

Consultee	Agent	Comment ID	Consultation Point	Comment Type	Comment justification and suggested changes	Officer Response:	Proposed Actions:
Sport England (Roy Warren)		TDS_1	Making Connections - C3) Promotes active and healthy lifestyles	Disagree	<p>Sport England welcomes the principle of promoting active and healthy lifestyles as one of the key considerations that must be incorporated into design to make safe and effective connections for all travel modes. The specific references in the design strategy to Sport England/Public Health England Active Design guidance are also welcomed. This shows that the Council recognises the role of design in achieving the wider objective of promoting active health communities and would be consistent with the NPPF and the Council's corporate/community priorities and the adopted Core Strategy. However, given the importance of promoting active and healthier lifestyles in Government policy and the Council's own policies, promoting active and healthier lifestyles should not just be a consideration in the context of making connections. It should be an integral part of 'Understanding the Place' (e.g. consideration A2 - incorporating strategic green infrastructure features) and 'Working with Site Features' (e.g. consideration B5 - identifying and incorporating green infrastructure) as well for instance. As set out in the 10 principles in the Active Design guidance, the principles extend beyond active travel and making connections. While for instance the Design Strategy legitimately considers the role of green infrastructure in design in terms of landscape, biodiversity, travel etc. objectives, it is not considered from an active/healthy lifestyle perspective.</p> <p>All parts of the design strategy (beyond consideration C3) should be reviewed to assess how promoting active and healthy lifestyles can be incorporated into the whole design process especially in terms of the parts relating to 'Understanding the Place' and 'Working with Site Features' as well as considering applicability in the local place typologies identified in the strategy. The Active Design guidance principles and case studies provide detailed advice on how this can be interpreted in practice. Furthermore, while acknowledging that the design strategy currently has to be based on policy PMDP2 of the Core Strategy, the emerging local plan that will replace the Core Strategy should be used to provide an updated design policy framework which includes the promotion of active and healthy lifestyles as a criteria that development proposals must meet. This is absent in the current policy.</p>	Agree, in part. Objective A2 is drafted in the context of landscape. Function of "recreation" is stated in para. 3.13.	Add the phrase "encourage recreation" to Paragraph 3.14.
Historic England (Michael Stubbs)		TDS_4	Paragraph 1.9	Not stated	<p>Paragraph 1.9. This refers to 'national design guidance' which is not a defined term in the NPPF. We recommend that the Council adds a technical footnote with a definition and/or a list of key documents which would fall within this umbrella term. We have assumed that these documents are those listed in paragraph 2.15. A cross-reference to paragraph 2.15 would be useful.</p>	Agree.	Clarify that this is a term to capture content in the NPPF and NPPG. Change "National Planning Policy Guidance to National Planning Practice Guidance

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Historic England (Michael Stubbs)		TDS_5	Paragraph 2.4	Not stated	Chapter 2 and paragraph 2.4. This chapter deals with the importance of good design. We welcome reference to the work by the Commission for Architecture and the Built Environment (CABE) and the Homes and Communities Agency (HCA). We recommend the addition of other guidance produced by Historic England, which has been recently updated and reference should now be to the Historic England Advice Note 4: Tall Buildings. This can be accessed at <a href="https://content.historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/heag037-tall-buildings.pdf/">https://content.historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/heag037-tall-buildings.pdf/</a> While our guidance does stress the need for good design, it also identifies that tall buildings can have a negative impact on the historic environment, noting that the NPPF also makes it clear that ‘the Government attaches ‘great weight’ to the conservation of designated heritage assets, including their setting’ (paragraph 132). The SPD should make it clear that design alone cannot mitigate the harm to the historic environment resulting from an inappropriately sited tall building and therefore proposals for tall buildings that result in unjustified and unacceptable levels of harm to designated heritage assets will not be supported. We recommend additional text to this effect within existing paragraph 2.4.	Paras 2.1-2.5 focusses on investing in design quality and relevant research in that context it is not intended to be an exhaustive list of design guidance provided by key stakeholders and influencers.	No action required.
Historic England (Michael Stubbs)		TDS_6	Paragraph 2.13	Not stated	As national planning policy guidance is regulated updated and amended, we recommend a link to the web-site and a caveat to the effect that it is occasionally updated.	Disagree, current reference is adequate. Para. 2.12 states that the NPPG is a “live resources that is continually updated”.	No action required.
Historic England (Michael Stubbs)		TDS_7	Paragraph 2.17	Not stated	This refers to landscape characterisation work within the scope of further guidance and background evidence documents. We recommend reference also to the historic characterisation work that the Council have previously undertaken.	The Council is currently in the process of updating its evidence base relating to the historic environment this evidence will inform decision making and future updates of the Design Strategy SPD.	No action required at this time.
Historic England (Michael Stubbs)		TDS_8	Paragraphs 2.19 to 2-25	Not stated	This deals with ‘Understanding the Character of Thurrock’ and we recommend mention in the explanatory text of the scheduled monuments at Tilbury Fort and Coalhouse Fort, for example, and their link to the history of the area, the evolution of defences along the Thames and the riverside/riverscape setting. Reference to the challenges that confront heritage assets links to heritage-at-risk and the grade II* State Cinema at Grays is such an example. A note to this effect would usefully accompany the image at page 16.	Agree, in part. The scope of the text is general to describe the evolution of Thurrock’s character, rather than to highlight the “challenges”.	Amend text to recognise the fort defences. Amend caption to recognise Grade II* Listed status of State Cinema.

