



Appeal on Behalf of Bloor Homes and Sandleford
Farm Partnership

Sandleford Park, Newbury

Urban Design Summary Proof of Evidence

LPA Ref: P0787/19/FU20/01238/OUTMAJ

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1. SUMMARY PROOF OF EVIDENCE

1.1 Introduction

- 1.1.1. My name is Andrew Williams. I am a qualified Urban Designer, Chartered Landscape Architect and a founding Director of Define; a Town Planning, Urban Design and Landscape Architecture practice.
- 1.1.2. I was appointed by Bloor Homes in February 2021 to review the refused Sandleford Park planning application in respect of urban design matters. Having reviewed the application material of the appeal scheme and adjacent land, alongside the Sandleford Park SPD, I advised that I found the scheme to be an appropriate response to its context, would lead to comprehensive development through common design control mechanisms and was able to prepare urban design evidence in its support.
- 1.1.3. My evidence addresses the first reason for refusal in addressing how the appeal scheme is capable of delivering a well-planned and sustainable urban extension. The principal area of interest of my evidence is how a comprehensive development that delivers high quality placemaking is achieved.
- 1.1.4. My reading of the delegated planning report, decision notice and statement of common ground is not that there is a claim or suggestion that poor urban design is being promoted. Instead, there is a concern that comprehensive development will not be achieved, with the critical relationship between the delivery of housing and its associated green, movement and community infrastructure not being co-ordinated.
- 1.1.5. As such, my evidence considers in some detail the 2015 SPD and the appropriate forward mechanisms that would achieve comprehensive development, informed by the projects and processes I am currently involved in that are achieving this.

1.2 Policy and Guidance

- 1.2.1 Both national and local design policy requires good design to achieve well designed places. This approach lies at the heart of section 12 of the NPPF, and is continued in the recent National Design Guide, which emphasises what good design means by listing their ten characteristics.
 - 1.2.2 Most recently a National Model Design Code has been prepared and is being consulted on (consultation closing 27 March 2021) which uses the ten characteristics of a well-designed place and sets this in a model approach to using a code to achieve these characteristics in a way that is specific and appropriate to the site's location. Of particular note is the Model Codes reference (at paragraph 9) to providing a *“framework for creating...distinctive places, with a consistent and high-quality standard of design”*. I emphasise the role of a design code here, as this is a key tool in delivering comprehensive development.
 - 1.2.3 At a site-specific level, the 2015 SPD sets out a range of Development Principles at its Section F. These principles vary from being high level in nature to quite specific, and these clearly apply at different stages of the delivery process.
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1.2.4 Indeed, Section G of the SPD sets out an expectation that design codes provide the process for building on the strategic objectives and design principles as set out in the SPD¹. I agree with this view – in my experience SPDs work best where they set out higher level aims and objectives and provide the structure for refined design decisions to be made in a comprehensive way by a code prior to the detailed design being prepared and submitted.

1.3 SPD Audit

1.3.1 The SPD is a positive tool that provides a framework for comprehensive development that applies over a variety of stages, from shaping the initial outline application stage, informing a design coding stage and acting as a background document as a health check for the consideration of detailed design and implementation / management stages. It is a simple but necessary point to identify that the alignment of the appeal scheme with the SPD can only be examined in relation to what principles within the SPD apply to the outline stage. My audit is undertaken on this basis.

1.3.2 Section F of the SPD holds the Development Principles information and this has a series of ten interwoven aspects that offer guidance at a wide variety of scales. This includes aspects that must directly shape an outline application – the retention of key woodland and green infrastructure, the provision of an appropriate access and approach to streets and identifying and providing for appropriate community and mixed use facilities for example.

1.3.3 It also includes information that only has an application at a later coding stage (and the SPD recognises that a coding stage is required), at a detailed design stage and a long term management stage. This is not a criticism, just recognition of the point I make at 3.3.1 above in that information must be given weight at the point in time it has relevance and influence.

1.3.4 Overall, and when appreciating those aspects of the SPD that relate to the outline planning stage, I consider the appeal scheme to meet its requirements. I do note that the majority of the SPD's principles apply to post outline planning stage, with the design coding stage in particular the point where the majority of the matters raised at Section F of the SPD have relevance.

