mentioned once, with regard to floodlights for recreational areas/play spaces, but the Council considers this surely to be important when designing new housing developments. There is no mention also about affordability and affordable housing. It is striking that, in the section on the Built Form, there is no section on domestic dwellings, but apartments, extensions, outbuildings, shop fronts, non-domestic buildings and mixed development are dealt with.</p>	
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Part 8: Design principles

Question 13: Design principles - Climate and sustainability [Click here to see the 'Climate and sustainability' design principles section in the guide.](#) If you'd like to comment on them, please use the space below:

	Comment	Council's response

1	<p>Too many words.</p> <p>Too many pages.</p> <p>Too many concepts.</p> <p>Too much everything.</p> <p>Y<u>O</u>u get the idea.</p> <p>The guide is too elaborate and lengthy.</p> <p>Nice concept.</p> <p>Poorly implemented.</p>	· Noted
2	<p>Generally speaking, a lot of this is covered by policies within the Councils recently adopted local plan. there is no need to repeat something that has already been provided.</p>	· Noted

3	I would like to see these measures as a mandatory requirement on ALL new buildings. Not just a few solar panels as a nod to environmental concerns, Planning permission should not be given if real efforts to adapt the design.	· Noted and will review
4	Thoroughly support these principles and goals	· Acknowledged
5	If airsource and groundsource heating systems are being considered then people need to understand the culture change required to make and keep that sustainable. Having solar panel or similar is fine but will only cover a % of energy costs given our climate.	· Noted
6	It is essential new developments are future proofed to take account of rapid climate change and the need to move quickly to a carbon neutral/negative society.	· We agree and recommend it as best practice.

7	<p>The existing Vale design guide is very clear, and yet in Faringdon we see multiple large developments being approved which skip the guidance . A cursory look at multiple exits and entry suggestions, space for growing food, movement framework, etc. shows there is little point in making new guides, if the implementation of existing guides is so poor. If the same people and processes are at work in the approval process, there is no point in investing in new guidelines.</p>	<ul style="list-style-type: none"> · Noted · The new guide will be delivered with training for officers to ensure the guide is more closely followed. · The more accessible online form of the guide will allow greater clarity around expectations and its use as a tool to review development proposals.
8	<p>some of the PYE houses in Hendred have recycle of rain water for toilets etc</p>	<ul style="list-style-type: none"> · We agree and recommend it as best practice.
9	<p>Important and helpful.</p>	<ul style="list-style-type: none"> · Acknowledged
10	<p>Nothing about bike storage in the "Space and layout" section. Developers should only consider "the promotion of car clubs/ rural car clubs". The "Climate and sustainability" section is not joined up with "Movement and connectivity" or "Space and layout" sections. Here is a "highly efficient and ultra-low energy" house, please park your car out front.</p>	<ul style="list-style-type: none"> · Noted · We will review integrating sustainability more comprehensively throughout the guide.
11	<p>Again, I like the emphasis on ecological design. I would also add water efficiency (very relevant to us here, threatened by a massive reservoir). I would like to add the suggestion that rainwater can be collected in underground tanks then used as grey water to flush toilets. This both saves energy in treating and pumping water, and decreases the overall water in the sewage system. The runoff from heavy rainfall is slowed down as much will be caught in tanks, and it will be released slowly as people flush their toilets</p>	<ul style="list-style-type: none"> · We agree and recommend it as best practice.

12	With apologies comments on this entered earlier in questionnaire	· Noted
13	See 11.	· Noted
14	The guidance is "best in class", but in my professional experience in working with developers, the building regulations must be revised to require sustainable solutions to be implemented. I have written to my MP in this regard	<ul style="list-style-type: none"> · Acknowledged · We can only encourage going beyond current building regulations unless specified within Local plan policies.

15	Extension is preferable to rebuilding any properties	· This would be considered on a case by case basis.
16	concern that the principles may be used by officers without an ability to discern intuitive and skilful design innovation	· The new guide will be delivered with training for officers to ensure the guide is more closely followed.

17	<p>The design principles should apply to all buildings however they need to be applied at an appropriate level - e.g a new sports pavilion should be treated differently from an extension to a sports pavilion.</p>	<ul style="list-style-type: none"> · The principles outlined in the design guide are applicable to all scales of development, unless otherwise specified.
18	<p>I think this should be more prescriptive - e.g. all new development must be built with insulation of walls and roof, with pv panels and with heating by heat pump (rather than consideration given to ---) . I have seen plenty of development locally that has been allowed without pv panels - why?</p> <p>Also even listed buildings should be able to install double glazing using sympathetic materials and designs.</p>	<ul style="list-style-type: none"> · We cannot insist on this approach but recommend it as best practice.
19	<p>It is interesting to note that both Vale of White Horse and South Oxfordshire Councils have declared climate emergencies and signed up to carbon emission reduction targets.</p> <p>Yet both are currently throwing up poorly designed, badly built, poorly insulated, fossil fuel heated developments. By definition these are unsustainable developments and should be halted immediately.</p> <p>It is good to see that the Councils are aware of passive design techniques. These have been around for 30 years and if properly implemented mean that no external power sources are required. The Councils should require developers to use them.</p>	<ul style="list-style-type: none"> · Noted · Passive design approaches do not result in no external power sources, this is a common misconception.

20	Ensure dont commit to these Technologies as council too early as changes ongoing.	· Noted
21	Comprehensive.	· Acknowledged

22	Biased towards developers, create a summarised version for householdersI can find no discussion here about the advantages of building upwards, and maximising the existing footprint. Has this even been discussed? Do yo have any view on it? Do planners just want our towns and villages to expand outwards and not upwards?	<ul style="list-style-type: none"> · Noted and will review
23	page not working	<ul style="list-style-type: none"> · Noted
24	This is well though through and I fully support these ideas.	<ul style="list-style-type: none"> · Acknowledged
25	Good use of renewables, good insulation essential. But these should not render the buildings to only be available to the ""well-off""	<ul style="list-style-type: none"> · This would not be a material planning consideration so may not be covered by the design guide. Only material considerations can be taken into account when deciding a planning application which the SPD helps inform.
26	Would like to see reference to Neighbourhood Plans	<ul style="list-style-type: none"> · Acknowledged
27	Has sounding heritage and sustainability been considered. What is the impact of the increase in 'noise' on the wild-life of a particular area for example. Has data been gathered?	<ul style="list-style-type: none"> · Noted. · No data is available on this subject.

28	Adding in provision for fast car charging and integrated waste systems to help facilitate and promote recycling and composting.	· We cannot insist on this approach but recommend it as best practice.
29	Goals are too vague and need to be measurable. Otherwise how can you demonstrate that you have achieved them	· Noted and will review
30	Some of these are looking like policy by default as they are much more precise than DES10? I support the aspirations in most instances but was a bit concerned that the principles didn't seem to make much allowance for special circumstances, eg listed building alterations/extensions.	· Noted and will review
31	Developing contractors should include carbon used in manufacture and cargo mileage of materials into UK when seeking manufacturers of all materials for new build development.	This is now advised in the guidance under Climate and sustainability - we refer to 'whole life carbon assessment' as an assessment method.
32	While applicable to all scales of development, these principles are at the heart of smaller scale developments. I would like to see guidance in this section raised to the status of a mandate where it exceeds national criteria.	· We cannot insist on this approach but recommend it as best practice.
33	Strongly support the best practice aims -am concerned that allowing for the possibility of not meeting these standards as the text implies could be highly detrimental to achievement.	· Noted and will review
34	OK	· Noted

35	Solar, water storage, ground/air source, insulation all should be mandatory	· We cannot insist on this approach but recommend it as best practice.
36	<p>The principles in this section are not as detailed as the others; a little elaboration wouldn't go amiss on terminology such as ""heat island effects"" - especially if the term ""vernacular"" needed to be defined in brackets in the Built Form section above.</p> <p>Also, point 6.9 lost me completely- but maybe that's just me?</p>	· Noted and will review
37	Good guidance	· Acknowledged

38	no reference found to the role of neighbourhood plans in climate and sustainability	· Acknowledged
39	not enough	· Noted
40	<p>In this section ""Reducing embodied carbon"" - there is an ambition to "" encouraged to minimise the embodied carbon of a building, focusing on its material fabric.""</p> <p>But there needs to be a reference to the methodology that can be used...</p>	· Noted and will review

41	<p>It needs to be possible to police the "built to last" principle. "Good design is only successful if it is built to last. Spaces and buildings that are difficult or expensive to maintain will not achieve good, long-lasting quality in their design. Proper consideration must be given at the design stage to the effects of ageing, weather and climate conditions, normal wear and tear on buildings, streets and spaces, and landscape." The materials to be used are often dealt with only at the reserved matters stage. That is too late for adequate public scrutiny. Solar technology should be more than simply an optional extra, and 6.6 and 6.7 should be clearer about this. The section about thermal efficiency is fine but what is meant by "an airtight building, mechanically ventilated, in order to maintain air quality and avoid cold spots and condensation". Mechanically ventilated should NOT mean air conditioning which generates carbon dioxide emissions even if it uses electricity. I am not convinced that the paragraph about embodied carbon sufficiently firm and clear. "Encouraged" sounds like something which is good to have rather than something which must always be considered.</p>	<ul style="list-style-type: none"> · Noted and will review · We cannot insist on this approach but recommend it as best practice.
42	<p>We support the principle of sustainable development and in particular use of renewable energy technologies to reduce conventional energy needs.</p>	<ul style="list-style-type: none"> · Noted
43	<p>Generally clear and understandable.</p>	<ul style="list-style-type: none"> · Acknowledged

44	<p>this is all well and good.but if the materials required to build a house that lasts for 500 years does not meet green standards in the short term still build it because in the next 50 years there may be no green problems</p>	<p>· Noted and will review</p>
45	<p>It is great to see reference to climate and sustainability. But where is the ambition in working towards climate 'positive' building, as championed by innovative Oxfordshire companies like Greencore Construction? There are various innovative Oxfordshire companies doing good things in this area that will affect our emissions e.g. https://origencarbonolutions.com and https://www.greencoreconstruction.co.uk.</p> <p>Also, there is no guidance as to how to upgrade buildings with solid wall constructions (generally pre-1919) - these require different treatment from modern buildings with cavity walls. There are lots of ways historic buildings can be retro-fitted without damaging their fabric. The key is to use breathable materials, including lime plaster and hempcrete. Snug-fitting secondary glazing can save as much energy loss as double glazing, which creates waste and emissions by requiring the removal of an existing window frame. Marianne Suhr's book 'Old House Handbook: A Practical Guide to Care and Repair' contains useful information on retrofitting old buildings, with lots of figures, data and practical examples to back up the text - the author lives in Blewbury, and could usefully have been asked to contribute her expertise to this Joint Design Guide.</p> <p>The Design Guide should be more ambitious in this section, especially as both the Vale and SODC have declared a 'climate emergency' and signed up to 'One Planet Oxfordshire'.</p>	<p>· Noted and will review</p>

46	<p>In producing a SPD it is important that the document builds on the principles established within the adopted Local Plan but does not seek to introduce more onerous requirements into the process. It is important to note that the strategic sites that were included within the Local Plan included a viability analysis which included assumptions around the level of sustainability within new builds that could be reasonably expected to be delivered whilst simultaneously delivering the necessary infrastructure package; this is notably the case in Berinsfield in which there is a significant imperative for wider regeneration. For example, as drafted the requirements include that all residential developments aspire to meet Passivhaus Certification. The section should include a more general reference to ensuring that the measures proposed can be viably supported without detriment to the wider delivery of the scheme.</p>	<ul style="list-style-type: none"> · Noted and will review
47	<p>Climate Change resilience and adaptation should be at the heart of the new design guide, the Council are concerned that by placing this at the end of the document that this is not demonstrating its importance.</p>	<ul style="list-style-type: none"> · Noted and will review

48

Response manually entered, submitted in an email format. 1. This is a very competent section, but in a post-Covid environment there could be more detail provided on systems for safe room ventilation with a volume change and filtration required.

· Noted

49

Response manually entered, submitted in an email format. Climate Change and Sustainability HLM supports the principle of a joint commitment to move towards greater resource efficiency. HLM considers that the design guide must adopt an approach that is 'in-step' and aligned with government guidance and must avoid prescription at local level. Whilst we note the reference to the requirements of Policy DES10 South Oxfordshire District Council's adopted Local Plan, this policy does not apply to proposals in the Vale of White Horse District, and therefore should not be used to justify application of higher standards sought through this joint SPD. Amendments to the Building Regulations will come into force in June 2022 that seek to reduce carbon emissions from homes and other buildings, with improvements to fabric efficiency, installation of electric vehicle charging points, revised heating and ventilation system requirement, and overheating prevention measures. These amendments are then due to be followed by The Future Homes and Buildings Standard that will come into effect in 2025 to set higher standards for greater sustainability and lower carbon emissions. Whilst standards and efficiencies that exceed those nationally described can of course be welcomed within the Guide, and relative benefits of any uplift can be considered as part of the determination of development proposals, HLM considers it critical that the guidance should progress 'in-step' with national guidance, and support delivery towards a targeted solution as advocated by a set of nationally prescribed standards that are to in force in the short and medium term. Passive and Active Design HLM note the approach taken in the guidance that "encourages" opportunities for passive and active design to be integrated into new developments. HLM supports this flexible approach, reflecting that such opportunities will differ depending on sites locations, features and their wider physical and socio-economic contexts, which will raise differing, design, practicality, and deliverability considerations. Flexibility should be given when assessing schemes and particularly with how they align with current requirements. Passivehaus HLM does not agree that all new buildings, including minor applications within South and Vale should aim for Passivehaus Certification. Whilst opportunities may exist for some features to be integrated into the design of new homes in some circumstances, it is critical that design and construction ambition is carefully and flexibly balanced with wider considerations, having regard to cost, practicality and deliverability. Passivehaus is one such example of where commitment to an 'uplift' in sustainability credentials could be considered as part of the overall benefits of a development proposal. i.e., it may weigh in the planning balance. Towards Zero Carbon Design and Construction HLM notes South and Vale's ambition to encourage a collective move towards zero carbon in both design and construction. However, any uplift in construction and design standards will need to be considered as part of a whole Plan viability – a step to be explored and tested as part of the emerging Joint Local Plan, it is not possible to predict future policies and seek their application now. The principle of seeking uplifts to sustainability performance and/or reductions in emissions on schemes, that is solely justified through planning guidance and where there is no supporting national nor local policy basis to require such provision, has been found to be flawed approach by the Secretary of State¹. Therefore, insofar as the approach to be taken in this SPD, that is being progressed ahead of new Local Plan policy, HLM considers such construction and design standards must be in step with the scope of the forthcoming changes to Building Regulations in June 2022 and Future Homes and Buildings Standard which the Government is intending to introduce as national policy commitment from 2025. Electric Vehicle Infrastructure Whilst HLM supports investment in electric vehicle infrastructure, the true costs for provision of charging points and the power requirements to the local network are only just being understood. Before imposing a standard of provision, due and evidenced consideration must be given to the technical and viability impacts for such technologies, and therefore reference to national guidance including Government proposals (and those to be defined under Building Regulations) is critical. HLM would suggest provision of active or passive infrastructure provision, should be applied flexibly having regard to cost, practicality, and deliverability. We trust these comments are helpful in advancing the Design Guide, at the appropriate time, and in line with the progression of evidence and policy formation in respect to the emerging Joint Local Plan.

· Noted and will review points individually

50	<p>Response manually entered, submitted in an email format.</p> <p>2. Rules on parking should ensure that there is adequate electric charging capacity available securely.</p> <p>6. The Guide should recognise the need for pre-installed electrical connectivity such as:</p> <ul style="list-style-type: none"> - fibre internet - electric charging capacity - matters like solar panels <p>7. The Guide should recognise the impact of flooding including:</p> <ul style="list-style-type: none"> - need for water absorption to reduce fast run-off (eg reducing tarmac area; water butts; individual house rain soakaways) - need to retain existing waterways and flood areas to continue to serve built development. 	<p>· Acknowledged</p>
51	<p>Response manually entered, submitted in an email format. Climate and Sustainability• The Planning and Development Committee support this.</p>	<p>· Acknowledged</p>

52

The need for exploring and using new sources of energy is clear. However we should be taking a balanced and thoughtful approach, especially given all the other points and considerations that go into good design. I would be keen to see something included on the installation of solar panels - be this in existing or new developments, and in particular with respect to any large scale solar farms on agricultural land which will have a huge impact on the character of the environment. There will also be a huge impact on the ecosystem which should be taken into account. This would similarly apply to Windfarms etc if these were to be considered for the local area.

· Acknowledged

53

The principles in this section as so important. I think this is the most important section of all.

· Acknowledged

54

Response manually entered, submitted in an email format. In the Climate and Sustainability section, the work of South Oxfordshire District Council is referenced but there also needs to be recognition of the work that the Vale of White Horse District Council are doing at the moment in terms of moving towards the introduction of higher levels of sustainable design than those included in the current building regulations.

· Noted and will review

55

What is sustainable development? Please add: -- Public and political awareness of the need for resilience and low carbon footprint development will accelerate as we experience in our Districts the extreme weather events predicted by climate change scientists. What is a Climate Emergency? Please make this statement more relevant locally by following 'by the Committee on Climate Change.' with the statement now in the background section: -- South and Vale are signed up to the carbon reduction targets of the Oxfordshire Energy Strategy, which committed to a 50% reduction in carbon emissions by 2030. Please expand what is meant by Active Design: -- Active Design includes measures to sequester carbon and encourage biodiversity. Measures to support biodiversity and carbon sequestering include planting trees, living walls, gardens, allotments, wild areas, preserving farmland, bird nesting and feeding, insect friendly plants and nesting places, wild flower areas for bees to feed, clean water courses to encourage fish. Active Design Principles to include: - Support for Biodiversity- Living Walls Design principles - sustainable development 6.0. Please change to: Uses tree planting in open spaces and streets and living walls for and in proximity to buildings to mitigate heat island effects. What are carbon emissions? Please include construction emissions at this stage: -- Achieve the optimal design approach to minimise energy usage and reduce carbon emissions in the construction and use of developments. Follow this by - Reduction in the carbon impact of construction is covered in the reducing embodied carbon section below. Standards and Certifications. It is essential, if the SODC and Vale are to achieve a 50% reduction in carbon emissions by 2030, for the construction of Domestic buildings to be included in the Standards and Certifications scheme. Choosing the right set of standards must be a high priority for the Design Guide Team. The BREEAM code for sustainable homes is an optional planning standard, subject to local authorities' justifying the case for their application on the basis of need and viability. Passivhaus is not always viable. The Planning Guide must state at this stage that domestic buildings should achieve either Passivhaus or The BREEAM code for sustainable homes with a note that the planners will consider applications which achieve higher standards than those covered by these schemes. Please insert a Box 'Residential Buildings' alongside that for 'Minor non-residential Buildings' pointing downwards to Passivhaus and The BREEAM code for sustainable homes with a note, exceptions to these codes achieving a lower carbon footprint will be considered.

Carbon sequestration is not currently calculatable; therefore we cannot specify requirements around it as it is not quantifiable. Support for Biodiversity and Living Walls are not Active design principles. Living walls do not mitigate heat islands. Construction emissions are measured under embodied carbon, not as emissions under regulatory policy and technical definition. Guidance on measuring and reducing Embodied carbon are already referred to. Both Passivhouse and BREEAM are optional standards of development unless specified by Local plan development policy. Currently only SODC have an adopted requirement for BREEAM, and only in certain types of development. References to residential, non-residential, both minor and major development, will be reviewed regarding BREEAM and Passivehouse.

56

I think adopting Passivhaus for new residential development is excellent and I support that. However, for non-residential, this design guide will result in buildings continuing to emit carbon, albeit at a lower level than currently, though that is easy given the low standards currently in place. The weakness of BREEAM is that it does not result in a nil carbon building. To meet Net Zero by 2050 then BREEAM on its own will not deliver that. I think that BREEAM is a well understood measure and so it seems sensible to keep it, but, it needs to be supplemented by the requirement that any new building or development must state 1 - its carbon emissions (which should be set at passivehaus levels), and 2 - how it is achieving net zero by 2050. Any new development must have a plan for how it does or will achieve net zero. At present we are worried about how to retro-fit old stock to contribute to net zero and that is a tough problem - however, new buildings should be held to a far higher standard. At present many builders do not know how to build to this level but they must increase their skills and capabilities so that they can, and this requirement will help I think

Both Passivhouse and BREEAM are optional standards of development unless specified by Local plan development policy. Currently only SODC have an adopted requirement for BREEAM, and only in certain types of development.