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Historic England (Michael Stubbs)		TDS_9	Section 3	Not stated	This section deals with the site appraisal process prior to submission of planning applications. It covers both matters of setting and views and involves the appraisal of impact on heritage assets. As an understanding of settings policy has been published since the adoption of the Core Strategy in 2011 and as the concept of significance was most recently included in the NPPF, Historic England recommend that these matters are introduced at paragraphs 3.8 to 3.11 or within 3.29 and section B1 on the appraisal of a site's features. Our Advice Note 3 (AN3) 'The Setting of Heritage Assets' and the NPPF Glossary provide definitions of setting. The Government's planning objectives for the historic environment is that conservation decisions are based on the nature, extent and level of a heritage asset's significance and are investigated to a proportionate degree. Our guidance sets out a five stepped staged approach to proportionate decision-making and this can be accessed at <a href="https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/">https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/</a>	Disagree, this is the role of more primary development management policies. However, there may be some opportunity to elaborate in B1 where setting is mentioned with reference to significance and relative importance.	Review objective B1 and seek to add additional detail where appropriate.
Historic England (Michael Stubbs)		TDS_10	Paragraph 3.30	Not stated	This paragraph deals with heritage assets and this term covers both designated and locally listed assets. We recommend reference to the definition in the NPPF Glossary. Where the design guide refers to wider historical and cultural references, the term significant places is also used as an umbrella to cover statutorily protected and assets of more local interest. We do recommend reference to the policy test of impact upon significance as is contained in the NPPF at its paragraph 132. We recommend that the aspirational images as used at pages 30 and 33 have a brief explanation of the intended design features as well as the location and perhaps the year of implementation.	Disagree, the intention of Para 3.3 is to highlight the importance of site appraisals in the round rather than in specific context of heritage assets.	No action required.
Historic England (Michael Stubbs)		TDS_11	Section 4 - Commerce and Industry	Not stated	One additional key design requirement is recommended here to address and enhance the setting of riverside and port facilities to improve the relationship with affected listed buildings, conservation areas and scheduled monuments. The adopted Core Strategy deals with opportunities to enhance the setting of Tilbury Fort and Coalhouse Fort. We recommend similar guidance is added to this section.	Agree.	Review text in Section 4 relating to Commerce and Industry and ensure that appropriate reference is made to mitigating any potential impact on heritage assets.
Intu Lakeside (Marc Myers)	Nathaniel Lichfield & Partners (Stephanie Walker)	TDS_12	Paragraph 1.6-1.7	Disagree	Intu shares the Council's view of the importance of achieving good design set out in the Design Strategy SPD. The recognised link between good design outcomes and achieving corporate and community priorities is also supported. In particular here, recognition by the Council of the role of design encouraging and promoting job creation and economic prosperity is supported. We consider the objectives listed at paragraphs 1.6 and 1.7 should be revised to more directly reflect this. In terms of other objectives, Intu welcomes the commitment of the Council working proactively with the development industry. Intu looks forward to continuing to work in consultation with the Council on design development for proposals.	Corporate and community objectives are high level and provide context for the Design Strategy Objectives.	No action required.

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Intu Lakeside (Marc Myers)	Nathaniel Lichfield & Partners (Stephanie Walker)	TDS_13	Paragraph 1.9	Disagree	The tenor of the comment at paragraph 1.9 about refusing schemes which do not reflect its design quality aspirations for the Borough is understood; however the terminology used is considered inappropriate in a policy document and should be removed. Planning decisions must be taken in accordance with the development plan unless material considerations indicate otherwise (i.e. P3/10 11135870v1 weighing up the planning balance). This document will supplement design policies in the Local Plan and its role as such should be made clear within this introduction.	The wording is aimed to emphasise the importance of design as a key material consideration which is often otherwise underappreciated in practice when balances against other wider planning objectives.	No action required.
Intu Lakeside (Marc Myers)	Nathaniel Lichfield & Partners (Stephanie Walker)	TDS_14	Paragraph 1.10	Agree	Intu supports the non-prescriptive approach to the Design Strategy referred to at Paragraph 1.10 which states that the design strategy does not establish a rigid blueprint but a framework within which well-designed proposals can be shaped and assessed. This is considered an important element of encouraging good design without risking frustrating development.	Comment noted.	No action required.
Intu Lakeside (Marc Myers)	Nathaniel Lichfield & Partners (Stephanie Walker)	TDS_15	Section 4	Agree	Intu also welcomes the use of place typologies and recognition of Thurrock Lakeside as a distinct typology area within the Borough.	Comment noted.	No action required.
Intu Lakeside (Marc Myers)	Nathaniel Lichfield & Partners (Stephanie Walker)	TDS_16	Section 3	Disagree	In Section 3.0 designing in context the four main considerations in preparing a site appraisal provides a helpful guide to approaching design, although it should be noted that there are many other factors that might be drawn into any such appraisal and inform an appropriate design response and this should be acknowledged explicitly.	Disagree, the site appraisal considerations are not aimed to provide exclusive or exhaustive assessment criteria.	No action required.
Intu Lakeside (Marc Myers)	Nathaniel Lichfield & Partners (Stephanie Walker)	TDS_17	Section 4 - Lakeside	Agree	In terms of the Lakeside Typology Area in Section 4.0. Intu supports the recognition of Lakeside as having significant growth and development potential. The aspirations for Lakeside, as detailed in the design strategy SPD, such as the mix of uses, public realm improvements, bringing development down to the lake front, and place making are appropriate and have guided the design development of proposals which have already obtained planning permission.	Support noted.	No action required.
Janet McCheyne		TDS_18	Full Document	Agree	I agree with the principle, but feel some details need expanding. Change 1: "Development layouts will be expected to be formed to a pattern, character and appearance that is related to the existing settlement" Please can development in rural areas to more distinctly rural: some new builds or extensions have resulted in incongruous town houses. 3 storey dwellings are not appropriate in most village settings; roofs should not be higher than surrounding buildings. Change 2: Inappropriate boundaries for village locations should also mention railings and metal electronic gates which urbanise the environment and are to the detriment of community ethos.	Support noted. Agree that some of the details in the Design Strategy could be expanded, however, the suggested changes could potentially make the document inflexible and no longer fit for purpose. The emphasis the document places on the need to design in context should ensure that new developments in rural areas are designed in an appropriate and sympathetic way.	Review document and add additional detail to explain key points and improve clarity.

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Cogent land LLP	Iceni Projects Ltd (Paul Drew)	TDS_19	Full Document	Not stated	Cogent Land LLP specialises in sustainable development and strategic land. It has secured development plan allocations and planning permissions for major development sites across the UK. Cogent has an established and extensive presence in the Thurrock area, with a strong and committed focus on the potential for sustainable growth and regeneration. Several notable schemes in Thurrock include: Ponds Farm – this site has planning permission for 38,686sqm (416,416 sq. ft.) of employment floor space. When constructed this site will make provision for approximately 900 new jobs; Williamson Farm, Corringham – a planning application was submitted in March 2015. Proposals include the provision of 750 homes; a new railway station; a secondary school; flood mitigation area, and supporting infrastructure; Bata Field, East Tilbury – planning permission was granted for 299 homes. This scheme is currently under construction and is positioned a short-distance from the Lower Thames Crossing routes; and, Land to the west of East Tilbury – a planning application is due to be submitted imminently for the provision of 1,000 homes; primary school; vehicular bridge crossing; and supporting infrastructure. This site is adjacent to the Lower Thames Crossing routes.	Comment noted.	No action required.
Cogent land LLP	Iceni Projects Ltd (Paul Drew)	TDS_20	Full Document	Not stated	The draft SPD recognises that achieving good design is important and a benefit in the delivery of more sustainable development and communities. The SPD could further embody the NPPF, for example, the NPPF at section 7.56 states - “Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people”. Section 7.57 continues - “It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes”. Thurrock could reinforce these principles of promoting good design outcomes when delivering development proposals across the Borough. The SPD will then strengthen the delivery of good design.	Comment noted. The Design Strategy already makes reference to national policy, additional references are not deemed necessary as the NPPF already forms part of the Development Plan and is a key consideration in the determination of planning applications.	No action required.

