

### **SUMMARY OF PROPOSED REPRESENTATIONS**

***1) That subject to a number of minor modifications set out below, the draft parking standards for Worcestershire and guidance contained in Chapters 1-4, 8-9 and 11\* of the draft Worcestershire Transportation Development Control and Design Guidance be welcomed and endorsed by Wyre Forest District Council.***

***2) That for the reasons set out below, the design guidance contained in Chapter 5, Section 6-7 and Chapters 12-15\* is not endorsed by Wyre Forest District Council who will continue to use the Adopted policy of the Wyre Forest District Design Quality when considering development proposals.***

***3) That Worcestershire County Council be asked to set out in the Worcestershire Transportation Development Control and Design Guide a commitment to review the guidance to take on board the emerging outcomes of the national 'Manual for Streets' review, at the earliest opportunity.***

\*Chapters are as numbered in the document and not as presented in the Contents Page.

### **Key Issues**

The following analysis looks at the consultation draft document on a chapter by chapter basis to identify any important issues and suggest possible representations.

#### ***Contents & General:***

- 2.1 The contents page does not accurately reflect the content of the document and the document lacks illustrations, diagrams and images.
  - 2.2 **RESPONSE 1: to highlight the need to revise the contents page and to include appropriate illustration to show the kind of environments that the County Council would like to see created.**
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#### ***Section 1: Introduction:***

- 2.3 The introduction to the guide sets a very laudable ambition for the document. However, key references are missing including the supporting role of Local Development Frameworks.
- 2.4 **RESPONSE 2: to request additional references to the supporting role of District LDF's and SPD together with other national good practice guidance.**
- 2.5 There are inherent contradictions running throughout the draft guidance (some of which are highlighted in the sections that follow) and they also come to surface in the Introduction. For example paragraph 1.2.4 states that "*whilst this document contains recommended "standards" they should not be regarded as totally prescriptive and the County Council as Highway Authority will consider alternative proposals...*" [there is no clarity of process in this regard]. Paragraph 1.3.2 goes further in recognising that "*...it may be difficult to adhere to the*

*standards contained in this Guide. Should you wish to depart from the guidance in any way, the Developer must make an acceptable case with supporting evidence that the proposals do not compromise highway safety...the above statement is to be regarded a "last resort" and where it is possible to achieve the standards sets out in this guidance adherence to those standards will be required."* This calls into question the advice at Paragraph 1.2.4 i.e. the suggestion that there is some degree of flexibility. Furthermore, the process by which these decisions are taken remains unclear.

- 2.6 **OBJECTION 1: WFDC would like to see a more positive approach that requires designers to demonstrate good design. The guidance also needs to address a number of internal inconsistencies to provide transparency and clarity in the decision making process.**
- 2.7 Reference to 'Development Control Officers' (Para. 1.3.4 and throughout) could usefully be clarified "Worcestershire County Highways Development Control Officers".
- 2.8 **RESPONSE 3: So as to avoid confusion with LPA Development Control Officers, WFDC would suggest that all references to Development Control should be clarified by the words "Worcestershire County Highways".**
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## ***Section 2: Policies***

- 2.9 Section 2 of the guide contains a series of 25 policies although their status is unclear. The fact that they are included in the consultation draft suggests that the policies are enshrined within it. However, the introduction to this section suggests that they have merely been used in the preparation of the guide. References to numerous PPG's are now out of date e.g. PPS1, Draft PPS3 etc.
- 2.10 **RESPONSE 4: to highlight the need to update references to include national planning policy statements (no longer just guidance) and clarify the status of these 25 policies.**

## ***National Policy & Guidance***

- 2.11 Policy 001 considers the importance of central government guidance and includes references to a number of out-of-date Planning Policy Guidance. Although suggested, it is unclear how 'Better Places to Live' has been integrated into this latest guidance. There is also no mention of other key guidance documents including 'Better Streets, Better Places' (Cabe, County Surveyors Association et al); Streets for All: West Midlands (English Heritage and DfT); 'Housing Layouts – Lifting the Quality' (DETR et al), West Midlands Regional Assembly Parking Standards Study (2005)... In short there is a considerable amount of good practice that the draft guide does not reflect. And this is considered later in the report.
- 2.12 **RESPONSE 5: to highlight the need to update references to include national planning policy statements (no longer just guidance) and to draw attention to other good practice documents and relevant guidance.**

## ***Regional Policy & Guidance***

- 2.13 Policy 002 – Regional Planning Guidance is no longer guidance, but the Regional Spatial Strategy and legally forms part of the Development Plan for each District.

