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VIA EMAIL ONLY: localplan@centralbedfordshire.gov.uk

20718/A3/OG/sI
13 March 2023

Dear Sir/Madam,

CENTRAL BEDFORDSHIRE COUNCIL DESIGN GUIDE SPD – CONSULTATION RESPONSE ON BEHALF OF HOUGHTON REGIS MANAGEMENT COMPANY (HRMC)

Central Bedfordshire Council 'CBC' are consulting on the Draft Design Guide SPD. The documents are being presented for consultation during an eight-week period between 17th January 2023 and 16th March 2023. The document sets out the key principles and standards of design for all new development.

We have reviewed the Draft SPD on behalf of HRMC, who are bringing forward the Linmere development scheme in Houghton Regis. The HRMC team is actively involved in discussions with CBC Officers across several teams about multiple planning submissions which are being considered by the Council at this time – including advanced infrastructure, Area Masterplans, reserved matters submissions and other discharge of condition submissions.

Overarching Comments

We have submitted representations on the Parking Standards for New Developments SPD in January 2023, on behalf of our Client. As set out within our letter of representation on the Parking Standards SPD, given the impact of car parking and parking standards on the creation of places, we would have expected a more integrated and collaborative approach to be taken. Hence, the documents should not, in our view, be developed in isolation of each other.

We believe that there would be considerable benefit in the Design Guide and Parking Standards SPD's being developed collaboratively and published in tandem, to ensure good placemaking within CBC.

The Highways Construction Standards and Specifications Guidance (Issue 8) 'HCSSG' which has recently been updated generally advocates for a car orientated development, yet this draft SPD

presents a more balanced approach to the conflicting issues within creating good places. It is our opinion that if the HCSSG is followed it will not deliver a place led, people orientated development. We further believe that the HCSSG document needs to be reviewed to ensure that it does not conflict against the urban design visions for CBC.

Detailed Comments

Section 5.0 – Context & Identity

Section 5.4 – The Council has prepared a Green and Blue Infrastructure Strategy which identifies the strengths and weaknesses of the green and blue infrastructure network in CBC and identifies priorities for enhancement. Consideration should be given to this Strategy when developing the design of new schemes.

Section 5.8 - Additional examples should be added which cover more contemporary detailing and how to achieve landmark buildings beyond traditional forms of Heritage details or traditional buildings such as Town Halls and Churches.

Section 5.27 - Reference to Electric Vehicle Charging Technical Guidance of New Development - implications on layout space provision for parking areas, power demand and cost to deliver requirements.

Section 5.28 - More specific guidance should be provided on signage for new build mixed use buildings such as Local/Neighbourhood centres.

Section 6.0 – Built Form

Section 6.10.3 - Deep plan buildings are primarily what we have at Linmere, which are able to achieve continuous frontages to give definition and enclosure to streets and active frontages.

Section 6.10.5 - The guide states that double loaded apartment blocks are 'incorrect' - this is a misinformed view as double loaded apartments are more efficient and acceptable depending on surrounding context and orientation. We suggest that this is reconsidered.

Section 6.12 - Other elements contributing to buildings on key frontages are; inclusion of brick detailing, accent materials to add texture and interest, this should be taken into consideration.

Section 6.21 – We believe there should be the addition of contemporary examples of well-proportioned windows, maximum division of 4 panes, typically 2 of which are operable.

Section 6.26.3 – There should be a greater diversity of balconies permitted. Guidance to include potential for cantilevered balconies in a different material from the building, this is a typical detail seen in many contemporary dwellings.

Section 7.0 – Movement

We support the SPD's intention in regard to its overarching vision to balance the accommodation of good place making while accommodating all road users in safe and attractive streets, however we note that some standards and principles in the HCSSG as published is in conflict with many of these intentions and as such the implementation of these intentions will be extremely difficult.

Section 7.1 – Reference should be included to Building for Healthy Life and Healthy Streets. Reference is made to the HCSSG, and CBC Parking Standards for New Developments however some of the 'guidance' presented in these CBC documents is contrary and conflicts with other recommended guidance e.g., Manual for streets BHL and HS.