6.4 - Rainwater harvesting - this is more successful on the back of garages rather than a house, and particularly intrusive on a small semi-detached or terraced houses with a narrow rear elevation. 6.6 - PV on all buildings - not necessarily the best technology on all sites nor all buildings. 6.13 - "all development aspires to go beyond Part L assessment" - this is above Building Regulations - there is not a Vale policy to support this. 6.15 - Passivhaus is again above Building Regulations with specific criteria to gain accreditation. Building Regulations should be implemented. The industry is going through a significant period of change with regard to carbon targets and climate change. As the largest volume housebuilder, the Barratt group (including David Wilson Homes) have set ambitious goals for our operations committing to Zero Carbon Homes from 2030. We have a dedicated Group Technical and Innovation Team responsible for delivery, who are developing our future ways of working with new products and technologies. This change will take time to bed in to the supply chain at a scale to support the quantum of housing needed across the district and country, and the 2030 target considers a realistic timeframe in which the industry and its supply chain can achieve zero carbon. The industry is also working on increased off-site production of components and Modern Methods of Construction. Whole-life carbon assessments will be difficult to provide given that supply of materials is currently not known far in advance of delivery, and changing materials through the construction period would become difficult and possibly threaten delivery. We would reiterate the above point on material availability issues affecting the sector, and our reliance on our suppliers to help meet these targets.

Both Passivhouse and BREEAM are optional standards of development unless specified by Local plan development policy. Currently only SODC have an adopted requirement for BREEAM, and only in certain types of development.

58	<p>sustainability and renewability must be geared to achieving the best possible environment, with good air quality. Without exception, all new buildings should be fully-fitted with solar panels to their maximum capacity.</p>	<ul style="list-style-type: none"> · Noted and will review
59	<p>This section refers to Passivhaus standards at the target energy performance standard which is admirable. It would be better here to be much more specific e.g. 15kWh/m2/yr heat requirement; 0.6 ACH for airtightness and specifics for the number of solar panels etc. This is because many developers might insist on meeting the minimum standards e.g. UK building regs even though they are not fit for purpose in a new zero carbon world.</p> <p>There is no reference to linking waste water/sewage management to renewable energy via the likes of AD plants. It would be very logical for communities to want to use their waste in this way and create community owned district heating systems as their solution to becoming net zero C.</p> <p>Of course developers won't just do this because it involves increased capital expenditure without any guarantees of future ROI. However, the planning guide doesn't need to present these types of community based infrastructure as a favoured option for future planned developments rather than just relying on every house being equipped with a heat pump connected to the electricity grid.</p> <p>Why are there no mention of links between waste water management, SuDs, biodiversity and energy? The report was intended to be simple and clear but by missing out linkages between technologies, it will just led to continued development of unsustainable sole less housing estates.</p>	<p>We cannot insist on this approach but recommend certain aspects of the approach where applicable.</p>

60

FORMATTING: Needs a chapter number for reference. Could a mini contents list be included under each chapter title/heading for easier navigation, to avoid scrolling? Principles should really be first, and then follow up with explanation text, diagrams and helpful links below. POSITION WITHIN THE JDG – the initial text for this chapter says that 'Sustainable development has many complex and interwoven dimensions to it that must be considered from the earliest stages of development, as the potential environmental impacts are significant'. Officers think that this chapter needs to be put right at the start of the JDG – before 'PLACE AND SETTING' – to highlight its significance. It could then host hyperlinks to connecting bits located within other chapters with the JDG. [6.10-6.15] STANDARDS AND CERTIFICATIONS - Officers raised concerns that specific reference had been made to standards and specifically South Oxfordshire Local Plan policies. This should be more generic, as although there will be a Joint Local Plan, it is not clear when Vale will have the stronger policy context in place. [6.14] "BREEAM EXCELLENT" – Please be aware that the BREEAM excellent standard is being brought into dispute in some instances for applications in South Oxfordshire. It is recommended that the wording of this principle is considered carefully, and Emily Hamerton contacted about this before it is formalised.

Contents and navigation will be reviewed as part of the website design and structure of the guide. Aspects of sustainable development that relate to other sections of the guide will be reviewed and possible re-structures. Both Passivhouse and BREEAM are optional standards of development unless specified by Local plan development policy. Currently only SODC have an adopted requirement for BREEAM, and only in certain types of development.

61

Clearly set out. This section should give more attention to technological developments and their future refinement that will allow individual dwellings to generate and store their own energy requirements using renewables, and also to facilitate retro-fitting as technologies develop. This has particular relevance to rural areas. It is all encapsulated in the 'active design approach', all of which can apply to 'rural design'.

· Noted and will review

Structure of the 'Climate and Sustainability' section: As highlighted in Bloor Homes' response to Question 9, the NPPF, PPG and recent case law have clearly established that the role of an SPD is to provide guidance in relation to existing policies in adopted local plans, and that it is not within the remit of an SPD to introduce new policy requirements. Indeed, the introduction of new policy requirements should be deferred to a local plan review, where impacts on viability can be considered fully. Whilst that is a general comment that has been made in relation to the Design Guide SPD as a whole, it is perhaps most applicable to the 'climate and sustainability' section which, as currently drafted, could be read as introducing new policy requirements. As such, this section should be refreshed to reflect the role of an SPD as providing guidance for applicants to ensure that they adhere to relevant policies. To make that clear, it is suggested that the section begins with a 'planning policy' sub-section that sets out the policy requirements within the adopted local plans for the Vale of White Horse and South Oxfordshire, so that it is clear to applicants and decision-makers what the development requirements are in that regard. So that users of the document are able to fully understand the policy requirements for each authority, the text contained within design principles 6.13 and 6.14 should be subsumed into the 'planning policy' section for South Oxfordshire, making clear that these are requirements for South Oxfordshire only. That 'planning policy' section should then be followed by an explanation that the following text and design principles are seeking to highlight matters that could / may be considered by applicants when seeking to adhere to those policy requirements, with the goal of delivering sustainable development schemes. It should be made clear at this point that development proposals are not required to meet each of those design principles in order to be policy compliant, but that a combination of those design principles may assist in a scheme demonstrating its policy compliance.

Design Principles: On the basis of that approach, the Councils should also amend each 'design principles' section / box to make clear that each of the design principles set out are highlighting matters for applicants to consider, and are not policy requirements in themselves. That is an important distinction to be made, in order to ensure that this section is clearly written and unambiguous, and so that decision-makers are aware of the status of this guidance. Thus, the wording of the design principle boxes should be updated to read "applicants may consider", rather than suggesting that applicants should "ensure the scheme" meets the design principles. Whilst a minor alteration, that will allow for decision-makers to have a greater understanding of the role and status of the SPD, and therefore will also assist in the application of this guidance within the development management process. Moreover, the wording of each design principle should be updated to reflect the purpose of the SPD. Taking principle 6.11 as an example, a more suitable wording would be "applicants may consider... prioritising modern methods of construction (MMC) for the built form and its envelope." That reflects more accurately that each design principle is effectively a potential design / construction principle that could be pursued to ensure that the scheme is policy compliant. However, other design principles require more substantial amendments to reflect the purpose of this section of the Design SPD. Whilst a full audit should be carried out by the Council to identify all instances, design principle 6.9 is one such example. As currently drafted, design principle 6.9 seeks to ensure that schemes demonstrate "strategies for energy infrastructure including that for proposed on-site generation, with a feasibility study, for distributive or on demands shared networks." Even when presented as a solution that applicants may consider, that will clearly not be a feasible or viable solution for the vast majority of sites. Rather, this design principle should suggest that "applicants may wish to consider... for larger development schemes, whether on-site energy generation, including distribution and / or on-demand shared networks, would be feasible." Alternatively, other current design principles should be reframed in terms of how they are presented. For example, design principle 6.15 seeks that "all residential properties aspire to meet Passivhaus certification." Whilst inspirational, that is not a policy requirement set out within an adopted plan, and the Design Guide SPD itself recognises that "we understand that this may not always be appropriate due to some development types and / or reasons of viability." References to inspirational standards that go over and above existing policy requirements should not be presented as design principles at all, and instead could be included in a separate section that relates to those developments that are seeking to exceed the required sustainability standards. Other design principles, however, should be removed entirely. For example, the suggestion that a "whole life carbon assessment [...] focusing on the product and construction stages" should accompany the submission of a planning application is wholly unsuitable. For the vast majority of developments, that requirement would not constitute proportionate evidence in comparison to the scale of development involved and, in any event, the submission of such a document is not included in the adopted plans of either authority, be that as a formal policy requirement or in passing. In light of the above, it is clear that the 'Climate and Sustainability' section

Both Passivhouse and BREEAM are optional standards of development unless specified by Local plan development policy. Currently only SODC have an adopted requirement for BREEAM, and only in certain types of development.

of this Design SPD requires a substantial review to ensure that it reflects the purpose of SPDs, is clearly written and unambiguous, and appropriately reflects the existing policies that are set out in adopted local plan documents.

63

No mention of green bus shelters. Current car spaces should be designed to be repurposed with ease. Solar energy capture has different voltage outputs for different scales. Solar farms need to have a 33,000V output so need to be near a major sub station. Maintenance and disposal of need to be accommodated.

· Noted and will review

64	<p>The design principles mandate the "use of solar technology on all roofs...." but makes no mention of heat pumps (ground, air or water) We should like to see these added rather than being an optional item in the generic catch all of the item under 6.5In section covering principles 6.10 to 6.15 and 6.16 to 6.21 we feel the use of phrases such as "aspire to" and "prioritised" allow avoidance by developers. We would prefer more prescription including the exclusion of any gas technologies.Likewise, for example "reduce materials with high carbon footprints" (6.18) has little if any meaning.</p>	· Noted and will review
65	Please refer to submitted representations.	· Noted

Response manually entered, submitted in an email format We strongly support all measures to achieve net zero carbon and believe that, given that CO2 emissions pose an existential threat to humanity we recommend that the Design Guide make it clear that designs that do not achieve this cannot and will not be considered acceptable. We do recommend that Street Light design also be included in Fig 55 as an 'Issue to consider when designing to zero carbon.' The challenge to designers, architects and developers must, despite the inevitable complaints about extra costs, be to achieve beautiful design once the net zero performance has been designed in. A design that adds to climate change, which is increasingly threatening the lives, health and well-being of human and all life cannot be considered acceptable. The Oxfordshire County Council Street Design Guide, must be included as a resource. <https://www.oxfordshire.gov.uk/residents/roads-and-transport/transport-policies-and-plans/transport-new-developments/transport-development-control> Sustainable Development – Active design Goal: Achieve an optimal active design approach Greater emphasis should be placed on these design 'considerations'. The guide should place a strong expectation that these WILL be included unless a strong case can be made for their exclusion. Design principles - sustainable development 6.6 solar energy capture is an essential component of a sustainable building. In this context major is not defined adequately and will result in disputes with developers. This section should specifically include all homes and buildings (both private & commercial) of more than a specified footprint or volume. Reducing carbon emissions Spelling: Should be 'Regulated energy: is energy consumed by a building and its controlled,

not 'Regulated energy: is energy consumed by a building and it's controlled,

Standards and Certifications Should read 'South Oxfordshire Local Plan policy DES10 not 'South Oxfordshire Local Plan policy DES10.

Street lighting is an issue controlled by OCC (Oxfordshire County Council) and outside of the districts control and scope of the SPD. Net zero cannot currently be required as there is no local plan development policy requirement in either district currently adopted to support it. This is beyond the scope of the SPD. The (OCC) Street Design Guide is already included as a resource. Design 'considerations' is design guidance that meets the ambition of corporate targets set by the local authorities but cannot currently be made mandatory as there is no local plan development policy to support them. References to residential, non-residential, both minor and major development, will be reviewed. Spelling and grammar are under review.

67

The objective for the Joint Design Guide is to raise the quality of design and sustainability in new development across both districts. However the guide has failed to recognise the importance of design in minimising light pollution. The negative impacts of light pollution on humans, wildlife & biodiversity are well known and recognised by South Oxfordshire District Council. Furthermore, energy is wasted by light spillage & undirected light, and the council should be looking to reduce this waste of energy. The council must include & insist on good design that will minimise light spillage to ensure harm to the environment is minimised, energy is not wasted, and the development will help the council meet its carbon reduction targets. Therefore, this document must include reference to reducing wasted light energy, i.e. pointing individuals, developers & architects to the guidance issued by the Institute of Lighting Professionals - <https://theilp.org.uk/>, as well as making individuals, developers & architects to the issues of light pollution, and giving examples of good designs, that use light spillage reduction glazing, minimal amount of glazing on wasted spaces, such as vaulted ceilings (which in themselves are not good for heating energy efficiency), and examples of correctly directed external lighting.

· This comment raises issues that fall outside the scope of the design guide.

68

Missing Neighbourhood Plan design and climate change policies again!

· Acknowledged

Response manually entered, submitted in an email format. The introductory text for this section provides an overview of the issues around climate change, sustainability and sustainable development. As a responsible promoter and developer, CEG fully supports the need to address climate change, and the need for schemes to deliver sustainable development in its widest sense. Nonetheless, the Joint Design Guide SPD cannot step beyond its role as a document that is supplementary to the adopted development plans for Vale of White Horse and South Oxfordshire District Councils. By way of example, in the Vale of White Horse, Core Policy 43: Natural Resources, encourages developers to make provision for the effective use of natural resources, including maximising passive solar heating, and Core Policy 40: Sustainable Design and Construction, encourages developers to incorporate planting, shading and advanced glazing systems to reduce solar heat gain. There is nothing in the Vale Local Plan Part 1 or Part 2 that explicitly requires solar panels on new buildings, and yet the 'Design principles – sustainable development' in the Joint Design Guide suggest it is ensured that schemes use solar technology on roofs for all [emphasis added] major commercial, noncommercial, and industrial buildings. Solar may not always be the optimal solution in any event, but the important point of principle is that the Joint Design Guide cannot create new policy requirements. Here and elsewhere, if there is no development plan policy (or Act of law) requiring something, the Joint Design Guide can only encourage, or require consideration of the relevant matter. To avoid Officers and applicants needing to constantly refer back to the adopted development plan policy for matters addressed in the Joint Design Guide, it is vitally important that the next version of the Design Guide is clear and robust throughout, in terms of those matters where encouragement is given, and those matters where there is a development plan policy requirement (which can of course then be presented as a requirement in the Joint Design Guide). Where relevant, the different requirements that apply in Vale of White Horse district and South Oxfordshire district, also need to be made clear. In relation to the section 'reducing emissions', there is clearly an evolving set of requirements, with the new Building Regulations, requiring a 30 per cent cut in carbon for all new homes, coming into force in June 2022, and the Future Homes Standards to be subject to further consultation in 2023. The Joint Design Guide should recognise the evolving nature of the requirements, and make it clear how the Council will keep the Joint Design Guide up to date and relevant in relation to national requirements aimed at reducing emissions. The 'Design principles – Standards and Certifications' state that applicants should ensure that all residential proposals aspire to meet Passivhaus certification (paragraph 6.15). How will the Council assess whether a scheme has aspired to Passivhaus certification? There is no development plan policy requirement for Passivhaus certification, and we would respectively suggest that the wording in paragraph 6.15 needs clarifying, perhaps to state that 'all residential proposals should aspire to Passivhaus principles'. In relation to BREEAM, whilst the South Oxfordshire Local Plan requires all non-residential proposals to meet BREEAM excellent standard, unless mitigating circumstances can be demonstrated, the Vale Of White Horse Local Plan (Parts 1 and 2) make no reference to BREEAM. Paragraph 6.14 of the Joint Design Guide therefore needs amending to make it clear that the requirement to meet BREEAM excellent standard (for all non-residential development) only applies to schemes in South Oxfordshire, and that in the Vale of White Horse, the Council will encourage development to this standard.

Both Passivhouse and BREEAM are optional standards of development unless specified by Local plan development policy. Currently only SODC have an adopted requirement for BREEAM, and only in certain types of development. The wording of guidance and expectations of solar panels and their incorporation as part of sustainable development, will be reviewed. Additionally wording of guidance and technical specification in relation to sustainable development will be reviewed.

70

Response manually entered, submitted in an email format. Now that the consultation period on the Draft joint design guide has ended I shall be very interested to hear what the responses say. At an earlier stage of consultation I did say that climate change issues should not be a bolt-on extra but should pervade everything we do in the council (and not just in planning). However the draft design guide has a chapter at the end entitled Climate and Sustainability. I don't disagree with anything written in that chapter. It has lots of good stuff in it. But I wish its suggestions had been taken on board in the other chapters.

The wording of guidance and technical specification in relation to sustainable development will be reviewed.

71

Response manually entered, submitted in an email format. Climate and Sustainability (Design Principles – Sustainable Development) Gladman recognise that the planning system has an important role to play in tackling the climate emergency and the underpinning intentions of the proposed sustainable development design principles. However, it is important to reiterate that SPDs should provide clarity and guidance on existing development plan documents rather than being a mechanism to fast-track the adoption of policy requirements without the corresponding consultation and independent examination. In this regard, we welcome that the proposed sustainable development design principles are not intended to be applied rigidly and are worded to provide flexibility where required. It is important to note that some of the requirements set out in the design principles have not been subject to the viability testing to understand any potential implications on the delivery of other Local Plan objectives, which may need to be completed if it was the intention to apply the proposed guidelines rigidly in all cases. Amending the initial design principles wording from 'Ensure the scheme' to provide greater flexibility such as 'Considers the delivery of' or 'Optimises the following elements' would support the Council's aspirations while also not rewriting Local Plan policy requirements. Climate and Sustainability (Design Principles – Standards and Certifications) Gladman have no specific comments to make on the design principles set out within the Standards and Certifications element of the Design Guide. Again, we welcome that the principles employ terms such as 'aspire to' and 'prioritise' which allow for flexibility in the application of the principles whilst also seeking to achieve the policy requirements set out in the adopted Local Plans.

The wording of guidance and technical specification in relation to sustainable development will be reviewed.

Many of the sections of this part of the guide, for example the sections relating to climate emergency, the definition of net zero carbon, carbon emissions, MMC are explanatory rather than guidance. Case law has established that the role of an SPD is to provide guidance in relation to existing policies in adopted local plans, and that it is not within the remit of an SPD to introduce new policy requirements. The introduction of new policy requirements should therefore be deferred to the current Local Plan review. The sections of the SPD should be clear as to what is explanatory, the Local Plan policy requirements; and what further advice is given to assist applicants in meeting these policies, via the SPD. Currently, the guidance is unclear. There are some references to Local Plan policies (e.g. DES10 of the adopted SODC Local Plan) in paragraph 6.13), and what appear to be new policy requirements. Bloor Homes suggests that this part of the SPD provides a 'planning policy' sub-section that sets out the policy requirements within the adopted local plans for the Vale of White Horse and South Oxfordshire, and then provides additional advice setting out how applicants might then meet the policy requirements. It should be made clear that development proposals are not required to meet each of the design principles in order to be policy compliant, but that a combination of those design principles will assist in designing a scheme that demonstrates policy compliance.

Design Principles: In order to be clear that the design principles in this section are areas for consideration in the design process, the wording of the design principle boxes should be amended to 'applicants should consider', rather than requiring applicants to 'ensure the scheme' meets the design principles. The wording of each design principle should also be updated to reflect the purpose of the SPD. Taking principle 6.11 as an example, a more suitable wording would be 'applicants should consider... prioritising modern methods of construction (MMC) for the built form and its envelope.' That reflects more accurately that each design principle is effectively a potential design / construction principle that could be pursued to ensure that the scheme is policy compliant. Other design principles require more substantial amendments to reflect the purpose of this section of the Design SPD. Whilst a full audit should be carried out by the Council to identify all instances, design principle 6.9 is one such example. As currently drafted, design principle 6.9 seeks to ensure that schemes demonstrate 'strategies for energy infrastructure including that for proposed on-site generation, with a feasibility study, for distributive or on demands shared networks.' Even when presented as a solution that applicants may consider, that will clearly not be a feasible or viable solution for the vast majority of sites. Rather, this design principle should suggest that 'applicants may wish to consider... for larger development schemes, whether on-site energy generation, including distribution and / or on-demand shared networks, would be feasible.' Alternatively, other current design principles should be reframed in terms of how they are presented. For example, design principle 6.15 seeks that 'all residential properties aspire to meet Passivhaus certification.' Whilst inspirational, that is not a policy requirement set out within an adopted plan, and the Design Guide SPD itself recognises that 'we understand that this may not always be appropriate due to some development types and / or reasons of viability.'

