



Appeal on Behalf of Bloor Homes and Sandleford
Farm Partnership

Sandleford Park, Newbury

Urban Design Proof of Evidence

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

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1. INTRODUCTION

1.1. Background

- 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. Since gaining my first degree and post graduate diploma in Landscape Architecture from the University of Central England in 1996 I have worked as a landscape architect for Lovejoy in Birmingham becoming Design Director in 2005. I gained a postgraduate diploma (distinction) in Urban Design from Oxford Brookes University in early 2005. I was appointed Managing Director of Capita Lovejoy's Birmingham office in March 2008. In March of 2011 I, with my colleague Mark Rose, founded Define, which has since grown to 22 professional staff (including town planners, architects, urban designers and landscape architects).
- 1.1.3. All of my professional work has been at the interface between development and its context, often in locations that are sensitive due to their landscape, townscape and visual qualities. I have audited in excess of 200 schemes, either during their determination or following refusal, and have given evidence at over 75 planning appeals.
- 1.1.4. Current projects I am involved in that rely on an integrated design approach that delivers high quality placemaking include being the lead designer for Garden Cities (such as Ebbsfleet Eastern Quarry), Garden Towns (such as Worcestershire Parkway), Garden Villages (numerous) and Garden Suburbs (such as Broadnook GS). I am also leading the design of a number of substantial new settlements across the UK in sensitive landscape, townscape and historic contexts, where the response to context and placemaking is central to their success. These projects rarely apply to single land ownerships, and I am very familiar with the need for comprehensive placemaking, and the tools to achieve this.
- 1.1.5. 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.

1.2. Main Issues

- 1.2.1. 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.
- 1.2.2. 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.

1.2.3. 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.

1.2.4. My evidence is therefore structured as follows:

Section 2 highlights the key national and local design related policy and guidance that relates to the ability to deliver comprehensive development.

Section 3 provides a high-level audit of the appeal scheme against the Development Principles (Section F) of the March 2015 Sandleford Park SPD.

Section 4 analyses the key issues relating to delivering comprehensive development at Sandleford Park, informed by the audit of the SPD and how the appeal scheme relates to it.

Section 5 provides conclusions and acts as a summary proof of evidence.

1.2.5. Figures referred to within this proof of evidence are set out in a separate A3 Appendix.

1.2.6. Separate evidence is provided by Owen Jones (Planning), Julian Cooper (Landscape), Chris Alder (Arboriculture), Chris Garratt (Sustainability), David West (Ecology) and Lee Witts (drainage).

1.2.7. Finally, this proof of evidence provided for this appeal is true and has been prepared and is given in accordance with The Landscape Institute Code of Conduct. I confirm that the opinions expressed are my true and professional opinions.

2. POLICY AND GUIDANCE

2.1 Introduction

- 2.1.1. This section of my evidence sets out only the design related policies and guidance that relate to the subject of design quality and comprehensive development. It only makes reference to policy text where it is deemed of particular relevance to my evidence and draw attention to specific references by placing them in bold.

2.2 National Policy and Guidance

National Planning Policy Framework (February 2019) – see CD8.1

- 2.2.1 Section 12 of the NPPF is titled ‘Achieving well-designed places’ and sets out a number of design related policies. Paragraph 126 is particularly relevant to this appeal as it addresses supplementary planning documents (SPD), stating that such documents should use tools such as design guides or codes to create a framework for creating distinctive places, with an appropriate level of detail or prescription. The NPPF provides a glossary that sets out what it means by ‘Design code’ stating:

***Design code:** A set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. The graphic and written components of the code **should build upon a design vision**, such as a masterplan or other design and development framework for a site or area.*

National Design Guide (January 2021) – see CD8.4

- 2.2.2 The National Design Guide is a helpful tool in that it sets out in detail the ten characteristics of a well designed place. This enables a more detailed understanding of what is required of the ‘well designed places’ as required by at section 12 of the NPPF. The guide recognises that these ten characteristics are mutually supporting, apply to all scales, that the priority should be discussed and agreed at an early stage, and that priorities will be determined by site and community specific concerns¹.
- 2.2.3 The National Design Guide was updated in January 2021 to align it with the consultation draft National Model Design Code².

National Model Design Code (January 2021) – see CD8.12

- 2.2.4 This consultation draft stage document provides detailed guidance on the production of design codes, guides and policies. It explains that Design codes are important because “they provide a framework for creating healthy, greener, environmentally responsive, sustainable and distinctive places, with a **consistent and high-quality standard of design**”.

¹ See paras 13 and 14 on page 4 of the NDG

² Consultation ending 27 March 2021

- 2.2.5 It sets out a coding process at page 5 through the stages 1. Analysis, 2. Vision, and 3. Code. The overall structure of the guidance is clearly directed towards land that has not yet been subject to analysis, design or planning stages. Hence the Analysis Stage addresses scoping and baseline, the Vision stage establishes a vision, provides a coding plan and separately a masterplan whilst the Code provides detailed guidance structured relative to the areas identified in the coding plan, whilst also addressing the ten characteristics of a well designed place.
- 2.2.6 The key information relationship within a code structured by this document is the cross reference of coding information via 'Areas' with a 'Coding Plan', the former setting out detailed guidance, the latter identifying where this requirement is located on a plan.

