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3rd March 2023

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My Ref.: F:\Planning\Planning Policy\

Central Bedfordshire Design Guide (consultation January – March 2023).

Thank you for consulting the Chilterns Conservation Board (CCB). This design guide is comprehensive and impressive. We have added several minor textural revisions.

All proposed textual revisions as underlined.

We would like to submit **one overarching point**, which is something of a strategic steer or methodology which might be best placed in the introductory section.

The draft Central Bedfordshire Design Guide extensively references the Chilterns Buildings Design Guide (CBDG) and we support this. We recommend that when considering design judgments and assessments within the AONB, a strategic steer or methodology is set out in the Central Beds guide to say that,

- (1) Within the AONB (including within its setting and/or the national character area, as may apply) then the Chilterns Buildings Design Guide should apply.
- (2) When dealing with planning applications within the AONB, should a conflict occur between the Central Bedfordshire Design Guide and the CBDG, where a design meets the Central Beds guidance, and a design that meets the CCB guidance, then the CCB guidance should take precedence.

Draft Central Beds Design Guide	Proposed CCB textual amendments (underlined)
<p>4.1.1 This Design Guide is a Supplementary Planning Document (SPD) that supports the Central Bedfordshire Local Plan 2015 -2035. It should be read alongside the National Planning Policy Framework 2021, the Design: Process and Tools National Planning Practice Guidance, the National Design Guide 2021, the National Model Design Code 2021, any design related policies and guidance contained within Neighbourhood Plans (where it exists) and any approved Design Codes or Masterplans for the area.</p>	<p>[To add] <u>The Chilterns Buildings Design Guide and Supplementary Technical Notes (on roofing, flint, and brick) may apply.</u></p> <p>We recommend a footnote to this text, linking to our 'strategic steer/methodology, as mentioned above.</p>

<p>5.1.4 Other key documents and resources that should be referenced include: ► Central Bedfordshire Landscape Character Assessment ► The Chilterns AONB Building Design Guide ► The Chilterns AONB Management Plan.</p>	<p>[To add] <u>The Chilterns AONB Supplementary Technical Notes on Brick, Roofing and Flint.</u></p>
<p>5.2.4 Central Bedfordshire has two designated landscapes – part of the Chilterns Area of Outstanding Natural Beauty (AONB) and part of the Marston Vale Community Forest. There are also 13 Registered Parks and Gardens and many Conservation Areas within towns and villages.</p>	<p>[To add] has two designated landscapes – part of the Chilterns Area of Outstanding Natural Beauty (AONB, <u>nationally designated</u>)</p>
<p>The Chilterns Area of Outstanding Natural Beauty (AONB)</p> <p>5.2.5 An extensive proportion of the Chiltern Hills within Central Bedfordshire lie within the Chilterns Area of Outstanding Natural Beauty (AONB), a nationally designated landscape which is afforded significant protection through the National Planning Policy Framework (NPPF). The AONB was designated in 1965 to protect the scenic beauty of the area. The Chilterns Conservation Board have produced a Management Plan which contains a comprehensive summary of the key issues facing the AONB and the management policies and actions needed to conserve this special place.</p> <p>5.2.6 The Board have also prepared the Chilterns Building Design Guide, which provides specific guidance to ensure new development is in keeping with the special qualities of the AONB. It covers such topics as the setting of buildings, the design of vernacular features and the use of traditional local materials. All development proposals within the AONB and its setting will be expected to take into account the Chilterns Building Design Guide, in addition to the guidance contained within this overarching Design Guide</p>	<p>[To add].</p> <p>5.2.5 An extensive proportion of the Chiltern Hills within Central Bedfordshire lie within the Chilterns Area of Outstanding Natural Beauty (AONB), a nationally designated landscape which is afforded significant protection through the National Planning Policy Framework (NPPF) <u>and the Countryside and Rights of Way Act 2000</u>. The AONB was designated in 1965 to protect the scenic beauty of the area. The Chilterns Conservation Board have produced a Management Plan which contains a comprehensive summary of the <u>special qualities of the AONB</u> and the key issues facing the AONB and the management policies and actions needed to conserve this special place</p> <p>5.2.6 The Board have also prepared the Chilterns Building Design Guide <u>and supplementary technical notes</u>, which provides specific guidance to ensure new development is in keeping with the special qualities of the AONB. It covers such topics as the setting of buildings, the design of vernacular features and the use of traditional local materials. All development proposals within the AONB and its setting will be expected to take into account the Chilterns Building Design Guide, <u>AONB Management Plan and the Chilterns Conservation Board’s Position Statement on Setting</u>, in addition to the guidance contained within this overarching Design Guide</p>
<p>6.1.4 Other key documents and resources that should be referenced include: ► CBC Highways Constructions Standards and Specification Guidance ► CBC Housing Policy Technical</p>	<p>We support this</p>

