



# Lichfield District Design Code Supplementary Planning Document (SPD) Consultation Statement

**December 2024**

## **1. Introduction**

This Consultation Statement for the Lichfield District Design Code Supplementary Planning Document (SPD) sets out how the public and other stakeholders have been consulted upon the SPD. The statement has been prepared in accordance with Regulation 12(a) of the [Town and Country Planning \(Local Development\) \(England\) Regulations 2012](#) and supports the Lichfield District Design Code SPD.

The Lichfield District Design Code SPD has been in development since January 2023. The council commissioned consultants BDP to develop and progress a Design Code to cover the whole of Lichfield District and which would ultimately be adopted as an SPD.

The draft Design Code was developed following several rounds of public and stakeholder engagement prior to formal consultation required by the regulations. This engagement included:

- March 2023 - Several community workshops and webinars were held to explain how the Design Code would be developed, its purpose and to seeking input from residents and stakeholders at an early stage.
- April 2023 – Community survey undertaken with stakeholders invited to answer a series of questions about the character of their local areas and their design preferences to shape the Design Code document.
- November 2023 – a draft Design Code document was published for informal consultation which was designed so that residents and other stakeholders could provide their views on the draft document before a final document was prepared for formal consultation.

The Lichfield District Design Code SPD was formally consulted upon, in accordance with Regulation 12(b) between 22 April 2024 and 3 June 2024.

Section 5 of this statement provides a summary of the comments received during the formal consultation period, including how the issues have been addressed in working towards the final SPD for adoption.

## **2. Consultation Regulations**

The Lichfield District Design Code SPD has been prepared in accordance with the [Town and Country Planning \(Local Development\) \(England\) Regulations 2012](#). The relevant regulations relating to the consultation process are explained below.

Regulation 12(a) requires that before the council adopts a SPD it must prepare a consultation statement setting out who was consulted, a summary of the main issues raised, and how these issues have been addressed in the final SPD.

Regulation 12(b) requires the SPD to be published, alongside a consultation statement, for a minimum of four weeks. The council must specify when responses should be received and provide details of where responses should be sent. This document represents the consultation statement required by the regulations and Section 4 sets out the approach that was used for the consultation including details of when and where responses should be made.

Regulation 13 makes clear that any person wishing to make representation to the consultation must do so by the end of the consultation period. All responses received during the consultation period have been considered and a summary of those comments along with the consideration is set out at Section 5 of this statement.

Regulation 35 sets out how the council should make the document available during the consultation. The consultation described below was undertaken in accordance with all regulations.

### **3. Statement of Community Involvement**

The council's adopted [Statement of Community Involvement](#) sets out the approaches which the council will use when consulting upon SPDs, in accordance with the required regulations. The adopted SCI states that the council will consult upon SPDs for a minimum of four and maximum of six weeks and specifies the additional measures the council may use when consulting.

### **4. Consultation Approach**

The draft Lichfield District Design Code SPD consultation took place for a period of 6 weeks between 22 April 2024 and 3 June 2024. The consultation process undertaken was in accordance with both the statutory requirements and the standards set out in the adopted SCI. During the consultation period the council:

- Published the draft Lichfield Design Code SPD and Consultation Statement on the [council's website](#) and [planning policy consultation portal](#).
- Published the documents and made hard copies available on request at the council's main offices at District Council House, Burntwood Leisure Centre, and the Old Mining College, Burntwood.
- Issued a press release and promoted the consultation using the council's corporate social media channels (for example [Facebook](#), [Instagram](#), [Threads](#) and [LinkedIn](#) and 'X').
- The document was available in alternative formats where requested.
- Notification emails sent to all stakeholders (individuals, organisations, or bodies) that the council considered would be affected or interested in the SPD.
- Consultation drop-in sessions were held during the six-week period in Lichfield, Burntwood, Armitage with Handsacre and Fazeley.

A consultation statement was published alongside the draft SPD and set out how comments could be made and when such comments needed to be submitted by.

### **5. Results and summary of the Consultation**

In total 21 responses to the consultation on the draft SPD were received from 21 individuals/stakeholders. A summary of these responses, along with how these issues have been addressed, including where any modifications that have been made to the SPD are set out in Table 1.

The key issues raised during the consultation are as follows:

Key theme	Response	Action
Nationally Described Space Standard(NDSS)	There were several objections of the need to meet this within the code.	No change, the code remains robust in advising developments 'must' meet NDSS.
Front Gardens/Parking	Significant disagreement with the front gardens and parking requirements; it is too stringent for developments and will lead to 'poor' design.	No change, the code remains unchanged, any loosening of the wording will create vague rules in the code.
Building Line	Developers felt the building line was restrictive and did not offer flexibility to detailed design considerations after the regulatory plan is drawn.	No change proposed as sufficient distance for variance of this is already built into the code.
Items not currently within the Local Plan	Consultees raised queries on items not currently within the Local Plan.	Section 3.1 will clarify that items not within the existing Local Plan will remain as guidance until LDC progresses with the adoption of a new Local Plan.
Canal conservation areas	Concerns that canal side development is not referred to in the code.	No change. Canal side development is deemed too specific to link to the code.
Clashes with Building Regulations	Concerns that the latest building regulations were not cited within the draft code.	BDP have reviewed and have updated the code in accordance with the latest regulations.
Heritage	Strong comments on heritage implications and design from Historic England indicating they require heritage to be referenced throughout the code.	Heritage assets already have significant policy basis locally and nationally; no changes to the code will be made.
Speed limits	Various comments relating to the speed of roads and stringent speed limits, particularly in industrial areas.	Specific speed limits to be removed and signposting to Staffordshire County Council(SCC) Highways guidance added into the code.