1.4 Analysis of Key Issues

1.4.1 I consider above how the appeal scheme performs against the key urban design and masterplanning issues of Comprehensive Development and Design Control Mechanisms. The former relates directly to the claimed harm within the first reason for refusal, and I identify the latter aspect due to it being central to the issue of how design is controlled on large schemes such as this, through its various stages to delivery.

1.4.2 In respect of comprehensive development, I find this criticism slightly odd and I sense originates from a frustration with the lack of a single planning application and a wide range of different plans and associated documents.

1.4.3 My conclusion in this regard is:

1. The SPD provides a really helpful context for comprehensive development – it sets out a series of development principles that must be met within the allocation. Many of these

¹ At paragraph 140 of the SPD

principles relate to this outline application stage, but most continue through design control, management and detailed design / delivery stages.

2. These principles should continue to be applied through design code and detailed design stages to be realised, that is the normal process, and in this case this process benefits hugely from having the SPD in place.
3. There are very few physical elements of the allocation that directly inter-relate between the appeal scheme and the adjacent Sandleford West application. The only direct element is the Main Access Street and a single block that sits within the Sandleford B neighbourhood. The location, design, delivery and access to the Neighbourhood Centre is also a key feature, although a simple one to address. Finally, the Park Edge has some inter-relationship across the two schemes on its southern edge, although this edge is separated by a school and woodland block. All of these issues in respect of design are very easily resolved through an appropriately structured design code.

1.4.4 I also consider the subject of Design Control Mechanisms further.

1.4.5 In this regard I strongly suggest separate site wide Design Code (using the new National Model Design Code approach to interpret the relevant SPD requirements) and a Detailed Landscape and Green Infrastructure Design and Management Plan being required for the application to be agreed prior to reserved matters stages being approved. These design controls will have coordinated areas of responsibility with no gaps or overlap.

1.4.6 This approach reflects good practice, ensures clarity and established a robust long-term design control mechanism that will result in faster reserved matters permissions delivering comprehensive designs in accordance with the SPD's development principles.

1.5 Policy Compliance

1.5.1 As a result of my analysis set out above, I find the appeal scheme in accordance with the National Planning Policy Framework, and the National Design Guide. It promotes a number of positive placemaking principles, directly informed by the 2015 SPD, which are capable of evolving further through a design code exercise to realise the ten principles of a well-designed place. This will need commitment to a design control process, and that is addressed separately by planning conditions.

1.5.2 I also find, for the reasons stated above, that the appeal scheme is in accordance with the Core Strategy policy CS14 (through developing an approach that will lead to a well-designed place), and for the same reasons also the West Berkshire Achieving Design Quality SPD.

1.5.3 In respect of the 2015 Sandleford Park SPD, and in particular Section F (design principles), accordance with this SPD can only be achieved across four distinct stages - 1. Outline Application (Principle), 2. Design Code and Detailed Landscape and Green Infrastructure Design and Management Plan (design control), 3. Landscape and Ecology Management Plan (management) and 4. Reserved / Full Planning Applications (detail and delivery).

1.5.4 My audit finds that the appeal scheme does everything it should and could do at the first of these stages. It must commit to a process that allows design evolution through design control and management to detail and delivery, with planning conditions (that are subject to separate discussions) demonstrate this commitment. I therefore find the appeal scheme to be in accordance with the 2015 SPD.

1.6 Overall Conclusion

- 1.6.1 Achieving comprehensive development for an allocation of the scale of Sandleford Park requires a commitment to the right design principles, thorough consultation with key stakeholders and 'following through' on design ambitions to the detailed design and delivery stages.
- 1.6.2 This ambition cannot, therefore, be achieved at outline planning stage alone. Many schemes set out on the right path and fail due to a lack of design control and detailed design commitment. That is not the case here.
- 1.6.3 The appeal scheme commits to the principles set out in the 2015 SPD for what could and should be committed to at this outline stage. Moreover, it also commits to the right process through the design control, management, and detailed design and delivery stages. This process is critically important in achieving long term comprehensive development, and reflects current central government guidance on the use of design mechanisms to achieve the ten characteristics of a well-designed place.
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