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Cogent land LLP	Iceni Projects Ltd (Paul Drew)	TDS_21	Full Document	Not stated	<p>The draft SPD has a good structure including a useful Section 3 (Designing in Context) which identifies key design considerations and summarises them into questions that Thurrock Council expect to be addressed as part of any site appraisal. Also Section 5 (The Development Process) provides good guidance on the progression of proposals from pre-application stage to post-application and monitoring. There is a good foundation in design policy which provides a sound design quality policy trail. But as above, the cross reference to NPPF could be stronger. In particular, the central premise of “presumption in favour of sustainable development”. Although definitions of this are still being resolved, reference to it and any agreed interpretation would help throughout the SPD in particular part D of Section 3 - Building in Sustainability. Where clearer guidance would help is in Section 3 - Designing on Context and Section 4 - Place Typologies in Thurrock. The issue of character is introduced in Section 2 – The Importance of Good Design (subsection ‘Understanding the Character of Thurrock’). Paragraph 2.22 notes the sharp contrast between the ancient and the modern, the man-made and the natural. It would help the SPD as a framework if this point was further carried over into Sections 3 and 4. In particular Section 4 on typologies should add further references to the juxtaposition of the ancient and the modern, the man-made and the natural. It is clear the SPD is trying to balance a Thurrock-wide sense of planned order but at the same time be sympathetic to economic-based development ideas that may challenge it. It is possible that planning officers will struggle with this balance. For example, the assessment of character – and critically judging where proposals do not meet expectations of responding to character – allows for a great deal of interpretation. Page 17, paragraph 2.25 in a case in point states: “Good design makes the most of what is already valued, and contributes to a sense of place by providing sustainable multiple benefits to the development and the surrounding area. Where a proposal cannot meet the expectations of character policies, a proposal may be refused or additional changes on site or off site, will be sought to reduce or compensate for the shortfall”. It could be possible for a planning officer to interpret this as support for rejecting designs that on the contrary may have the potential to be successful. Memorable schemes such as the Rainham Marshes RSPB visitor centre, or historically, the Bata shoe factory at East Tilbury might never have been allowed with such guidance.</p> <p>Perhaps the SPD could go further. Along with robust site appraisals, a further qualification could include a comment regarding interventions that challenge the established character of a place by imposing development in the landscape, must require exceptional design standards.</p>	Support noted. Agree that some of the details in the Design Strategy could be expanded upon to provide clarity and ensure consistency.	Review document and add additional detail to explain key points and improve clarity.

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Cogent land LLP	Iceni Projects Ltd (Paul Drew)	TDS_22	Section 4 - Village Locations	Not stated	Currently the SPD expects little change within Villages described in Typology Five, stating that “Proposals coming forward within these locations are likely to be more limited to include small scale infill and redevelopment proposals within the defined development boundaries of existing settlements”. However, some villages could provide the opportunity to make better use of under patronised railway stations. How will a planning officer interpret the conflict between modest proposals as expected in Typology Five – Village Locations (page 60), and the need sustainable transport, as referenced in Typology Two, stating: “Proximity to substantial rail and road infrastructure is a critical part of the design and layout of development as part of a residential neighbourhood”. Some small villages are extensively supported by rail infrastructure but are not considered by Typology Two, as they are too small to be classed as Residential Neighbourhoods. A planning officer will need more certainty as to whether a proposal is sustainable because it makes the best use of rail infrastructure or whether a village with this opportunity should not grow.	The map indicating the broad typology areas shows that all settlements/locations that are adjacent to railway stations should be defined as either typology 1 or typology 2. As such, this comment is considered invalid.	No action required.
Cogent land LLP	Iceni Projects Ltd (Paul Drew)	TDS_23	Paragraph 3.48	Not stated	The expectation of design elements to be included in proposals to raise quality is welcomed. However, some of the elements suggested may be challenging when assessed for adoption. An example is the requirement for street trees in paragraph 3.48. Whilst this addition is considered positive, Cogent would like to seek reassurances that the requirements of the Design Strategy SPD have been consulted on and have adoption officer’s approval. It is not uncommon for a policy framework to be agreed only to find subsequent proposals that comply are not acceptable by adoption officers.	Agree, in part. Some of the language used within the Design Strategy is too prescriptive and should be amended before adoption.	Review document and ensure that the guidance meets the criteria for Supplementary Planning Documents set out in the National Planning Policy Framework.
Cogent land LLP	Iceni Projects Ltd (Paul Drew)	TDS_24	Full Document	Not stated	It has been identified that some use of specific language on occasion confuses the overall message and therefore diminishes the significance of some points. For example, the word ‘should’ is used frequently in instances when the main point is to urge a quantifiable assessment. Other instances of language use include stating that proposals must accord with a certain criteria ‘where appropriate’ and that proposals must provide an ‘adequate’ provision of something. These words are used without qualification, and therefore do not strengthen the overall message of the SPD, particularly in relation to specific design considerations. Further to this, the use of generic jargon such as seeking ‘design quality that raises the bar’ does not contribute to the specific guidelines expected of a design SPD, against which to measure proposals. The SPD also includes some individual typographical and spelling errors, as follows: Page 17, paragraph 2.24: implies that South Ockendon is a river side settlement; Page 20, paragraph 3.7: ‘features of the Borough’; and Page 22, paragraph 3.15: refers to an unqualified ‘Place Check’, which could be explained in the glossary. As a general comment, the guidance should avoid ambiguous aspirational statements, jargon and also define key technical terms to ensure the SPD is as useful as possible to all parties.	Agree, in part. The language within the document needs to make clear what is required of developers and what we encourage/promote and support as good practice. The word require should only be used where a statement is directly linked to policies within the Core Strategy and/or does not place add unnecessarily to the financial burdens on development.	Review document and ensure that the language used is consistent and appropriate in the context of the Core Strategy and National Policy.