References to inspirational standards that go over and above existing policy requirements should not be presented as design principles, and instead could be included in a separate section that relates to those developments that are seeking to exceed the required sustainability standards. Some of the design principles should be deleted. For example, the suggestion that a 'whole life carbon assessment [...] focusing on the product and construction stages' should accompany the submission of a planning application is wholly unsuitable. For the vast majority of developments, that requirement would not constitute proportionate evidence in comparison to the scale of development involved and, in any event, the submission of such a document is not included in the adopted plans of either authority, be that as a formal policy requirement or in passing. In light of the above, Bloor Homes submits that the 'Climate and Sustainability' section of this Design SPD requires a substantial review to ensure that it reflects the purpose of SPDs, is clearly written and unambiguous, and appropriately reflects the existing policies that are set out in adopted local plan documents.

73

Please see submitted letter for full comments.

· Noted

74

Please ensure that you require sustainable principles for all future development.

· We cannot insist on this approach but recommend it as best practice.
The wording of guidance and technical specification in relation to sustainable development will be reviewed.

75

Brundtland Commission definition of sustainable development is (arguably) out-of-date. It should be clear that a building is only sustainable if it is zero carbon in construction and operation; has generated a significant increase in bioabundance and biodiversity; and is free from risk of overheating, drought, flood and storm. These aspects should be insisted upon. It is better practice to refer to zero carbon rather than net zero or carbon neutrality. Please delete references to 'natural gas'. It should be insisted upon that heating systems are electric, air source heat pumps (ASHP). Gas boilers going in now, will need replacing in 13 years time just as the government bans new gas boilers. It is not always easy to 'bolt on' an ASHP to a system designed for a gas boiler. NO gas boilers should be being used. A misprint in the first section? ""Here are the climate action targets for the districts"" should then say that South Oxfordshire's is zero carbon by 2025 for council operations, and by 2030 for the district. (Plus twice in this section it says Oxfordshrie not Oxfordshire). Fuel cells? I do not think these are likely to be a useful source of energy for homes. Perhaps delete. Homes should be built to Passivhaus standard (thank you - but could we be more insistent)? Thank you for including water harvesting and storage provision. LETI believe that mechanical ventilation and heat recovery should be used, and passive ventilation not relied upon. I think this is right. It ensures that a home can be kept airtight in the winter, and fresh, dry air can be brought in, warmed by the outgoing stale, damp air. Please note, construction can be zero or negative carbon by sequestration of carbon in the building (hemp or wood building materials). This is not always calculated in and subtracted from the construction carbon emissions and is not always recognised as a means of achieving zero carbon (pers comm, Ian Pritchett, Greencore Construction Ltd). Taylor Wimpey calculate 200T of carbon dioxide is emitted for each home built, on average, just in construction. It would take 10,000 mature trees a year to absorb that carbon dioxide.

· Acknowledged

76

Remember that too much solar can be intrusive and ugly. Glint & glare must be considered from large numbers of panels.

The wording of guidance and technical specification in relation to sustainable development will be reviewed.

77

Response manually entered, submitted in an email format. We are impressed by the overall principles embodied in the plan for sustainability, beauty and design. Although the focus of the plan is urban, we would like to see the plan make recommendations with those same principles for the local green environment in which our communities are embedded. We urge you to include content on development of the green landscapes surrounding our communities. Two particular types of new land development deserve more attention: 1. Solar farms We have recently seen proposals for two solar farms in Cumnor parish. Both are likely to have a negative impact on an area which provides rural leisure both for the local inhabitants and walkers coming out from Botley and Oxford. Of course we need all the green energy we can get. But two solar farms within the bounds of a parish of Cumnor's size seems self-evidently inappropriate. Both proposals come from investment companies from outside the County. 2. Carbon Capture External investors are offering farmers considerable incentives for land purchase to offset carbon dioxide by forest planting. Farmers and their communities are unable to compete with the same speed of action as investment companies and face the prospect of having limited control over the long term use of the land, and the likelihood of mono-culture pine forests, with their risk to biodiversity. Some of the issues were highlighted in the BBC programme "Costing the earth" on 8 March 2022, <https://www.bbc.co.uk/sounds/play/m00154b2> We believe both types of development are necessary but there are drawbacks when they come from external companies whose prime motivation is cash generation and who have no loyalty to the future of the localities. We know that farmers have faced considerable challenges in recent decades. Those challenges are increasing as society reviews farming practices in the light of climate change. It is a poor state of affairs when farmers who have preserved our agricultural production and our landscape for centuries are playing a lesser role in what happens to that land for years to come. We need planning policies that can favour that heritage. We appreciate this is not in your brief but believe urban and rural issues are closely connected in districts such as South and Vale, and we hope you can find ways to ensure these issues are not overlooked.

Graphics and photography will be reviewed and updated. Specific guidance on the siting and design of renewable energy schemes will be added to the design guide. The wording of guidance and technical specification in relation to sustainable development will be reviewed.

78

Response manually entered, submitted in an email format. General Comment • This is an excellent section in terms of explaining the different elements of design and how they relate to climate change/sustainability • Would be beneficial to move this chapter higher up to match our corporate objectives and reflect its importance. It seems at the moment a little stuck on the end. • Figure 55 – this graphic seems a little random i.e., a large selection of icons which don't relate to each other- not sure this works? Could this be more of a drawing of a house? Or have labels? • Ground source heat pump photo – looks almost offputtingly large – is this for a multi-house scheme? if so would be useful to label as such, or is it possible to find a photo of the kit you need with a domestic scale GSHP e.g. more like this image from <https://www.insulationsuperstore.co.uk/help-and-advice/product-guides/plumbing-heating/everything-you-need-to-know-about-ground-source-heat-pumps/General-Comment> • We note that there is no specific guidance on the siting and design of renewable energy schemes and would suggest that some guidance is added to support developers of these types of schemes and promote renewable energy generation. • This could include guidance on site selection, such as appropriate types of land and connectivity; landscape and visual considerations; biodiversity considerations; heritage considerations; and flood risk; and also guidance on the detailed design of a scheme, such as the layout of the scheme; broad specification of the technology; ground works; security fencing and lighting; maintenance; safety and wellbeing and public rights of way. • We also consider that additional guidance should be provided to assist homeowners and housebuilders with the installation of domestic-scale renewable technologies including protecting the residential amenity of neighbouring properties and existing domestic scale renewable energy technologies. Standards and Certifications • BREEAM – Don't think there is a requirement for non-residential buildings in Vale to meet BREEAM Excellent – this requirement is only for non-residential buildings in South. • Principle 6.13 – the 40% requirement will increase in 2026 to 50% and in 2030 to 100%

Passivehouse is an optional standard of development unless specified by local plan development policy. Passivehouse is a methodology of achieving sustainable development. More flexible approached to achieving sustainable development including Passivehouse certification will be reviewed and incorporated into the guide. The wording of guidance and technical specification in relation to sustainable development will be reviewed.

79	<p>Response manually entered, submitted in an email format. Paragraph 6.4 of the draft Design Guide notes that water harvesting is required for 'all major and minor development types'. Thakeham agree with the intent of this requirement in principle, however Thakeham consider further guidance is needed to detail what this will mean in practice. For example, can this requirement be met via a water butt at each property, or does it require a more substantial communal tank? In providing clarity on this it should also be made clear what type of solution is applicable to what scale of development and where there is a graduation, thinking specifically about the viability of smaller schemes. Figure 60 illustrates Policy DES10: Carbon Reduction from the adopted South Oxfordshire Local Plan 2035, which requires a 40% reduction in carbon emissions (compared with a code 2013 Building Regulations compliant base case) to 2026, a 50% reduction to 2030 and a 100% reduction from 31st March 2030. Thakeham support this approach and our own commitment to Net Zero by 2025 will mean that Thakeham exceed these targets. The draft Design Guide includes a section on 'Passivhaus' and paragraph 6.15 requires that "all residential proposals aspire to meet Passivhaus certification". Thakeham do not support this requirement. Whilst following the principles of Passivhaus encourages a strong fabric-first design, our experience is that Passivhaus homes present issues from an occupier perspective that requires training, understanding, and constant monitoring to avoid health issues from mismanagement of the complex systems. Airtightness exceeding Building Regulations can reduce energy consumption, however Passivhaus requirements of over fifteen times tighter than Building Regulations has unintended consequences for people in the home. Thakeham's Zero Carbon specification focusses instead on the Space Heating Demand through fabric efficiency improvements; exceeding Passivhaus' target of 15KWh/m2/year down to our figure of 13.44 which Thakeham believe is the most effective and beneficial for the long-term. Delivering this alongside air tightness that is over twice as tight as building regulations means the home is still intuitive and convenient for all. Thakeham therefore suggest that some flexibility is built into this section of the draft Design Guide, to allow for other innovative solutions which meet or exceed the levels set by 'Passivhaus'. Thakeham would additionally note that within the Passivhaus text the draft Design Guide states "...we understand that this may not always be appropriate due to some development types and/or reasons of viability". Such commentary does not appear within the 'design principles' section and therefore the guidance itself is contradictory. Regarding embodied carbon, the draft Design Guide discusses the need for this to be minimised with regard to the material fabric of a building. Thakeham support this approach and would add that as part of our commitments to Net Zero by 2025, Thakeham has committed to all homes being Carbon Neutral in Production – including monitoring and reducing the embodied carbon of each home Thakeham produce. Thakeham is a leader in this area and can therefore help inform the resulting process that the councils wish to see.</p>	<p>The wording of guidance and technical specification in relation to sustainable development will be reviewed.</p>
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Many of the sections of this part of the guide, for example the sections relating to climate emergency, the definition of net zero carbon, carbon emissions, MMC are explanatory rather than guidance. The role of an SPD is to provide guidance in relation to existing policies in adopted local plans, and it is not within the remit of an SPD to introduce new policy requirements. The introduction of new policy requirements should therefore be deferred to a future Local Plan review. Design Principles: Many of these design principles replicate the issues raised in the NDG that are required to be considered by applicants. The wording of the design principles should be amended to clarify that these issues are for consideration, and not necessarily issues with which all proposals can comply. Applicants may not be able to 'ensure' that high quality schemes meet all of the principles as set out, and the wording of text in the SPD should be amended. An appropriate alternative would be 'applicants should ensure consideration has been given to...'

Both Passivhouse and BREEAM are optional standards of development unless specified by Local plan development policy. Currently only SODC have an adopted requirement for BREEAM, and only in certain types of development. More flexible approaches to achieving sustainable development will be reviewed and incorporated into the guide. The wording of guidance and technical specification in relation to sustainable development will be reviewed.

81

Response manually entered, submitted in an email format. Design Principles - Standards and Certifications CEG questions whether Para. 6.13 requiring 40% reduction in carbon emissions and Para. 6.14 requiring BREEAM excellent in non-residential development needs restating beyond the Local Plan requirements when potentially the Local Plan could be superseded during the lifetime of the Design Guide. This part of the document also states that applicants should ensure that all residential proposals aspire to meet Passivhaus certification. Clarity of the priority outcomes is required in order to evaluate whether Passivhaus is a suitable certification to achieve. Principles can be aspired to without a requirement to achieve formal certification. In relation to the 'reducing emissions' section, the JDG should recognise the evolving nature of national changes (specifically in relation to Building Regulations and the Future Homes Standard) and set out how the JDG will remain up-to-date and relevant amidst these national changes. As a general comment, it should be noted that the SPD cannot go beyond its role as a document that is supplementary to the adopted development plans for Vale of White Horse and South Oxfordshire District Councils. If there is no development plan policy (or Act of law) requiring something, the Joint Design Guide can only encourage, or require consideration of the relevant matter.

82	<p>Response manually entered, submitted in an email format. Infill developmentThe design of infill development is often a cause for concern, particularly where 2 or 3 houses replace a single dwelling in a large garden. Assessing the impact on neighbours is a key issue. There are only two short sentences about neighbour amenity. The guidance on separation between buildings is useful but does not take into account unusual orientations of houses on infill sites or backland development, where front to back or front to side distances are key. The guidance on amenity space and particularly, access to rear gardens and avoidance of long narrow alleyways is useful in assessing small infill developments. However, a situation that frequently arises is backland development that often leads to long drives to provide access and parking for the rear property which have a detrimental effect on the front property and neighbours. Guidance in this area would be useful. Climate ChangeThis provides a useful guide to the issues facing development today and the steps that can be taken to address those issues.</p>	
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Part 8: Design principles

Question 14: In general, how useful do you think the design principles in the draft Joint Design Guide are when assessing a design proposal?

	Comment	Council's response
1	<p>I can't remember the details of them and can only get back to them by trashing this reply and starting again. This form should have a facility to dive back in to them without losing the place on the page - Shame as I'd have liked to respond</p>	<p>Apologies, the online survey does however have the ability to save your progress and re-enter or edit your comments.</p>

2	<p>The guide is too elaborate and lengthy.</p> <p>Nice concept.</p> <p>Poorly implemented.</p>	· Noted and will review
3	<p>Fundamentally the design guide MUST differentiate between small householder/minor development, and large scale mass housing projects. There is simply too much information in a single place to sift through to find what is being sought after. The design guide should be broken down into 3 documents. MAJOR DEVELOPMENT : HOUSEHOLDER DEVELOPMENT : EVERYTHING ELSE. This would be clear and concise and allow applicants to know exactly what they need to provide.</p>	· Noted and will review

4	<p>The problem most of have is the public consultation never really considered to be important. We feel powerless when dealing with developers and all levels of local government. Our views and concerns are ignored and developers' wants are the only consideration. We feel that we are fighting YOU and the developer. You are the enemy rather than our employees. We pay your salaries and you work against our interests.</p>	<ul style="list-style-type: none"> - Noted
5	<p>They are things that are important to think about at the start of the process</p>	<ul style="list-style-type: none"> - Acknowledged
6	<p>The question is worded so that you are a numpty if you do not agree. The draft joint design guide is only good if all of the principles are met and the quality of the build and finish are complied with. My stronger question is who will oversee the work and how much influence will they have if the quality is poor? There are already pressures on developers given the manpower shortages and the building supply shortages. There are incentives there for them to cut corners. The guide is fine - the finished product is what counts.</p>	<ul style="list-style-type: none"> - Noted - Urban design officers are principally responsible for judging the design quality of a development.
7	<p>They will be extremely useful if they are used and applied which means they have to be more than merely aspirational.</p>	<ul style="list-style-type: none"> - Acknowledged
8	<p>The existing Vale design guide is very clear, and yet in Faringdon we see multiple large developments being approved which skip the guidance . A cursory look at multiple exits and entry suggestions, space for growing food, movement framework, etc. shows there is little point in making new guides, if the implementation of existing guides is so poor. If the same people and processes are at work in the approval process, there is no point in investing in new guidelines.</p>	<ul style="list-style-type: none"> - Noted - The new guide will be delivered with training for officers to ensure the guide is more closely followed. - The more accessible online form of the guide will allow greater clarity around expectations and its use as a tool to review development proposals.
9	<p>See above</p>	<ul style="list-style-type: none"> - Noted

10	Employees have been paid huge salaries to compile these reports in an ideal world in rainbow land probably work in south Oxfordshire zero	· This comment raises issues that fall outside the scope of the design guide.
11	In my experience, most people are attracted by new opportunities, such as the promise of a swimming pool for local people. Or they live in poorly designed accommodation and don't understand how bad development reduces their enjoyment of their local environment. Money drives most decisions. This guide looks like a useful way to help focus developers on doing the right thing. It will be more influential on small and local developers than on the big blue-chip investment and building companies.	· Acknowledged
12	Well, I like them but I am extremely sceptical that developers will pay anything other than lip service to them....	· Noted
13	See comment above on climate & sustainability	· Noted
14	Please please please do not adopt this guide without major changes	· Noted

15	<p>concern that the principles may be used by officers without an ability to discern intuitive and skilful design innovation</p>	<ul style="list-style-type: none"> · Acknowledged
16	<p>the concern here is that the average person in Abingdon High street will not be that interested until they submit a planning application for their extension or find the house their were hoping to buy is £25K more expensive due to the additionality this guidance will cause them. It is the age old planning issue: how do we educate the population and get them to buy into more expensive solutions in order to protect the environment.</p> <p>Perhaps there needs to be an ongoing commitment to take this message in to schools and parish councils? Perhaps also to update the document on a regular basis with good practise cases studies - the use of Youtube may help to get the message across and sharing of best practise drawing details?</p>	<ul style="list-style-type: none"> · This comment raises issues that fall outside the scope of the design guide.

17	<p>Worried that all sounds good but already and very recently principals arent being followed. The amount of money collected from developers is not to be shouted about on its own which is what Vale have just done! Have to look at a) Does local community want it b) is it best good-looking practical cost efficient design c) is it sympathetic in landscape and to its wildlife/environment Seems too much of 'yes you can build it...this is what you will pay planning/community infrastructure' Its no good letting developments trash the environment and have a few quid after to supposedly improve the area with!...its too late. Stop shouting about £14 million collected...show and tell us what you are going to do with it and how you will seek to minimise further Wantage expansion!</p>	<p>· This comment raises issues that fall outside the scope of the design guide.</p>
18	<p>Thank you for the opportunity to comment. Good luck with the 2nd draft</p>	<p>· Acknowledged</p>
19	<p>I like the simplicity with good examples and written in plain English - nice to see less jargon</p>	<p>· Acknowledged</p>

20	You follow all the design standards and your plan is just rejected based on the officer's own bias	- Noted
21	I love the general structure, clarity and balance of diagrams to words - overall it has a useful simplicity about it - which I think will mean that the document will be well used by a wide range of audiences - brilliant - well done!	- Acknowledged

22	See comments above - lawyers from the developers will run circles around you.	· Noted and will review
23	See above for availability to all levels of incomes!!	· Noted and will review
24	Would like to see reference to Neighbourhood Plans	· Acknowledged
25	please see my comments in section 11	· Noted and will review
26	This helps householders and developers understand what is expected of them, and consider factors they may not have thought about.	· Acknowledged
27	Past experience tells me that future build will very likely be just as cramped and miserable looking as new build during the past 5 years.	· Noted

28	Very useful if applied.	· Acknowledged
29	Far too wordy for none professionals to digest.	· Noted and will review
30	It will make sure that proposers of major developments 'tick all the boxes' in their proposals. However, planning decisions are made on the balance of benefits and harms, and applicants can still 'talk the talk' in their proposals without 'walking the walk'.	· Noted
31	What concerns me is the weight they would actually have when planning permission is sought. Even more to the point, to what extent they might be applied in the face of national government directives.	· The guide is a material consideration as a supplementary to both adopted local plans. · The guide is written to follow current adopted government policies.
32	These design principles are like having your own notecards for writing a report- I think they they're brilliant and pretty much cover anything you would need to consider. The fact that examples of and solutions to common design issues are included within this Guide is fab too, as a civilian who would otherwise be clueless.	· Acknowledged
33	no reference found to the role of neighbourhood plans	· Acknowledged
34	Too much to read, and take in, need to be simple and in laymans terms. Not bamboozled with all this	· Noted and will review

35	The Design Guide principles are adequate but could be much better.	· Noted and will review
36	see comments from earlier sections that apply to these heading	· Noted
37	However, most of it does not apply to a rural setting. Regrettably it is unsatisfactory in rural settings.	· Noted and will review

38	One of the better sections. Reasonable clear and simple explanations.	· Acknowledged
39	but remember forget the humbug and the we want to win an award for this design. A security B houses that last	· Noted
40	It is good to have everything in one place for someone considering a planning application, although, as I've already said, it's not quite hitting the right language for a lay person (and a professional probably knows all this stuff as they do it daily).	· Noted and will review

41	<p>The principles are superb. Is it the case that we are unable to REQUIRE compliance until building regulations come up to the level of these design principles? How strongly can we urge developers to actually DO these things?</p>	<p>We require all development to meet to current building regulation.</p> <p>South Oxfordshire district Council have an adopted Local plan policy (DES10) that requires development over a certain size to go beyond building regulations under certain criteria.</p> <p>All other design guidance for development is an 'encouragement' to go beyond building regulations.</p>
42	<p>I have graded the design principles 'Somewhat useful' as the changes in legislation and public awareness forced on us by future climate change events will demand flexibility in the application of the principles. The change mechanism for the Joint Design Guide documentation must be agile so that it may react quickly to new Government guidance and public pressure.</p> <p>The fact that no Standards and Certifications for residential buildings are mandated is a major omission in the Guide and approvals process. The Planning team are requested to address this complex area as a top priority task.</p>	<p>The change mechanism for the guide is the regulatory mechanise of an SPD, see: https://www.legislation.gov.uk/uksi/2004/2204/part/5/made</p> <p>The guide currently states the Standards and Certifications that are required by legislation or regulation. Additional certification for sustainable development if referenced within the climate and sustainability section of the guide, including PASSIVHOUSE and BREEAM.</p>
43	<p>I think in the absence of sensibly challenging building regulations then driving the increase in standards through the planning process is all we can do and this guide is a good attempt</p>	<p>- Acknowledged</p>

44	<p>I think this design guide would be pretty useless in assessing a "Hockerton" style development which is probably what we need more of in the district. It is also doubtful whether it would prevent the development of poorly designed housing estates as they would still have car dependency, look like mock Tudor developments with limited local input and kitted out with the cheapest plumbing and electrical appliances.</p>	<p>- Noted. Hockerton housing development in Nottinghamshire is not a mandatory model or form of development, and we cannot insist on this in the guide. Additional Fixtures and fittings within a dwelling cannot be dictated by the design guide.</p>
45	<p>Extremely useful, subject to stronger principle wording in some instances. Thank you for all of your hard work on this so far!</p>	<p>- Acknowledged</p>

46	<p>This is an excellent design guide, which is easy to follow and covers all the relevant factors that need to be considered. It should be a model for other design guides across the Chilterns. For it to be successful in influencing design, it must be embedded into the policies in the emerging Local Plan.</p>	· Acknowledged
47	<p>Please refer to Bloor Homes' comments in response to Questions 9 to 13 above, which raise specific comments in relation to the design principles set out in each section of the Design Guide SPD.</p>	· Noted

48

The navigation is poor and cumbersome. Check lists would be useful. It appears to be developed solely for medium sized to large developments and not very helpful for individual houses - infilling or extensions which are most common in our parish in the Green Belt.