<p>Guidance SPD ► CBC Parking Standards for New Development SPD ► www.livingroofs.org.uk ► Guidance on Sound Insulation and Noise Reduction for Buildings (BS8233) (2014) ► Building Regulations Part K ► The Chilterns Building Design Guide ► Building for Life Building for Life 12 Built for Life Homes ► Secured by Design.</p>	
<p>8.1.3 Other key documents and resources that should be referenced include: ► Central Bedfordshire Sustainability Plan 2020-2030 ► CBC Environmental Framework ► Biodiversity Net Gain Guidance ► Green and Blue Infrastructure Strategy ► Central Bedfordshire Landscape Character Assessment ► CBC Tranquillity Strategy ► The Forest of Marston Vale: Design Guidance SPD ► CBC Surface Water Advice Note ► CBC Sustainable Drainage SPD ► CBC Highway Construction Standards and Specifications Guide (2019) ► Chilterns Building Design Guide ► Trees in the Townscape ► Biodiversity Planning Toolkit - an online resource aimed at helping users to incorporate biodiversity into the planning system and new development. Created by the Association of Local Government Ecologists (ALGE) in partnership with a wide range of conservation and planning organisations. ► How to build a Living Landscape – Hertfordshire & Middlesex Wildlife Trust ► Rebuilding Biodiversity in Bedfordshire – biodiversity opportunity mapping.</p>	<p>We support this.</p>
<p>8.5.1 Policy EE5 of the adopted Local Plan requires all major development proposals to demonstrate how they incorporate landscape enhancement, in accordance with the guidelines in the Landscape Character Assessment, the Central Bedfordshire Design Guide and other relevant documents for specific areas. This includes the Chilterns Area of Outstanding Natural Beauty (AONB), Forest of Marston Vale and the Greensand Ridge Nature Improvement Area. Landscape and visual appraisals will be expected to support planning applications and include the assessment of local landscape character and views.</p>	<p>We support this.</p>
<p>12.22 Light Pollution 12.22.1 The problems and issues associated with the provision of outdoor lighting are becoming more</p>	

<p>widely recognised as a source of pollution. Obtrusive lighting can be damaging and be both an environmental and intrusive visual nuisance arising from glare and light spillage. Light pollution in the countryside can lead to a suburban feel, losing the sense of distinctiveness associated with the countryside.</p> <p>12.22.2 Whilst the importance of artificial lighting for security, pedestrian, and traffic safety, in promoting access to sport and recreation and for enhancing historic and architecturally important buildings is recognised, lighting can have a marked impact on the night-time scene, significantly changing the character of the locality and altering wildlife and ecological patterns. On the widest scale, dark skies and views of the stars are now becoming a thing of the past except in the most remote areas.</p> <p>12.22.3 For development proposals that involve the introduction of external artificial lighting (including external signage), the Council may require a Light Impact Assessment (LIA) to be provided before an application can be determined.</p> <p>Key Aims for Light Assessments to prevent</p> <p>12.22.4 The key aims for Light Assessments to prevent are: ► Sky glow -the orange glow visible around urban areas resulting from the scattering of artificial light by dust particles and water droplets in the sky ► Glare - the uncomfortable brightness of a light source when viewed against a dark sky ► Light trespass - light spillage beyond the boundary of the property on which a light is located.</p>	<p>[To add].</p> <p>Light pollution in the countryside can lead to a suburban feel, losing the sense of distinctiveness associated with the countryside. <u>The Chilterns AONB enjoys relatively dark skies as a constituent of its special qualities. Great weight must be given to the protection of this special quality when making planning decisions.</u></p>
<p>12.22.6 Further guidance on controlling impacts from Artificial light sources can be found in Guidance Note 1 for the reduction of obtrusive light 2021 Institution of Lighting Professionals (theilp.org.uk).</p>	<p>[To add].</p> <p>Further guidance on controlling impacts from Artificial light sources can be found in Guidance Note 1 for the reduction of obtrusive light 2021 Institution of Lighting Professionals (theilp.org.uk). <u>The AONB Management Plan includes a policy on lighting, seeking to keep skies dark at night by only using light where and when needed. The Chilterns Conservation Board is producing a position statement on lighting with the AONB or when affecting its setting.</u></p>



The Chilterns Area of Outstanding Natural Beauty

The Chilterns AONB was designated in 1965 for the natural beauty of its landscape and its natural and cultural heritage. In particular, it was designated to protect its special qualities which include the steep chalk escarpment with areas of flower-rich downland, woodlands, commons, tranquil valleys, the network of ancient routes, villages with their brick and flint houses, chalk streams and a rich historic environment of hillforts and chalk figures.

Chilterns Conservation Board

The Chilterns Conservation Board is a statutory independent corporate body set up by Parliamentary Order in 2004 under the provisions of Section 86 of the Countryside and Rights of Way (CRoW) Act 2000.

The Board has two statutory purposes under section 87 of the CRoW Act:

- a) To conserve and enhance the natural beauty of the AONB; and
- b) To increase the understanding and enjoyment by the public of the special qualities of the AONB.

In fulfilling these roles, if it appears that there is a conflict between those purposes, Conservation Boards are to attach greater weight to (a). The Board also has a duty to seek to foster the economic and social well-being of local communities within the AONB.

Like all public bodies, including ministers of the Crown, local authorities and parish councils, the Chilterns Conservation Board is subject to Section 85 of the CRoW Act which states under "General duty of public bodies etc"

"(1) In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."

List of Organisations providing Nominees to the Chilterns AONB Conservation Board

The Chilterns Conservation Board has 27 board members, all drawn from local communities:

- Hertfordshire and Oxfordshire County Councils
- Central Bedfordshire and Luton Borough Councils (unitary authorities)
- Buckinghamshire Council (formerly Aylesbury Vale, Chiltern and South Buckinghamshire, and Wycombe District Council).
- Dacorum Borough Council, North Hertfordshire DC, Three Rivers DC and South Oxfordshire DC.
- The Central Bedfordshire, Buckinghamshire, Hertfordshire and Oxfordshire Parish Councils (6 elected in total), and
- DEFRA (8 in total).