

Planning Policy
Central Bedfordshire
By Email: localplan@centralbedfordshire.gov.uk

15th March 2023

Dear Planning Policy,

Re: Central Bedfordshire Design Guide SPD

This letter is submitted in response to the current consultation held by Central Bedfordshire Council on the Design Guide SPD. From the outset, Gladman agrees with the reasoning and principles sitting behind high-quality design and recognises the value that good design has to play for environmental, social, and economic wellbeing of communities. The points made in this representation are to ensure that the principles suggested in the SPD are in relation to CBC Local Plan Policies, specifically HQ1 and HQ9, and therefore compliant with national planning policy on SPDs.

Purpose of Supplementary Planning Documents

SPDs are not subject to the same degree of consultation and examination as policies contained in Local Plans and should only be prepared, therefore, to provide additional guidance to those bringing forward development proposals across the district. The National Planning Policy Framework (NPPF 2021) confirms this in Annex 2: Glossary where it defines SPDs as

'Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.'

The role of the SPD should therefore seek to provide guidance on existing planning policy contained in the adopted Local Plan. It is important to note that this does not present an opportunity to reinvent existing planning policies contained in the adopted Local Plan.

Purpose of the Design SPD

Gladman welcomes the preparation of the SPD as it provides additional clarity beyond policy wording contained within the adopted Local Plan. Specifically, the wording of Policy HQ1 of the Local Plan is the starting point for this SPD, setting the parameters within which the principles of this consultation document must operate. HQ1 states that:



Policy HQ1: High Quality Development

The Council will ensure that all developments are of the highest possible quality and respond positively to their context. Development proposals, including extensions and change of use, will be permitted where:

1. Proposals take account of opportunities to enhance or reinforce the local distinctiveness of the area and create a sense of place;
2. Size, scale, massing, orientation, materials and appearance relate well to the existing local surroundings and reinforce local distinctiveness, both built and natural;
3. Careful consideration is given to the density of all new housing proposals to ensure that they make the most efficient use of the land available, whilst reflecting the existing character of the surrounding area and making provision for appropriate landscaping and boundary treatments;
4. Proposals are well connected to surrounding areas, providing safe, attractive and convenient routes that encourage travel by sustainable modes and meet the needs of all street users;
5. The distinction between public and private space is clear, with defined boundaries;
6. Proposals are complementary to the existing natural environment, taking account of the landscape setting, landscape character and tranquillity, Rights of Way, biodiversity and Green Infrastructure;
7. High quality hard and soft landscaping appropriate to the scale of development proposed should be used to integrate the proposal into the existing built, natural and historic environment;
8. Healthy lifestyles are promoted through the design and layout of the development;
9. Inclusive design is considered from the outset of the design process;
10. Layouts are designed to maximise surveillance and increase pedestrian activity within the public realm to reduce opportunities for crime and the fear of crime;
11. There is not an unacceptable adverse impact upon nearby existing or permitted uses, including impacts on amenity, privacy, noise or air quality;
12. Any lighting associated with the development does not have a detrimental impact on the surrounding area; and
13. Development supports the sustainable management of waste through the appropriate layout and design of buildings, external spaces and roads in accordance with the Design Guide for Central Bedfordshire and Waste Strategic Policy WSP5 of the Minerals and Waste Local Plan (January 2014).

All new development will be expected to have regard to the Central Bedfordshire Design Guide (and subsequent revisions).

Local Plan Policy HQ9 is also relied upon, which states that:

Policy HQ9: Larger Sites, Development Briefs and Design Codes

The site allocation policies in this Plan identify the sites that are required to prepare a Development Brief and Design Code.

Any site that meets the following criteria will be required to prepare a Development Brief and/or a Design Code:

A Development Brief must be prepared by the developer and endorsed by the Council prior to the determination of a full or outline planning application, and be accompanied by an Ecological Mitigation and Enhancement Plan, to demonstrate delivery of biodiversity net gain in accordance with National Policy, where it meets one or more of the following criteria:

1. Development exceeds 300 dwellings; or
2. On sites below 300 dwellings, where there are complex or sensitive design issues.

A site-wide Design Code will be required for residential developments in excess of 300 dwellings, commercial developments where the total floorspace exceeds 50,000sqm, or for sites below this threshold where:

3. The site is made up of multiple, related sites that will be built out in phases over a long period of time; or
4. The site is in multiple ownership and coordination between the parties is necessary; or
5. The site is likely to be developed by two or more different developers; or
6. A well-considered approach to design is required due to its sensitivity or the sensitivity of the surrounding area.

Sites over 500 dwellings will also require an Area Specific Design Code for each phase of the development.

Therefore, principles set out in this SPD must be related to the policies above – or those documents set out in paragraph 4.1.1 of the consultation document (e.g. NPPF 2021, Planning Practice Guidance, the National Design Guide 2021, or the National Model Design Code 2021). Gladman must take this opportunity to congratulate Central Bedfordshire Council on the level of detail within this SPD as this will help developers and the Council to work together to ensure high-quality sustainable design is delivered across the authority.

Gladman notes that each of the chapters make reference to other Local Plan policies, which is welcomed as long as each of the policies is clearly relevant to the chapter area of the SPD. It would be useful for Central Bedfordshire to provide clarity on which Local Plan policies are prioritised – HQ1 and HQ9, or those that are referenced in each of the chapter introductions? There are instances in which the reader is referenced in chapter introductions to policies and yet the policy is not mentioned at all in the chapter (e.g. SP4 for Context & Identity). This leads to questions surrounding the relevance of the policy in question and how the chapter helps with interpretation of the policy, particularly when the same policies are referenced in across multiple chapter introductions. Gladman suggest that the relevance of the policies are clearly demonstrated for the avoidance of doubt and to aid the reader to understand how information contained in the chapter helps their interpretation of Local Plan policy. This being said, Gladman note that all guidance under the following headings is exactly that – ‘should be’ rather

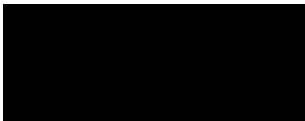
than 'must be' or the creation of policies. The chapter headings (with associated Local Plan policies in brackets) are:

- Chapter 5: Context & Identity (Policies SP4, SP5, SP7, HQ1, HQ8, HQ9, HQ10, EE1-EE12)
- Chapter 6: Built Form (Policies R1, HQ1, HQ8, HQ9, HQ11, DC1, EE2, EE3, EE4)
- Chapter 7: Movement (Policies T1-T6)
- Chapter 8: Nature (EE1-EE4)
- Chapter 9: Public Spaces (EE1-13)
- Chapter 10: Uses (R1-R3, T3, HQ1, HQ3, HQ7-9, HQ11, DC1, EE2-EE4)
- Chapter 11: Homes and Buildings (no specific policies given in the introduction to this chapter however reference in this section is made to policies H2, EE4, H6; can their reference be made clearer in the introduction to the chapter?).
- Chapter 12: Resources (T1-T6, EE3, EE4, EE10, EE11, EE14, CC1-CC8, HQ1, HQ9, HQ11, DC1, DC5)
- Chapter 13: Case Studies

Gladman would like to be kept informed as the document is progressed. Gladman reserves the right to provide further comments on the SPD at any later stage of public consultation.

I hope you have found these representations useful and please do not hesitate to contact me should you wish to discuss any of the points raised within this representation.

Yours faithfully,



Oliver Lloyd
Planner
Gladman Developments Ltd.