Key theme	Response	Action
Biodiversity Net Gain (BNG)	Several suggestions that BNG should reflect national requirements.	This has been changed to reflect national guidance.
Watercourses	Developer disagreement on strong wording around opening watercourses.	Requirement for opening these has been loosened.
General requests for loosening of the code to make for a less stringent code	Several requests were made for the 'must' wording to be changed to 'where possible'.	These were discussed on a case-by-case basis and unless within this table as a change, it was decided that wording would not be weakened within the code.
Building heights	Concerns raised about the limits to the height of development. With strict height requirements, developers are fearful this will result in lack of variation and them being unable to create feature points in developments. Also does not accord with potential density requirements.	Wording has been changed slightly to include the provision of significant justification for an increased height.
Loss of trees within developments	Several comments regarding the retention of Cat A & B trees, unless justified. Developers expressed disagreement with this.	Exceptional circumstances text has been changed to 'significant and evidenced justification' making it a lot clearer for the Planning Officer to determine.
Street Trees	Concerns were raised by SCC that street trees directed on one side of the highway or both sides could have knock on effects to private frontage depth and building lines.	Officers discussed and agreed to add that street trees on the side of highways should have the following rule 'if practical to do so and by agreement with all parties involved'
Highways	Developer concerns over what SCC would/would not be willing to adopt.	Addressed by including signposting to SCC guidance.
Building materials	Concerns raised over the requirements for Brick and Tiles	Additional text has been added to include sustainable materials

Lichfield District Design Code SPD Consultation Statement

Key theme	Response	Action
	when trying to achieve sustainability objectives.	if justified in terms of design and local context.
Access to facilities and bus routes	Quite strong coding limits have been placed on this aspect of the Code. Developers are questioning whether this is possible on all schemes, with infrastructure harder for them to provide.	No change has been made; it is expected that developers show how this will be achieved. We are looking to achieve sustainable development and for people to use other transport options and active travel.
Larger schemes	Consultees sought clarification on the definition of larger schemes.	Any reference to larger schemes will caveat over 100 homes.
Secure by Design	Concerns raised that developments 'must' meet the Secure by Design standard will negatively impact place making quality.	Code loosened to state design 'should' meet this standard and not 'must'.

Table 1: Lichfield District Design Code SPD consultation – summary of responses

Consultee	Summary of comment	Council response	Modification to document
Prologis	<p><b>Street safety:</b> disagreement on speed limits</p> <p><b>Trees:</b> comments relating to existing trees being relocated too onerous. Disagree with blanket requirement on retention of trees.</p> <p><b>Biodiversity:</b> request for BNG to comply with national policy level.</p> <p><b>Sustainable Urban Drainage (SuDS):</b> disagreement on using green roofs advising not suitable on large scale employment buildings.</p> <p><b>Permeable surfaces:</b> request for flexibility in the inclusion of permeable surfaces.</p>	<p>Specific speed limits reviewed.</p> <p>The trees aspect of the Code is misinterpreted and the 'should' means this is not essential. The use of Trees and Nature will all link together to feed into BNG. Some trees will fall under the exceptional circumstances. Schemes should be developed to design around significant trees.</p> <p>BNG requirement will align in the code with national policy.</p> <p>Green roofs are shown as a recommendation for SuDS and greening Industrial Spaces. It does not require this through developments.</p> <p>Agree slight change of wording on EA 2.6 for permeable surfaces.</p>	<p>All streets within the Industrial Area Type should be designed to achieve a 10mph speed limit.</p> <p>No change.</p> <p>Text changed to national policy requirement.</p> <p>No change.</p> <p>Text changed including robust justification for deviating from this.</p>

Consultee	Summary of comment	Council response	Modification to document
	<p><b>Building Heights:</b> strong objection to building heights set at a maximum height for new employment developments.</p> <p><b>Architecture:</b> disagreement with 20% requirement regarding front façade of glazed windows.</p> <p><b>Employment uses:</b> request for the guidance to make clear that employment areas including retail, leisure and food stores should be ancillary and complement the main employment classes.</p> <p><b>Public consultation:</b> requested changes on public consultation wording.</p>	<p>Text on building heights will be changed to include option for taller development.</p> <p>The 20% of windows on development facing street should be retained. It would allow for better reading of buildings. Variations could be agreed at a site-wide Design Code level.</p> <p>The code is clear on employment uses.</p> <p>Wording changed to apply to major developments.</p>	<p>Text changed to include 'If develops seek to introduce any taller development, it should be accompanied with an appropriate views assessment and justification of the size.'</p> <p>No change.</p> <p>No change.</p> <p>Text changed to 'a program of public consultation is required for all new major development'.</p>
Barratt Homes West Midlands	<p><b>Streets and highway:</b> still unclear as to whether the regulatory plan is required for all types of development at any scale or if there will be a specific threshold applied.</p>	<p>Wording for larger schemes reviewed.</p>	<p>Text reviewed and added 'For new development of over 100 homes, a regulatory plan should establish a hierarchy of streets.'</p>