- 2.14 **RESPONSE 6: to highlight the need to update references to the Regional Spatial Strategy (no longer just guidance) and to draw attention to other good practice documents.**

*Local Policy & Guidance*

- 2.15 Policy 003 – Other guidance prepared by Local Planning Authorities might include design guides and development briefs and reference could usefully be made to these in Policy 003.
- 2.16 **RESPONSE 7: to highlight the need to include references to other Local Planning documents including development briefs and design guides.**

*Transportation Assessment, Travel Planning & Accessibility*

- 2.17 Policies 004, 006 & 007 set out the criteria for requiring a Transportation Assessment (TA), Travel Plan (TP) and Accessibility Assessment (AA). They require all developments proposed where 'congestion already exists' (not defined) or where there are 'identified concerns regarding highway safety' (not defined) to include a detailed TA, TP and AA regardless of the scale of development or significance of the trigger. Where a proposed development is shown to have a poor or moderate accessibility rating and is incapable of achieving a 'good' rating it will be recommended for refusal regardless of scale etc (see section 1.4.2 of the document).
- 2.18 **RESPONSE 8: raise concern over uncertainties about the thresholds requiring a TA, TP or AA.**

*Accessibility*

- 2.19 Policy 008 (Accessibility) should make it clear that this only applies to developments that are subject to the criteria set out in Policy 007.
- 2.20 **RESPONSE 9: the guidance should clarify when Policy 008 will be applied.**

*Environment*

- 2.21 Policy 010 requires an environmental study to be undertaken by an independent expert. It is suggested that the study looks into a number of diverse issues including biodiversity and cultural heritage of a site. This would in effect require numerous experts to be involved and could prove to be very onerous. In addition, elements of this 'environmental study' could duplicate surveys that would normally be requested by the local planning authority.
- 2.22 **RESPONSE 10: raise concern over possible duplication arising with the role of the Local Planning Authorities.**

*Road Hierarchy*

- 2.23 In the preamble to Policy 011 reference is made to 'Shared Surface Roads' to serve up to 50 properties where the pedestrian has priority rather than vehicles. "These are residential roads not necessarily provided with separate footways". This provision has been carried forward from the 1994 guidance and is most welcome. However, despite requests for consideration from planners and developers there are no known examples in Wyre Forest District. In reality these tend to be discouraged by the County Council during negotiations in

favour of the tried and tested two metre wide footway with dropped kerb either side of the carriageway. However, it does not lend itself to the creation of quality pedestrian environments or townscape aesthetics.

- 2.24 **OBJECTION 2: request a firmer commitment to delivering quality shared surface environments. The guidance should be clear that poor quality design (and often materials) would be unacceptable to Local Planning Authorities. Despite this provision existing since 1994 there have been no significant shared surface schemes in Wyre Forest District due to some resistance from the County Council Development Control team.**
- 2.25 Additional descriptions introduced since the 1994 guide includes Home Zones for which mention is again to be welcomed. However, as will be highlighted later, where mentioned they are accompanied by discouraging remarks about the need for substantial commuted sums.
- 2.26 **OBJECTION 3: WFDC request that the wording should be more positive and proactive about quality design.**

#### *Design Standards*

- 2.27 Policy 012 indicates that standards are to be based on Design Bulletin 32 (DB32). However, it has been outlined above that these standards are now being called into question through a project sponsored by the DfT and ODPM called 'Manual for Streets' which is shortly due to replace DB32. Mention of this programme could usefully be made in the WCC guide together with its inevitable implications for the future review of the document.
- 2.28 **OBJECTION 4: WFDC request that a clear commitment be made to review the document following the preparation of the 'Manual for Streets'. Examples of more flexible interpretations of DB32 should be positively considered and illustrated in the guide to follow examples from 'Better Places' etc.**

#### *Drainage*

- 2.29 Policy 014 suggests that all development will be required to include a comprehensive design for a Sustainable Urban Drainage System. However, as suggested in section 8.13 of the draft document SUDS can be expensive and may not be required in all cases. Whilst, the District Council would normally welcome the introduction of SUDS (see Local Plan Policy D.7) there may be other material considerations and more pressing issues for the site. Therefore the Policy should require advice to be sought from the Environment Agency.
- 2.30 **SUPPORT 1: WFDC supports the overall thrust of the policy but object (OBJECTION 5) to SUDS being required in all instances – may divert valuable s.106 funding away from more relevant needs. Suggest reference to the need to consult with the Environment Agency for further advice.**

#### *Public Transport*

- 2.31 The section on Public Transport appears to relate to all new developments. However, thresholds would be helpful, as it would clearly be unreasonable to expect a new bus service serving a one dwelling development. Therefore, in suggesting that all parts of a new development are to be within 400m of a bus

stop, policies 018 and 019 appear to place onerous and potentially unrealistic requirements on small developments particularly in rural areas.