- Noted and will review

49	Some areas of the guide are clear , with additional clarity provided by diagrams. Other areas introduce large amounts of explanatory text and what seem to be new policy requirements that should properly be part of a Local Plan review.	· Noted and will review
50	Please see submitted letter for full comments.	· Noted

51	The lack of reference to the public rights of way network and other off-road access that is currently available to vulnerable/non-motorised road users is a significant omission within the guide. NPPF specifically requires that planning decisions ""...should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks including National Trails.""	· Noted and will review
52	Not as useful as they could be if they were extended to cover some of the most pressing development and design issues - such as multiple applications for solar power stations on farmland rather than on brown field sites at the solar PV lobby claim	· Noted and will review
53	Some areas of the guide are clear, with additional clarity provided by diagrams. Other areas introduce large amounts of explanatory text and what seem to be new policy requirements that should properly be part of a Local Plan review. The below comments are in response to question 15: The key design objectives replicate the National Design Guide (NDG) to some extent, but are not completely in accordance with the NDG. The SPD should ensure that National Design Guidance is not replicated, but that the SPD adds a layer of relevant local detail.	· Noted. The design guide does align with the National Design guide and seeks to build upon it, inline with Local development policies.

Part 9

Question 17: The draft Joint Design Guide has been produced as an innovative, interactive website that is much more visual than a normal document, providing illustrations, plans and photos to convey important messages and provide explanations rather than simply detailed text. Do you have any comments about the way the draft Joint Design Guide is presented?

	Comment	Council's response
1	As above - it doesn't seem to work on an ipad and there's no ability to refer to the text to respond intelligently to the questions	- Acknowledged. We have now fixed this.
2	<p>The guide is too elaborate and lengthy.</p> <p>Nice concept.</p> <p>Poorly implemented.</p> <p>It is expected that one will be negated.</p>	- Noted and will review

3	As previously, too much information in a single place. It is imperative the information is broken down to actually relate to specific development.	· Noted and will review
4	The design guide has its own priorities.	· Noted
5	Like most surveys from local government, my views will be ignored unless they happen to be positive. I find it difficult to understand why we even need three layers of bureaucracy when you just ignore local views and follow government directives.	· Noted
6	Only on the developers delivery of what is promised (whoever the developer(s) are).	· Noted

7	See note about search engine.	· Noted and will review
8	The existing Vale design guide is very clear, and yet in Faringdon we see multiple large developments being approved which skip the guidance . A cursory look at multiple exits and entry suggestions, space for growing food, movement framework, etc. shows there is little point in making new guides, if the implementation of existing guides is so poor. If the same people and processes are at work in the approval process, there is no point in investing in new guidelines.	· Noted
9	Already commented written as a thesis not actually possible	· NA
10	I have read it one time. The only weakness I cannot test for is how easy it is to find something that I read in the guide when I return six months later to uncover it - the search function. Also, I am not currently involved in any development, so I do not have a particular need for information. Often well-intentioned websites fall down because the user asks a question in a way that the content designers did not consider.	· Noted and will review
11	I do hope that on the design team you will have some seniors, to give of their very wide opinions of living in our beautiful area In the last 10 years I have watched the A417 turn into a HGV and building lorry highway and the pollution from all the diesel traffic onway to building sites.	· Noted

12	You have done a great job. I like it. Thank you.	· Acknowledged
13	No.	· Noted
14	I like it !	· Acknowledged

15	I wish to highlight the failure within it to recognise the existence of Local Plans and Neighbourhood Plans as key determinants of local popular views.	· Noted and will review
16	This looks to me as something that was produced by Consultants; and I am not sure who they were working for?	The Design guide was not produced by an external consultant. The guide was produced in house by both Urban design team for South Oxfordshire and the Vale of White Horse.

17	It's a great tool for industry professionals, but I suggest a simpler guide for lay people is produced and widely communicated to help them provide informed comment on planning applications. If members of the public demonstrate their support for quality design, it would surely help officers and committees insist developers provide the best designs	· Acknowledged
18	Designed more for trades people than general public	· Acknowledged
19	it doesn't really work	· Noted and will review

20	its not bad	· Acknowledged
21	<p>Too wordy...needs bullet points.</p> <p>Most presentations 12-13 pages for common person. Many wont comment as too longwinded.....unfortunately then means you arent engaging the general public en masse only those who can be bothered to read it/take time to comment.</p>	· Noted

22	I think it looks fantastic - attractive and functional.	· Acknowledged
23	<p>far too biased towards developers, create a simpler version for householders</p> <p>Make a commitment that if the design standards are met then the plan will be approved, unless there are real objective concerns, and not just an officers's bias based on an unwillingness to change roof scapes, even where it is for the benefit overall</p>	· Noted
24	Great to see innovation of this type.	· Acknowledged
25	I think the interactive bit is perhaps a bit gimmicky - but nice - its the content and layout that 'do the job extremely well'	· Acknowledged
26	Hmmm. I guess I'm too old. I get my information from the printed page - why do you think newspapers and books still sell so well?	· Noted
27	I found initial access difficult. Age is not on my side!!	· Noted

28	Would like to see reference to Neighbourhood Plans	· Noted and will review
29	none	· NA
30	I much prefer this to a dense, wordy document. It is far easier to use. It's intuitive, the colours help define the subject areas, and it's easy to follow through the guide.	· Acknowledged
31	It feels like a really positive step to ensure all developments are positive and enhance local communities and existing features.	· Acknowledged
32	Sorry to seem so negative but no recent build in my area inspires me with feelings of joy or hope for the future. I can only imagine that most newcomers had such dreadful previous surroundings that they consider the new stock acceptable, or even desirable.	· Noted
33	As noted above, the buttons on the side are not clear. It would be better to have a 'next step' at the bottom of the page as well, plus an index at the top.	· Noted and will review
34	Bright and inviting for users to alight upon - fresh and clean - well laid out and documented -	· Acknowledged

35	<p>The website format is good but needs to be more signalled. The individual pages are large and it would be helpful to have an initial indication of content so that you can see what will be covered and in what order - otherwise you won't know whether it is going to help. Otherwise a very good move.</p>	<ul style="list-style-type: none"> · Noted and will review
36	<p>Font size of diagrams??</p> <p>Are there audio/tactile options for Visually Impaired members of the community? Not just large print. Or other options for people with disabilities to be able to be involved and have the opportunity to respond?</p>	<ul style="list-style-type: none"> · The website is being developed to Web Content Accessibility Guidelines (WCAG). This is a requirement for public sector bodies regarding accessibility. This includes those with: <ul style="list-style-type: none"> - impaired vision - motor difficulties - cognitive impairments or learning disabilities - deafness or impaired hearing
37	<p>Relatable diagrams and photographs seem to be mainly restricted to Abingdon and Didcot</p>	<ul style="list-style-type: none"> · Noted and will review

38	Just one minor suggestion, the buttons to access each section could be palced a bit more obviously.	· Acknowledged
39	It merits a ""Good Try"" I wonder if it would be better presented as an essential outline for the potential householder, with more detailed technical sections for the architects and builders.	· Noted and will review
40	The pictures and diagrams are excellent in aiding understanding	· Acknowledged

41	quite like it.	· Acknowledged
42	easy to follow and understand, well done.	· Acknowledged
43	It is innovative, meticulous and very well executed.	· Acknowledged

44	Some of the initial discussion found for each section could be written in bullet points and/ or have key words highlighted in bold or italics. Otherwise, good.	· Noted and will review
45	It is a scrupulously put together document that I think will be hugely beneficial to those in the District planning to develop in the future; it's fully accessible, it holds a person's attention unlike most other DGs (literally because of all of the pictures and nice colours- you're onto a winner there!), it still holds all of the information that it needs to but has brought it down to a level that people can actually understand - I'd be very happy to use this Guide as an average member of the public.	· Acknowledged

46	what about potential users who for whatever reason cannot access or use an interactive website	· A low resolution version will be available to download and we will break up the file into different parts if necessary.
47	The ""dots"" down the side of the web site which are the navigation were not clear to me	· Noted and will review

48

It needs to be searchable. I made a lot of notes about paragraphs which weren't numbered and then struggled to find the relevant place. This is particularly a problem with the drop down information on the interactive plans.

· Noted and will review

49	<p>The guides aims are admirable - "short and concise with a simple set of rules", "provide a simple set of design criteria", "is relevant for all scales of development". However I don't think it achieves them. Section of it are verbose, with overly complex descriptions/explanations. Why use a simple word when you can prefix it with another (e.g. well-overlooked). Why stop at one explanation when two can do the job. I'm probably being more than a little unfair but short, simple and concise this guide is not.</p>	<ul style="list-style-type: none">· Noted and will review
50	<p>full page diagrams make diagrams big and even better artists illustrations</p>	<ul style="list-style-type: none">· Acknowledged

51

The key difficulty is finding universal agreement of what is a "beautiful" design. This will be extremely difficult and probably impossible to define as it is so subjective. It may be better to drop this objective or find an alternative that can be more easily defined.

· Noted and will review

52

I really like the way this document is presented especially its interactive website and photos.

· Acknowledged

It would be useful to also have a PDF version of the document when the final version of it is produced.

· A low resolution version will be available to download and we will break up the file into different parts if necessary.

54

It's fine. The left hand navigation of dots is a little odd because, at least on my Mac/Safari the labels for those dots pop up over the top of the website text. But it's fine.

· Noted and will review

55

Whilst it is encouraging that the guide is interactive and digitally accessible, it is difficult to navigate and the menu is hard to find. The guide would benefit from a contents page at the beginning of the document with sign posting and links used throughout the document.

· Noted and will review

56

I have struggled somewhat but on the whole it comes across as reasonably clear to a non-professional

· Acknowledged

57

Top marks for the team that has built this. I hope it will have the impact on future development in South and Vale that we all want and need.

· Acknowledged

58	<p>Thank you for producing a very helpful draft of the Joint Design Guide supported by an excellent web site and an easy way to comment. The amount of work that has gone into this masterpiece is greatly appreciated. The inclusion of the section on Climate and Sustainability is excellent. Perhaps this topic is becoming so important that it should appear as the first subsection rather than the last section of the Guide.</p>	· Acknowledged
59	<p>I agree with this statement; the website with illustrations, plans and photos is much more accessible and easy to understand than a normal document would be.</p>	· Acknowledged

60

It is an improvement on many official publications

· Acknowledged

61

The presentation with illustrations and photos is useful but including photos of Didcot with mowed lawns and cement pavers is not really showing exemplar developments that are future-proof and low carbon as required.

- Acknowledged
- We are seeking to update the images to ensure they are relevant.

62

Officers wanted to say thank you for the sheer amount of work that has been put into the JDG. However, Officers did not feel that the website, as currently formatted, was user friendly. A lot of scrolling is required to reach the information needed. Please see comments overleaf.

- Acknowledged
- Noted and will review

63

It is excellent!

· Acknowledged

64	No comments.	· Noted
65	Where there are bullet points within sections they should be lettered for accuracy.	· Noted and will review

66

Overall we very much approve of the approach and content. It is a shame it was not in place 10 years ago

· Acknowledged

67

We are supportive of the webpage links that have been provided within the Joint Design Guide to direct the user of the document to relevant Local Plan policies and guidance. In general, we consider the interactivity of the document and the fact that it consolidates various policies and guidance into one document is helpful and reduces the time required to review specific policy requirements.

· Acknowledged

68

Usability – poor. One needs to be able to search the whole document in one go, rather than searching for a word in each individual section.

· Noted and will review

69

Yes, the navigation is poor and cumbersome. It needs a large PC screen. Check lists and forms with tick boxes would be useful as with Oxford City's Character Assessment forms, which are helpful and have scores

· Noted and will review

70

The format of the guidance and the diagrams work well. Clarity is needed on what is 'policy requirement' and what is 'SPD guidance'.

· Acknowledged

71

Please see submitted letter for full comments.

· Acknowledged

72

See earlier comment about the lack of headings for the bulleted links on the first page of the Guide. Overall, the guide is relatively simple to follow once one understands how the different sections are structured and how to access and navigate them, however it is very easy to overlook a section. The Guide should also be made available as a downloadable pdf to enable those needing to refer to it regularly to review it as a complete document rather than in discrete sections.

· Noted and will review

73

It looks very accessible. Congratulations

· Acknowledged

74

I think this is an excellent design guide. Thank you very much.

· Acknowledged

75

too many line drawings (aka artists impressions) rather than the locally evidence based photos that are often to be found in neighbourhood plans

· Noted and will review

76

Too many errors in the English. Some diagrams are not clear. The Landscape Charters map is unclear, inaccurate and tries to put too much detail in one page - the colours are not distinguishable in many places.

· Noted and will review

77	<p>The below comment is in response to question 16: The key design objectives replicate the National Design Guide (NDG) to some extent, but are not completely in accordance with the NDG. The SPD should ensure that National Design Guidance is not replicated, but that the SPD adds a layer of relevant local detail. The format of the guidance and the diagrams work well. Clarity is needed on what is 'policy requirement' and what is 'SPD guidance'.</p>	<ul style="list-style-type: none"> · Acknowledged
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Part 10: Anything else?

Question 18 and 19: Do you have any other comments that you would like to make on the draft Joint Design Guide? Please include any comments about what would help make the guide more suitable to your needs. Please also include anything that you think should be included or expanded on?

	Comment	Council's response

1	Fix that problem and my response will be more revealing	· Acknowledged
2	<p>Villages should be treated differently to urban areas like towns. The villages in this area are being over developed and slowly losing their identity with the countryside between them being swallowed up by inappropriate developments which are not integrated into the communities where they have been built.</p> <p>Steventon is a classic example of this.</p>	· The principles outlined in the design guide are applicable to all scales of development.

3	no other comments	· Noted
4	Insufficient respect is given to the existing structure and context of the area, eg height restrictions are not related to existing structures. Each new house is higher than the last and each plot fuller than the last.	· The height of a developemnt should be reviewed on a case by case basis. The guide should not specify height limits to development. The guide does generally state that development should be visually subservient to the adjacent development.
5	I understand that you need to appear to be doing something but this is just another guideline that can be completely ignored when it suites the developer. Planning permission WILL eventually be given and objections ignored. In my experience, the planning department leaves it to the individual to fight with the developer and takes no part in the process. Local government (County, District, and Parish) has made itself irrelevant and is just an extra expense that the beleaguered householder has to pay with no visible benefit.	· Noted
6	This is a valuable, well presented document and the content is very encouraging. Can the same scientific and aesthetic good sense be applied to existing developments? Are you shutting the stable door when the horse has bolted??!	· Acknowledged

7	<p>As families grow and their children get cars, every dwelling must be built making parking space for that families potential car ownership in yhe future. Too many cars line the pavements due to lack of allocated space. We are currently making life safer on the roads for pedestrians putting the onus on the drivers . What about the cars parked outside their homes half on the pavement, this isnot making pavements safer for pedestrians.</p>	<ul style="list-style-type: none"> · Acknowledged
8	<p>The designs look good on paper and are of the standard and quality required by the law, of that there is no doubt. I would like to see more detail and commitment relating to who will maintain the site once completed, what guarantees are in place if the developer goes bankrupt during or immediately after completion (often happens) and what is being done to ensure there are recovery positions for the council if things go awry.</p>	<p>This would be established through the preapplication or planning application process, chiefly the submission and management agreements and maintenance strategies. The bankruptcy of a developer is beyond the scope of the SPD.</p>
9	<p>I hope this carries weight and is implemented as soon as possible.</p>	<ul style="list-style-type: none"> · Acknowledged
10	<p>The design of this ""feedback"" questionnaire is focussed purely on ticking a participation box, it fails entirely to ask the question ""what have we learned about the implementation of previous guidelines?"" and as such has 0% learning in it.</p>	<ul style="list-style-type: none"> · Noted
11	<p>All new housing should be provided with solar electricity generation and heating alternatives to gas/electric boilers. All new housing should have off street parking including for visitors. All new housing should have electric vehicle re-charging points.</p>	<ul style="list-style-type: none"> · Noted and will review

12	I think I have made my views clear	· Noted
13	<p>Many of the trees on the roadsides of this county are dead or very old. They all need attention and culling with new trees planted to prevent trees and branches falling on cars and people in high winds.</p> <p>Good opportunity would be to hire teams of trained young people to cut down and replant new trees to take us into the future. Governments will give grants for new trees so it would be very cost effective to make safe our country roads.</p> <p>many thanks</p> <p>as a senior I have time and energy to get involved in planning consultancy as I would like to see the character of architecture in England move forwards into the 21st cent.</p> <p>Mary Thomas</p> <p>mary69thomas@gmail.com</p>	<p>· This comment raises issues that fall outside the scope of the design guide.</p> <p>Acknowledged</p>
14	More developments need to be monitored as the work progresses or things will be added that cannot be undone once a build has finished.	· This would be established through the preapplication or planning application process.

15	What a load of puerile waffle!!It's GCSE level architecture/town planning stuff, so generic as to be meaninglessWas this a job creation scheme?	· Noted
16	I would repeat my comment above about NDPs, Historic Parks and Gardens and undesignated heritage assets. The guide is incomplete without recognising their importance in the relevant sections.	· Noted and will review

17	My comments have been recorded above. It is incomplete as it stands.	· Noted
18	Please see comment for Questions 3 & 11.	· Noted
19	My main point is to lobby government to get the building regulations amended to force developers to do the right thing!	· This comment raises issues that fall outside the scope of the design guide.

20	concern that the principles may be used by officers without an ability to discern intuitive and skilful design innovation	· Acknowledged
21	car parks could be used in a positive way to collect solar energy by the use of photovoltaic cells on covered areas - please see attached.	· Acknowledged

22	<p>The needs of disabled people, ie dropped kerbs clearly marked, easy access to all areas, and good infrastructure, cannot emphasise both issues enough.</p>	<ul style="list-style-type: none"> · Noted and will review
23	<p>This whole exercise is secondary to the fundamental issue of over-development, and there is a fear that it will be used as a smokescreen.</p> <p>The danger is that everybody will get buried in the minutiae of the planning process. Innovative thinking about moving from the current unsustainable development to passive designs which do not harm the AONBs and Green Belt and minimise damage to the rest of the environment are required.</p>	<ul style="list-style-type: none"> · Noted. · The guide does make reference to both passive and active approaches to sustainable design under the Climate and sustainability section.
24	<p>Air pollution and noise are considerations not covered.....cause stress and health issues.</p> <p>Traffic flow to dense new housing not thought out:</p> <p>1) 38ton Quarry Trucks traffic massive upflow from Shellingford Quarry blighting north wantage, damaging road surfaces</p> <p>2) Massive uplift in Traffic flow in Mably Way serious issue which will get worse as more houses built on Airfield and new relief road around Challow links to it, soon providing a rat-run to the north from Ardington area.....a link road</p> <p>Dont allow constant in-filling by developers...leave some green areas/fields. Protect Elm Farm fields by A338...no Lid!...totally inappropriate.</p>	<ul style="list-style-type: none"> · Noted and will review
25	<p>I am not an architect or designer. More space on the ""What makes a good development"" section would apply better to members of the public who do not have design experience/training.</p>	<ul style="list-style-type: none"> · Noted and will review
26	<p>Only that it is implemented quickly and that the major developers buy into it.</p>	<ul style="list-style-type: none"> · Acknowledged
27	<p>far too biased towards developers, create a simpler version for householdersMake a commitment that if the design standards are met then the plan will be approved, unless there are real objective concerns, and not just an officers's bias based on an unwillingness to change roof scapes, even where it is for the benefit overall</p>	<ul style="list-style-type: none"> · Noted and will review · This comment also raises issues that fall outside the scope of the design guide.

