

Residential Design Guide
Representations Received During Consultation: Mon 4 November – Mon 16 December 2013

The Council directly contacted 571 people or groups; all of whom were given a letter/email explaining the consultation process. This included the Council's consultation list for planning consultations, elected members and local architects/planning agents. In addition, the consultation was featured in 'About Watford' magazine, promoted in the Town Hall and on the Council's website and was included in the consultation events in the Intu Shopping Centre.

We received 8 responses. The representations received have been summarised below for the sake of clarity and brevity.

001: Paul Embleton (Cassiobury Residents' Association)

SECTION	RESPONDENT'S COMMENTS	WATFORD COUNCIL'S REPLY	PROPOSED TEXT CHANGE
7.3.4	Suggest including wording along lines of ... for all new development in existing areas, particularly in the case of infill or backland (...), it is important that proposals respect and in most instances mirror the height and scale of adjoining or nearby buildings - in the interests of maintaining the quality of the local character, the street rhythm and the relationships to the street and (houses) to each other.	The current wording provides a more balanced approach than the suggested wording, which would be overly restrictive.	N/A
7.3.9	Suggest including wording along lines of ... The Council will always apply the BRE guidance targets to assess new development and where new development may affect natural light to existing properties.	The current wording provides a more balanced approach than the suggested wording, which would be overly restrictive.	N/A
7.3.10	Suggest including wording along lines of ... Care should be taken in the design of residential	The current wording provides a more balanced approach	N/A

	environments to ensure that adequate levels of natural light can be achieved within new dwellings and unacceptable impacts on daylight and sunlight to nearby properties are avoided. In particular, there should be no loss of existing levels of daylight or sunlight to any existing residential windows, owing to the beneficial effects of sunlight in creating a pleasant amenity, quality of life, and a reduction in energy consumption and heating bills.	than the suggested wording, which would be overly restrictive.	
All	Generally, this proposed draft appears to be a welcome honing and improvement to the previous RDG. Thanks to all those who labours have informed the resulting document.	Noted.	N/A

002: Peter Stephens (Central Town Residents' Association)

SECTION	RESPONDENT'S COMMENTS	WATFORD COUNCIL'S REPLY	PROPOSED TEXT CHANGE
Section 7	Regarding a recent development that our members were not happy with. From the point of the prospective occupants one has to wonder whether the internal layout is adequate, where the sizes of the individual units seem to bear little or no sensible comparison with those set out for small to medium developments in Section 7 of the Design Guide.	Noted. The Residential Design Guide is intended to help facilitate higher quality development in the future.	N/A
All	One hopes that, in the borough as a whole, there will be a more sympathetic consideration of existing residents' views on proposed developments of a similar nature – will the new policies and guidelines	Noted. The Residential Design Guide is intended to help facilitate higher quality development in the future.	N/A

	allow this?		
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003: Janet Nuttall (Natural England)

SECTION	RESPONDENT'S COMMENTS	WATFORD COUNCIL'S REPLY	PROPOSED TEXT CHANGE
All	We welcome this opportunity to comment. On this occasion our comments are general remarks on the opportunities that design related guidance documents offer in relation to our core remit, and guidance on further sources of advice.	Noted.	N/A
All	Further generic comments were made regarding green infrastructure, biodiversity enhancements, landscape enhancements and light pollution.	Noted. It is felt that repeating existing national guidance in this document will make the document a lot longer and less user friendly. The links at the end of the Residential Design Guide direct developers to further advice on specific issues such as this.	N/A

004: Paul Rogers (Terence O'Rourke: on behalf of Watford Health Campus Partnership)

SECTION	RESPONDENT'S COMMENTS	WATFORD COUNCIL'S REPLY	PROPOSED TEXT CHANGE
All	The Partnership notes that the draft residential design guide represents an update to the 2008 guide and is intended to assist developers in formulating design proposals. In this respect the guide is welcomed.	Noted.	N/A
All	Whilst the Partnership accepts the need for	The Residential Design Guide	N/A

	guidance to help steer new development and ensure that buildings and spaces are designed to a high standard, it believes that the guidance should be applied in a sensible and flexible manner to reflect individual site circumstances, context, and the design philosophy that is appropriate to each site.	provides overarching guidance for new residential development. Individual cases will be judged in light of the content of the Residential Design Guide and any site specific issues.	
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005: Kevin O'Callaghan (Architect)