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	<p>Request further clarity on whether engineered measures, such as build outs, to reduce traffic speeds within developments are also acceptable.</p> <p><b>Cycle routes:</b> suggests that the code should be weakened in relation to schemes providing access to cycle routes.</p> <p><b>Service access:</b> query on distance relating to access for service vehicles not in line with building regulations.</p> <p><b>Consultation:</b> request for SCC to be consulted on the code.</p> <p><b>Parking:</b> object to the proposed level of unallocated visitor parking (1 space per 4 homes) as it is excessive in addition to the allocated parking spaces per dwelling and is likely to impact on the street scene.</p> <p>Request for on plot parking to be to the side or rear of the property is considered overly restrictive.</p> <p><b>Play space:</b> requested more flexibility within the wording for provision of play space.</p>	<p>The code doesn't go to this level of detail and would have to be assessed on a case by case basis by LDC.</p> <p>LDC prefer this for new schemes any flexibility will weaken the code.</p> <p>Align this text to building regulations.</p> <p>SCC have been consulted on the code throughout various stages in the last two years.</p> <p>This has been through substantial thought and was considered as an appropriate level for visitor parking. Particularly given the context of housing development in Lichfield which leads to excessive informal parking areas. The code is trying to reduce this.</p> <p>This has been considered by LDC and decided as an appropriate addition in the Code.</p> <p>Adding flexibility will lessen the power of the code.</p>	<p>No change.</p> <p>No change.</p> <p>Text changed.</p> <p>Changes reflected in the code where relevant.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>



Consultee	Summary of comment	Council response	Modification to document
	<p><b>BNG:</b> glad that the council have amended to reflect national policy. Suggest that the Design Code should specifically state that the council will also be supportive of off-setting BNG in line with national secondary legislation where required.</p> <p><b>Emergency plan:</b> clarity requested on this. Request for third paragraph to be changed within SU2.6. Request for 2.6 wording to be changed to 'where possible and practicable'.</p> <p><b>Building line:</b> concerns that the 0.5m requirement for building line will hinder the use of corner houses on developments. Request to add 'where possible' to this section of the code. Request for SU3.7 to have flexibility in relation to building line.</p> <p><b>Building heights:</b> proposed building heights should be based on site context and character areas within a site (if a larger scheme) rather than the high level blanket coding plan within the Design Code which does not look at site specifics. Do not like blanket height limit in the code.</p> <p><b>Large schemes:</b> support the change from 'larger schemes' to major schemes, however, clarity is still sought on what LDC define as a 'larger scheme' and consider that a</p>	<p>Current text is adequate.</p> <p>Further information provided on emergency plans. Paragraph amended to 'this is a crucial requirement due to the likely changes in weather events and sea levels due to climate change.' No change made to weakened wording requested on SU2.6.</p> <p>Adding 'where possible' will invalidate this section of the Code. The code is intended to be prescriptive.</p> <p>A maximum height for homes is appropriate given the existing context and development types within Lichfield.</p> <p>Major Outline Schemes is the limit. This gives more assurance and restrictiveness to outline schemes</p>	<p>No change.</p> <p>Text changed where applicable.</p> <p>No change.</p> <p>Text has been changed to include significant justification for going above building heights set out.</p> <p>No change proposed - clarification provided elsewhere that a larger</p>

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	<p>proposed threshold should be added to the Design Code to make it clear which developments are required to prepare a Site Design Code.</p> <p><b>Set backs:</b> not supported, requested weakening the code by adding ‘where possible and practicable in relation to set backs’.</p> <p><b>Windows:</b> flexibility requested to change this part of the code to “where possible 35-40% of a front façade should be window openings”. This can vary for house types and may not always be feasible.</p> <p><b>Materials:</b> do not support the blanket use of certain materials.</p> <p><b>Street design:</b> request that the SPD should be using more flexible wording, for example ‘encourage’ rather than ‘should’.</p> <p><b>Housing mix:</b> pleased to see that the housing mix text has been changed to delivery of AH. As required in the adopted Core Strategy, AH contributions should be agreed on a site by site basis and informed by site specific constraints and opportunities and supported by up to date viability evidence (NPPF Paragraph 31).</p>	<p>and enables developers to align their Codes with the principles within the district-wide Code.</p> <p>Noted – LDC would like to see suitable setbacks on developments.</p> <p>Text has been reviewed.</p> <p>Addition to the code to use sustainable materials, where justified in terms of design and local context.</p> <p>This is not the point of the code; the section remains prescriptive.</p> <p>Noted.</p>	<p>scheme in Lichfield is over 100 homes.</p> <p>No change.</p> <p>Text changed.</p> <p>Text changed.</p> <p>No change.</p> <p>No change.</p>