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Cogent land LLP	Iceni Projects Ltd (Paul Drew)	TDS_25	Full Document	Not stated	The Design Strategy SPD provides a good foundation for improving and enhancing the Borough's natural, built and historic environment. It could be made all the more robust as a tool to assist both design teams when producing proposals and case officers when assessing them to ensure that the Design Strategy accords with the aims of Thurrock Council to substantially raise design standards across the Borough. Central to this is ensuring that that all opportunities to cross reference to sustainable development contained within national policy in the form of the NPPF are taken, the classifications of typologies do not restrict sustainable growth, and that specific language is able to be qualified, with generalisations being avoided. In conclusion, with the suggested changes outlined above, Cogent Land LLP welcome this design guidance and are committed to raising the standard of design throughout Thurrock. We trust you find this consultation response helpful and look forward to working alongside Thurrock Council and other stakeholders in developing a robust Design Strategy SPD.	Comments noted.	Review document and ensure that the language used is consistent and appropriate in the context of the Core Strategy and National Policy.
Keepmoat Homes (South)	Urbanissta (Jo Hanslip)	TDS_26	Full Document	Not stated	Urbanissta Ltd has been instructed by Keepmoat South to submit representations to the Thurrock Council Design Strategy Consultation. Keepmoat has an interest in the Site that is located at the Former Treetops School site at Dell Road, Grays. They also have an interest in land that has been advertised as the Corner Site, which is located on the corner of Dell Road with Orsett Road. The Treetops site is the subject of a planning application and is shown at Appendix 1 to these representations. Representations are made on a number of specific points: • Paragraph 1.11 • Policy B5 • Paragraph 3.37 • Paragraph 3.48 • Section D - Building in Sustainability • Paragraph 3.60 • D3 - Sustainable Drainage • Paragraph 4.18 • Typology 5 point 3 • Paragraph 5.5 • Paragraph 5.6 • Paragraph 5.16 Representations in relation to each of the above points will be dealt with separately below. Overall, it is considered that the Design Strategy is in instances negative in its drafting and there are concerns that it has an inflexible and restrictive approach to design may impact upon the prospects of securing the timely and effective delivery of new development.	Comments noted. It is recognised that the language within the document needs to make clear what is required of developers and what we encourage/promote and support as good practice. The word require should only be used where a statement is directly linked to policies within the Core Strategy and/or does not place add unnecessarily to the financial burdens on development.	Review document and ensure that the language used is consistent and appropriate in the context of the Core Strategy and National Policy.
Keepmoat Homes (South)	Urbanissta (Jo Hanslip)	TDS_27	Paragraph 1.11	Not stated	Providing guidance on the design process having regard to the context of a site, ensuring that proposals are embedded within an understanding of place and thereby avoiding anonymous, 'off-the-peg' schemes is considered overly prescriptive in terms of the manner in which the design process should take place. The design process needs to have regard to the site and it's surroundings and context, this includes architectural content. The design of new development needs to acknowledge respect and respond positively to surrounding development, but it also needs to be buildable and saleable. Standard housing product can in many instances provide a good design solution for a site and as such should not be 'ruled out' by the Design Strategy.  Paragraph 1.11 should provide suitably flexibility to enable all types of development to be considered on site where this responds and relates favourably to the local vernacular.	Disagree, if it can be demonstrated by an applicant that a standard house typology is the most appropriate design in the context of an individual site then it will satisfy the conditions of Para 1.11. It should also be noted that Para 1.11 does not seek to impose a particular architectural style and could also be applied to layout issues such as ensuring that a dwelling appropriately addresses a corner.	No action required.



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Keepmoat Homes (South)	Urbanissta (Jo Hanslip)	TDS_28	Objective B5	Not stated	Objective B5 seeks to identify and incorporate green infrastructure, existing open spaces and wider networks as part of a robust landscape framework. Whilst landscape is a significant component of any development proposal, the objectives of Policy B5 are slightly misleading, as it is not always possible for development to provide open spaces that link into and create wider open space networks, particularly where they form part of the urban area. Clearly where such opportunities are possible these will be included within the design rationale and review for a site, however such objective cannot be considered to be a 'requirement' of development as they might not always be appropriate or possible in some developments. Greater clarity is required within the Design Strategy in relation to this matter.	Agree. The language used within Objective B5 could be amended to make it clearer what is expected of developers and recognise that on smaller sites it may not be practical or appropriate to include open space on site.	Review Objective B5 and amend where appropriate.
Keepmoat Homes (South)	Urbanissta (Jo Hanslip)	TDS_29	Paragraph 3.37	Not stated	Paragraph 3.37 states that the Council will reject proposals that have not fully considered the importance of open space. Paragraph 3.37 is negative in its drafting. It is not appropriate for this Design Strategy to be setting out the cases for refusing development, it is the role of the development plan which would set out that there are alternative approaches to open space provision including commuted sums.	Agree, in part. The language used within Objective B5 could be amended to make it clearer what is expected of developers and recognise that on smaller sites it may not be practical or appropriate to include open space on site. It should be noted that the role of a Supplementary Planning Document is to provide additional guidance on the implementation of policy which includes national policy as well as policies within the Core Strategy, where appropriate this can include setting out reasons for refusal.	Review Objective B5 and amend where appropriate.
Keepmoat Homes (South)	Urbanissta (Jo Hanslip)	TDS_30	Paragraph 3.48	Not stated	Paragraph 3.48 states that: "Thurrock Council will also require street trees to be incorporated as part of the hierarchy of streets in all developments". The requirement for street trees in all development is considered too prescriptive, as there may be instances where the provision of street trees is not possible for highways or other technical reasons. The Design Strategy should seek to encourage such opportunities where site circumstances and constraints allow. The requirement for street trees in new development would need to be considered in the context of the overall management of the site as well as overall siting of development in relation to the location of visibility splays, drives and front/back gardens.	Comments noted. It is recognised that the language within the document needs to make clear what is required of developers and what we encourage/promote and support as good practice. The word require should only be used where a statement is directly linked to policies within the Core Strategy and/or does not place add unnecessarily to the financial burdens on development.	Review document and ensure that the language used is consistent and appropriate in the context of the Core Strategy and National Policy.
Keepmoat Homes (South)	Urbanissta (Jo Hanslip)	TDS_31	Section 3 - Part D	Not stated	Section D of the Design Strategy sets out the Council's preferred approach for sustainable design in new buildings. The Design Guide should reflect the Council's approach to the optional technical standards in light of the National Housing Review 2015. Policies within the Core Strategy Focused Review relating to water and energy efficiency are to be interpreted by reference to the nearest national equivalent standard. In conjunction with the Local Plan, the Design Strategy can assist in clarifying the Council's preferred approach to relevant standards to ensure that development complies from the outset.	Comment Noted. The Design Strategy cannot introduce new policies. Adoption of the Optional Technical Standards will be explored as part of ongoing work on the emerging Local Plan.	No action required.