**2.32 RESPONSE 11: request that thresholds should be introduced to clarify when public transport provision will be required.**

*Landscaping on the Highway*

2.33 The section on Landscaping on the Highway starts positively by saying that “a carefully designed and presented landscaping scheme can enhance the appearance of any proposed development...” However, the opening paragraph concludes that “soft landscaping on the adopted highway must be kept to a minimum...”. Safety and maintenance are given as the over-riding consideration, although examples from other parts of the country suggest that soft landscaping can be sensitively incorporated into the streetscene. This approach does little to deliver an environment conducive to walking and cycling.

**2.34 OBJECTION 6: the landscaping on the highway section (preamble to Policy 021) is overtly negative and inconsistent with national good practice on the design of the public realm. To discourage soft landscaping and insist on poor visual quality (low maintenance) materials will provide a further disincentive to walking and will not be acceptable to Wyre Forest District Council.**

2.35 The section on landscaping becomes even more negative towards the issue of trees located on highway land. Throughout the UK and in particular as part of inner city regeneration, trees are a valued and integral element of the public realm/ streetscene. Policy 021 suggests they are not allowed, although the preamble to the Policy suggests that “where trees are accepted on the Adopted Highway...”. There is no reference to root containment and other means of minimising any adverse impact e.g. choice of species. The Policy directs the planting of trees towards public open space and private land and discourages the planting of trees in the adopted highway. The guide states that “where soft landscaping areas or trees are accepted as adopted highway then substantial commuted sums must be paid by the developer to the County Council to take account of increased maintenance costs and increased liability.” However, the draft guide creates some confusion over what constitutes the highway (see further comments about Policy 24 below). Public realm is wider than public open space and there are many situations including highway verges and bankings where large areas of space form an integral part of the public realm and highway environment. Generally, the Highway Authority act as the custodian of this environment, but it is unclear whether trees and quality landscaping will be encouraged here.

**2.36 OBJECTION 7: Policy 021 needs to be clarified. Poor quality public realm that does not include appropriate tree planting will be less likely to receive planning consent. Highway Authorities elsewhere in the UK and the Highways Agency permit tree planting within street design and the County Council should be more proactive about how trees can be satisfactorily incorporated e.g. root trainers, guards etc. This seems to be a significant backward step from the 1994 guide, which provided a much more positive framework for considering trees in the highway.**

2.37 The suggested approach put forward by the County Council would perhaps suggest that developers might be well advised to cover the highway and its

immediate environment in low maintenance 'tarmac'. However, new national guidance now states that the key question for planning is to ask whether a proposal is good enough to approve rather than bad enough to refuse – OK developments incorporating poor/ mediocre public realm are more likely to be refused on design grounds.

### *Street Lighting and Illuminated Signs*

- 2.38 Policy 022 – Lighting can be used to good effect particularly in urban environments. The policy and explanatory text provide a standards approach and suggest little scope for innovative lighting solutions. Policy 022 also requires developers to provide or replace lighting in the surrounding area (to be determined by the County Council). However, it is not clear in what circumstances and how. This requirement should be reasonable and should presumably involve some form of consultation or due process. Perhaps such contributions may be sought only where the surrounding lighting network is substandard (this could ensure that s.106 monies are targeted to priorities) rather than enforcing an arbitrary requirement.
- 2.39 **OBJECTION 8: Policy 022 should be further clarified to establish appropriate criteria when determining contributions to the wider area. Reason: To ensure that the proposed arrangements are sufficiently transparent**

### *Areas for Adoption*

- 2.40 Policy 024 identifies what the County Council will consider for adoption as public highway. Historically, highway land has covered the highway in context including verges, banking, public footpaths and cycleway environments. However, the preamble to Policy 024 calls this definition of highway land into question and this in turn raises significant question over the design of quality streetscape. The draft design guide seeks to separate 'highway users' from the environment that they are travelling through. Ideally this relationship would be more interactive than simply 'passing' through which could imply bypassing communities and neighbourhoods. For many users of the highway and particularly pedestrians this relationship is far more critical. If, through the design guide the County Council are negating responsibility for the ancillary environment to highways then the planning authority in its search for quality public realm will need to negotiate with developers to ensure that 'greenways' and quality public realm continue to be delivered.
- 2.41 **OBJECTION 9: Policy 024 needs to be further clarified in order to establish how the County Council intend to assist in the delivery of quality public realm conducive to walking and cycling. Reasons: To comply with national planning policy and to ensure internal consistency with the stated ambitions of the draft design guide i.e. "to promote sustainability" (para. 1.3.1) and the 'emphasis for movement around the site and commuting to work should comply with a hierarchy' starting with walking and cycling (para. 1.2.3) [N.B. The District Council agrees with these ambitions but considers these statements to be flawed in the above context.]**
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## ***Chapter 1: Transportation Planning***