28	<p>Where relevant please include reference to Oxfordshire Gardens Trust which can be contacted about historic parks gardens and landscapes. We have researched a number of sites which are not on the national register, but which may come to be at some point, these include Radley and Rycote, researched for the CB300 project.</p> <p>On our OGT website there is online information about our research on walled kitchen gardens in both districts, CB300 research and recreational parks as well as links to the registered sites. If it were possible to include an interactive link to our site this could help those wishing to make changes impacting on these sites and their settings find relevant information rapidly</p> <p>In other cases we can be contacted directly at secretary @ogt.co.uk</p> <p>Much of this information has been deposited with the HER.</p>	· Acknowledged
29	As hinted at above, I'd be inclined to think about the design of THE PLANNING PROCESS as much as the layout of the design guide.	· Noted
30	<p>Accessible areas need to be ensured and builders need to be supervised. Access alley ways need not to have steps to aid wheelchairs and prams.</p> <p>Through traffic should be able to have speed restriction if children and the poorly sighted are to be provided for.</p>	<p>Inclusive design is a key principle within the design guide and we have tried to cover areas not already covered by regulations.</p> <p>Aspects of access are covered by building regulations.</p> <p>Through traffic and speed restrictions are applied by OCC.</p>
31	Would like to see reference to Neighbourhood Plans	· Acknowledged
32	All good, but with reservations expressed about EV charging in section 11	· Noted and will review
33	to many house being build we need carparks and primark in didcot to many cafes in didcot	· Noted

34	<p>Sorry that I haven't completed your survey correctly. However having recently been the totally innocent victims of incredibly poor SODC Planning Department decisions, none of this is relevant - as it just isn't taken into account in reality. The SODC Planning Department hides behind the General Permitted Development rights ruling regardless of what the real local situation is. In our case, a wealthy, selfish, arrogant couple with no regard for local community and the rural habitat was allowed to build a monstrous modern 'outbuilding' larger than their house which now sits on what is agricultural land essentially at the end of our garden...not affecting their outlook, no, but creating a Berlin Wall of metal roof for us to look at as a reminder - every day - and that creates the most hideous unbearable glare for us on sunny days. But despite going through the Enforcement Investigation route, there is 'no breach' of planning law. No, legally maybe not. But morally - absolutely it breaches all manner of things. Disaster for the rural community as it has now set a precedent for awful modern stark characterless buildings to be built in the midst of some real rural heritage. No, a Design Guide is not going to help. The first correction needs to be the Planning Department that we pay our taxes towards actually considering each situation in a much more real human community-minded way - and not hide behind Westminster.</p>	<p>· NA</p>
35	<p>Sound; the listening experience of the inhabitants of the developments has not been considered. South Oxfordshire has many large, busy roads eg A34, M40 which have a significant sounding impact on the inhabitants and their internal and external domestic spaces. For example I made a series of audio recordings in Drayton during the initial stages of the pandemic (first lockdown) and at various dates before the pandemic. The impact of the sound of the A34 on quality of experience of those living with 500m of the road is extreme. During the lockdown the soundscape was birdsong; the slow creak of swings; the sound of football on the recreation ground. The current daily soundscape consists entirely of the rattle of the A34, the sound of tyres on asphalt, the clank of trucks as they pass imperfections in the road surface.</p> <p>Sound has a considerable impact on wellbeing and the success or failure of any given development but is completely absent from this Design Guide.</p>	<p>· Noted and will review</p>
36	<p>I understand that your guide wishes to be useful, but without legal powers to enforce it, I regret to say that I expect developers to continue to erect crowded facilities with minimal infrastructure. This will always be the outcome whilst those in control are motivated by making profit as large as they can get away with. You are quite simply up against human nature.</p>	<p>· Noted</p>

37	These included in the various sections of the survey thank you.	· NA
38	Perhaps architects could consider Poundbury as a way of introducing new build properties near or into richly historic villages and county towns and not uniform "boxes" which are reproducible from one boring set of drawings from Lands End to John of Groat. Each county has its own individual look: flint and render being prominent in Oxfordshire - not red brick (rendered block better?).	· Acknowledged

39	<p>As an individual with no connection with the building or associated industries, my interest in responding to this consultation is purely as 'an active village resident'. Most of my comments relate to the guide's focus on issues only relevant to large scale developments - and this might properly yield the greatest benefits. However, I doubt that householders contemplating an extension or constructing a single new dwelling would bother to seek out the guide or apply it guidance.</p>	· Noted and will review
40	<p>Thank you for the opportunity, but at our age we are not looking to move from our home of over 50 years to a new build. Except perhaps a Care Home.</p>	· NA
41	<p>As you can see my main concern is nature conservation in the context of development so please put more teeth in the requirements</p>	· Noted

42	<p>Neighbourhood plans are not mentioned.</p> <p>Discussion with local town/parish councils needed pre application- to fully understand the local context, and local initiatives.</p>	<ul style="list-style-type: none"> · Acknowledged
43	<p>you need to understand that we simply dont want all this development . how about redesigning on existing sites and upgrading them, like Blackbird leys and Cowley, Kidlington, instead of building on green belt all the time. Appreciate you are aiming for better design, but that's just a sinecure as we dont want more of your building in the first place. this will end in tears, please stop the development or intensify building in existing sites.</p>	<ul style="list-style-type: none"> · NA
44	<p>There could be a glossary in order to access the meaning of words such as 'fenestration' etc.The Joint Design Guide needs to be checked for spelling mistakes (there are several of these) and punctuation e.g. 's.</p>	<p>Noted. The guide currently has a glossary, spelling and grammar will be reviewed as part of the editorial process</p>

45	<p>Actually there is one thing that I noticed - on one of the graphics I think in fig1, Place and Setting - where you have in the lower left corner the view toward site from AONB, it actually says ANOB but that's a really nit picky detail so feel free to ignore!</p>	<p>· Noted and will review</p>
46	<p>Dear Sir/Madam, Thank you for consulting Network Rail on the draft Joint Design Guide. This email forms the basis of our response. Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure. The design guide acknowledges how access to public transport is key in order to meet the access needs of a wide range of users and in producing high quality development. Development should therefore take into account existing nearby rail infrastructure such as freight and passenger services in the area. The design of development should also consider any noise/vibration mitigation when building near the railway. With this in mind, any planned future development (both residential and employment) should take into account any adverse impact on railway. It could be that the predicted growth, may increase future demands at nearby stations which may, in turn, necessitate the need for enhancements to existing facilities such as waiting rooms, toilets and parking. Where there is an adverse impact on the operation of the railway, Network Rail will require appropriate mitigation measures to be delivered as part of the planning application process and developer contributions when necessary. Level Crossings Development proposals' affecting the safety of level crossings is an extremely important consideration for emerging planning policy to address. The impact from development can result in a significant increase in the vehicular and/or pedestrian traffic utilising a crossing which in turn impacts upon safety and service provision. Any development which would result in a material increase or significant change in the character of traffic using a rail crossing should be refused unless, in consultation with Network Rail, it can either be demonstrated that the safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission. In this regard, we would request that the potential impacts from development affecting Network Rail's level crossings, is specifically addressed through planning policy as there have been instances whereby Network Rail has not been consulted as statutory undertaker where a proposal has impacted on a level crossing. We request that a policy is provided confirming that:</p> <ul style="list-style-type: none"> • The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway; o Schedule 5 (f)(ii) of the Town & Country Planning (Development Management Procedure) order, 2010 requires that... "Where any proposed development is likely to result in a material increase in volume or a material change in the character of traffic using a level crossing over a railway (public footpath, public or private road) the Planning Authority's Highway Engineer must submit details to both Her Majesty's Railway Inspectorate and Network Rail for separate approval". <p>§ Any planning application which may increase the level of pedestrian and/or vehicular usage at a level crossing should be supported by a full Transport Assessment assessing such impact: and § The developer is required to fund any</p>	<p>· Acknowledged</p>

	<p>required qualitative improvements to the level crossing as a direct result of the development proposed. We trust these comments will be considered in your preparation of the forthcoming Design Guide. Yours Sincerely, Grace Lewis Town Planning Technician Wales and Western Network Rail Temple Point, Redcliffe Way, Bristol, BS1 6NL www.networkrail.co.uk/property</p>	
47	<ul style="list-style-type: none"> - no reference found to the role of neighbourhood plans - much more limited information on location and form of conservation areas than current design guide - much more limited information on local character assessments for different parts of the district council's area than in the current guide - fewer usable examples (e.g. over reliance on drawings rather than using photos as in current guide) 	<ul style="list-style-type: none"> - Acknowledged

48

See my previous answer.

· Noted

49	see comments made in earlier sections re Neighbourhood plans - their policies will heavily influence the design at location level	· Acknowledged
50	It is an impressive piece of work but sadly biased in favour of urban situations.	· Acknowledged

51

crime is a major problem the elite are in denial make all estates ect mugger no go zones

• Noted

52

Response manually entered, submitted in an email format. Please can you tell me why you bother to produce such guides when the SODC planning committee do not recognise them, or even acknowledge them, when making planning decisions-as we recently found out to our cost.

· Noted

53

Response manually entered, submitted in an email format. Difficult to find anything to disagree with, as it is all motherhood and apple pie. The proof is in implementation of limited new building, compatible with the location. Adequate infrastructure is also essential for new housing. That does not apply to the appalling developments around Didcot. The planners should be ashamed that they allowed them.

· Noted

54

Response manually entered, submitted in an email format. The original response is attached below for reference. M&W officers have reviewed the consultation information and at this time do not consider it likely that materially significant mineral and waste impacts will emerge as a result of implementing the consultation's proposals. M&W officers have based this response on potential impacts relating to: - Gloucestershire's mineral resources; the supply of minerals from and / or into Gloucestershire; and the ability of the county's network of waste management facilities to operate at its full permitted potential | M&W OFFICERS RAISE NO OBJECTION M&W officers have reviewed the consultation information and have no further comments to make.

· Noted

55

Response submitted in an email format and is attached below. Admin note: please view attachment below for detailed comments.

· Noted

56

Response manually entered, submitted in an email format. Having considered the consultation, I can confirm Buckinghamshire Council has no comments in wishes to make.

· Noted

57

Response manually entered, submitted in an email format. Thank you for your email below regarding the Joint Design Guide consultation. The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy & Industrial Strategy. As a statutory consultee, the Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas. As you are aware, South Oxfordshire and Vale of White Horse District Councils lie outside the defined coalfield and therefore the Coal Authority has no specific comments to make on your Local Plans / SPDs etc. In the spirit of ensuring efficiency of resources and proportionality, it will not be necessary for the Council to provide the Coal Authority with any future drafts or updates to the emerging Plans. This letter can be used as evidence for the legal and procedural consultation requirements at examination, if necessary.

· Noted

58

Response manually entered, submitted in an email format. Thank you for your message below, together with the link to your "Joint Design Guide" web-site. I can confirm that I have no comments to make.

· Noted

59

Sunningwell Parish Council's comments on the proposed Joint Design Guide 2022 are as follows;The author of the new design guide is not referred to in the document although it appears to have been written in a way that makes it difficult to understand for anyone other than maybe a town planner or possibly architect/designer; it is not user friendly for Applicants, Councillors or those not directly involved in the planning process. Key design objectives uses words such as contextual analysis, green and blue infrastructure, net gain biodiversity, clear and permeable hierarchy, positive relationships between front and backs of buildings, design complimentary to 'grain'. Most people won't know what this means or how to apply it to a design.Design is required to 'adapt to the changing requirements of occupants'. Is that possible or is it an idealistic view?There will be no differentiation between open market and affordable housing; if developers aren't going to achieve the same value for affordable as they might do for open market housing then it is very unlikely they can build affordable housing to the same quality and design. Has this point been discussed with housebuilders and developers to get their view?In the council's opinion the document makes a number of unnecessary assumptions, and statements without supporting examples or evidence, such as 'good design of hospitals helps people recover quicker', 'good design of schools improves educational achievement', 'good design of open space affects people's mental health', and 'good design of a department store improves turnover'.The section on 'Built Form' referring to extensions being sensitive to character and appearance of original dwellings and street scene and being aware of the impact of a proposal on existing adjacent property [Neighbouring Amenity]. This is already well documented in the existing design guide published in 2015 as are most other issues mentioned in this latest draft document;In summary there doesn't appear to be a great deal of difference between the 2022 draft Design Guide and the existing one which is more user friendly and straightforward; it therefore should be questioned why it is deemed necessary to go to the cost and time of producing a completely new design guide when the existing one would suffice but with a simple Addendum to update the 2015 Design Guide on changes that have taken place between then and now.Sunningwell Parish Council 24 February 2022

· Acknowledged

60

The lack of any reference to the usefulness of adopted neighbourhood plans is a serious omission. They could (and do!) play a very useful role in guiding developers working in various locations in SODC and the Vale, and should be supported through this document.

· Acknowledged

61

N/A

· Noted

62

The original email submission is attached below.

• Noted

63

Design guides are most effective where they contain clear design principles (which has been done) and are supported by examples. The Council feel that more case studies and examples could be included especially in terms of major housing developments which can have a big impact when poorly designed. It would also be helpful to have some indication of how this links to National Design Guide and National Design Codes.

- Noted and will review the further use of case studies.
- The Design guide has links to both the National design guide and code.

The structure of the Joint design guide looks to closely align to the National design guide

64

Response manually entered, submitted in an email format. I would like to comment on Goals. In the third Paragraph, I would like to see more emphasis put on Access for people who are disabled. Hiding it away in the small print does not emphasise the importance of access for people using mobility scooters, rollators and mums with baby buggies. A watchful eye should be kept on Developers who change their plans from ramps at the initial planning stage to steps in retrospective planning. Can I suggest something: All routes should be open to access by people who are mobility impaired and for those who need to use baby buggies. Route surfaces should be carefully considered as gravel and bricked surfaces are very uncomfortable for people in wheelchairs. Also, there should be dropped kerbs at junctions and other relevant points, eg to schools, shops or post boxes, etc. If there are public footpaths across fields, etc giving shortcuts to nearby facilities, it would be helpful if they are made accessible to enable those using mobility scooters, wheelchairs and pushing baby buggies to have equal access. Developers appear to need more help in designing fully accessible developments, so it would be very helpful if this website puts more emphasis in supporting those who are disadvantaged.

· Noted and will review

65

Response manually entered, submitted in an email format. Original submission attached below for reference. 1.0. Introduction. The Chilterns Conservation Board (CCB) is grateful for the opportunity to submit comments on the draft design guide and, at the outset, would congratulate the Councils on their production of a readily accessible, legible, and very well focused guide. We have a few points to make, mostly dealing with appropriate cross-reference to the Chilterns Buildings Design Guide and other CCB documents that are germane. All the contributions made below are submitted against this overall level of support.2.0. Detailed Policy Submissions.2.1. To assist, we set out the duties and responsibilities of the CCB in Annex 1, at the end of these representations. For ease of reference, we have tabulated our points, with additional text as underlined or deleted text as 'strikeout' text. The Chilterns AONB is nationally protected as one of the finest areas of countryside in the UK. Public bodies and statutory undertakers have a statutory duty of regard to the purpose of conserving and enhancing the natural beauty of the AONB (Section 85 of CroW Act). The Chilterns Conservation Board is a body that represents the interests of all those people that live in and enjoy the Chilterns AONB. It is made up of representatives nominated by the organisations listed in Appendix 1. Should you require any further information please do not hesitate to contact me. Appendix 1: About Us The Chilterns Area of Outstanding Natural Beauty The Chilterns AONB was designated in 1965 for the natural beauty of its landscape and its natural and cultural heritage. In particular, it was designated to protect its special qualities which include the steep chalk escarpment with areas of flower-rich downland, woodlands, commons, tranquil valleys, the network of ancient routes, villages with their brick and flint houses, chalk streams and a rich historic environment of hillforts and chalk figures. Chilterns Conservation Board The Chilterns Conservation Board is a statutory independent corporate body set up by Parliamentary Order in 2004 under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000. The Board has two statutory purposes under section 87 of the CRoW Act: a) To conserve and enhance the natural beauty of the AONB; and b) To increase the understanding and enjoyment by the public of the special qualities of the AONB. In fulfilling these roles, if it appears that there is a conflict between those purposes, Conservation Boards are to attach greater weight to (a). The Board also has a duty to seek to foster the economic and social well-being of local communities within the AONB. Like all public bodies, including ministers of the Crown, local authorities and parish councils, the Chilterns Conservation Board is subject to Section 85 of the CRoW Act which states under "General duty of public bodies etc" "(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty." List of Organisations providing Nominees to the Chilterns AONB Conservation Board The Chilterns Conservation Board has 27 board members, all drawn from local communities: • Hertfordshire and Oxfordshire County Councils • Central Bedfordshire and Luton Borough Councils (unitary authorities) • Buckinghamshire Council (formerly Aylesbury Vale, Chiltern and South Buckinghamshire, and Wycombe District Council). • Dacorum Borough Council, North Hertfordshire DC, Three Rivers DC and South Oxfordshire DC. • The Central Bedfordshire, Buckinghamshire, Hertfordshire and Oxfordshire Parish Councils (6 elected in total), and • DEFRA (8 in total).

• Noted and will review

66

Response manually entered, submitted in an email format. The original submission is attached below for reference. Thank you for allowing Thames Water Utilities Ltd (Thames Water) to comment on the above. Thames Water is the statutory water and sewerage undertaker for the South Oxfordshire and Vale of White Horse district councils and is hence a "specific consultation body" in accordance with the Town & Country Planning (Local Development) Regulations 2012. We have the following comments on the JDG: Water Efficiency/Sustainable Design The Environment Agency has designated the Thames Water region to be "seriously water stressed" which reflects the extent to which available water resources are used. Future pressures on water resources will continue to increase and key factors are population growth and climate change. Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in the Policy. Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on our website via the following link: <https://www.thameswater.co.uk/Be-water-smart> It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations. Proposed policy text: "Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption). Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met." Comments in Relation to Flood Risk and Sustainable Drainage Systems The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers". When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas. Flood risk sustainability objectives and policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development. With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding. Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change. SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits. With regard to surface water drainage, Thames Water request that the following paragraph should be included in the JDG: "It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding." We trust the above is satisfactory, but please do not hesitate to contact David Wilson on the number above if you have any queries.

• Noted and will review

67

Response manually entered, submitted in an email format. The original submission is attached below for reference. Please find below Horspath Parish Council's response to the draft Joint Design Guide.1. SODC is to be congratulated of producing an innovative web-based document with plentiful inter-active maps and illustrations.2. However, it is probably untrue to state in the introduction that earlier Design Guides had included too much detail, because unless such detail is actually included in a Design Guide which will become a Supplementary Planning Document, there will always be scope for dispute about its interpretation in specific situations where there is no detailed specific advice included in the new Guide, and this will unnecessarily consume the time of Planning Service staff and possibly involve seeking expensive legal advice. 3. It is likely that more pre-Application advice will be needed to ensure that a Planning Application will fulfil all the requirements of this Design Guide.4. While it is logical to provide both a web-based version of the Design Guide and a hard copy version, it is difficult to see how developers who use the hard copy version can follow through the same checklist of tests on the sustainability of their proposed development as can be carried out using the online web-based version.5. The bias and focus of the Design Guide is clearly more on urban design rather than the design of places in rural areas, of which there are many in South Oxfordshire.6. In terms of obvious omissions in the scope of the guide, there is insufficient importance given to ensuring that good design will achieve SODC's policy objectives to improve biodiversity in the natural environment and to respond to the declared Climate Emergency by setting standards for the mitigation of climate change and the extremes of weather forecast to be associated with it.7. The maps need to be labelled or coded as 'inter-active' when they are inter-active, to be distinguished from maps which have no 'clickable' access to further information.8. The vertical line of buttons on the right side of the pages need to be labelled, at least by number, to indicate that these are buttons to click on to open the various sections of this Guide.