Section 7.2.1 - User hierarchy puts pedestrians first and motor traffic last which we agree with, however the guidance in HCSSG is in direct contradiction. We suggest that this is cross referenced to ensure a clear messaging.

Section 7.2.6 - Clear reference required to relevant section on HCSSG, on appropriate sizes for junction widths and radii dimensions.

Section 7.2.11 - Reference made to discourage the use of parking courts. Guidance should be provided to set out how these can be delivered in an acceptable manner as they will be required for apartment blocks and some housing.

Section 7.2.15 - Reference made to the need for cyclists to be physically separated and protected from 'high volume vehicular traffic'. This needs to be quantified.

Section 7.3 - Reference should be made to the use of continuous footways as one of the options available to meet the objectives set out by the design principles. Guidance on the parameters where a cyclist can share the carriageway without any designated cycle lanes is unclear, this should be provided within the guidance.

Sections 7.7/7.7.3/7.7.4 – The draft SPD very much implies a 'vision and validate' approach for defining and establishing an appropriate street hierarchy, which we support. In this approach streets are designed to reflect its function, its role in the hierarchy and who will use it, and this is seen as current best practice.

However the HCSSG advocates a 'predict and provide approach' which is in direct contrast with the draft SPD, and is a more outdated approach that leads to overengineered and less place amenable designs.

Taking a vision and validate approach means that the road hierarchy/typology is best determined by assessing the function and role the street is required to perform, rather than the number of vehicular movements which a particular street is envisaged to accommodate. This then enables the creation of appropriate street types resulting in a flexible network. At Linnere this has enabled us to design a 'grided street network model' which creates a choice of routes to enable traffic to move in different directions through the network, thus reducing the reliance on a single road in the network for access and egress for each neighbourhood cluster. This means that more streets can have a lower hierarchy with lower vehicular speeds and therefore be designed to be safer, and more liveable, whilst ensuring that cars can still have good access and parking to residential units. HCSSG guidance does not enable this, and rather result in a 'Tree-branch' network with none of the aforementioned benefits, by creating more streets using a higher hierarchy of street types and resulting in less choice.

Section 7.7.5 - The diagram in the draft SPD is conceptual and would be better understood if the streets were characterised by their hierarchy to understand the functionality of the network and how this can be achieved. It refers to cul-de-sacs which in our opinion should be avoided, and no reference is made to modal filters, which provides permeability for pedestrians and cyclists, while controlling the routes taken by cars. A similar diagram with a colour coded street hierarchy is used in the HCSSG (fig. 3.1 page 6), where shared minor streets are indicated as cul-de-sacs, which in our opinion reduces permeability and legibility. HCSSG's diagram should be reconsidered to achieve the principles illustrated by the SPD for consistency and reflect best practice.

Therefore, there is a clear disconnect between the SPD guidance and HCSSG.

Section 7.8.7 – The SPD states that any planting should be clear of visibility splays both at the time of planting and with consideration given to expected growth and spread. This position will impact on private drives and direct access onto streets, so we recommend a relaxation on the reliance on

visibility splays for private drives and locations for direct access to ensure sufficient planting is still achievable.

Section 7.10 - The principles set out for shared minor streets within the SPD are supported. It refers to priority for pedestrians, flexibility and that the design should reflect the context and function of a place (7.10.4). In contrast the guidance in the HCSSG is 'black and white' and indicates a more rigid set of rules (8.8m widths for example). The criteria for achieving variation of shared streets expressed in the SPD must be made more explicitly clear in the HCSSG.

Section 7.11 – We challenge the proposal that narrowing's of 3.7m should be no longer than 5m, an illustration of which is required to show how this works in practice. With regard to Defensible Space the depth required is large and generally not allowed for by developers and house builders. Longer sections of narrower carriageways will help reduce vehicular speeds. There is no rationale provided that substantiates CBC's suggestion that 5m length should be the limit of 3.7m narrowing.

Section 7.12 - While we do not object to the information provided here, it should be expanded to include modal filters and where these should be used.

Section 7.26 - Review of Electric Vehicle Charging SPD to be undertaken.