SECTION	RESPONDENT'S COMMENTS	WATFORD COUNCIL'S REPLY	PROPOSED TEXT CHANGE
All	Does RDG relate to new build only; are conversions covered?	The document relates to new build, extensions and conversions.	N/A
7.3.4 – 7.3.8	Why adopt London design guide standards?	The internal space standards from London have been subject to extensive research and have a sound evidence base. It is therefore best practice to utilise high quality material, from a local source, for the Residential Design Guide.	N/A
All	These days people prefer to live with open plan living spaces - should this be mentioned?	While it is true to say that some people do favour open plan internal arrangements, it does not appear relevant to mention this in this document.	N/A
All	Why change the document?	The existing Residential	N/A

		Design Guide is out of date and contains information that has been superseded. The new document has also been streamlined to make it more user friendly.	
All	If WBC are looking to restrict development via implementation of RDG, this can be achieved by other means: i.e. 10% conversion rate, 27.5 between properties.	Watford Borough Council are not looking to restrict development through the Residential Design Guide unless it is not of a standard that is acceptable.	N/A
7.3.21	Why larger private amenity? Should the focus not be on using existing and improving / making more accessible public amenity areas.	While accessible public open space is of value, private amenity space is also important for residential development. This needs to be of a size that is adequate for flexible use.	N/A
7.2.13	Street widths and enclosure: uncertainty regarding ratio street to street height, where is height measured from eaves or ridgeline?	It is measured from the ridgeline.	N/A
7.3.14	Sunlight orientation: what happens if habitable rooms face NW-N-NE, there are already so many examples with Watford.	The guidance seeks to design out new development that fails in this regard where possible.	N/A
7.3.15	Privacy b) rear elevation why 27.5m when other local authorities are 18m?, also guide mentions that in some cases between new houses this could be reduced to 22m.	The proposed standard is not new and has been carried over from the last Residential Design Guide, which was	N/A

		<p>adopted in 2008.</p> <p>The more substantial distances are to protect the privacy of existing residential properties, while the lower standards reflect potential higher densities within new developments.</p>	
All	<p>If properties are to get larger, this will results in more expense to build. The people who require the help - first time buyers, will end up paying more money and it's these people we should help.</p>	<p>The affordability of new housing is an important consideration, but this has to be considered alongside the need for adequate internal space in residential units. Good internal space provision helps facilitate better living standards and more flexibility for residents.</p>	N/A

006: Mary Forsyth (102 Langley Road)

SECTION	RESPONDENT'S COMMENTS	WATFORD COUNCIL'S REPLY	PROPOSED TEXT CHANGE
7.3.15c & 8.4.6	<p>Regarding the use of obscure glazing: what is to stop the obscure glass being changed to clear equivalent by the owner in the future? Recent development included obscure glazing – would the new RDG have prevented this?</p>	<p>Planning conditions cover this potential change.</p>	N/A
All	<p>Some of the diagrams could do with being more</p>	<p>Noted. Options for improving</p>	<p>Potentially replace some of the</p>

	legible.	the diagrams are currently being looked into.	diagrams with clearer versions.
All	A much more accessible document than those it replaces.	Noted.	N/A

007: Katharine Fletcher (English Heritage)

SECTION	RESPONDENT'S COMMENTS	WATFORD COUNCIL'S REPLY	PROPOSED TEXT CHANGE
All	The NPPF refer to the importance of new development responding to local character and history. We very much welcome section 7.1 underlining the importance of understanding both the development site and its wider context. The reference to the Council's Character Area study provides an excellent basis for enabling prospective developers to work from.	Noted.	N/A

008: Paul Donovan (Hertfordshire County Council)

SECTION	RESPONDENT'S COMMENTS	WATFORD COUNCIL'S REPLY	PROPOSED TEXT CHANGE
7.3.24	The MWPA is pleased to see references on p.22 of the need for carefully designed waste storage and recycling facilities in new residential development within the borough.	Noted.	N/A
7.3.25	The MWPA would wish to see reference made in paragraph 7.3.25 to the accessibility of recycling boxes, wheelie bins and compost bins being positioned in a way that it enables refuse collection vehicles to gain access easily to any new	Noted. Amend text.	Add in reference to accessibility of external bins for collection.

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