### *Travel Plans*

- 2.42 Section 1.3 – it could be argued that greater flexibility should be applied in town centres. Simply by locating development in town centres developers are indirectly encouraging alternative modes of travel i.e. lower parking standards, better access to public transport and greater potential for linked trips etc. It is development in out-of-centre locations where travel planning is particularly important. Taking this approach may help to incentivise town centre regeneration.
- 2.43 **OBJECTION 10: request that consideration be given to travel planning incentives (i.e. making less onerous) be offered when considering town centre proposals. Reason: To support the provisions of PPS6.**
- 2.44 **RESPONSE 12: In respect of targets and monitoring (para.1.3.3), the principle of a bond system might be supported as a means of providing an incentive for targets but the proposed system needs greater clarification in terms of reasonableness, expected level of payments and administration. It is unclear how the principle will work for housing schemes – are there any examples from elsewhere in the UK? Reason: To ensure that the proposed arrangements are sufficiently transparent**

#### *Accessibility Assessment*

- 2.45 Section 1.4 –
- 2.46 **RESPONSE 13: this section would ideally incorporate the background provided in the LTP2 especially regarding accession accessibility mapping. Reason: To provide further clarification.**
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### **Chapter 2: Parking Standards**

#### *Introduction*

- 2.47 The new maximum parking standards are roughly consistent with those of PPG13, which is clear in stating that local planning authorities should not ask for more parking than the developer themselves wish to provide unless there are good reasons in terms of highway safety (see 2<sup>nd</sup> bullet point to Para 2.1.2). The essence of the new requirements is that authorities cannot prescribe minimum standards. Para 2.1.1 of the draft guide states that at accessible locations “...lower parking provision is more likely to be acceptable to the Highway Authority than the maximum number of spaces...”. This suggests that the maximum is in fact the target (or minimum).
- 2.48 **RESPONSE 14: It should be clarified that developers will only be required to provide more spaces than they themselves would like in very special circumstances where highway safety would otherwise be compromised. Reason: In order to ensure consistency with PPG13.**
- 2.49 Para 2.1.2 (parking spaces for disabled people) - not all developments can provide car parking. Many sites are infill developments within existing streets and will inevitably rely on shared town centre parking etc.
- 2.50 **RESPONSE 15: suggest that further clarification be provided for those developments unable to accommodate on-site parking i.e. convenient disabled parking.**

#### *Scope*

- 2.51 Section 2.2 outlines the procedure for scoping parking standards. The guide contains references to the Use Classes Order, which now needs to be updated following amendments in 2005. Para 2.2.2 starts by stating that “the initial parking requirement for mixed-use...” which suggests that the maximum standards are a target or minimum level of provision unless the applicant can demonstrate a sufficient level of accessibility. This appears to be at variance to PPG13.
- 2.52 **RESPONSE 16: reference to the Use Classes Order needs to be updated to refer to ‘as amended’. Also need to clarify why there is an initial parking requirement.**

*Detached or Remote Parking Areas*

- 2.53 Section 2.6 states that parking which is remote or detached from the development it is intended to serve will not normally be allowed. However, an exception should perhaps be made within town centre environments where shared parking facilities are welcomed. Similarly off street servicing is not always possible (particularly in central areas) and there should be explicit flexibility for those types of environment.
- 2.54 **OBJECTION 11: Shared parking can lead to better design particularly in town centres, local centres and office parks etc. Appropriate exceptions should be highlighted.**

*Servicing*

- 2.55 Section 2.7.1 sets out the standards relating to parking for service vehicles (lorries) and is clearly expressed as minimum – manoeuvring space will not be counted and should be kept clear at all times. These spaces can result in a considerable vacuum in townscape and are particularly undesirable in conservation settings. Furthermore in town centre infill sites it is not always practicable (or desirable) to require on-site servicing and in these instances there should be a preference for on-street servicing. Further clarification is needed in this regard. The standards set out in Table One seem to require a lorry parking space for almost every type of commercial operation e.g. all A3 units regardless of size. This seems onerous and some degree of flexibility is required depending on size of operation, likely duration of lorry stays etc.
- 2.56 **OBJECTION 12: WFDC would request that Section 2.7.1 be reworded to provide some flexibility in the application of lorry parking standards in certain instances/ settings.**