Section 8.0 – Nature

Section 8.1 – We believe that the following documents should also be referenced: Biodiversity Net Gain Guidance, Green and Blue Infrastructure Strategy and CBC Sustainable Drainage SPD.

Section 8.2.4 - The approach to green infrastructure should be evidenced at pre-application stage and when applying for planning permission. Proposals should support the Council's commitment to move to net zero by 2030 and ambition to support the planting of 1 million trees by 2030 (CBC Sustainability Plan).

Section 8.6.7 - Street trees will not significantly overshadow roofs or buildings during their lifetime as this can reduce effectiveness of energy generation from solar technologies.

Section 8.81 - Structural landscaping must be provided within the public realm (rather than within private land / rear gardens) to allow better control and certainty over management and maintenance. Ownership and responsibility for maintenance needs to be agreed with the Council, and a landscape management plan established as part of the formal planning process.

Section 8.11.14 - Biodiversity enhancements and net gain will be required in accordance with Policy EE2 of the adopted Local Plan and the NPPF. The Environment Act 2021 introduces a requirement for all new development proposals to provide at least 10% improvement in biodiversity (Biodiversity Net Gain (BNG)) over a 30 year period from 2023. This pre-requisite will be inserted into the Town and Country Planning Act 1990 from November 2023 and is a significant step change, moving away from the requirement to simply mitigate the impact of a development. Major development sites of 10 homes or over are likely to require the stakeholder engagement of local conservation groups. In addition, strategic and large commercial sites are likely to require future management or stakeholder involvement from the Wildlife Trust and Greensand Trust.

Section 10.0 – Uses

Section 10.1 – Reference should be made to Building for Healthy Lives.

There is no reference within this section to modular homes. It is recommended a section is included to encourage and support sustainable modular homes.

Modular homes are generally quicker to build than conventional homes. A modular home can be put together on-site in less than two weeks. A traditional home typically takes 40 weeks. Modular home construction is less likely to be delayed by skills and materials shortages.

Section 10.3.21 - Layout options for vertically mixed uses is insufficient. More information and guidance is required regarding access, active frontages and/or visual surveillance and servicing arrangements.

Section 11.0 – Homes and Buildings

Section 11.6.5 - Guidance is contradictory. Section 11.6.3 states that setbacks up to 6m are permissible, however 11.6.5 states that setbacks of between 2-6m are to be avoided to prevent conversion of frontage gardens for parking. An example needs to be provided. We support the principle that gardens between 2-4m are permissible to create a greener and more verdant feel along some streets.

Section 11.6.7 - Reference is made in the SPD for boundary treatments to be designed in accordance with HCSSG, however we could not find the relevant section in this document, therefore this needs to be clarified.

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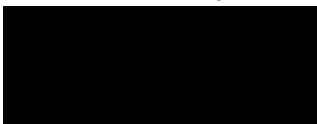
Section 11.12 - Reference is made to a drag distance of 10m. This has been difficult to achieve at Linmere and we understand it is a more stringent distance than other local authorities. We suggest that this distance be revised to reflect a more 'commonly' acceptable distance.

Section 11.14.13 – Reference made to meter cupboards being accommodated in purpose made joinery- These are typically pre-formed/pre-fabricated - guidance to be updated to reflect this point.

Section 11.15.5 - Reference is made to Self/custom build guidance in Housing Policy Technical Guidance SPD - this to be reviewed to identify any conflicts.

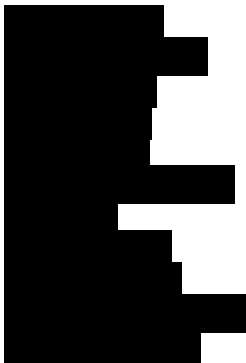
We are happy to meet with the Local Plan team to further discuss the comments set out above. Please keep us updated with all future stages of the development of the draft SPD.

Yours faithfully,



OLIVIA GLENN
Planner

Cc: By EMAIL:



- CBC
- CBC
- Place Services
- Land Improvements Holdings
- Land Improvements Holdings
- Land Improvements Holdings
- Land Improvements Holdings
- WT Partnership
- Barton Willmore, now Stantec
- Barton Willmore, now Stantec
- Barton Willmore, now Stantec