

particularly promote have lifespans of 10-20 years, and therefore need to be planned very carefully and in particular, with future ways of living firmly in mind.

Future ways of living, and in particular energy usage, movement, and community interaction, have all evolved massively over the past few years and are likely to change significantly in coming years. Therefore, whilst respecting the past, the focus on design should not be fixated upon how buildings were designed and built over the last century. Instead, efficient use of land with higher densities, taller buildings, energy efficiency and modern methods of construction should all be advocated within the Design SPD, as appropriate in relevant locations. In fact, very often the most lauded new developments in the country have taken great strides forward in terms of modern design, bringing places and people together in innovative ways and setting a new benchmark for others to aspire to.

Our response below is structured according to the sections of the Design Guide SPD. The headings and numbering refer to the numbering within the SPD.

5.0 Context & Identity

The National Planning Policy Framework ('NPPF') and Planning Practice Guidance ('PPG') identify that SPDs should build upon and provide more detailed advice or guidance than policies in the adopted Local Plan. They cannot introduce new policies. The PPG states that SPDs should not add unnecessarily to the financial burdens on development.

For an SPD to be effective it should not be overly prescriptive, nor should it repeat policy and advice from other documents, guidance, or parts of national and local policy.

This SPD is, however, unnecessarily detailed and contains significant additional material that is not necessary or helpful. The result is that this has created a lengthy, overly detailed, and prescriptive document that is not helpful due to the level of detail contained within. It is also not proportionate to the task in hand; namely promoting good design and providing a framework for guiding and determining planning applications.

The result is that, whilst well intended, this document which has been created will lead to endless debate in planning applications and at appeals. Directly at odds with the Government's stated intention to "simplify the planning system", it instead adds further complexity and requirements, most notably in that it is a 181 page document adding to the many other documents that are cross-referenced within it.

Section 5 illustrates this point well. Much of the information contained within this section is repeated from other documents, cross-referenced and is not clear on how it relates to and informs design. By way of example, page 25 explains what the Historic Environment Record is, whilst page 26 describes when listed building consent is required. There are many other examples, e.g. 5.29 - 5.37. These are not matters for a Design SPD and their inclusion is unhelpful as they distract from the primary purpose of the document.

We wish to point out that we do not identify all instances of repetition, unnecessary inclusion of additional information, or excessive text, but instead set out some examples below.

Much of the content of Section 5 is repeated later in the document (e.g. paragraph 5.3 which is then set out in Chapter 8 and 12, and Figure 4 which is repeated again at Figure 221). Whilst it is recognised that context is necessary, a simple cross-reference to other documents (in particular, the Local Plan), with context/explanation within the relevant chapter, would in our view be far more appropriate and create a much more usable document than the current draft SPD. An example of where this has been done well is paragraph 7.26, with a simple reference to the EV Charging SPD. If this approach was taken consistently across all topics within the document, the length of the SPD could probably be halved and made far easier to digest and navigate.

6.0 Built Form

Section 6 of the SPD considers built form and the pattern of development. NPPF para 128 states that design guides “*should allow a suitable degree of variety*”. Section 6, however, seeks to discourage such variety.

In our view, this SPD should encourage:

- innovative concepts that fit in with the landscape
- outstanding design solutions for different densities
- building beautiful through stunning and iconic design where appropriate
- embracing height as a good thing, where appropriate
- making more efficient use of land through higher densities to help create great places.

Therefore, our comments are as follows:

Paragraph 6.2.2 states that “*New developments should be designed to imitate and reflect the existing pattern, avoiding alterations to the fine urban grain in central locations*”. This approach stifles innovation, modern masterplanning and architectural creativity. The SPD recognises (para 5.8.1 and 5.8.2) that twentieth century development has resulted in poor forms of development and vehicle dominant developments, particularly in town centres. Therefore, stipulating that new developments should imitate the existing pattern will simply result in poor design following poor design which is contrary to NPPF paragraph 130 c), which states planning policies should be:

*“sympathetic to local character and history, including the surrounding built environment and landscape setting, **while not preventing or discouraging appropriate innovation or change (such as increased densities)**,”* (emphasis added).

The text should therefore be amended for consistency with the NPPF in that it should allow for innovation and higher densities.

It is helpful that Paragraph 6.14.2 (Building Design) recognises the need for architectural creativity and encourages innovative design solutions, but the same approach should also be taken in paragraph 6.2.2 to pattern.