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	<p><b>Active frontage:</b> requested “where possible and practicable” should be added to the first paragraph to provide some flexibility and for the level of active frontages to be determined on a site-by-site basis.</p> <p><b>Access to facilities:</b> requested wording to be weakened to “where possible and practicable” in relation to distances to local services and facilities from the residential development.</p> <p><b>NDSS:</b> strong disagreement with the code requiring new developments to meet these standards. Feel it is too restrictive.</p> <p><b>Lighting, noise, and privacy:</b> request that, “where possible” should be added to privacy distances as there may be some circumstances where smaller distances are considered appropriate.</p> <p><b>Private outdoor space:</b> request that “where possible and practicable” should be added to the proposed outdoor space standards to allow more flexibility for standards to be agreed on a site by site basis and informed by site specific constraints and opportunities.</p>	<p>The existing level of active frontage is low.</p> <p>LDC seek to enhance access on new developments.</p> <p>NDSS are nationally recognised and now referenced in the GPDO as a requirement on new dwellings. Aligning with this, LDC would want to ensure an appropriate level of internal space for all new development.</p> <p>No change.</p> <p>LDC will retain this level of provision.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>

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	<p><b>Energy efficiency:</b> disagree with reference to new homes meeting Future Homes standard.</p> <p><b>Consultation:</b> disagree with the requirement to consult on all new development. Request that the wording “where necessary and applicable engagement with voluntary organisations and civic groups will be encouraged” is used.</p>	<p>No change.</p> <p>Requirement for this changed to 'larger schemes' i.e. over 100 homes.</p>	<p>No change.</p> <p>No change.</p>
<p>St Modwen</p>	<p><b>Street safety:</b> requests that “All streets within the Industrial Area Type should have a 10mph speed limit and be designed to achieve this.”</p> <p><b>Public transport:</b> requests change to wording as A 10-minute walk is defined as 800 metres, not 400 metres in transport terms.</p> <p><b>Cycling and micro transport:</b> The level of cycle parking is onerous, requested that the code is changed to accord with the Sustainable Design SPD.</p> <p><b>Emergency access and servicing:</b> requested that the code accord with building regulations. Requested removal of EA1.6 completely.</p> <p><b>Junctions and access:</b> request for EA1.8 be removed, junction design should be informed by technical detail such as Transport Assessments, feels inappropriate to specify junction design on a district wide basis.</p>	<p>Change to text agreed.</p> <p>Change to text agreed.</p> <p>Code future proofs schemes.</p> <p>Change to text agreed.</p> <p>TS/TA will still be required to justify development proposals. This ensures it is being thought about early in the process.</p>	<p>Text changed.</p> <p>Text changed to ‘800m as a 10 minute walk’.</p> <p>No change.</p> <p>Changed to reflect building regulations.</p> <p>No change.</p>

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	<p><b>Permeable surfaces:</b> requests that the blanket requirement for all non-adopted hard surfaces to be permeable is removed as not appropriate for employment led development.</p> <p><b>Building Heights:</b> objection to building heights set at a maximum height for new employment developments.</p> <p><b>Architecture:</b> disagreement with 20% requirement regarding front façade of glazed windows. Rather than prescribing the use of brick as part of the Design Code, SMSL suggests that wording is revised to reflect brick being a potential option (i.e. could rather than should) or refer to brick or metal cladding.</p> <p><b>Imagery:</b> employment area figures EA21, 23 and 25 Class E – commercial, business and service use class precedent imagery should include an example of a light industrial building to reflect class.</p>	<p>Agree slight change of wording on EA 2.6 for permeable surfaces.</p> <p>Text on building heights will be changed to include option for taller development.</p> <p>The 20% of windows on development facing street should be retained. It would allow for better reading of buildings. Variations could be agreed at a site-wide Design Code level. This section is not prescriptive with a 'must' for brick.</p> <p>Not considered essential within the Code for an image.</p> <p>The Code does not require this within development, it is very loose</p>	<p>Text changed including robust justification for deviating from this.</p> <p>Text changed to include 'If develops seek to introduce any taller development, it should be accompanied with an appropriate views assessment and justification of the size.'</p> <p>No change</p> <p>No change.</p>