· Acknowledged

68

I would like to see greater emphasis on responding to the implications of climate change. For example, developers should be required to install solar panels and ground or air source heat pumps for each and every house built - as I travel around the district I see row upon row of new build houses going up without a solar panel in sight: this is surely utterly irresponsible with the energy supply situation we now face and the urgent need to move to renewable from carbon sources of energy.

· Acknowledged

Response manually entered, submitted in an email format. The original submission is attached below for reference. Hallam Land Management Ltd ('HLM') is pleased to respond to the consultation on the South and Vale Joint Design Guide. Hallam has various land interests within South Oxfordshire and Vale of White Horse, promoting and delivering development at various scales and therefore has a vested interest in the future growth ambitions of both authorities and how these are articulated and supported as part of a new Joint Local Plan to 2041 for the area and associated Supplementary Planning Documents. HLM commends the draft Design Guide for being creatively presented with an engaging and interactive format that is easily navigable, with a logical structure. As a general comment, HLM notes that the guide is intended to build upon and replace previous local design guides and the statement that it aligns with the National Design Guide (2019), however is concerned that the SPD is seeking to prescribe specific design outcomes and standards across a Joint Plan area at a point where there are no joint development plan policies yet in place, due to the Plan's infancy, and therefore there has been no consideration nor testing of the application of standards and criteria sought, in the round, nor having regard to whole Plan viability. One approach to safeguard against this risk and ensure that the SPD is appropriately guided by and aligned with local plan policy could be to retain the document as a draft, until such time the 'parent' local plan policies (and supporting evidence) are progressed to a point at which there is certainty around the implications in respect to deliverability and viability of the approach and standards sought. This approach would provide flexibility for the draft SPD to be refined and adjusted alongside the progression of the emerging joint plan. Design Principles, not Prescription HLM notes that one of the four aims of the Design Guide is to "provide a simple set of design criteria that applications should meet and are easy to follow" – first bullet. The wording "should" is supported in this context; it rightly recognises the need for design guidance to retain a degree of flexibility to allow for a balance of conclusions to be reached, specific to a scheme and its context. However, the Design Guide then presents a set of detailed principles, referred to as 'criteria' which the document states "You need to ensure your design meets" (How to use the guide). HLM strongly maintain that an SPD should not include a level of prescription that stymies proposals from reaching appropriate master planning and design conclusions as to how best to achieve sustainable development in the round, as advocated by the NPPF. Whilst some principles will have relevance to many development proposals, a number of principles are narrower in focus, and very detailed (i.e., specific design treatment in relation to street materials, private amenity space, open space and storage, services and utilities) and will need to be considered insofar as their desirability and relevance with regard to both characteristics and context of each site and proposal; and critically, at the right stage of the proposals. HLM considers that the principles can be used as helpful guidance against which to test and challenge proposals to seek improvements in the quality of development, and not a set of strict criteria to assess development proposals, so as to provide important flexibility in application. There are also a number of examples where the tone of the SPD seems at odds with the NPPF. This response does not seek to quote all cases; however, a more general observation is the continued use of "must" throughout the draft SPD, which in effect removes any opportunity for an iterative design process to be achieved that is appropriate to the intrinsic characteristics of a scheme. The NPPF uses "should", which allows for due consideration of an effective alternative. Design Principles that are proportionate to the proposal HLM supports the draft Design Guide in providing assistance in the process of developing high quality development proposals. HLM however, wish to raise that as currently drafted, the Guide appears too narrowly focussed and detailed, in relation to planning applications and fails to differentiate between the scope and detail of the design requirements at the outline, full and/or reserved matters planning application stages. HLM considers that the document must reflect that in reality, the design evolution differs in scale, scope and complexity from the stages set out in the Design and Planning diagram. This is critical to ensure support for a flexible approach to design particularly where development proposals are at an outline stage. Relevant to this point, is an opportunity for the guide to acknowledge wider integration of locating development aligned with infrastructure provision, and encouragement of a mix of uses, which support and strengthen the quality of placemaking. Avoiding repetition of National Policy in the NPPF, planning practice guidance and additional guidance and frameworks HLM welcomes the reference to national policy and guidance both at national and district wide levels. In this context HLM considers that there are parts of the Design Guide where guidance and principles unnecessarily repeat those already provided in the wider guidance and frameworks, for example Biodiversity Net Gain. HLM suggests that the Design Guide has the potential to be focused on the key design issues that are important and unique to South and Vale – and not unduly repeat guidance and principles that are well established at a national level, to ensure the guide is focused and concise (an approach advocated at in the planning

Practice Guidance ID: 26-005-20191001), but also allows for and supports variety of design applications. This proportionate and flexible approach is amplified in NPPF paragraph 128, "Their (design guides and codes) geographic coverage, level of detail and degree of prescription should be tailored to the circumstances and scale of change in each place and should allow a suitable degree of variety.

70

• Add bubble to the second diagram saying – 'is in keeping with the character and nature of the environment of the receiving area' • Under Key Design objectives – add separate bullet (rather just an add on to the bullet uses land efficiently whilst respecting the existing landscape character and delivers a net gain biodiversity) - something like as follows: Conserve and, where possible, enhance the natural beauty and value of the landscape, respecting policy requirements for the national (AONB to be renamed perhaps as National landscape), and any district and parish designations of valued landscapes • Under Key Design objectives – Explain what is to be included under 'contextual analysis' (landscape/built form/habitats/historic/water catchment and so on?). this may have to vary for a house extension up to a major development Additional guides at beginning Need to add Neighbourhood development plan if there is one for area AONB management plan – design guide if applicable As this is mainly for developers, if large development, should there be mention of consultation and communication with local community Would be helpful to have page number I think the description of high quality is descriptive and not informative There is nothing about affordability in the initial part of the guide Key design guide – ensure the proposal – Mainly relevant to urban or town development, in rural areas, there may not be access to local services, and public transport – At beginning say want to use easily accessible language, then use – high quality public realm - what does this mean Design principle 4.11 Play space – MUGA need to be aware of floodlights and light pollution Light pollution only mentioned once – movement and connectivity ? should be in other areas of the guide

• Acknowledged

71

Response manually entered, submitted in an email format. The original response is attached below for reference. Pegasus Group have been instructed on behalf of our clients, Dorchester Residential Management (DRM) and Christ Church, Oxford (ChCh) to provide a representation in response to the consultation of the Draft Joint Design Guide, which closes on Tuesday 1st March 2022. DRM and ChCh welcome the opportunity to engage with the Councils and support the principles behind the preparation of the Joint Design Guide, however, we do have some specific and detailed comments which are set out below.

· Noted and will review

72

Response manually entered, submitted in an email format. The original submission is attached below for reference. Thank you for your consultation. We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process. Based on the information available our substantive response (as required by the Town & Country Planning (Development Management Procedure) (England) Order 2015 (as amended)) is that the Trust has no comment to make on the proposal. Please do not hesitate to contact me with any queries you may have.

· Noted

73

Response manually entered, submitted in an email format. The original submission is attached below for reference. The Parish Council would also query if small scale developments should be included as a separate item?

· Noted and will review

74

Response manually entered, submitted in an email format. The original submission is attached below for reference. The Planning and Development Committee resolved to submit the following comments on the draft Joint Design guide, at their meeting on 23rd February 2022: In general, the Planning and Development Committee feel the document is clear and well-written. It is full of worthwhile statements, and it would be good if the actions could be carried through but in the current Planning climate, the Committee are not confident of the Council's ability to do this.

· Acknowledged

75

I have already filled in this consultation before but would like to add a couple of points on Solar power. As solar power is likely to be the best form of renewables in Oxfordshire, I would like to include the use of solar panels on roof tops, such as all domestic houses and huge buildings like warehouses and data centres, as well as in car parks and children playgrounds. The last two areas also means there is added shade and rain protectionwe are likely to need more shade as our climate heats up.

· Acknowledged

76

It would be very helpful to incorporate some clear policies into the Joint Design Guide, including a well-considered policy for the installation of solar panels, both in existing buildings and also in new developments and new stand-alone solar farms.

· Acknowledged

77

Please include design concepts to do with renewable energy in appropriate places throughout the Design Guide. How should they be included in individual houses? What about offices or manufacturing buildings, and retail? And flatted developments? This Design Guide is exceptional. Thank you.

· Acknowledged

78

Response manually entered, submitted in an email format. Cllr Rankin, Chair of the Planning Committee, commented that he likes the present guide. Cllr Kay feels that the Draft Joint Design Guide has tidied up aspects of the previous guide. Cllr Dowie feels that it is better for the end user than the previous version, it is less vague. The links are easier to find. Cllr Rankin had to learn to navigate the present version of the guide. Cllr Kay commented that the Design principles are still there and links to other plans but not to Neighbourhood Plans, he felt that the Neighbourhood Plans - Vale of White Horse District Council (whitehorsedc.gov.uk) link should be in the new design guide.

· Acknowledged

79

The Planning Team is of course a key player in the need to adapt our lifestyles to the pressure of climate change in a National Planning framework that is still focused on GDP driven growth, rather than the preservation of our natural and social capital. On one hand David Attenborough has told us that 'What we do now and in the next few years will profoundly affect the next few thousand years'. On the other hand the Planning system has to comply with the controversial Oxfordshire Growth Needs Assessment imposed by Central Government. Please build a change mechanism into the guide so that it can quickly reflect any changes in Government policy in this area. Thank you for all you are doing!

· Noted

Your Ref: South Oxfordshire and Vale of White Horse District Council Joint Draft Design Guide DIO Ref: 10053938 It is understood that South Oxfordshire and Vale of White Horse District Council are undertaking a Joint Draft Design Guide consultation that will provide guidance on how new development can be designed and constructed within the shared Authority areas. The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. This response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments. Paragraph 97 of the National Planning Policy Framework 2021 requires that planning policies and decisions should take into account defence requirements by 'ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.' To this end MOD may be involved in the planning system both as a statutory and non-statutory consultee. Statutory consultation occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued by Department for Levelling Up, Housing and Communities (DLUHC) in accordance with the provisions of that Direction. Copies of these plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above. Having reviewed the current supporting documentation in respect of South Oxfordshire and Vale of White Horse District Council Joint Draft Design Guide, there are four areas of interest for the MOD. DIO safeguarding have an area of interest in RAF Benson and the statutory Aerodrome Height, Birdstrike and Technical Safeguarding Zones surrounding the aerodrome. Both South Oxfordshire and White Horse District Councils have encompassing areas within the statutory Aerodrome Height, Birdstrike, Technical and Explosive Safeguarding Zones surrounding RAF Benson. Additionally, DIO safeguarding have an area of interest in RAF Brize Norton and RAF Fairford whom both have statutory Aerodrome Height and Birdstrike Safeguarding Zones surrounding both aerodromes within the Vale of White Horse District Council authority area. The MOD's secondary area of interest is a new technical asset known as the Central WAM Network which contributes to aviation safety by feeding into the air traffic management system in the central areas of England. There is the potential for development to impact on the operation and/or capability of this new technical asset which consists of nodes and connecting pathways, each of which have their own consultation criteria. Both South Oxfordshire and White Horse District Councils have encompassing areas within this network. The aerodrome height and technical safeguarding zones serve to protect the airspace above and around aerodromes to maintain an assured, obstacle free environment for aircraft manoeuvre and ensure that line of sight navigational aids and transmitter/receivers are not impeded. This airspace needs to be kept free of obstruction from tall structures to ensure that aircraft transiting to and from or circuiting the aerodrome can do so safely. Additionally, within the statutory consultation areas associated with aerodromes are zones that are designed to allow birdstrike risk to be identified and mitigated. The creation of environments attractive to those large and flocking bird species that pose a hazard to aviation safety can have a significant effect. This can include landscaping schemes associated with large developments, such as green and/or brown roofs/roof gardens on flat roof buildings, as well as the creation of new waterbodies. Sustainable Drainage Systems (SUDS) additionally provide an opportunity for habitats within and around a development. The incorporation of open water, both permanent and temporary, and associated reedbeds, wetlands ponds and ditches provide a range of habitats for wildlife, including potentially increasing the creation of attractant environments for large and flocking bird species hazardous to aviation. Explosive Safeguarding Zones define areas in the vicinity of storage sites and armed aircraft stands in which land use and building types are regulated to maintain explosives storage licensing standards. The safeguarding map associated with the Central WAM Network has been submitted to DLUHC for issue. As is typical, the map provides both the geographic extent of consultation zones and the criteria associated with them. Within the statutory consultation areas identified on the map are zones where the key concerns are the presence and height of development, and where introduction of sources of electro-magnetic fields (such as power lines) are of particular concern. Wherever the criteria are triggered, the MOD should be consulted in order that appropriate assessments can be carried out and, where necessary, requests for required conditions or objections be communicated. In addition, where development falls outside designated safeguarding zones the MOD may also have an interest, particularly where the development is of a type likely to have an impact on operational capability. Examples of this type of development are the installation of renewable energy generation systems and their

associated infrastructure. The MOD has, in principle, no issue or objection to renewable energy development though some methods of renewable energy generation, for example wind turbine generators or solar photo voltaic panels can, by virtue of their physical dimensions and properties, impact upon military aviation activities, cause obstruction to protected critical airspace encompassing military aerodromes, and impede the operation of safeguarded defence technical installations. In summary, the MOD would wish to be consulted within the South Oxfordshire and White Horse District Council Joint Local Plan, of any potential development within the Aerodrome Height, Birdstrike, Technical and Explosive safeguarding zones surrounding RAF Benson, of any potential development within the Aerodrome Height and Birdstrike safeguarding zones surrounding RAF Brize Norton and RAF Fairford which consists of structures or buildings exceeding statutory safeguarding technical zones. In addition, the MOD request that developers are made aware, through policy provisions, that development which might result in the creation of attractant environments for large and flocking bird species hazardous to aviation will be subject to scrutiny, and that those schemes where risk cannot be removed or mitigated will be refused. The MOD should also be consulted on any applications for development within the safeguarding zones designated to ensure the operation and capability of the Central WAM Network that trigger the criteria set out on the statutory safeguarding plan for that asset. I trust this clearly explains our position on this consultation. Please do not hesitate to contact me should you wish to consider these points further. Yours sincerely

It is understood that South Oxfordshire and Vale of White Horse District Council are undertaking a Joint Draft Design Guide consultation that will provide guidance on how new development can be designed and constructed within the shared Authority areas. The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the Ministry of Defence (MOD) as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. This response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments. Paragraph 97 of the National Planning Policy Framework 2021 requires that planning policies and decisions should take into account defence requirements by 'ensuring that operational sites are not affected adversely by the impact of other development proposed in the area.' To this end MOD may be involved in the planning system both as a statutory and non-statutory consultee. Statutory consultation occurs as a result of the provisions of the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002 (DfT/ODPM Circular 01/2003) and the location data and criteria set out on safeguarding maps issued by Department for Levelling Up, Housing and Communities (DLUHC) in accordance with the provisions of that Direction. Copies of these plans, in both GIS shapefile and .pdf format, can be provided on request through the email address above. Having reviewed the current supporting documentation in respect of South Oxfordshire and Vale of White Horse District Council Joint Draft Design Guide, there are four areas of interest for the MOD. DIO safeguarding have an area of interest in RAF Benson and the statutory Aerodrome Height, Birdstrike and Technical Safeguarding Zones surrounding the aerodrome. Both South Oxfordshire and White Horse District Councils have encompassing areas within the statutory Aerodrome Height, Birdstrike, Technical and Explosive Safeguarding Zones surrounding RAF Benson. Additionally, DIO safeguarding have an area of interest in RAF Brize Norton and RAF Fairford whom both have statutory Aerodrome Height and Birdstrike Safeguarding Zones surrounding both aerodromes within the Vale of White Horse District Council authority area. The MOD's secondary area of interest is a new technical asset known as the Central WAM Network which contributes to aviation safety by feeding into the air traffic management system in the central areas of England. There is the potential for development to impact on the operation and/or capability of this new technical asset which consists of nodes and connecting pathways, each of which have their own consultation criteria. Both South Oxfordshire and White Horse District Councils have encompassing areas within this network. The aerodrome height and technical safeguarding zones serve to protect the airspace above and around aerodromes to maintain an assured, obstacle free environment for aircraft manoeuvre and ensure that line of sight navigational aids and transmitter/receivers are not impeded. This airspace needs to be kept free of obstruction from tall structures to ensure that aircraft transiting to and from or circuiting the aerodrome can do so safely. Additionally, within the statutory consultation areas associated with aerodromes are zones that are designed to allow birdstrike risk to be identified and mitigated. The creation of environments attractive to those large and flocking bird species that pose a hazard to aviation safety can have a significant effect. This can include landscaping schemes associated with large developments, such as green

and/or brown roofs/roof gardens on flat roof buildings, as well as the creation of new waterbodies. Sustainable Drainage Systems (SUDS) additionally provide an opportunity for habitats within and around a development. The incorporation of open water, both permanent and temporary, and associated reedbeds, wetlands ponds and ditches provide a range of habitats for wildlife, including potentially increasing the creation of attractant environments for large and flocking bird species hazardous to aviation. Explosive Safeguarding Zones define areas in the vicinity of storage sites and armed aircraft stands in which land use and building types are regulated to maintain explosives storage licensing standards. The safeguarding map associated with the Central WAM Network has been submitted to DLUHC for issue. As is typical, the map provides both the geographic extent of consultation zones and the criteria associated with them. Within the statutory consultation areas identified on the map are zones where the key concerns are the presence and height of development, and where introduction of sources of electro-magnetic fields (such as power lines) are of particular concern. Wherever the criteria are triggered, the MOD should be consulted in order that appropriate assessments can be carried out and, where necessary, requests for required conditions or objections be communicated. In addition, where development falls outside designated safeguarding zones the MOD may also have an interest, particularly where the development is of a type likely to have an impact on operational capability. Examples of this type of development are the installation of renewable energy generation systems and their associated infrastructure. The MOD has, in principle, no issue or objection to renewable energy development though some methods of renewable energy generation, for example wind turbine generators or solar photo voltaic panels can, by virtue of their physical dimensions and properties, impact upon military aviation activities, cause obstruction to protected critical airspace encompassing military aerodromes, and impede the operation of safeguarded defence technical installations. In summary, the MOD would wish to be consulted within the South Oxfordshire and White Horse District Council Joint Local Plan, of any potential development within the Aerodrome Height, Birdstrike, Technical and Explosive safeguarding zones surrounding RAF Benson, of any potential development within the Aerodrome Height and Birdstrike safeguarding zones surrounding RAF Brize Norton and RAF Fairford which consists of structures or buildings exceeding statutory safeguarding technical zones. In addition, the MOD request that developers are made aware, through policy provisions, that development which might result in the creation of attractant environments for large and flocking bird species hazardous to aviation will be subject to scrutiny, and that those schemes where risk cannot be removed or mitigated will be refused. The MOD should also be consulted on any applications for development within the safeguarding zones designated to ensure the operation and capability of the Central WAM Network that trigger the criteria set out on the statutory safeguarding plan for that asset. I trust this clearly explains our position on this consultation. Please do not hesitate to contact me should you wish to consider these points further. Yours sincerely

The design guide would be more helpful if it tried less to maintain the "in-keeping" design approach but rather focussed on design that is necessary to meet net zero targets. The authors should have referred to the LETI design guide or even the UK Ecotown PPS instead of coming up with something failing far short of what is actually required. How will developers be encouraged to create new developments with an integrated sustainability approach as opposed to a tick box exercise? How will developers/communities establish new "Hockerton" style developments using this guide? How will new developments be created to include urban/rural agriculture at varying scales? How will this guide lead to improved biodiversity within the region especially on-site? How will this guide lead to the required level of new innovative technology being implemented in future developments in the region? How will developers be prevented from building buildings with the lowest possible energy performance and biodiversity standards that they can get away with? How will car-free developments built to Passivhaus standards using local low embodied energy materials, serviced with renewable energy district heating systems be prioritised via this design guide? How will more self-build be promoted by this design guide?