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Keepmoat Homes (South)	Urbanissta (Jo Hanslip)	TDS_32	Paragraph 3.60	Not stated	Paragraph 3.60 sets out that a site appraisal will identify opportunities for on-site energy to be provided as part of proposals and that sites may be able to be development with their own heat and power system. The potential for combined heat and power would need to be assessed on its own merits in the context of the site size, overall applicability, viability of such uses and the relationship with existing and proposed adjacent uses in terms of noise and impact on amenity. These considerations should be set out clearly within Strategy.	Agree, in part. The language used within Objective D2 could be amended to make it clearer what is expected of developer/applicant.	Review Objective D2 and amend where appropriate.
Keepmoat Homes (South)	Urbanissta (Jo Hanslip)	TDS_33	Paragraph 3.63	Not stated	Paragraph 3.63 states that site assessments will reveal the scope for integrating SUDs into development. Paragraph 3.63 should be amended to include reference to circumstances where underlying ground conditions would also mean that SUDs are not a suitable means of dealing with flood risk and that alternative methods for dealing with flood risk could be adopted.	Disagree, Paragraph 3.63 indicates that applicants should assess the potential it does not require the use of sustainable drainage measures. As such it is flexible enough to respond to concerns raised.	No action required.
Keepmoat Homes (South)	Urbanissta (Jo Hanslip)	TDS_34	Section 4 - Residential Neighbourhoods	Not stated	Point 5 "Thurrock Council will expect proposals for Residential Neighbourhoods to incorporate a number of character areas differentiating one location from another with the number of character areas and this is dependent on context and the size of the scheme being proposed." In this case, it is considered that the Council would need to set out the size and scale of development that is applicable for providing character areas.	Disagree, a residential neighbourhood could consist of several smaller sites with each contributing towards the wider character of the neighbourhood.	No action required.
Keepmoat Homes (South)	Urbanissta (Jo Hanslip)	TDS_35	Section 4 - Village Locations	Not stated	In identifying the village typology the Design Strategy states that: Proposals coming forward within these locations are likely to be more limited to include small scale infill and redevelopment proposals. It is not considered appropriate for this Design Strategy to be advocating the spatial approach to development in Thurrock, this is the role of the Local Plan which will set out the Spatial Strategy. Depending upon the strategy, village extensions may be a suitable approach to housing delivery. This Design Guide is therefore prejudicing the Spatial Strategy of the Local plan and should be removed. Paragraph 4.18 would need to be deleted, as it is not the role of the Design Strategy to identify the size and scale of development.	Agree that it is not appropriate for the Design Strategy to dictate the spatial strategy. However, the statement made in relation to village locations reinforces the spatial strategy set out in the Core Strategy.	No action required.
Keepmoat Homes (South)	Urbanissta (Jo Hanslip)	TDS_36	Section 4 - Village Locations	Not stated	In setting out the key design requirement for village locations, the guide advocates a contemporary interpretation of character within village locations. Contemporary design is not always the most appropriate approach in new development particularly within village locations where there is a greater relationship with local rural architectural characteristics. For example in the context of a Conservation Area or a landscaped area, it might be that a more traditional design style would related better to existing development. Again, we object to the prescriptive approach being applied to village development within the Design Strategy and suggest that a more open and flexible approach to the design solution for a site being determined in a site-by-site, case-by-case basis. Point 3 of the design requirements for village locations should be amended to reflect that contemporary interpretation of character would need to be considered in the context of the overall site and its location and that traditional styles may also remain appropriate design solutions.	Agree that contemporary design may not always be the most appropriate solution but the wording within point 3 is clear that contemporary design is encouraged not required.	No action required.

<b>Consultee</b>	<b>Agent</b>	<b>Comment ID</b>	<b>Consultation Point</b>	<b>Comment Type</b>	<b>Comment justification and suggested changes</b>	<b>Officer Response:</b>	<b>Proposed Actions:</b>
Keepmoat Homes (South)	Urbanissta (Jo Hanslip)	TDS_37	Paragraph 5.5-5.6	Not stated	<p>The Design Strategy sets out that a Design Review may assess 'larger scale' projects. The Design Strategy should ideally provide greater clarity as to the framework for the Design Review as this can have implications on project cost and timescales for bringing forward development proposals. It would also be advantageous if a 'major project' or 'larger scale' project was defined and the criteria identified that would trigger a development to be taken to Design Review Panel.</p> <p>The Design Strategy should include more detailed information regarding the Design Review Panel.</p>	Agree, in part. It is appreciated that more information on the design review process would be useful however including additional information within the document may date the document if the process changes.	Include a reference to information about design reviews on Council's website in the text.
Keepmoat Homes (South)	Urbanissta (Jo Hanslip)	TDS_38	Paragraph 5.16	Not stated	<p>Paragraph 5.16 of the Design Strategy states: "Thurrock Council will resist subsequent proposals for minor amendments or to vary extant permissions or conditions that are likely to undermine their design quality." We would object to the Council's approach to restricting the use of minor amendments in planning applications. The Council are applying an inflexible approach to overall development proposals which may impact upon development coming forward, and this paragraph should be more positive in its drafting and not seek to compromise an established element of the planning process – in securing minor or minor material amendments to previously consented schemes. There may be instances, for example an outline development, where minor amendments may be required to improve the overall siting of development or amend the palette of materials that are more agreeable to the local context.</p>	Disagree, the intention of para 5.16 is to resist minor amendments that reduce the design quality of a scheme. As explained in your comment not all minor amendments will result in a loss of quality and these types of amendments would still be deemed acceptable.	No action required.