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	<p><b>Space standards:</b> disagreement with flexibility built in for variance in space for employment area development. Also states guidance not affective relating to multi storey developments for industrial use.</p>	<p>in this section. What is presented reads more as general guidance rather than as prescriptive coding principles.</p>	<p>No change.</p>
<p>Bloor Homes</p>	<p><b>Role of an SPD:</b> Suggestion that the DC is going beyond the development plan and that it is not linked to the adopted development plan.</p> <p><b>Area types:</b> Request for clarification to be made about new development coming forward and how the proposed area type would be taken into account rather than existing.</p> <p><b>Connected streets:</b> suggested that the tertiary street typology is extended to incorporate cul-de-sacs / private drives.</p> <p><b>Street safety:</b> speed limits of 30mph may not be appropriate in some instances.</p> <p><b>Public transport:</b> request for withdrawal of the requirement for the nearest bus stops being within 400-800m of a bus stop.</p>	<p>Section 3.1 which identifies this. The Code is futureproofing the district.</p> <p>The proposed area type will be considered where appropriate. Development in the Rural Area shall initially be considered against that Code. This is already shown and captured in figure SU.2</p> <p>This is general principles. Case-by-case assessment and justification can be provided by developers.</p> <p>It is expected that developers show how this will be achieved. We are looking to achieve sustainable development and for people to use other transport options and active travel.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>Signposting to Staffordshire County Council Highways guidance added into the code.</p> <p>No change.</p> <p>No change.</p>

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	<p><b>Cycling and micro transport:</b> suggests that the code should align to the Department for Transport’s LTN 1/20 guidance as published in July 2020 and to consider cycle lanes on a case by case basis.</p> <p><b>Walking routes:</b> 2m width on both sides of footpath is unsuitable for some street typologies such as tertiary streets.</p> <p><b>Emergency access and services:</b> suggest would be more appropriate to refer to SCC Highways Design Guide in relation to emergency and service vehicle access.</p> <p><b>Allocated parking:</b> suggested that a more flexible approach to frontage parking is proposed, and that the focus instead should be on highlighting frontage parking arrangements that would and would not be appropriate / supported.</p> <p><b>Cycle parking:</b> suggests the cycle parking should align to the Sustainable Development SPD.</p> <p><b>Play space:</b> state that it is unclear where the requirement for play space has come from as not in the Local Plan.</p> <p><b>Water and flood:</b> suggest the policy is reworded to encourage removal of culverts.</p>	<p>Disagree - seek to obtain cycleways on majority of schemes to build the infrastructure.</p> <p>Tertiary Streets is identified as having shared surface footways in Section 5.2.</p> <p>Will be updated in line with building regulations.</p> <p>LDC want to ensure parking does not clutter the street scene.</p> <p>Design Code will supersede any current SPD.</p> <p>Distances of play spaces in vicinity to developments will be retained and used as guidance until formalised with the Local Plan.</p> <p>Reworded in the code.</p>	<p>No change.</p> <p>Text updated.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>Text updated with scope for removal of culverts.</p> <p>Text changed to include justification where trees may</p>

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	<p><b>Trees and verges:</b> the code is written to suggest that trees are required on all streets which is not always appropriate.</p> <p><b>Building line variance:</b> SU3.5 states that the front face of all new buildings must not vary by more than 0.5m from the building line. This is not always possible. SU3.5 should be reworded to provide more flexibility.</p> <p><b>Building heights:</b> SU3.8 as currently drafted would not allow for the required flexibility to respond to the local context and vernacular and could give rise to poor place-making.</p> <p><b>Site design:</b> site specific Design Codes should only be required for larger schemes over a certain size e.g. 500 homes and over.</p> <p><b>Architecture:</b> additional flexibility should be allowed for schemes to depart from the prevailing architectural character where that is of a lower quality, where there is no consistent building character / quality in the area, or where it would be inappropriate to deliver a pastiche of a historic character.</p> <p><b>Set back:</b> disagreement with setback of 6m on all new homes is overly restrictive. Would not allow for mews style</p>	<p>Encouragement of trees would have no weighting; the text has been changed to allow for circumstances where it may not be appropriate.</p> <p>Rewording will loosen the code, no change made.</p> <p>Taller buildings will be considered with significant justification and in consideration of the local context.</p> <p>All major schemes need to have this.</p> <p>LDC are keen to retain a lot of the existing style and character within new developments.</p> <p>Reviewed text and has been changed to up to 6m.</p>	<p>not be appropriate and to be agreed with LDC.</p> <p>No change.</p> <p>Additional guidance text added to the code.</p> <p>No change.</p> <p>No change.</p> <p>Text changed.</p>



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	<p>development and best use of land. More flexibility requested.</p> <p><b>Street type and design:</b> requested section SU5 be completely deleted due to the area being too broad to apply the street type guidance.</p> <p><b>Access to facilities:</b> disagree with the maximum distance between residential development and services. Feel the current draft would limit rural developments.</p> <p><b>Space standards:</b> The extant local plan has not adopted the NDSS requirements, and therefore the DC SPD should not seek to implement them.</p> <p><b>Inclusive design and adaptability:</b> Reference is made to Part M4(2) and Part M4(3) housing. Feel that is a matter for consideration through the emerging Local Plan process (eLP).</p> <p><b>Ageing population:</b> reference is made to the provision of bungalows. That is currently not a policy requirement in the extant local plan and should only be considered in setting out the new housing mix requirement in the eLP.</p> <p><b>Energy efficiency:</b> disagree with reference to new homes meeting Future Homes standard. Feel should refer to national standards.</p>	<p>This will not be deleted; the Code is based off the NMDC which utilises the street types as way for coding.</p> <p>LDC to retain this in there as guidance until Local Plan has them as limits it will then become policy.</p> <p>The requirement to meet NDSS will be retained in the code.</p> <p>Guidance until in LP.</p> <p>Guidance until in the LP.</p> <p>No change.</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>