Section 6.9 considers densities and the text at paras 6.9.2 and 6.9.3 encouraging higher densities in key locations is welcomed. Whilst examples are included of densities at 20, 35, 60 and 74dph, it is not clear if these are net or gross figures. It would therefore be helpful for the SPD to make it clear how the Council will be assessing densities, i.e. what areas of land/types of landforms CBC consider are included in the calculation. Furthermore, the SPD should be clear that these are

example densities only and that higher densities can be acceptable and will be encouraged in appropriate locations.

New developments and settlements provide an opportunity to create iconic, landmark buildings, taking a different approach to existing (historic) patterns of development and design. Therefore, whilst the language contained within Section 6 is largely focused on development within the existing built environment it misses the opportunity to set out how development within new settlements should be designed.

The SPD should make it clear in Section 6 that new settlements are encouraged to experiment with modern and innovative design, including height, and to encourage higher densities including around key nodes and public transport.

Building Form is considered at 6.10, with paragraph 6.10.4 referencing sloping sites and ground works. An additional paragraph should be included here to promote opportunities for development to work positively with topography, placing particular emphasis on made ground and restored mineral sites.

It is important to note that the CBC administrative area contains many active and former quarries, with development coming forward on several sites. Through a holistic and well thought out approach, these sites provide an opportunity for these despoiled, industrial landforms to be shaped and exploited to create innovative and aspirational developments where people wish to live.

This could also include multi-level development with sub-terranean non-residential uses such as storage depots, datacentres and multi-modal interchange transport terminals set below the ground level of unquarried land. Additional built form could then be delivered above these uses, ensuring the efficient use of land in line with national policy.

More consideration should also be given in Section 6 regarding non-residential buildings. These are only considered in a small section towards the end of the chapter.

Importantly, no consideration is given at all to renewable energy and how this can be incorporated within schemes from the outset. Net Zero Carbon schemes should be positively encouraged by CBC, helping meet both local and national climate ambitions and targets.

7.0 Movement

Additional text should be added to paragraph 7.2.1 to clarify the role and approach to equestrians. Whilst such use is sustainable, it should only be prioritised and encouraged in appropriate locations, and not within more urban environments. Developments within and on the edge of settlements such as Leighton Buzzard should not have to consider or prioritise equestrian users.

Section 7.5 should encourage large scale new developments to provide opportunities for public transport interchanges and public transport electric charging. EV Car club bays are mentioned here, but in a passing comment and should also be encouraged. Reference to how such facilities are expected to be designed and what they should contain would improve this section.

Paragraph 7.8.4 states that “all parties should enter into formal pre-application discussions”. It is not the SPD’s place to require this. Pre-application discussions are referenced elsewhere in the document, again showing the repetition within. A better approach would be to state in the introduction that applicants are encouraged to enter into pre-application discussions to achieve better outcomes, and any subsequent references removed.

Street trees are very important to good urban design. However Section 7.8 on street trees does not grapple with conflicting policies such as SuDs drainage and residential parking. Also, the issue of maintenance, management and the significant cost implications street trees can have has not been properly addressed. As such, this SPD could unnecessarily financially burden development by mandating street trees which can require very expensive root containment systems that ensure they do not damage the highway. Further, Local Highway Authorities often do not wish to take on the responsibility for maintenance for these so CBCs position on this should be carefully set out within this section as well.

8.0 Nature

The reference (para 8.2.4) to supporting the Council’s commitment to move to Net Zero is supported, but further recognition should be placed within the document about the important role renewable energy plays in achieving this. This matter is considered further in our comments under Section 12.

Paragraphs 8.4.1 and 8.4.2 should include reference to restored mineral sites and planning for restoration and landforms, as per our comments in response to Section 6 above.

The reference to developments being visible within the skyline in 8.4.2 is supported. The SPD should move away from the long-held view that development being visible is bad. Well-designed development can be visible and may change the skyline, and it is accepted that this is not always a negative.

The effect of development will always be that it changes things, so it is how this change takes place and what the result is that is the key consideration here. Beautiful developments and better results will more easily be achieved from the initial standpoint that there will be change, rather than simply copying development examples from the recent past or trying to hide or minimise built form.

Regarding height, a change to the skyline is not always a bad thing. New landmarks and iconic buildings or structures can have a very positive effect on the skyline. They can create new ways to orientate oneself or can create positive visual cues. Onshore wind turbines, for example, are often seen as modern-day windmills and are strong, positive reminders to all of the need to live in a more sustainable fashion.

9.0 Public Spaces

Section 9 confuses public open space with land that is not publicly accessible. For example, paragraph 9.5.1 refers to semi-natural green spaces which could protect ecological features. Inevitably these areas are unlikely to be public but feature under the heading “public open space”.