An integrated approach to sustainability in line with development plan policies is present throughout the guide. There are currently no tick box criteria or exercises within the guide. Eco Towns: PPS 1 Statement, provided the standards any eco-town had to adhere to before it was cancelled for all areas excluding northwest Bicester on 5 March 2015. This statement is not relevant as there are no Eco-towns within South or Vale covered by this PPS. All applicants, not just developers, are encouraged by the guide to integrate sustainable approaches to new development through their design. An integrated approach to sustainability in line with development plan policies is present throughout the guide. There are currently no tick box criteria or exercises within the guide. There is no requirement of any applicant to follow an individual model or approach towards development including the Hockerton style of development. Green infrastructure – water – planters – orchards – grow areas The SPD is only applicable to the two district councils, it is not a regional document. Improved Biodiversity is established under design principle: 2.13 retains and enhances existing important habitats, creates new habitats and aims to deliver at least 10% Biodiversity Net Gain (Environment Bill 2020); The SPD is only applicable to the two district councils, it is not a regional document. Innovative technology would be deployed by the use of technologies indicated for sustainable development under the Climate and sustainability section of the guide. There is no requirement of any applicant to go beyond the energy performance levels as set out in Building regulations. Development policy DES10 of the South Oxfordshire Local Plan specifies increased level of energy performance, for South Oxfordshire only, this is covered under the climate and sustainability section of the guide. There is no Development policy context to require developments to deliver these specific issues in combination, therefore the guide cannot elaborate on these other than where there is supporting development policy. The SPD

cannot promote additional self-build beyond the current specified quantum by each Local authority. The guide has incorporated guidance from LETI and builds upon concepts where applicable.

CONTENTS PAGE - Officers asked for a separate clearer contents page, to ease navigation. The three lines in the top right corner were not clear/obvious enough. A contents page needs to link directly to the location of the 'Principles' boxes, which are used for assessment. LABELLING OF CHAPTERS/ REFERENCE POINTS NEEDED - Officers commented that there needed to be a point of reference of chapters, rather than just the paragraph numbers. The design guide is often referred to in delegated reports, emails with agents, appeal statements. It is easier to do this the current design guide at the moment (e.g. Chapter 10 – Householder Development > Principles DG103/104/105). Could this be incorporated into the JDG. (e.g. Chapter 5 – Built Form > DG5A – General Built Form, DG5B – Apartments etc.)? Officers queried the text alignment in some of the 'Principles' boxes and questioned whether the paragraph points could be labelled 5.01, 5.02, 5.10 etc. rather than 5.1, 5.2 etc). LAYOUT OF SECTIONS: PRINCIPLE BOXES FIRST In our opinion the principles are the most important part of each section. Could the principles boxes be relocated to the top of each section so that they appear under the relevant chapter/section titles, for quick and easy reference. The Goals/Objectives Text and supporting diagrams can then expand on the principles. PAGES & PRINTABLE LAYOUT –Officers commented that the formatting, over two columns in widescreen, without any separation between sections was more difficult to read. Officers raised that there would need to be clearer separation for reference, and the JDG would need to be in a format that would be more easily printable. Without page numbers, it is difficult to navigate the document, or refer people to specific areas of the guide. For example, appeal Questionnaires often ask for the Title Page, Contents Page etc. to be submitted separately. Officers were mindful that Planning Inspectors do not like web links. WEBSITE LAYOUT: SCROLLING / NAVIGATION Linked to this, Officers asked whether more distinct colours could be used for each section/chapter. Officers also commented that the small navigation circles on the right hand side were not easy to use. The website felt like a continuous scroll to reach the information needed. A clear navigation panel on the side which set out the different chapters, sections, subsections and principles should be incorporated. Lines are needed to demarcate the sections or alternatively, separate web pages could be created to break it up more. This could address the point above about having printable web/pages which could then be used as supporting documents for e.g. Appeals. AUDIENCE – Officers commented that the wording of the design guide seemed aimed at planning professionals who know what they would be looking for and what guidance would be applicable to the scale of the development proposed. It may not come across as well to a citizen who is completely new to planning. Officers noted that some of the wording/planning jargon used did not have a link to a glossary definition for someone who is new to planning. For example, 'green / blue infrastructure'. DIFFERENTIATION BETWEEN SCALE OF DEVELOPMENT - Officers note that an all-inclusive approach has been taken for design principles. From an Officers perspective - we can differentiate between principles relevant to Majors, and principles relevant to Householders but this may not be immediately obvious to those who are new to planning. For example, Officers expressed preference for how the current Vale Design Guide had a separate Householder Extensions Chapter. For example, making it clear for Mrs Bloggs who is visiting the website because she would like to know more about guidance around Householder Extensions. In this instance a lot of the Majors design guidance wouldn't apply, but this isn't immediately obvious. GUIDANCE ON CONTEMPORARY DESIGN This may still be in development, but please basic design guidance/principles/best practice be provided on how to successfully incorporate contemporary design into a scheme – particularly surrounding fusing contemporary design with existing buildings (e.g. scale, the design cues that should be taken, materials etc.). Please see example ref. P20/V2106/HH. This would be helpful for Officers assessing a scheme, particularly also for Listed Buildings. We are seeing many more of these types of application, so to achieve consistently high quality schemes, a section on this to advise people on how to approach them would be extremely useful, in replacement of architect's panel. GLOSSARY Please could the formatting of this section be looked at. It is not user friendly. It might be worth expanding the glossary to include more jargon like 'green/blue infrastructure', and in the first instance listing the words, and then having it set out so that when a user clicks on the word, the definition expands out underneath. This would reduce the amount of text and should make it easier to use. ADOPTION: Officers asked;(1) when this JDG is due to be adopted, and (2) how often the JDG will be reviewed?

83	It is a very good Design Guide, but it needs to be clear that it can be applied in rural as well as urban areas.	· Acknowledged
84	No other comments.	· Acknowledged
85	An explanation on how to use this guide for small developments and extensions as well as strategic sites. A bit thrown in at the deep end when someone might want to paddle.	Select:
86	<p>I consider it would be useful to developers and support the delivery of renewable energy schemes if guidance was added on the siting and design of stand-alone renewable energy generation schemes, such as solar farms.</p> <p>I also consider it important to add guidance on the siting and design of domestic-scale renewable technologies to ensure these do not detract from the quality of a development and that the residential amenity of neighbouring property is protected.</p>	· Acknowledged
87	Would be helpful to release word versions with check boxes that can be ticked. Marking the survey questionnaire available in a variety of formats would be really helpful to organisations like Town Councils when they respond so the answers can be easily shared and agreed prior to submission.	· Noted.

88	<p>We are sceptical how committed the District is to implementing the Design Guide in practice when it comes to agreeing detailed planning applications. There should be training, awareness raising, workshops and other events to involve officers and the private sector in understanding and implementing the content.</p>	<p>· Noted and will review</p>
89	<p>I think the Joint Design Guide should include something specific on solar farms. In particular, I think they should be located near to appropriate sub-stations where they can be connected to grid without disrupting roads or SSSIs. The perimeter fencing should be in keeping with the surroundings or screened from view by hedges. Consideration should be given to distributing panels in a way that reduces the visual impact i.e. not facing all the same way. This can help level the output. Consideration should be given to compatibility with existing wildlife and the management of the land beneath the panels should be defined so that it maximises biodiversity.</p>	<p>· Acknowledged</p>
90	<p>Response manually entered, submitted in an email format.</p> <p>Thank you for producing this draft guide and I look forward to seeing the final version.</p> <p>Acknowledgment of different groups' needs is noted in a couple of places but the guide could take this further to outline more clearer the 'how'. Local Authority guidance has an important role in clearly setting out the standard and level of ambition expected in new development and the role that the design of the built environment can play in tackling inequalities.</p> <p>It is sometimes assumed that developers (who I assume are one of the target audiences of this guide) should know how to make places accessible for different groups, and there can be a tendency to support 'freedom of interpretation', but in practice developers do not always keep abreast of latest research or they can add in token elements (with little evidence of their effectiveness) that are later value-engineered out. Therefore having a comprehensive, people-focussed and evidenced-led Local Authority Design Guide is very valuable.</p> <p>Play space and youth provision as well as children and young people's mobility can often act as an indicator of the quality of the built environment. I would highly recommend Tim Gill's book, <i>Urban Playground: How Child Friendly Planning and Design can Save Cities</i> (2021) which expands on this point well. Numerous accompanying webinar recordings introducing the book can also be found on YouTube. Another useful guide is NACTOs <i>Designing Streets for Kids</i> (2020) which is a resource that can be downloaded free from NACTOs website. Another recommended text, covering the topic of inclusive design and providing guidance on 'putting mental health, wellness and quality of life at the forefront of city planning and urban design', is Jenny Roe & Layla McCay's book <i>Restorative Cities: Urban Design for Mental Health and Wellbeing</i> (2021).</p>	<p>Noted. Play space section has been expanded..</p>

91	<p>Response manually entered, submitted in an email format.</p> <p>Thank you for consulting the Environment Agency on this draft Joint Design guide which is a Supplementary Planning Document (SPD), and will be 'material consideration in determining planning applications submitted to the Council.</p> <p>The draft Joint Design guide is said to be relevant for all scales of development and we support the fact that the Key design objectives (especially these three listed below), should be considered at the outset and throughout the design process for all development types in delivering high quality sustainable development.</p> <ul style="list-style-type: none"> • uses land efficiently whilst respecting the existing landscape character and delivers a net gain biodiversity • incorporates and/or link to a well-defined network of green and blue infrastructure; • is sustainable and resilient to climate change, minimises carbon emissions and mitigates water run-off and flood risk; <p>In that regard we have no further comments. If you have any queries do not hesitate to contact us.</p>	Noted. Will review points individually.
92	The original email submission is attached below.	Noted. Will review points individually.

93	<p>THE DESIGN GUIDE</p> <p>Additional guidance and frameworks beyond our guide – should include Chilterns Conservation Board design guide, & similar for North Wessex Downs AONB.</p> <p>Key design objectives need to include, ensure light pollution from light spill into the environment is kept to a minimum. Picture windows that go from ground level to apex, or floor to Apex should be discouraged as they cause unnecessary light spillage, and heat is wasted when such glazing accompanies vaulted ceilings.</p> <p>Roofs on new dwellings, should be at the optimum angle (30 to 40 degrees) to allow for the installation of solar panels at construction or fitted afterwards.</p> <p>For large developments, discussions must be held with all utility providers at a very early stage. It is appalling that developments built in the 1970s to today (this includes very recent developments) where there are no overhead lines are now blighted with telegraph poles & overhead wires (Airband UK). Surely these overhead wires will conflict with government & local policies for tree planting, as the trees will require much more maintenance to protect the communication wires. It is also unsatisfactory that developments built in the past few years as well as having new telegraph poles & overhead wires are now having their pavements dug up to provide new fibre communications (Switch Fibre).</p> <p>ABOUT SOUTH & VALE</p> <p>There seems to be confusion about Landscape Character, Landscape Type in the document.</p> <p>The Landscape Character map seems to show landscape type. Landscape Character is better described in Design Principles – Place & Setting and the Natural Environment section, where the links to the appropriate documents can be found.</p> <p>In the 2016 guide the South Oxfordshire Landscape Assessment (pg 19) includes a map showing broad landscape character areas, and includes a table of Character Areas (pg 20) detailing the correlating landform and landscape & associated settlement patterns for each of these Character Areas, which gives a broader overview of each area. The landscape assessment seems to now be covered in the section Natural Environment but not in as much detail and no associated landform & landscape or settlement patterns as in the 2016 document.</p>	Noted. Will review points individually.:
94	<p>Response manually entered, submitted in an email format.</p> <p>I also have a question about how you envisage people referring to the guide in their applications and us in our responses? Do you think we will just refer to sections of the guide rather than section numbers as we used to? Maybe this will be in your training?</p>	Paragraph numbers will be added.
95	<p>Will the SODC Planning Officers use it? Previous Design Guides appear to have been ignored and not used by SODC itself.</p> <p>It is developed for medium to large developments and not individual ""fill in"" houses or extensions which our PC normally deals with</p>	Noted.

<p>96</p>	<p>Response manually entered, submitted in an email format. There are currently over 40 made Neighbourhood Development Plans (NDPs) across South Oxfordshire and the Vale of White Horse District Councils. Once a NDP is successful at referendum, it becomes part of the development plan, sitting alongside the Local Plan. Therefore, planning applications will be determined in accordance with them, unless material considerations indicate otherwise. Paragraph 127 of the NPPF states: 'Neighbourhood planning groups can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development, both through their own plans and by engaging in the production of design policy, guidance and codes by local planning authorities and developers.' National policy encourages communities to engage in achieving well-designed places through neighbourhood planning. A number of adopted NDPs across the districts already include either design planning policies, detailed character assessments and/or separate design guides. An increasing number of NDPs are including detailed design codes and/or design guidance. The Government also currently offers technical support to groups looking to include design codes in their plan, therefore we foresee this uptake across the districts continuing. Currently the Joint Design Guide does not make any reference to NDPs and the potential for these to include locally distinctive design policies, design codes and guidance. For the above reasons we see a benefit in the Joint Design Guide recognising the role NDPs can play in influencing good design. Within the Joint Design Guide there is a section titled 'Additional guidance and frameworks beyond our guide:', and we recommend that reference to the potential of locally bespoke design guidance in NDPs is inserted here, linking through to the South Oxfordshire and the Vale of White Horse Neighbourhood Planning webpages respectively.</p>	<p>Noted. Will review points individually.</p>
<p>97</p>	<p>Response manually entered, submitted in an email format. The original submission is attached below for reference.</p> <p>We write on behalf of our client, CEG, in response to the consultation on the draft Joint Design Guide for South Oxfordshire and Vale of White Horse District Councils.</p> <p>CEG create spaces and places that positively contribute to the lives of those who live and work within them. As a long-term investor, they maintain an enduring commitment to the future of their developments and surrounding communities, and are determined to deliver future-proofed designs of the highest quality.</p> <p>With these objectives in mind, CEG support the principle of preparing a Joint Design Guide Supplementary Planning Document (SPD) to support the implementation of Local Plan policy, but we do have some comments on the scope and content of the draft document, which we believe need to be addressed prior to adoption of the SPD.</p> <p>Overall, CEG welcome the proposed Joint Design Guide, but do have some concerns that in places the Guide steps beyond its role as a Supplementary Planning Document. It is also considered that interaction between the Joint Design Guide, national design guidance and development plan policy could be made clearer, which would be of benefit to both applicants and Council Officers.</p> <p>We would like to be kept informed of progress with the Joint Design Guide.</p>	<p>Noted. Will review points individually.</p>

	<p>Please do get in touch if you require any clarification in relation to this consultation response.</p>	
98	<p>Response manually entered, submitted in an email format. Having got to https://data.southoxon.gov.uk/JDG/Menu.html I have been searching for something about gardens. I realise that we cannot be too prescriptive about gardens since as soon as someone moves into a property they can more or less do what they like with the garden. But many won't. And developers want to provide something which will look moderately attractive for passive occupiers. Is there a section on gardens which I just haven't found yet? If there is one there are 3 issues I'd like to see addressed:</p> <ul style="list-style-type: none">• People have expressed their concerns to me about plastic backed turf. I gather that producers like to plant grass on this plastic mesh backing as it grows more quickly and/or it is easier to pick up and move? But it is very bad for the environment and wildlife, in particular for creatures which can get caught up in the mesh. I have been asked if we can ban the use of this turf with plastic mesh backing?• If trees are to be planted in gardens, from a sustainability point of view I'd like to see fruit or nut trees provided where possible.• For boundaries between properties where there is room, and certainly at the edges of sites, hedges would be better from a nature and environment point of view than fences or walls although I appreciate a strong wall may be needed in some places. So I await the next iteration of the Joint Design Guide with interest and wish you all well with its production. I should say that I would be happy to read through the next version if someone can send it to me as a file(s) - my husband is very good at proof reading!	Noted.

99	<p>Response manually entered, submitted in an email format. The original submission is attached below for reference. This letter is submitted in response to the current consultation held by South Oxfordshire and Vale of White Horse district councils on the Joint Design Guide. Whilst at this stage Gladman have only a few specific comments to make on the draft Design Guide, we request to be kept updated on its progress moving forwards and be notified of any further consultations regarding the guide. Purpose of Supplementary Planning Documents SPDs are not subject to the same degree of consultation and examination as policies contained in Local Plans and should only be prepared, therefore, to provide additional guidance to those bringing forward development proposals across the district. The National Planning Policy Framework (NPPF2021) confirms this in Annex 2: Glossary where it defines SPDs as: "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 role of the SPD should therefore seek to provide guidance on existing planning policy contained in the adopted Development Plan. It is important to note that this does not present an opportunity to reinvent existing planning policies contained in the adopted Local Plan. Scope of the draft Joint Design Guide SPD Gladman welcome the preparation of the SPD as it provides additional clarity beyond the policy wording contained within the adopted Local Plan. Nonetheless, having reviewed the contents of the draft SPD, Gladman feel that there are elements of the document which may require further refinement. Conclusion Gladman welcome the opportunity to comment on the draft Joint Design Guide SPD and would like to be kept informed as the document is progressed. Gladman reserve the right to provide further comments on the SPD at any later stage of public consultations. I hope you have found these representations useful and please do not hesitate to contact me should you wish to discuss any of the points raised within this representation.</p>	Noted.
100	Response manually entered, submitted in an email format. The original submission is attached below for reference.	Noted. Will review points individually.
101	Please see submitted letter for full comments.	Noted. Will review points individually.
102	There is an early reference to pre-app advice. ONPA is concerned that such advice, when offered to applicants, sometimes fails to take into account the policies of neighbourhood plans (NPs), whether on design or other matters. We would like to see more emphasis given in the guide to the need for applicants to check for NP policies that might impact on their proposals, at an early stage.	Select:
103	<p>In omitting any reference to Public Rights of Way in the Movement and connectivity section, the Guide disregards an entire section of the local Highway network. This must be addressed, with PROW clearly identified as part of the Active Travel network for both commuting and recreation within and around the development. Within this there should be further information about existing and potential use of both the PROW and road network by vulnerable road users, to ensure that designs will include elements to safeguard and improve safe off- and on-road access for walkers, cyclists, equestrians and people with limited mobility.</p> <p>The British Horse Society has a comprehensive range of guidance on the design and layout of shared-use, off-road paths, covering topics such as Surfaces, Widths, Signage, Structures and Road Crossings. These can all be found on the Society's website at www.bhs.org.uk/accessadvice.</p>	More references on PROW have been added
104	This is great.	Acknowledged.

105	<p>Should include guides on applications which claim to be addressing the climate emergency - such as wind/solar power, the installation of industrial scale batteries - but which are often the result of speculative applications (aka landbanking by housing developers) in order to garner tax credits, green subsidies and to provide 'greenwashing' for entities claiming to be 'net zero'. If in planning terms 'net zero' means a polluter can offload an environmental disbenefit on one locality (eg solar power stations on farmland) in order to be able to claim carbon offsets and/or green credentials when in fact none of the environmental benefits are accrued locally then we have a major problem: urban landowners and consequent investment will seek to place their greenwashing entities in the cheapest location which, as with housing developers who eschew brownfield sites, will often be (greenbelt) farmland which is ever more needed to enable a reduction in food miles and an increase in the UK's food security.</p>	Noted. Beyond the remit of the design guide.
106	<p>How this fits in to the planning process is not at all clear - see notes at start of survey.</p>	Noted
107	<p>Response manually entered, submitted in an email format. The original submission is attached below for reference.</p> <p>Please find attached a few comments made by our Members in response to your recent Joint Design Guide consultation. Concern was expressed about the ability of the District / Vale Councils to encourage (and even enforce) better development given the resource levels that exist between the two authorities. The document itself was, however, largely well-received.</p> <p>Plain English</p> <ul style="list-style-type: none"> • We note the aim to break the mould and avoid a lengthy document that is "full of complex design phrases and terms". Yet the document does use architectural and placemaking terminology. While we recognise it is difficult to avoid terminology in these very specialist fields, we would hope each term / word is identified and pop-up / hyperlinks used to explain them. Given the structured form of the Guide, it may be appropriate to provide such guidance at each occurrence within the document. 	Noted. Will review points individually.

108

Response manually entered, submitted in an email format. Thank you for including the Marine Management Organisation (MMO) in your recent consultation submission. The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.

Marine Management Organisation Functions
The MMO is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are: marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing grants.

Marine Planning and Local Plan development
Under delegation from the Secretary of State for Environment, Food and Rural Affairs (the marine planning authority), the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the Mean High Water Springs (MHWS) mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of MHWS, there will be an overlap with terrestrial plans, which generally extend to the Mean Low Water Springs (MLWS) mark. To work together in this overlap, the Department of Environment, Food and Rural Affairs (Defra) created the Coastal Concordat. This is a framework enabling decision-makers to co-ordinate processes for coastal development consents. It is designed to streamline the process where multiple consents are required from numerous decision-makers, thereby saving time and resources. Defra encourage coastal authorities to sign up as it provides a road map to simplify the process of consenting a development, which may require both a terrestrial planning consent and a marine licence. Furthermore, marine plans inform and guide decision-makers on development in marine and coastal areas.