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	<p><b>Environmental performance:</b> SU8.2 reads that new non-residential development will be expected to achieve a minimum of BREEAM Good. However, the extant development plan makes clear that this only relates to buildings of 1,000m<sup>2</sup> or above. SU8.2 should be updated to reflect that.</p> <p><b>Renewable energy:</b> EV charging points set out in the draft has been superseded by building regulations.</p> <p><b>Whole life carbon approach:</b> new developments are not required by national or local planning policy to undertake Whole Life Carbon Assessments. Therefore, SU8.7 should be removed.</p>	<p>LDC wish to retain BREEAM good in non-residential development.</p> <p>Updated with latest building regulations.</p> <p>No change the Design Code does not require a specific assessment.</p>	<p>Text changed.</p> <p>No change.</p>
Canal and River Trust	<p><b>Area coding plans:</b> appears to miss Canal Conservation Areas. More detail requested on coding.</p>	<p>The Canal which has not be considered at this district-wide level.</p>	<p>No change.</p>
Charlotte Lewis	<p><b>Area type:</b> Mile Oak shown as Village Suburban, area key plan on page 9 says Outer Suburban.</p> <p><b>Building regulations:</b> code should comply with building regulations, e.g. access to service vehicles.</p> <p><b>Parking standard:</b> justification required as to why unallocated on-street parking may not include unmarked on-street parking.</p> <p><b>Building heights:</b> limiting development at up to 2 storeys does not aid the designer in optimising placemaking strategies for largescale residential development.</p>	<p>Updated the key.</p> <p>Updated to comply with building regulations.</p> <p>This results in visual clutter on the street scene and promotes informal parking solutions.</p> <p>Text reviewed to permit 3 storeys.</p>	<p>Text changed.</p> <p>Text changed.</p> <p>No change.</p> <p>Text changed to permit 3 storey properties.</p>

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	<p><b>Inclusive design and adaptability:</b> greater clarity on M4(2) and M4(3) requirements required here, as per guidance on NDSS.</p> <p><b>Imagery:</b> area key required on page 49 of appendices.</p>	<p>Guidance until in the LP.</p> <p>Code updated with area key.</p>	<p>No change.</p> <p>Updated with key.</p>
Dave King	<p><b>Greenbelt:</b> concerns that there is no reference to protection of the green belt and concerns over 'garden grabbing'.</p>	<p>Greenbelt issues will be dealt with at LP level.</p>	<p>No change.</p>
Elizabeth Muller	<p><b>Cycling infrastructure:</b> various suggestions to increase cycle lanes and accessibility to these.</p>	<p>The code can only go so far to help with these issues. Both a new LP and SCC would need to get this rectified.</p>	<p>No change.</p>
Morgan Sindall Construction Ltd	<p><b>Whole document:</b> various comments relating to Birmingham Road Design Code.</p>	<p>Birmingham Road site has its own code to sit alongside the district wide code.</p>	<p>No change.</p>
George Petrou	<p><b>Density and design:</b> suggests the code does not apply upper limit densities and there is nothing to stop developers cramming a lot of houses onto one site with no character.</p>	<p>Upper limits on density are set within the area types - LDC recognise there is a need for more density in areas of the district.</p>	<p>No change.</p>
Historic England	<p><b>Heritage:</b> various comments about heritage, would like to see heritage assets protected, would like the council to develop the concept of the cathedral spire, feel there is little information on how design details correlate with the historic environment, support the need for heritage assessment on planning applications, suggest that more detail about what detail should be included on the assessment, would like to see more detail on historic shop frontages, requesting meetings with the council to review heritage assessments where submitted as part of planning applications.</p>	<p>Heritage in each code would not be in line with the MNDC - heritage still forms an important aspect of the Development Plan.</p>	<p>No change.</p>