Consultee	Agent	Comment ID	Consultation Point	Comment Type	Comment justification and suggested changes	Officer Response:	Proposed Actions:
Keepmoat Homes (South)	Urbanissta (Jo Hanslip)	TDS_39	Full Document	Not stated	<p>Keepmoat have serious concerns that the Design Strategy in its current format is too negative in it's drafting and in instances, overly prescriptive. This may have consequences on the ability of development proposals to come forward in a timely manner. Keepmoat would request that the Council revisit specific sections on open space, the use of SUDS, on site heat and power networks and street trees. Currently, the Council have applied an inflexible approach to on site infrastructure but it is considered that these points are reviewed with the strategy setting out alternative approaches to the provision of these types of infrastructure as in some cases it is not possible to provide these on site. The Council should also set out within this Design Strategy, their approach to the implementation of the relevant Building Regulation Standards. The Design Strategy should also be revisited to include more details on the framework for requirement to attend Design Review Panel, as there is currently no information on thresholds, types or scale of developments to which such an obligation will be imposed. Attendance at a Design Review Panel will have cost and timescale implications for developers and will impact upon the delivery of development within the Borough. Thurrock Council has suffered from low levels of housing delivery for a number of years and viability restrictions constraint the delivery of many sites within the Council's administrative area. Any proposals, which seek to further constraint or control development have the potential to impact upon delivery and/or result in additional costs being borne by developments. This risks further delays to the delivery of much needed housing in Thurrock. The Design Strategy should be reviewed to ensure that whilst establishing a framework for ensuring good design within the Thurrock area, it is also positively prepared and drafted so as to support and encourage new developments to be brought forward within the Borough. As currently prepared, it is not considered that the Design Strategy has the balance quite right and as such we consider the document should be amended as detailed in our representations above.</p>	<p>Agree, in part. Some of the language used within the Design Strategy could be amended to improve clarity and worded in a more positive way. With regards to including additional information on the design review process and building regulations the document will be amended to signpost information on the Council's website. Design reviews are encouraged through the National Planning Policy Framework as such the requirement for significant development proposals to be assessed against this process remains valid.</p>	<p>Review document and ensure that the language used is consistent and appropriate in the context of the Core Strategy and National Policy.</p>

Consultee	Agent	Comment ID	Consultation Point	Comment Type	Comment justification and suggested changes	Officer Response:	Proposed Actions:
Persimmon Homes Essex (Anna Davies)		TDS_40	Full Document	Not stated	<p>Persimmon Homes is a FTSE 100 house builder with a national presence. Persimmon Homes has a strong commitment to Thurrock and welcomes the opportunity to comment on Thurrock’s Draft Design Strategy SPD. Paragraph 1.10 of the document states that the Design Strategy will be used as a “tool to inform and assess proposals within existing locations, at all scales, from small infill sites through to larger regeneration and redevelopment schemes. It will also be used on new comprehensive development sites and master planning projects as and when they come forward within the Borough. It does not establish a rigid blueprint but a framework within which well-designed proposals can be shaped and assessed”. Having regard to the above, the Design Strategy SPD is intended to be used in advance of the production and adoption of the new Local Plan for Thurrock, which is timetabled for adoption in 2020. There are areas of conflict and contradiction between Thurrock’s Draft Design Strategy SPD (2016) and the adopted Development Plan, namely the Thurrock LDF Core Strategy (2011). Furthermore, in certain instances it is not clear that what is advocated, and in some instances prescribed, in the Thurrock’s Draft Design Strategy SPD would allow development to accord with adopted development plan policies. It is not clear in some instances the Policy basis for what is being sought within the SPD. The conflict and contradiction between Policy documents is unhelpful, confusing and needs to be addressed. The SPD should not seek to (a) re-write policy, (b) seek to set standards at odds with policy (c) have the effect of rendering development incapable of meeting adopted policy, (d) render development unviable. Statute is clear regarding the primacy of the development plan and the SPD needs to be reviewed in light of this; - Section 70(2) of the Town and Country Planning Act 1990 obliges the decision maker to have regards to the provision of the development plan, so far as material to the application, and to any other material consideration. - Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that, if regard is to be had to the development plan for the purposes of any determination under the planning acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise. The SPD should be consistent with the principles and policies set out in the Adopted Development Plan, the LDF Core Strategy (2011). Para 028 of the Planning Practice Guidance makes clear that ‘They [SPD’s] should build upon and provide more detailed advice or guidance on the policies in the Local Plan. They should not add unnecessarily to the financial burdens on development’. Para 153 of the Planning Practice Guidance (Plan Making – Local Plans) warns Local Authorities not to use SPD’s to add unnecessarily to the financial burdens on development. ‘Para 153 - Each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances. Any additional development plan documents should only be used where clearly justified. Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development’. Whilst we are supportive of achieving good</p>	<p>Comments noted. The Design Strategy is intended to guide applicants on the implementation of policies within the Core Strategy including Policy PMD2. It is recognised that the language within the document could be improved to make clear what is required of developers and what we encourage/promote and support as good practice. With the word require used only where a statement is directly linked to policies within the Core Strategy and/or does not place add unnecessarily to the financial burdens on development. In determining if financial implications are unnecessary the Council will consider policies within the national policies and guidance and the Core Strategy.</p>	<p>Review document and ensure that the language used is consistent and appropriate in the context of the Core Strategy and national policy.</p>

Consultee	Agent	Comment ID	Consultation Point	Comment Type	Comment justification and suggested changes	Officer Response:	Proposed Actions:
					design, we are concerned that the SPD seeks to place additional costs on development in the Borough. Furthermore, that there has been no assessment of the impact of such measures both individually or cumulatively. Additional costs would impact development viability, deter investment and delivery. Thurrock has a significant shortage in housing when measured against housing targets. In certain instances, the draft SPD is highlighting or referring to documents that formed the evidence based for the LDF Core Strategy which themselves are out of date. This is particularly the case in terms of open space assessment, Green Grid and Green Infrastructure. Furthermore, such documents fail to satisfactorily identify open space requirements and what strategic allocations are identified to deliver in terms of GI. Whilst Persimmon Homes welcome the production of the draft SPD, presently we have concerns regarding lack of consistency with the adopted development plan policies and the, prima facie, lack of consideration of and potential impact upon development viability. Notwithstanding the above, it is not clear as to the timescale for the proposed introduction of this document. Furthermore, whether it will be used from the period of adoption and if so, whether it will apply to schemes pending determination. Upon adoption it would be considered unreasonable to seek to apply this document to schemes that have been submitted or are in the later stages of pre-application discussion. Furthermore, purchasing decisions and options are often taken out on sites significantly before planning applications are advanced. It would seem reasonable to only introduce such guidance after providing an advanced period of notice.		
Persimmon Homes Essex (Anna Davies)		TDS_41	Paragraph 3.14	Not stated	Paragraph 3.14 seeks to create new and improved green spaces within development proposals. The requirement does not stipulate a standard or quantum that the Council will seek to achieve and as such is vague and not helpful. The Council does not have a clear standard which it applies. The standard contained in the Thurrock Local Plan (1997) Annex would not allow for the densities of development prescribed within the LDF Core Strategy (2011).	Comments noted. The Council is currently in the process of preparing its Active Place Strategy which looks at needs for open space, pitch, and built leisure facilities across the borough. Once finalised, piece of work will inform policies within the emerging Local Plan and future Supplementary Planning Documents.	No action required.
Persimmon Homes Essex (Anna Davies)		TDS_42	Paragraph 3.10	Not stated	The Design Strategy SPD seeks to “ensure that the Borough’s biodiversity and habitats are protected and enhanced’. This requirement goes beyond the test in the NPPF, paragraph 109 stating “the planning system should contribute to and enhance the natural and local environment by minimising the impacts on biodiversity and providing net gains in biodiversity where possible”. There is no justification within the document for applying a higher threshold than the NPPF.	Comments noted. The Council does not consider the phrasing used in paragraph 3.10 to exceed the threshold stipulated in the National Planning Policy Framework.	No action required.