There are examples in CBC of areas within private ownership that are thought of as “public” by the community, without being public areas. The SPD should be clear in the distinction between public and private open space (not just gardens).

Paragraphs 9.21.5–9.21.7 introducing new policy, which an SPD cannot do. They require “Public Art Statements & Plans” to be submitted with proposals of a certain scale. No such requirement is included within Policy HQ7 of the Local Plan. This appears to be a policy style requirement and it is not within the ability of an SPD to require such submissions. The requirement for these statements/plans must therefore be removed.

10.0 Uses

Paragraph 10.3.7 requiring a critical mass of population within easy reach of a centre is supported. Furthermore, the proposal to include residential accommodation within a mixed-use development is also supported, being a sensible and appropriate way to make efficient use of land and improve sustainability. Reference is included at 10.3.8 to increasing density in town centres. This should be increased in scope to refer to encouraging higher densities in the centre of new settlements and at other appropriate locations within those new settlements.

Sections 10.6 and 10.8 (Extra Care and Residential Care Homes) should encourage the location of such facilities to be at the heart of developments, co-located with other community uses. Paragraph 10.6.4 notes that the location can influence the degree of community involvement they have. We are of the view that the SPD should go further and positively promote/encourage co-location with other community uses, such as local centres, schools, community buildings etc.

The key design principles for schools (10.12) should suggest opportunities for innovative, multi-level design where appropriate and effective. It is well known that such school design is increasingly used throughout the country and allows for more efficient land use, higher densities, and can also reduce build costs.

11.0 Homes & Buildings

Section 11 fails to consider the use of renewable energy, such as solar PV on the roof or ground source heating supplied from a heat network to all the new homes. Reference should be made within this section to encourage such technologies to assist CBC in meeting their net zero carbon ambitions.

12.0 Resources

As a general comment, Section 12 does not promote renewable energy or the concept of Net Zero sufficiently. The section should strongly encourage developments to incorporate renewable energy within them, particularly at a strategic scale. It should also state that Net Zero development should be prioritised ahead of other developments given both local and national climate targets.

Paragraph 12.2.1 must include an additional bullet point for natural resources. It should encourage early consideration of opportunities to maximise renewable energy use through location and design of developments, e.g. the ability to include (or connect to) solar arrays, onshore wind turbines and ground source heat networks.

Paragraph 12.3.7 should clarify what size of wind turbine is considered to be of a “large commercial scale” (i.e. how many MW and above). Currently, onshore wind turbines

are being manufactured up to 6.2MW approx. which is substantial. The SPD should, therefore, encourage applicants to consider large wind turbine/s as a very important and effective source of green energy for their development – particularly given the U.K. is one of the countries with the highest wind levels in Europe.

Paragraph 12.3.8, meanwhile, only appears to relate to individual property ground source heat pumps. Instead, a new paragraph should be inserted which promotes larger scale ground source heat networks across new developments. AWG owns Synergy Boreholes, which is a borehole company which has experience in ground source heating across the country and is currently involved in ground source heat for AWG's 200 new homes being delivered at their Chamberlains Barn development at Leighton Buzzard. Such technology is being applied commercially, at scale, to new developments at various locations across the country and is an approach that should be encouraged through the SPD.

Conclusion

In summary, AWG consider that the SPD, whilst well intended, is too lengthy, repetitive, and prescriptive, whilst also being contrary to national policy.

It could be improved and made far more effective by removing all the unnecessary content (e.g. explanations of topics such as listed building consent), and instead simply cross-referencing other documents rather than repeating them, so keeping the focus on the key matters.

Moreover, the SPD should include greater consideration to density, renewable energy, and allow for modern and innovative design approaches to new development.

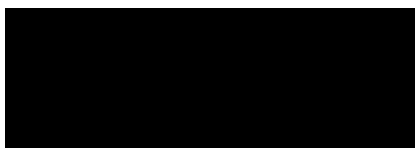
The SPD attempts to introduce new policy through requirements for Public Art Statements/Plans. This must be removed as it is not within the remit for an SPD to create policy.

Encouraging innovation and higher density will make more efficient use of land, create beautiful and better developments, and also release development pressures throughout CBC.

Prioritising Net Zero Carbon schemes that have renewable energy as a key component of their design to is essential if the Council are to meet their Net Zero carbon targets.

We trust that these comments are of assistance and would be happy to meet with the Council and discuss how the document can be improved if that would assist.

Yours faithfully



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