*Residential Layouts*

- 2.57 Section 2.13 of the guide looks at parking in residential layouts. The County Council proposes to classify one garage (and the space in front of the garage) as one space and this is considered unacceptable. Therefore requiring additional spaces to be provided in those instances where two or more spaces are “required”.
- 2.58 **OBJECTION 13: The space in front of the garage can also be used for parking and should be classed as one space (in addition to the garage itself).**

*Reduction in the provision of on-street parking*



- 2.59 Section 2.14 looks at the possible reduction in the provision of on street parking through the introduction of controls. However, emerging good practice and the Wyre Forest District Design Quality SPG suggest that on-street parking is a desirable way of accommodating parking provision, particularly where this is the established tradition. Increasingly, when internal rear parking courts are developed residents use the street and pavement to park and some form of on-street provision would facilitate and help to meet this natural demand.
- 2.60 **OBJECTION 14: On-street parking should be recognised as a means of accommodating cars and, subject to design, encouraged where this is part of the established tradition (e.g. town centres and traditional residential streets). In contemporary streets the District Council would like to see favourable consideration to some on-street parking again subject to design and ownership and management issues being appropriately resolved.**

## *Design & Layout*

- 2.61 Section 2.16 considers the design and layout of private car parks off the public highway. This begins “as well as providing the appropriate level of car parking, it is incumbent upon the Developer to incorporate good design for the layout, landscaping and lighting of parking areas.” The County Council appears to be applying different standards for private areas and the public highway. The requirement for ‘good design’ is equally if not more important for the public realm.
- 2.62 **RESPONSE 17: support the requirement for good design in off-street car parks but suggest that the same standards should also apply to the public highway.**
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## ***Chapter 3: Passenger Transport Facilities***

### *Introduction*

- 2.63 Section 3.1.1 sets out the criteria for requiring public transport provision. However, these are considered to be very vague i.e. “Where the Passenger Transport Development Manager deems the development is of sufficient size...”. There are further references to ‘reasonable’ walking distance and this is similarly not defined.
- 2.64 **RESPONSE 18: request further clarification in the form of thresholds to ensure clarity and transparency of approach.**

### *Design Considerations*

- 2.65 References to carriageway dimensions are noted and presumably reflect those of Design Bulletin 32. Manual for Streets is due to replace DB32 and the standards contained therein. Wyre Forest District Council would like to see a commitment to review space dimensions following the replacement of DB32.
- 2.66 **RESPONSE 19: WFDC would like to see a clear commitment to reviewing the design guide following the introduction of Manual for Streets.**
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## ***Chapter 4: Road Safety Audits***

- 2.67 No detailed comments on the road safety audit section of the guide. However, would like to see some explanation of how the safety audit process can impact on the final implementation of approved plans. Could the guide clearly put emphasis on auditor involvement in the initial design process in order to limit the need for changes to the approved plans.
- 2.68 **RESPONSE 20: WFDC would like to see a clearer emphasis on considering safety at the initial design stage.**
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## ***Chapter 5: Urban and Residential Roads***

### *Introduction*

- 2.69 It is noted that for ‘simplicity and familiarisation’ section 5.1.1 sets out the road types/ hierarchy, which the guide is based on, i.e. the descriptions contained in DB32 such as Primary Distributor, District Distributor, Local Distributor etc. It is also noted that the section “follows closely the concepts [and standard

dimensions] of Design Bulletin 32”, which is currently being replaced. Given that these standards are now being questioned through the Manual for Streets project, the District Council has concerns over the rigorous adherence to such standards (as implied in para.1.3.2). There is no sense of the overall characteristics of the street types listed from a land use, connectivity, pedestrian priority or urban character perspective i.e. place making such as that provided at para. 3.84 of the Wyre Forest Design Quality SPG (illustrated examples would also be useful).

- 2.70 **OBJECTION 15: WFDC has concerns about the rigorous adherence to standards and would like to see examples of how the rules can be flexibly applied. In addition WFDC request that a less technical analysis of street types be incorporated into the guidance in order to demonstrate how a hierarchy of streets can help to create a sense of place.**