Consultee	Agent	Comment ID	Consultation Point	Comment Type	Comment justification and suggested changes	Officer Response:	Proposed Actions:
Persimmon Homes Essex (Anna Davies)		TDS_43	Paragraph 3.15	Not stated	Paragraph 3.15 requires applications to appraise how proposals can work with existing site features and incorporate them into the green infrastructure that forms a robust landscape framework. Persimmon Homes notes that the Council's evidence base in relation to Green Infrastructure is; a) outdated, b) confusing in so much that there is a variety of Green Grid documents that have contradictory proposals and c) does not explain what will be sought, practically with regards to off-site works. The Council must ensure that the evidence base used to support the SPD document and the emerging Local Plan is up to date. This is a key requirement of paragraph 158 of the NPPF which states that "each local planning authority should ensure that the Local Plan is based on adequate, up to date and relevant evidence about the economic, social and environmental characteristics and prospects of the area". In terms of the bullets under para 3.15, one way in which GI is to be achieved is through the delivery of SUDs and water attenuation. It should be recognised that SUDs are not always achievable, particularly on brownfield sites.	Comments noted. The Design Strategy is intended to guide applicants on the implementation of policies within the Core Strategy and should be read alongside other key documents and evidence. The Council is currently in the process of updating its evidence when finalised these documents will be made available on the Council's website. With regards to the use of sustainable drainage systems, Paragraph 3.63 indicates that applicants should assess the potential it does not require the use of sustainable drainage measures. As such it is flexible enough to respond to concerns raised.	No action required.
Persimmon Homes Essex (Anna Davies)		TDS_44	Paragraph 3.20	Not stated	Paragraph 3.20 seeks proposals to have regard to the prevailing density of an area. Policy CSTP1 of the adopted Core Strategy (2011) prescribes density ranges for new development. The Design Strategy should have regard for these and direct the developer to this policy (see above comments regarding consistency with development plan policies). Paragraph 17 of the NPPF encourages the effective use of land. Whilst this relates to brownfield development, the same approach should be adopted for greenfield sites. This requirement could result in an inefficient use of land, purely on the basis that surrounding development is of a low density. The appropriate density should be informed by the development plan policies. Clearly there is a role for pre-application discussions between the developer and the Council to ensure that paragraph 17 is adhered to.	Agree. Paragraph 3.20 could be expanded to include other aspects that should be considered when determining an appropriate density for a site including aspects such as accessibility and the need to make efficient use of land.	Amend paragraph 3.20 to make reference to other factors that can influence site density.
Persimmon Homes Essex (Anna Davies)		TDS_45	Paragraph 3.22	Not stated	Paragraph 3.22 refers to 'raising the bar' for design quality in areas that have a 'less distinct' or 'attractive character'. It is not clear what is meant by 'less distinct', less distinct than what? The test for proposals should be about whether the scheme is a 'high quality design' in line with paragraph 17 of the NPPF. The terminology used in the draft Design Strategy would suggest that the design quality would always need to increase from development to development. This is unduly onerous, allows for the shifting of goal posts and may render development unviable.	Agree, in part. The intention of this paragraph is to ensure that new developments in areas of poor and unattractive design promote a higher design quality than the surrounding area.	Amend paragraph 3.22 to ensure that the intention of the paragraph and the implications for development proposals are clear.

Consultee	Agent	Comment ID	Consultation Point	Comment Type	Comment justification and suggested changes	Officer Response:	Proposed Actions:
Persimmon Homes Essex (Anna Davies)		TDS_46	Page 28	Not stated	Page 28 of the document describes 'a typical residential neighbourhood'. It is not clear of these 6 points relate to schemes which have been delivered in the borough or whether they are aspirations. We have the following issues: 1. The quantum and type of open space sought is not detailed either in this document or elsewhere in the development plan. 2. The majority of sites identified in the LDF-CS do not overlook the waterside. This is not a typical residential neighbourhood. 3. This point lacks clarity. It needs to recognise that parking is needed and will have an impact on appearance. 5. It should be recognised that the introduction of commercial uses may not be appropriate having regard to; a) location, b) demand and c) viability. There is no Policy support in the LDF-CS requiring the introduction of live / work or mixed use development on residentially allocated sites. 6. The term 'variety of houses' needs further explanation. Does it relate to housing mix, tenure or design?	Comments noted. The image shown is a well designed residential neighbourhood and represents what could be delivered in the borough. The annotation is not intended to be a description of what a typical residential neighbourhood is it is a way of communicating visually how some of the aspects set out in the strategy can be interpreted. However, it is appreciated that this is not necessarily made clear by the title of the image.	Review diagram captions and ensure that the new phrasing highlights the fact that the image is an example of what can be achieved.
Persimmon Homes Essex (Anna Davies)		TDS_47	Paragraph 3.37	Not stated	Paragraph 3.37 states that it will reject proposals that have not fully considered the importance of open space as an integral part of the development layout. This reads like a policy but provides no basis for making this statement. What does 'fully considered' mean? As detailed above, there is a fundamental lack of guidance in relation to open space requirements both within this document, the development plan and associated evidence base.	Agree, in part. The language used within Objective B5 could be amended to make it clearer what is expected of developers and recognise that on smaller sites it may not be practical or appropriate to include open space on site. It should be noted that the role of a Supplementary Planning Document is to provide additional guidance on the implementation of policy which includes national policy as well as policies within the Core Strategy, where appropriate this can include setting out reasons for refusal.	Review Objective B5 and amend where appropriate.
Persimmon Homes Essex (Anna Davies)		TDS_48	Paragraph 3.48 and 3.56	Not stated	Paragraph 3.48 and 3.56 requires proposals to incorporate street trees as part of the hierarchy of streets in all developments and reduce the visual impact, particularly for on street parking provision or where substantial areas of car parking are required for a particular use or mix of uses. This requirement is too prescriptive and does not have regard to the sites circumstances and the ability of such an arrangement to achieve the density targets set out in the LDF-Core Strategy (2011).	Agree, in part. It is appreciated that street trees may not be appropriate in every circumstance but the onus is placed on the applicant to demonstrate this. Comments relating to the impact of street trees on density are deemed to be unfounded as there are plenty of examples across the country including Thurrock where street trees have been used in higher density schemes.	Review document and ensure that the language used is consistent and appropriate in the context of the Core Strategy and National Policy.
Persimmon Homes Essex (Anna Davies)		TDS_49	Section 3 - Part D	Not stated	Section D relates to sustainable design. The requirement for certain design features is not supported by adopted development plan policy and therefore can not be insisted upon. The need for sustainable design features must also have regard for the sites circumstances and adopted development plan policy.	Comments noted. It is recognised that the language within the document could be improved to make clear what is required of developers and what we encourage/promote and support as good practice. With the word	Review document and ensure that the language used is consistent and appropriate in the context of the Core Strategy and national policy.



