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## Response from South Bedfordshire Friends of the Earth to the Central Bedfordshire Design Guide Consultation.

This has been a very difficult consultation for community groups. There is a lot of repetition making it a very long document and very unwieldy to comment on.

1. This design guide contains some really exciting work in chapter 12 on Sustainability and biodiversity. However this does not seem to clearly run through the guide. This chapter should be at the start of the document. Meeting Carbon and biodiversity targets and dealing with effects of lack of exercise and loneliness on health should be explained in some detail and then should run through the document as golden threads. Although they are mentioned. This is not nearly strong enough.
2. The design guide is severely hampered by the objectives of the Local Plan which are really out of date in relation to the sixth carbon budget and the latest research which shows how depleted the UK is in terms of Nature using the 2019 State of Nature report which highlights that 44 million pairs of breeding birds have been lost since 1967, 97% of wildflower meadows lost since the 1960's, and huge declines in hedgehogs and butterflies.
3. There need to be targets for Biodiversity creation as a whole in Bedfordshire and then these need to feed through into the design of green spaces and landscape. There needs to be much more emphasis on flowering shrubs both native and non native, on ivy which is so important for nectar in the autumn and for habitat for birds, spring bulbs that support pollinators, areas of long grass, wildflower meadows with management plans, areas of rotting logs, winding paths through trees and shrubs etc, areas of ponds that are kept filled up in the summer, untidy areas with brambles where birds can shelter from the huge danger of cats, areas of dead leaves and areas for hedgehogs to hibernate and bare areas of earth on banks where solitary bees can create nests. The photos show very sterile areas for the most part.
4. As well as this there need to be corridors of flowering shrubs both native and non native for children to play with winding paths and big logs etc to encourage natural play. There need to be many informal play areas with old logs, shrubs etc and mounds and space for kicking a football for children to play out so that they can be seen by parents. There should be regular areas of green



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space within the development so that it is not a long walk for a toddler to a green space. Instead they should be able to play and be seen from key windows.

5. Health and co benefits of carbon cutting and sustainability need to run through this guide , opening up pathways for extra external funding to help with sustainability of the development.
6. In light of the Committee on Climate Change's recent announcement on the slow pace of decarbonising the electricity grid, it is really important to include wind turbines/ farms going to a direct wire to a new estates, along with heat pumps etc and linking this in to landscape.
7. In town centres there needs to be studio space and workshop space to support artists who in turn create regeneration as evidenced in Margate and Deal and many other areas. There needs to be both covered and indoor spaces. Solar panels on car parks and building and translucent solar rooves. Health and culture and local businesses and education on green skills need to be key to the town centre. Culture, heritage and the arts are key to supporting health, wellbeing and building community in town centres. There is significant background information on this on the LGA and the Arts Council websites.
8. There need to be much stronger targets for cycling and walking. Promoting cycling and walking will not create the necessary cuts in carbon, health benefits and meet the government targets of 50% of short journeys being made by walking and cycling. Para 7.1.4 should include the framework document for Active Travel England. There also need to be targets for bus use for new development.
9. Only 5% of homes will be wheelchair accessible. It should be much higher with an aging population.
10. 12.9. 10 Biomass boilers are mentioned. Biomass boilers could create significant air pollution.
11. There is no mention in chapter 12 of pollution into watercourses from microplastics in car tyres. This needs to be mitigated and prevented.
12. In chapter 12 there is reference to noise and wind turbines. The Design guide should point out that ETSU-R-97 will be updated by BEIS who have commissioned a WSP report.
13. The issue of litter should be covered and design that encourages litter should be avoided such as underpasses.
14. Plastic grass has negative effects in terms of permeability and microplastic pollution. Conditions should be sought that stop plastic grass being put down in gardens.
15. SUDS management should be aimed to increase biodiversity by leaving reeds long for the winter at least and supporting a dense habitat for much of the time.



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