#### *Design Considerations*

- 2.71 Para 5.2.2 highlights the need for buildings to be the main organising principle whereby transport facilities are fitted into the place. This is welcomed and is consistent with Para. 3.88 of the Wyre Forest District Design Quality SPG (which also illustrates how this can be achieved – p.62 of the SPG). However, whilst the stated ambition is welcomed, detailed guidance elsewhere in the consultation draft guidance appears to contradict this aspiration. For example, section 5.7.2, 5.7.4 and 5.7.6 state that for the first 20 metres (a considerable distance – equivalent to more than four cars) direct access or construction of dwellings designed in such a way as to encourage kerbside vehicle parking will not be permitted. This calls into question whether buildings may front onto the street. Wyre Forest District Design SPG states that “the first impression of a scheme should not be a timber fence or brick wall” and is clear that all public streets should be addressed by building frontages (para.3.142). In reality, despite the sentiment, Worcestershire’s housing layouts i.e. building orientations and the overall sense of place are strongly determined by highway design, such that many layouts contain unnecessary and illogical chicanes, bends and deflections. In summary, at para. 5.2.2 the draft would suggest that highway design should be determined by built form in which case a straight section of road might be dealt with by traffic calming, on-street parking, landscaping etc and this would be welcomed, but it is clearly not happening.
- 2.72 **RESPONSE 21: WFDC would request clarification that where practicable all public streets should be addressed by building frontages (even within the first 20 metres). Would also suggest the inclusion of an illustration similar to that on page 62 of the Wyre Forest Design SPG and that sufficient flexibility be inherent in the guidance to enable the design of building layouts to influence highway design and not visa versa.**
- 2.73 Para 5.2.2 goes onto highlight specific issues for designers to consider when designing urban and residential roads. These include “Is the highway of sufficient dimensions to enable the intended users [drivers] to travel over it and carry out any necessary manoeuvres in a safe and efficient [30mph] fashion?” This list does not take a hierarchical approach in terms of putting the emphasis on pedestrians. Although as a secondary consideration the guidance asks whether “the needs of both pedestrians and cyclists are appropriately addressed in the design?” The section puts the emphasis on limiting the speed of users to the intended design speed of the road type. In the urban areas of

Wyre Forest District this suggests that roads will be designed to enable drivers to travel at 30mph (distributor and major access roads).

- 2.74 **OBJECTION 16: WFDC would like to see a greater emphasis placed on the safety and comfort of pedestrians. The physical layout i.e. the buildings and landscape features defining the public realm, together with parking bays etc should be such as to limit the speed of vehicles in some instances to below the ‘design speed’. For example if forward visibility is impaired then drivers would automatically only proceed with caution.**

#### *Public Rights of Way*

- 2.75 Section 5.11 sets out the design issues for public rights of way in urban or residential settings and seeks to ensure that Public Rights of Way should be suitably incorporated into development schemes. As with public streets development should ideally be required to front onto such rights of way in order to ensure natural surveillance and provide a pleasant aspect for walkers and cyclists etc. All too often developments have turned their backs on Public Rights of Way.
- 2.76 **OBJECTION 17: request that the guidance seeks to encourage developments to front onto Public Rights of Way.**

### **Section 6: Home Zones**

#### *General*

- 2.77 Section 6 provides NEW guidance on Home Zones and in this respect is welcomed. It is refreshing to hear acknowledgement at section 6.8.1 that “a raised kerb sends out a powerful message to all road users that the street is divided into vehicular and pedestrian areas.” Many of these principles could also, presumably, apply for shared surface solutions elsewhere?
- 2.78 **SUPPORT 27: WFDC endorse the recognition given to Home Zones and broadly supports the content of Section 6.**

#### *Adoption as public highway & future maintenance*

- 2.79 Paragraphs at section 6.13.1 set out the criteria for adopting Home Zones as public highway. It is clearly negative towards their adoption. It will in short only consider adoption of the “running surface” (not the whole street) where the street forms part of a through road and where the development exceeds 30 dwellings. Even then the guidance offers further discouragement by reminding readers that this will only happen on “payment of a substantial commuted sum to cover the costs of future maintenance of any ‘specialist’ surfacing materials”. The second paragraph reinforces the problem by stating that the Highway Authority will not adopt the intrinsic elements of a home zone i.e. parking areas, street trees, landscaping etc. This effectively seems to rule out the prospect of any home zones being introduced.
- 2.80 **OBJECTION 18: This section sends out a powerful message that despite over 5 pages of interesting guidance, Home Zones are not welcome in Worcestershire. Section 6.13 needs to be more positively worded to explain that Home Zones will be encouraged and that the Highway Authority will work with developers and local planning authorities to explore means of securing their future maintenance.**

## **Section 7: Industrial, Commercial and Retail Developments**

- 2.81 As with references in the urban and residential roads section, place making is equally important when considering business, leisure or retail parks, although very little consideration is given to the broader design issues. For example it is important that commercial premises front onto the street.
- 2.82 **RESPONSE 22: WFDC would like to see further consideration given in section 7 to landscaping and public realm.**
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## **Section 8: Drainage Design**

- 2.83 No significant comments on this section other than regarding Sustainable Urban Drainage Systems (SUDS) at section 8.13. Reference should usefully be made to the Environment Agency and their latest good practice on SUDS.
- 2.84 **RESPONSE 23: WFDC would suggest that early contact should be made with the Environment Agency to establish the key issues and requirements for a given site.**
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## **Section 9: Construction Details**