Consultee	Agent	Comment ID	Consultation Point	Comment Type	Comment justification and suggested changes	Officer Response:	Proposed Actions:
						require used only where a statement is directly linked to policies within the Core Strategy and/or does not place add unnecessarily to the financial burdens on development.	
Persimmon Homes Essex (Anna Davies)		TDS_50	Section 3	Not stated	This section sets out Thurrock Council's requirements regarding assessing the context of a site, including a checklist of key questions that need to be addressed as part of the design process. The section is illustrated with examples from within the Borough and elsewhere. Persimmon Homes has no comments on this section.	Comments noted.	No action required.
Persimmon Homes Essex (Anna Davies)		TDS_51	Section 4 - Urban Areas	Not stated	A typical secondary street is described as having street tree planting and wide pavements. See our comments in section 2 relating to street tree planting. The presence for wide pavements rules out shared surface streets. This is not necessary, unduly prescriptive and contrary to Manual for Street and the Essex Design Guide.	Comments noted. The image shown is a well designed secondary street and represents what could be delivered in the borough. The annotation is not intended to be a description of what a typical residential neighbourhood is it is a way of communicating visually how some of the aspects set out in the strategy can be interpreted. However, it is appreciated that this is not necessarily made clear by the title of the image.	Review diagram captions and ensure that the new phrasing highlights the fact that the image is an example of what can be achieved.
Persimmon Homes Essex (Anna Davies)		TDS_52	Section 4 - Residential Areas	Not stated	This section states that residential neighbourhood must provide a range of different housing reflecting local need, include a range of tenure and affordable homes. This is being prescriptive and needs to relate to development plan policies which support this approach. The draft Design Guide does not recognise that development viability can impact on tenure and affordability which is recognised and reflected in adopted policy. The requirement that a range of different housing 'must' be provided is to prescriptive and does not reflect national policy.	Comments noted. It is important that new housing schemes respond appropriately to local housing needs. The latest Strategic Housing Market Assessment indicates that there is a need for a mix of house types across the borough with the greatest need being for 2/3 bed terraced/town houses. The Design Strategy is simply reinforcing this message.	No action required.
Persimmon Homes Essex (Anna Davies)		TDS_53	Section 4 - Residential Areas	Not stated	A higher density development will be acceptable around locations with good public transport accessibility. What is meant by a higher density in this context? The document needs to have regard to Policy CSTEP1 of the adopted Core Strategy (2011).	Policy CSTEP1 indicates that new residential development should be led by the design standards set in a subsequent SPD and that in centres and areas of high public transport accessibility a minimum of 60dph will be sought. The Design Strategy SPD adds additional guidance around how the density of scheme should be determined but does not seek to propose specific targets.	Amend paragraph 3.20 to make reference to other factors that can influence site density.

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Persimmon Homes Essex (Anna Davies)		TDS_54	Section 4 - Residential Areas	Not stated	A typical Tertiary Street is described as having 'parking discretely accommodated'. This is too vague and open to interpretation. The document should not rule out a range of parking typologies. If the document is advocating an approach, it would be useful to set out examples at the density ranges required in the LDF Core Strategy.	Comments noted. The image shown is a well designed tertiary street and represents what could be delivered in the borough. The annotation is not intended to be a description of what a typical residential neighbourhood is it is a way of communicating visually how some of the aspects set out in the strategy can be interpreted. However, it is appreciated that this is not necessarily made clear by the title of the image. Additional more specific standards relating to parking provision and design will be consulted upon in 2017.	Review diagram captions and ensure that the new phrasing highlights the fact that the image is an example of what can be achieved.
Persimmon Homes Essex (Anna Davies)		TDS_55	Full Document	Not stated	The document does not have sufficient regard to development plan policies which should underpin the guidance. The document does not take the opportunity to address fundamental gaps in guidance in Thurrock, such as guidance on open space requirements. It refers to documents that are themselves out of date and do not provide effective guidance as to what is sought (see comments on GI and Green Grid as an example) It is not clear how the document, including the measures sought and prescriptions therein, has had regard to paragraph 173 and paragraph 174 of the NPPF and therefore can not be considered in conformity with national policy.	Comments noted. The Design Strategy is intended to guide applicants on the implementation of policies within the Core Strategy including Policy PMD2. It is recognised that the language within the document could be improved to make clear what is required of developers and what we encourage/promote and support as good practice. With the word require used only where a statement is directly linked to policies within the Core Strategy and/or does not place add unnecessarily to the financial burdens on development. In determining if financial implications are unnecessary the Council will consider policies within the national policies and guidance and the Core Strategy. With regards to references to specific evidence documents these will be replaced to make the document more flexible and response to emerging evidence as it is published.	Review document and ensure that the language used is consistent and appropriate in the context of the Core Strategy, national policy and emerging evidence.