Consultee	Summary of comment	Council response	Modification to document
	<p><b>Building heights:</b> it should be clear that the Cathedral will maintain its role in the skyline and not be compromised by tall buildings.</p>		
<p>Stantec</p>	<p><b>Street safety:</b> disagree with speed limits of 30mph on high streets and tertiary streets.</p> <p><b>Public transport:</b> request for wording to be changed in relation to proximity of bus stops to “all new housing should be within walking distance of a bus stop that’s located on a route with potential for use by regular bus services.”</p> <p><b>Cycling and micro transport:</b> the definition is inconsistent with the Street Design table set out in SU5.2 and is overly prescriptive on how cycle provision is accommodated within the site. This should be reworded to read: “Cycle lanes will typically be expected on primary streets, high streets and secondary streets based on an assessment of local need. In some instances, an alternative cycle strategy might be acceptable where cycle lanes are diverted down smaller streets or dedicated off-street routes.”</p> <p>Width of buffer within figure VA.4 is not always an appropriate solution.</p> <p><b>Parking:</b> disagrees with the Design Code suggests parking should be to the rear of properties. Designers can weigh up the best locations for frontage or rear parking forms. The that end, the following wording should be removed: “This only applies where there is room to retain 3m of frontage</p>	<p>Text reviewed.</p> <p>No change, LDC want this in the code to ensure appropriate location of new development sites.</p> <p>Text reviewed and changed.</p> <p>The Code is clear that Table in VA5 is 'guidance'.</p> <p>Front parking is still allowed - the code makes provision for landscaped areas to avoid cluttering of the street scene.</p>	<p>Text changed.</p> <p>No change.</p> <p>Text changed.</p> <p>No change.</p> <p>No change.</p>

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	<p>as a garden (an exception can be made for blue badge parking).”</p> <p>Unclear if all the parking options shown within the images are acceptable for the purpose of Lichfield District Design Code.</p> <p><b>Play space:</b> concerns over requirements for play space for all new development being too restrictive. Also distances to play areas is a concern.</p> <p><b>Biodiversity:</b> it is recommended that the text is amended to read: “In line with national policy, Biodiversity Net Gain shall be achieved on all new development. Please refer to national policy and legal regulations for up-to-date figures.”</p> <p><b>Water and flood:</b> wording on watercourses and culverts considered too prescriptive.</p> <p><b>Trees and verges:</b> suggested change to wording to allow flexibility with street trees and verges.</p> <p><b>Urban form:</b> concerns over conflicting guidance on cul de sacs.</p> <p><b>Building line:</b> advise that the building line requirement currently in the code is restrictive. Prefer wording to be changed as follows ‘for new development houses should</p>	<p>These would be considered as acceptable options if designed accordingly.</p> <p>Distance reviewed and changed.</p> <p>Text change to align to national policy.</p> <p>Wording amended.</p> <p>Amendment to requirement for street trees that if they are not possible this is justified and agreed with LDC.</p> <p>Wording reviewed to ensure no conflict in the guidance.</p> <p>Sufficient distance for variance of this is already built into the code.</p>	<p>No change.</p> <p>Text changed.</p> <p>Text changed.</p> <p>Text changed.</p> <p>Text added.</p> <p>Text updated.</p> <p>No change.</p>

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	<p>follow the building line principles set out by the regulatory plan for the site.'</p> <p><b>Building heights:</b> considers the current draft too prescriptive, requested more flexibility.</p> <p><b>Set back:</b> suggests increasing the set back distances.</p> <p><b>Building materials:</b> advise that the use of certain building materials is too restrictive. This requirement doesn't recognise the need for use of similar materials to reduce viability or carbon footprint concerns. It is suggested that the paragraph is amended.</p> <p><b>Street design:</b> disagreement with the table setting out street typology. Concerns regarding whether SCC would agree.</p> <p><b>Access to facilities:</b> disagree with the distance in relation to access to services, facilities, and bus stops.</p> <p><b>Private outdoor space:</b> there are sometimes challenges in providing outdoor space, requested change to "Apartments should have access to communal space of at least 10sqm per unit or small private space such as a balcony (of at least</p>	<p>Text on building heights will be changed to include option for taller development.</p> <p>No change.</p> <p>Text reviewed and use of sustainable materials included where justified.</p> <p>This is noted as guidance in the code.</p> <p>It is expected that developers show how this will be achieved. We are looking to achieve sustainable development and for people to use other transport options and active travel.</p> <p>LDC seek to have amenity space on all apartments.</p>	<p>Text changed.</p> <p>No change.</p> <p>Text changed.</p> <p>No change.</p> <p>No change.</p> <p>No change.</p>

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	<p>5sqm). Where apartments are adjacent to local accessible amenity space, this requirement could be waived.”</p> <p><b>Security:</b> requested that new homes ‘must’ meet Secure by Design standard is relaxed to ‘should’.</p> <p><b>Management of neighbourhood:</b> a more flexible approach to resident management to include A more flexible approach is suggested below: “new residential development of more than 20 homes should explore opportunities to involve residents in the management of their neighbourhood.”</p> <p><b>Land at Watery Lane:</b> conflicting information on the density level that should be applied here as conflicting information within the area types.</p> <p><b>Whole document:</b> advise if all their requested changes are made, they feel the code has good potential for high quality place making within Lichfield and give certainty to those undertaking development within the district, without unnecessarily stifling the delivery of new communities.</p>	<p>Text reviewed and amended to ‘should’.</p> <p>No change.</p> <p>Reviewed and amended to Outer Suburban.</p> <p>Noted.</p>	<p>Text changed.</p> <p>No change.</p> <p>Text changed.</p> <p>Some changes made because of comments see above.</p>
Jonathan Siegel	<p><b>Cycling provision:</b> various requests with examples for better cycling provision in Lichfield.</p>	<p>These matters are hard to include in the Design Code. Many aspects within the Code will enhance the provision of cycling.</p>	<p>No change.</p>
Lichfield City Council	<p><b>Services:</b> concerns over communal bins being used and abused.</p>	<p>Communal bins stores are required in some instances to support higher densities.</p>	<p>No change.</p>