### *Crossing points (vehicular, cycle and pedestrian)*

- 2.85 No significant comments at Section 9.15. The D... vertical deflections i.e. pedestrian priority (as i...
- 2.86 **RESPONSE 24: WFDC pedestrian crossings.**



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### *Pedestrian Guard Rails*

- 2.87 Section 9.19 sets out the construction details for pedestrian guardrails. Wyre Forest District Design Quality SPG requires these to be kept to an absolute minimum as a barrier to pedestrian movement. In line with the Council's policies regarding fencing and street furniture such features may be more appropriately painted. In conservation and town centre settings more sympathetic designs should be sought. It would be helpful if the guidance could identify these possibilities.

- 2.88 **RESPONSE 25: WFDC would like to see explicit reference to the need to minimise the extent of guard railings and to ensure appropriate measures to reduce their visual prominence.**
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## **Chapter 11: Structure**

### *Structures for Adoption by the Highway Authority*

- 2.89 As with previous sections the County Council is seeking to introduce new provisions and clarifications over what it is willing to adopt as the 'public highway'. In 1994, the County Council's advice on the adoption of verges recognised that localised "verge widening may occur where trees are planted or local narrowing occurs as part of traffic calming measures and account will be taken of these areas within the adopted width" (Para.3.3.9). However, the latest draft guidance seems to take a backwards step in clearly limiting the adoption to the 'running surface' (see earlier comment) and at section 11.2.2 relating to structures does not include bankings where one may expect to see a significant landscaping scheme.
- 2.90 **RESPONSE 26: WFDC to seek clarification regarding the possible adoption of earth embankments supporting or providing context (i.e. noise mitigation etc) to the public highway.**
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## **Chapter 12: Traffic Management and Traffic Signals**

### *Speed Restraint By Design*

- 2.91 Section 12.2.1 places the emphasis for speed restraint on the arrangement of buildings rather than the design of the highway and this is welcomed. However, no explanation or examples are provided as to how this can be achieved and references to things like a 'deformed grid' and 'speed control bends' suggest something rather different. In the end these highway design features often introduce unnecessary bends in the road which are unhelpful and an inconvenience to pedestrians. Despite the sentiment these features affect the overall layout of the streets and buildings.
- 2.92 **RESPONSE 27: WFDC would request further clarification on how it is intended that buildings and space will be designed to restrain speed.**
- 2.93 Section 12.2.2 refers to restraint measures in existing streets. Reference to raised junctions is particularly noted and welcomed. Reference to raised pedestrian crossing points would also be welcomed. At the moment it is understood that raised features in the highway now have to be agreed by Senior Management at the Highway Authority and WFDC would like to request reassurances that the County Council remain committed to these measures. It would also be expected that these measures could be integral to new developments as a means of ensuring pedestrian priority. Would welcome reference to conservation approach in 'older existing streets'.
- 2.94 **RESPONSE 28: WFDC would request further clarification and a firmer commitment to raised junctions and crossing points.**
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## **Chapter 13: Street Lighting**

### *Street Lighting Requirements*

- 2.95 Section 13.1.1 recognises the importance of higher standards of design in conservation areas or very close to them and in other environmentally sensitive areas. This is welcomed but WFDC would also like to see specific mention of quality design in 'town centre' and 'regeneration area' settings where lighting can help in terms of branding etc. Lighting can also be used to artistic effect, or to light up particular landmarks (e.g. bridges) and features and some reference to this would be useful. Similarly at the pedestrian level reference could usefully be made to up lighters, bollard lights etc.
- 2.96 **RESPONSE 29: WFDC support the flexibility to be applied in conservation areas but would like to see this broadened to include town centres and regeneration areas where varied forms of lighting and branding might be expected. Reference to up lighters and bollard lighting particularly in town centre settings as a means of helping illuminate the pedestrian environment might also be helpful.**
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**Chapter 14: Landscaping**  
**(incorporating comments from WFDC's Arboricultural Officer)**