Under Section 58(3) of Marine and Coastal Access Act (MCAA) 2009 all public authorities making decisions capable of affecting the UK marine area (but which are not for authorisation or enforcement) must have regard to the relevant marine plan and the UK Marine Policy Statement. This includes local authorities developing planning documents for areas with a coastal influence. We advise that all marine plan objectives and policies are taken into consideration by local planning authorities when plan-making. It is important to note that individual marine plan policies do not work in isolation, and decision-makers should consider a whole-plan approach. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service: soundness self-assessment checklist. We have also produced a guidance note aimed at local authorities who wish to consider how local plans could have regard to marine plans. For any other information please contact your local marine planning officer. You can find their details on our gov.uk page. See this map on our website to locate the marine plan areas in England. For further information on how to apply the marine plans and the subsequent policies, please visit our Explore Marine Plans online digital service.

The adoption of the North East, North West, South East, and South West Marine Plans in 2021 follows the adoption of the East Marine Plans in 2014 and the South Marine Plans in 2018. All marine plans for English waters are a material consideration for public authorities with decision-making functions and provide a framework for integrated plan-led management.

Marine Licensing and consultation requests below MHWS
Activities taking place below MHWS (which includes the tidal influence/limit of any river or estuary) may require a marine licence in accordance with the MCAA. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object. Activities between MHWS and MLWS may also require a local authority planning permission. Such permissions would need to be in accordance with the relevant marine plan under section 58(1) of the MCAA. Local authorities may wish to refer to our marine licensing guide for local planning authorities for more detailed information. We have produced a guidance note (worked example) on the decision-making process under S58(1) of MCAA, which decision-makers may find useful. The licensing team can be contacted at: marine.consents@marinemanagement.org.uk. Consultation requests for development above MHWS

If you are requesting a consultee response from the MMO on a planning application, which your authority considers will affect the UK marine area, please consider the following points:

- The UK Marine Policy Statement and relevant marine plan are material considerations for decision-making, but Local Plans may be a more relevant consideration in certain circumstances. This is because a marine plan is not a 'development plan' under the Planning and Compulsory Purchase Act 2004. Local planning authorities will wish to consider this when determining whether a planning application above MHWS should be referred to the MMO for a consultee response.
- It is for the relevant decision-maker to ensure s58 of MCAA has been considered as part of the decision-making process. If a public authority takes a decision under s58(1) of MCAA that is not in accordance with a marine plan, then the authority must state its reasons under s58(2) of the same Act.
- If the MMO does not respond to specific consultation requests then

Noted. Will review points individually.

	<p>please use the above guidance to assist in making a determination on any planning application. Minerals and Waste Local Plans and Local Aggregate Assessments If you are consulting on a minerals and waste local plan or local aggregate assessment, the MMO recommends reference to marine aggregates, and to the documents below, to be included:</p> <ul style="list-style-type: none"> • The Marine Policy Statement (MPS), Section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK's) construction industry. • The National Planning Policy Framework (NPPF), which sets out policies for national (England) construction mineral supply. • The minerals planning practice guidance which includes specific references to the role of marine aggregates in the wider portfolio of supply. • The national and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period, including marine supply. The minerals planning practice guidance requires local mineral planning authorities to prepare Local Aggregate Assessments. These assessments must consider the opportunities and constraints of all mineral supplies into their planning regions – including marine sources. This means that even land-locked counties may have to consider the role that marine-sourced supplies (delivered by rail or river) have – particularly where land-based resources are becoming increasingly constrained. If you wish to contact the MMO regarding our response, please email us at consultations@marinemanagement.org.uk or telephone us on 0208 0265 325. 	
109	<p>Response manually entered, submitted in an email format.</p> <p>Thanks for notice & invite for comments</p> <p>For any lengthy consideration of planning matters I always prefer to peruse and consider</p> <p>local printed copies at Wallingford Library</p> <p>PS This may be far too late for the 1000 plus Wallingford Housing developments already approved</p> <p>and for the local Crowmarsh housing area ""planning"" to swamp the village with 600 new houses over 4 sites.</p> <p>local Crowmarsh developments of some 600 houses</p>	Noted.

110	<p>Response manually entered, submitted in an email format.</p> <p>Thank you for providing us with the email below asking for comments on the S&V design guide. The links don't seem to be working...thought I would let you know ...</p> <p>If you can let me know when they are up and running, I'd be grateful.</p> <p>It is working well now, and the Design Guide is looking good....</p>	<p>Acknowledged. Links have been checked.</p>
111	<p>Response manually entered, submitted in an email format. The original submission is attached below for reference. Please find attached the collated responses from the planning policy team on the Joint Design Guide - we hope these comments/recommendations are useful. These include comments from our Transport Officer, and other offices focusing on Local Plan workstreams that relate directly to elements of the Design Guide, but have all been collated together for ease and divided by section. I have also reviewed the guide in terms of healthy placeshaping and have added recommendations throughout. If you have any questions or comments on anything in the attached please do not hesitate to get in touch. It's a great guide, and we are looking forward to its implementation</p> <p>General Comments</p> <ul style="list-style-type: none"> • Font size – this feels too small, it is difficult to read and not very inviting • Navigation needs to be clearer – it is not obvious to the user that once completing the first page you need to click on the next circle set down the right-hand side of the page. Could a prompt be added to encourage people to go through the rest of the document? This could be explained in the 'about the design guide section' which explains how to interact with the pop-up graphics. • Interactive format looks good but again makes it more difficult to navigate. Suggest a PDF version is produced when the final version is published (if this isn't already planned). This will also mean it can be easily shared with PINS in an appeal or local plan examination. • It lacks the ability to word search the whole document – is there a way of adding this function? • The Design Principles in the strongly coloured boxes don't look as readable or enticing as the emptier white box text. Some of us found ourselves skipping reading these principles boxes and looking at the pictures and spacious text instead. We suggest changing the hierarchy in the page design, so the principles are bigger font/ less text crowded/ more prominent. • All references to the National Design Guide should be updated to have (2021) in brackets rather than (2019) to reflect the most recent updates. There is currently references to both. Typos • 'Landscape Charters' (is this supposed to be 'Character'?) • Landscape Character Map: 'Former Airfield/MOD sites' • In Climate and Sustainability supporting text 'South Oxfordshire' has a typo twice in the two links 	<p>Noted. Will review points individually.</p>
112	<p>The original submission is attached below.</p>	<p>Noted</p>

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Response manually entered, submitted in an email format. These representations have been prepared by Thakeham Homes Ltd (hereafter referred to as Thakeham) in relation to the South and Vale Draft Joint Design Guide consultation ("the draft Design Guide") as a local stakeholder. Thakeham is a housebuilder with offices in Sussex and the Thames Valley that has a track record for delivering high quality, sustainable developments. About Thakeham Thakeham prides itself in being an infrastructure-led sustainable placemaker and is committed to creating new, extraordinary places, where the highest attention to detail makes a positive difference. Thakeham builds for the future, for communities and individuals. Our approach sets us apart from our competitors. Thakeham deliver schemes with a focus on sustainable development, looking ahead of current housing standards. From 2025, all Thakeham Homes will be carbon neutral in production and zero carbon in lifetime use. Each development is different and tailored to its locality with careful consideration of the area's character, as well as the environment. The delivery of homes facilitates the delivery of physical, social and green/blue infrastructure which benefits the wider surrounding area, as well as the new residents, and ensures that Thakeham creates sustainable places to live and work. Thakeham is passionate about having a positive impact on people's wellbeing, constantly striving to deliver against our four key focus areas: Building local communities via excellent placemaking that creates interconnected communities that challenge issues of loneliness and promoting healthy living, and via our long-term charity partnerships. Building future generations via our school engagement programmes, including our industry leading holistic ecology programme 'Eddie and Ellie's Wild Adventures' for primary age pupils, and providing inspiring careers support to secondary age pupils through our Cornerstone Employer status with The Careers Enterprise Company. Building a stronger industry with our support of small and medium size enterprises and upskilling for local workers, supporting apprenticeships, and actively contributing to the diversification and upskilling of the construction sector. Building sustainable places by tackling issues of climate change, biodiversity loss and societal disconnects via our ambitious Sustainability Strategy. As one of 12 members of the NHS Healthy New Towns network, Thakeham is a committed advocate of developing healthy places in line with the Healthy New Town principles. However, over time, Thakeham has realised that these principles are just the starting blocks, and, as a founder member of the HBF (Home Builders Federation) Future Homes Task Force, Thakeham is committed to delivering sustainable, zero carbon communities. Our approach sets us apart from our competitors. Thakeham deliver schemes with a focus on infrastructure-led sustainable development. Thakeham's Approach to Sustainability Thakeham would like to take this opportunity to outline the measures implemented on its developments to minimise environmental impacts as a direct and indirect result of development as Thakeham consider this will have a direct bearing on the sustainability of our Site and our proposals in the context of the Consultation:

- From 2025, all Thakeham homes will be net-zero carbon in lifetime use.
- From 2025, all Thakeham homes will be carbon neutral in production. Our off-site panelised system will make construction more efficient, faster, enhancing quality and reducing construction traffic.
- Thakeham is committed to offsetting the embodied impact from the production of new houses, as well as development houses that are zero carbon in lifetime operation.
- Thakeham supports the Wildlife Trust's guidance on Homes for People and Wildlife. Our commitment is to achieve 20% biodiversity net gain (double the target set out in the recent Environment Act 2021) on all our developments post-2025, with attractive and functional green and blue infrastructure throughout all our developments.
- Through placemaking and the implementation of sustainable travel plans, Thakeham prioritises walking and cycling over car travel, helping people make more sustainable choices, as well as highlighting innovative car-sharing online platforms such as LiftShare to reduce single-occupancy car use.
- Thakeham provides electric car charging points at all of our homes both market and affordable alike, reducing barriers to customers purchasing emission-free vehicles.
- Thakeham is keen to champion low carbon transport in the local area, encouraging local transport services such as buses to electrify their fleets.
- Mechanical Ventilation with Heat Recovery (MHVR) is installed in our homes, which has a filter built-in to capture incoming pollution to provide fresh filtered air.
- Thakeham works with its supply chain with an aim that all mechanical plant on site is less than 18 months old, which means it is less polluting and more fuel efficient.

Response to the draft Design Guide consultation These representations are structured to accord with the individual sections within the draft Design Guide, for ease of reference. Generally, Thakeham is supportive of the proposals set out in the draft Design Guide and particularly welcomes the digital approach taken, as well as its conciseness. Thakeham therefore supports the aim and overall approach of the draft Design Guide, where it provides additional clarity to design policies within the respective Local Plans. General comments Whilst the representations above follow each section of the draft Design Guide, there are some themes which flow

Noted. Will review points individually.

	<p>throughout which Thakeham would specifically highlight. For example, it is notable that there is an absence of development scale attributed to some requirements and Thakeham are of the view that a graduation of these requirements, relevant to site size and capacity, would be fundamental to their interpretation and would avoid protracted dialogue at the application stage. When considering South Oxfordshire's proposed CIL (Community Infrastructure Levy) increases (currently the subject of a separate consultation), the draft Design Guide must be clear that the requirements are proportionate and viable to the scale of development proposed. The draft Design Guide must also be consistent in its approach to the requirements, particularly where these might be covered in multiple sections. Thakeham has highlighted a few areas where there are contradictions or different levels of detail in relation to the same requirement, and consider it is imperative that the draft Design Guide is clear to understand. Conclusion As noted, Thakeham support the approach taken in relation to the draft Design Guide and in general are supportive of its contents. Thakeham has however highlighted several areas where Thakeham suggest statements need to be qualified, better explained, or amended. Thakeham has also raised the issue throughout that the requirements do not appear to be applicable to all scales of development. Thakeham would be pleased to discuss any elements of these representations further if that would be helpful. Should you therefore have any queries please do not hesitate to contact me.</p>	
114	<p>No further comments.</p> <p>Admin note, the original submission is attached below for reference, alongside the submitted supporting document.</p>	<p>Noted. Will review points individually.</p>

115	<p>Response manually entered, submitted in an email format. The original submission is attached below for reference. Carter Jonas is instructed by CEG to respond to the draft Joint Design Guide (JDG) produced by South Oxfordshire and Vale of White Horse district councils ("the Councils"). CEG is a landowner and promoter which operates across both South Oxfordshire and the Vale of White Horse, and is specifically the promoter of Culham Science Village ("CSV"); the land allocated in the South Oxfordshire Local Plan for development under strategic policy STRAT9: Land adjacent to Culham Science Centre. It is understood that the intention is for the Councils to adopt the JDG as a Supplementary Planning Document (SPD). CEG is pleased to have the opportunity to comment on the JDG, and generally supports the guidance contained therein. In general, the JDG provides credible and well-established good practice principles that will result in high quality placemaking. There are some areas, however, where CEG would like to make comments and observations, and the areas that are questioned are broadly around numeric standards and those relating to the design process. Role of SPD Before turning to the technical areas of the design guide, CEG considers that the role of the SPD is not made clear in the JDG. SPDs provide a role in explaining and amplifying adopted policy of the development plan, and they are capable of being material considerations in planning decisions. Whilst the latter point is made clear in the supporting material to the JDG, the policy framework within which the JDG sits is less clear. The adopted policies upon which the SPD is built should be clearly set out in the JDG, and this is especially important where it is a shared document between two Councils. There is a suite of 'design' related policies in the Vale of White Horse Local Plan and similarly there are several "DES" policies in the South Oxfordshire Local Plan. Many of these policies are complimentary, or even say the same things, but others are not. Chief amongst the policy differences in South and Vale is the existence of policies that are explicitly directed towards carbon neutrality in South, which are less explicit in the Vale. Moreover, there are a range of Neighbourhood Plans in both authority areas – made and emerging – which include design guidance, and so a clear policy framework which shows where and how the JDG will work should be included at an early part of the document (or interactive web pages). Conclusion In conclusion, CEG supports the principles set out in the Joint Design Guide, however, as set out above, there are some details that should be considered, and matters clarified, before the JDG is adopted by the Councils.</p>	Noted. Will review points individually.
116	The original submission is attached below.	Noted. Will review points individually.

117	<p>Response manually entered, submitted in an email format. The original submission is attached below for reference, alongside photos for the Design Guide. General points: The document is very long and wordy in places despite the introduction advising that this document is not. Our main point is that everything that will be required by a development proposal should be covered in the design principles boxes and these should be numbered so that reference can be made to them in reports, and appeals. Some information / guidance set out elsewhere in the text or interactive menus was not included in the principles, or perhaps did not translate into a detailed design principle as a "requirement" that officers could communicate to applicants. This would make it tricky for officers to defend a particular position when faced with challenge by applicants or appellants. Having it all together in principles would also assist making a speedier decisions. An enhanced glossary would be also be useful in that respect. This should also be available from the circles to the right hand side in addition to the main menu. There was no contents page, or page numbers, as such it will be hard to reference the design guide in reports and statements etc. (evident below as we have not referred to para numbers) The interactive links are perhaps engaging, but they are not immediately obvious, and it seemed many of them once opened did not relate to the headline. The spot headings at the side were not immediately obvious. A pdf document will be necessary as some may not be able to use interactive function. Control F does not work on the current interactive webpage document. Could all relevant umbrella (adopted local plan) policies be highlighted, it is appreciated that the Councils do not always have the same policies so perhaps it is better to include these at the beginning of each section rather than in relation to specific points? Photos: Some of the locations / photos are not correct or do not really represent the point, e.g Prezzo is not in Wallingford (it is in Thame), the Thame paving looks like a wall, and bricks are covered in scaffolding. We have included some hopefully useful photos that our team has gathered to assist. We think the tick / red X approach on good and bad examples gives an immediate message and is useful. We have some comments on specific matters, but these are not comprehensive due to time constraints.</p>	Noted. Will review points individually.
118	<p>Response manually entered, submitted in an email format.</p> <p>There are two things I take from the draft guide:</p> <ol style="list-style-type: none"> 1. is there an easy search facility? That is, can you just search for, for example, "lighting" or "materials" or "heat pump" and be taken to the appropriate policy/words? 2. I can't see anything at all about dark skies, the desirability of reducing light pollution and light spill etc. 	Link to Dark skies documents added. Search facility to be explored.
119	The original submissions is attached below for reference.	Noted. Will review points individually.
120	The original submission is attached below for reference.	Noted. Will review points individually.
121	<p>Response manually entered, submitted in an email format.</p> <p>The Council fears that, in the effort to cover all design issues, the guide is unduly long and complex and, clearly, is written for professional users (architects, developers, planning consultants etc). The Council would prefer a guide which starts with a menu of "what sort of building do you want to design?" and then directs you to the appropriate section where there would be detailed instructions with worked examples.</p>	Noted. Will review points individually.

122	Response manually entered, submitted in an email format. I thought the guide was absolutely brilliant. One thing I thought of this morning, actually (a silly point) is that I was a couple of sections in before I realised that I needed to scroll down to get the full info on each section.	Select:
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Part 11: Our commitment to equal access for all

Question 20: We want to provide a service that meets the needs of all of our residents. Have you experienced any difficulties engaging with the planning service as a result of the following? Tick all that apply.

1	Access is easier for those with computer facilities and skills.	· Acknowledged
2	Is this a serious question? The difficulties I've had with the planning service centre around their competency and not with your ridiculous diversity targets.	· Noted

3	I have not interacted with the planning service so cannot comment	· Noted
4	None	· Noted
5	That main difficulty has been to make contact with some specialists. Sometimes occasioned by the need for some officers to work from home but hopefully this will not continue for long.	· Acknowledged
6	This section prompts me to add that developments for accom. should be in line with projected demography over say 25 years - families, single people, single storey developments Might add to green space which is included suggest space for allotments low miles horticulture, small holding	· Noted

7	<p>Have to use a mobility scooter and the present development on KA's East Site has no easy access at the far end, the only good access is in Springfield Road, the other end is stepped. i understand there was supposed to be a slope there.</p>	<ul style="list-style-type: none"> · Noted and will review
8	<p>On-line surveys of this nature are very long winded yet restrictive. The Councils must return to far more meaningful face to face consultations.</p>	<ul style="list-style-type: none"> · Noted
9	<p>Parking spaces not wide enough in Sainsburys main car parking areasall needs relining. If car parking bays wider would shop more but daren't use as car damage the norm.</p>	<ul style="list-style-type: none"> · This comment raises issues that fall outside the scope of the design guide.
10	<p>I found the planning officer to be arrogant, and thought her rude. I only wish I had recorded the call.</p> <p>Having a terrace house which can only have front dormers, she was dismissive, even though a larger house in a more secluded area would have been approved. She clearly was patronising about the circumstances</p>	<ul style="list-style-type: none"> · This comment raises issues that fall outside the scope of the design guide.
11	<p>A new housing area in Wantage has steps on a so called ""Walkway"" from the estate to the main road pavement.</p>	<ul style="list-style-type: none"> · This comment raises issues that fall outside the scope of the design guide.

12	Hard people to get to actually talk to	· Noted
13	No problems as a result of any of the above BUT I have found the service to be slow, unwieldy and generally not very helpful - and all I wanted to do was erect a noticeboard !	· This comment raises issues that fall outside the scope of the design guide.
14	I do not agree with respondent profiling	· Noted

15	N/A	· Noted
16	It is important that the general views of the local population are considered and not ignored.	· Acknowledged

17	yes as a parish council we have not been notified of screening opinion requests in our parish, having to rely on an eagle eyed clerk and residents to spot when they appear	· Acknowledged
18	I have not used the service	· Noted
19	im 66 and the internet when you know what button to press does make life easier.i am surprised how many young people do not know what there computers can do	· Acknowledged

20	Have not had to deal with the seervice for many years so remain as satisfied now as I was then.	· Noted
21	The lack of communication from the planning service is a concern. I am surprised that things like this are set up as a public consultation yet it seems to be tricky to actually hear of them openly and transparently.	· Noted

22	<p>Insulation and solar panels on listed buildingsLack of public transport</p>	<ul style="list-style-type: none"> · We agree and recommend it as best practice. · Public transport is an issue outside the scope of our SPD
23	<p>We ask questions on planning applications and get no response.</p> <p>We have schemes given approval that contain major errors, yet nothing is done to correct them.</p> <p>We have planning approvals that ignore national guidance, Local Plans (including existing Design guide) - yet nothing is done to correct the omissions.</p> <p>When we present evidence that shows the above, it is ignored.</p> <p>I would like a copy of all my comments - could you please provide one?</p>	<ul style="list-style-type: none"> · Noted