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	<p><b>Heating type:</b> would like to see that the air source heat pump (ASHP) should be placed away from windows' wording strengthened and enforceable due to possible noise issues.</p>	<p>ASHP have potential to cause noise disturbance, strengthen the code to require a Noise Impact Assessment where these are being introduced in / near residential areas.</p>	<p>Added in to text requirement for a Noise Impact Assessment.</p>
<p>National Forest Company</p>	<p><b>Whole document:</b> the National Forest is not mentioned in as much detail as expected. Recommended the text is changed in relation to Edingale and Harlaston sections.</p>	<p>Whilst the National Forest is key - we would not expect significant development within these areas.</p>	<p>Suggested text changed to the Edingale and Harlaston sections.</p>
<p>Peter Boulton</p>	<p><b>Whole document:</b> various comments made, unresponsive of the code.</p>	<p>Matters not relevant to the code.</p>	<p>No change.</p>
<p>Thorpe Estate</p>	<p><b>District wide coding plan:</b> concerns that new sites aside from strategic sites in the framework section are not coded. Requested reference to 'General Transect Theory'. Requested specific mention of garden communities.</p> <p><b>Area types:</b> request for the text in section 3.1 to be weakened to allow flexibility. Requested flexibility to be built into each area typology.</p> <p><b>Built form:</b> requested additional flexibility to the built form sections as densities may vary due to various factors, including environmental (i.e. landscape), place-making (i.e. focal points) and social (i.e. areas of higher public interaction).</p>	<p>The Design Code has framework sites within the adopted LP. New sites will be considered as the LP develops and more sites become adopted.</p> <p>General Transect Theory is not relevant to the code. This specific reference to Garden Communities is not applicable to this SPD document.</p> <p>The Design Code has prescriptive rules for various types of development. Flexibility in the Code will devalue it.</p> <p>Densities are based on the Area Type - a variation of area type across new developments will ensure that densities can be appropriately considered. This can be set out in</p>	<p>No change.</p> <p>No change.</p> <p>No change.</p>



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	<p><b>Density:</b> suggest that proposals for garden communities such as land at Thorpe Estate (as shown in the Vision Document at Appendix B) will be strongly landscape led which may include areas of lower density. There is a risk that some areas would potentially fall below the minimum required density of the relevant Area Type (i.e. areas defined as Inner or Outer Suburban Area Type). Considering the above, it is recommended to slightly amend the densities of each Area Type to provide a suitable, indicative range.</p> <p><b>Garden communities:</b> advise it would be beneficial if the overarching Lichfield Design Code SPD qualified that a site-specific Design Code SPD will likely be required for any future garden communities, if proposed.</p>	<p>applications with a site-wide regulatory plan to set out densities and street structure.</p> <p>Current densities within the code are acceptable and applicable by LDC.</p> <p>The code refers to site-specific Design Codes coming forward as part of major outline consents. Any further Design Code would be expected to conform to the principles of this district-wide Code.</p>	<p>No change.</p> <p>No change.</p>
Staffordshire County Council	<p><b>Street design and SuDS:</b> request that the code should be read in conjunction with the most recent published guidance by SCC on street design and SuDS.</p> <p><b>Speed limits:</b> request that the public realm tables within the code are updated to signpost to SCC guidance. Speed</p>	<p>Text changed within 3.1 to incorporate this.</p> <p>Rather than signposting in each row, the text will be changed on all tables, to reflect that highways</p>	<p>Text changed.</p> <p>Text changed.</p>

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	<p>limits in employment areas of 10mph is not achievable wording change requested to remove the 10mph.</p> <p><b>Street trees:</b> advice that there maybe instances where trees would be best located in the central reservation but the code at present would not allow for this. Request that the sides of the road where trees are planted are removed and that the minimum spacing is all that is retained. This should ensure tree lined streets are delivered and not just an odd tree here and there.</p> <p><b>Watercourses:</b> our guidance encourages opening of watercourses we support the wording in the code.</p>	<p>requirements should be read in conjunction with SCC guidance. Wording updated on speed in employment areas.</p> <p>LDC wish to retain street trees on either side of the street however if the developer is unable to achieve this, they could deviate from this with agreement from LDC.</p> <p>No change.</p>	<p>Text changed to the public realm table to include ‘if this is not feasible, agreements should be reached with LDC to determine and alternative approach’.</p> <p>No change.</p>
LDC Conservation Team	<b>Conservation:</b> various comments made, and changes made previously based on some of these.	No further changes.	No change.
Natural England	<b>General response:</b> did not feel the Design Code is relevant to them at the present time.	No change.	No change.
Environment Agency	<b>General response:</b> comments relate to specifics of the Mavesyn Ridware Neighbourhood Plan.	Not relevant to the district Design Code.	No change.