*General*

- 2.97 Section 14.1 recognises the important role of landscape design and is welcomed. However, this initial sentiment is contradicted elsewhere in the guidance e.g. as mentioned earlier the preamble to Policy 021 states "soft landscaping on the adopted highway must be kept to a minimum...". Similarly, Section 14.4.1 entitled 'restrictions' places significant onerous constraints on landscape design. For example, the second bullet point rules out the planting of trees or shrubs (with a mature height of more than 25cm i.e. anything other than grass within 2m of a footway, cycle-way or shared surface. This limitation is unacceptably restrictive in terms of environmental and design quality. The majority of highway authorities within the UK manage to permit the planting of trees/shrubs/hedges within closer proximity than 2m subject to detailed design and maintenance. The 3<sup>rd</sup> bullet point of Para 14.4.1 sets out different rules for planting trees within verges that are not proposed to be adopted as public highway. In these instances appropriate references are made to the importance of species selection and the guidance states that "these constraints should not be used as a reason not to plant trees, as there are various proprietary root barriers available". These are reiterated later in the guidance as para. 14.8.1 which indirectly suggests that tree planting immediately adjacent to the carriageway or footway is possible. It would seem reasonable to suggest that the same rules should apply to those areas proposed for adoption as for private highways. The 4<sup>th</sup> bullet point also relates to trees and precludes their planting within a service strip, within the area to be adopted highway or within 3m of the route of major underground services. Despite the acknowledgements set out in relation to private highways, this categoric restriction effectively rules out trees anywhere near the adopted highway.
- 2.98 **OBJECTION 19: WFDC strongly objects to these provisions. WFDC will continue to encourage planting in the public domain to include trees and hedges as part of a comprehensive landscape design and requests Worcestershire County Council takes a more positive view of planting in the highway in line with good practice guidance. Recognition of the possible role of landscaping as a traffic calming measure would also be welcome.**

*Restrictions*

- 2.99 Bullet point 7 of Para 14.4.1 continues to restrict trees and soft landscaping by seeking to prevent the planting of any tree or shrub where, at their mature size, they will obstruct street lights or road signs. Whilst consideration should be given to species selection in relation to obstruction this restriction is considered to be unworkable in practice. In addition, it would also be suggested that as part of a joined-up approach to design lighting should be designed to complement the planting regime. Bullet point 8 starts by stating "poor design and choice of plant species can produce security problems..". This is a symptomatic problem of the overall approach i.e. a negative starting point. Most designers would suggest that good design and appropriate planting could be a complementary and active ingredient in a comprehensive approach towards security and surveillance. The negative wording of the policies appear to imply that the aim is to prevent developers designing poor car parks. However, times



have changed and increasingly the development industry now recognises the value of good design. The aim is to provide further encouragement and positive words to encourage a joined up approach. However, the draft design guidance generally seeks to look at specific issues in isolation. For example, the reference to the implications of planting on lighting and security is not complemented by guidance on other factors such as natural surveillance, active fronts and private backs etc.

**2.100 OBJECTION 20: WFDC requests that the guide should be more positively worded to encourage designers to seek comprehensive designs that deliver a complementary planting and lighting design solution.**

2.101 Bullet point 9 of Para 14.4.1 refers to BS5837 (1991) which has been renewed and is now (2005) and has been upgraded to 'Recommendations'. Fencing specification has changed from chestnut place fencing to, barriers should consist of a scaffold framework with a weldmesh barrier, normally 2.3m high (see section 9 of the updated standard). Five metres beyond the canopy edge is rarely practical and WFDC would suggest this element be removed and a reference be made to the new BS 5837.

**2.102 OBJECTION 21: WFDC requests that reference should now be made to the new BS5837.**

#### *Tree Surgery and Excavating Adjacent Existing Trees*

2.103 Section 14.5 considers the issues of works relating to existing trees. It would be helpful for the guidance to set out a definition of 'rooting area'. References to BS 5837 should now be (2005). The 9<sup>th</sup> bullet point pertaining to the installation of services is a must i.e. 'must be carried out' not 'should be carried out'.

**2.104 OBJECTION 22: WFDC requests appropriate alterations to section 14.5.2 as detailed above.**

2.105 Section 14.5.3 makes provision for replacement planting when existing trees are removed from the highway. This is welcomed and WFDC would like to see a clear commitment to replace existing trees despite the aforementioned provisions regarding the planting of new trees in the highway (see comments above). This paragraph states that the size and species of replacement trees will as per required by the Council. WFDC request that this should be in consultation with the District Council. As currently worded it is not clear that a replacement tree will necessarily be required and this is something WFDC would like clarified.

**2.106 OBJECTION 23: WFDC request that the guidance be clearer in stating that a replacement planting will normally be required and the size and species of tree will be determined by the County Council in consultation with the appropriate District Council.**

#### *Surveys*

2.107 Section 14.7.1 considers tree surveys and it is suggested would be best to refer to details as contained within BS 5837 (2005) rather than trying to include a list which will certainly have missed a number of elements.

**2.108 RESPONSE 30: WFDC requests that reference should now be made to the new BS5837.**

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#### ***Chapter 15: Miscellaneous***

*Some concerns relating to paragraphs 15.6 – 15.8 (e.g. Para. 2.87 above).*