2.3 Local Policy and Guidance

West Berkshire Core Strategy (July 2012) – see CD8.5

- 2.3.1 The Core Strategy policy of most relevance to my evidence is CS14, which is titled Design Principles and sets out the need for development to demonstrate high quality design that is informed by its context. It sets out a list of expectations for development.

West Berkshire Achieving Design Quality SPD (June 2006) – see CD8.17

- 2.3.2 This SPD sets out a number of key design principles to achieve design quality. It is now almost 15 years old and informed by guidance that in some cases is 20 years old. I do not therefore consider it in detail, as a combination of the National Design Guide and the Sandleford Park SPD reflects more up to date guidance.

Sandleford Park SPD (March 2015) – see CD8.14

- 2.3.3 This SPD was adopted in September 2013 and updated in March 2015 with a revision to require a single planning application. It has seven sections (A to G) with Section F being the most relevant to my evidence, as it contains a wide range of development principles. These are considered in more detail at section 4.
- 2.3.4 I separately note that at Section G of the SPD it states at paragraph 140:

*Where the planning application is submitted as an outline application, the Design and Access Statement, which forms part of the application should provide the basis for quality of layout and design to be delivered through subsequent Reserved Matters and detailed planning applications. This should be achieved by **a process of design coding** which builds on the strategic objectives and development/design principles set out within this document.*

2.4 Conclusion

- 2.4.1 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.

- 2.4.2 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.
- 2.4.3 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.
- 2.4.4 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 SPD³. 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.

³ At paragraph 140 of the SPD

3 SANDLEFORD PARK SPD - SECTION F AUDIT

3.1 Introduction

3.1.1 The Sandleford Park SPD was adopted in September 2013 and updated in March 2015 (with the requirement for a single planning application added). It supports the principle of a July 2012 allocation for up to 2000 homes along with education, community and public open space.

3.1.2 It is structured in the following way:

Section A of the SPD provides an introduction and identifies the purpose of the SPD to guide future development, provide a framework for a planning application, assist in the delivery of comprehensive development, set out planning and design principles and help inform the local community and engage them in the process.

Section B of the SPD provides a vision and strategic objectives (14 in number).

Section C sets out the Planning Policy Framework (which has in places been superseded).

Section D describes the site context, including facilities, landscape, ecology, access, drainage, heritage, arboriculture, infrastructure, education, ground conditions and renewable energy. It leads to a summary of the site's opportunities and constraints.

Section E addresses community engagement.

Section F sets out a number of Development Principles (which are considered in more detail below and at Appendix B).

Section G provides guidance relating to the delivery and implementation of the planning application requirements. I have drawn attention at 2.4.4 above as to how this section envisages the use of design codes

3.2 SPD Section F Audit

Introduction

3.2.1 The appeal site is located on the southern edge of Newbury, with a wide range of facilities readily accessible within comfortable walking distances (see Figure 1).

3.2.2 The context of the site has evolved in an accretive manner, predominantly over the last century, with various incidences of replacement and renewal of the urban fabric in recent decades. It is, as a result, a patchwork of characteristics, as evidenced at Figure 2A-2D.

Audit

3.2.3 I set out below an overview of the respective Development Principles found at section F of the SPD and analyse these (only in so far as my masterplanning and urban design expertise allows) with regard to:

- a) At what stage in the design and delivery process they apply, and;
- b) How the appeal scheme performs relative to what would be expected or required at outline application stage.

3.2.4 This analysis is also set out in more detail at Appendix B in the form of a schedule.

S - Single Planning Application

3.2.5 This principle (S1) requires proposals for the site to be a single planning application to achieve a comprehensive development and ensure the timely provision of infrastructure, services...etc. Where the SPD refers to a planning application it means a single outline planning application for the site⁴ that is either outline or full⁵

3.2.6 This requirement, for a scheme of this size, would only logically apply to the outline application / principle stage, and the appeal scheme does not provide a single application for the whole of the allocation. However, it must be noted that the single application requirement is only identified due to it having been identified as leading to comprehensive development.

3.2.7 The test is therefore can the appeal scheme lead to comprehensive development, and the answer to that (from a masterplanning / urban design perspective) is yes. It relies on the correct planning and design process across the full outline, design control and detailed design stages to deliver comprehensive solutions. I address this point further in section 4 of my evidence.

L – Landscape and Heritage

3.2.8 Eight separate principles are set out under this title at Section F, from a sitewide Strategic Landscape and GI Plan (L1), a detailed Landscape and Green Infrastructure Design and Management Plan for each phase (L2) and inclusion of the Country Park in this information (L3). L4 sets out that all important trees are to be retained and integrated, L5 to protect and enhance views and L6 promoting green links and spaces. The detailed design of the valley crossing is required in the single planning application as part of L7 and an LVIA is required at L8.

3.2.9 The majority of these requirements are high level in nature and relate to the outline stage in principle, and some only at this stage (L1 and L8 for example). Most of these aspects continue to be relevant at later stages as the precise detail as to their location, form, character...etc is important (such as L6). Other aspects more realistically apply to later 'control' stages (such as L2 and L3), whilst others a clearly detailed design exercises (L7).

3.2.10 Detailed evidence on landscape matters is provided separately by Julian Cooper. However from my review it is clear that for those aspects expected at an outline stage, the application delivers the requirements. Moreover, a planning condition (ref) will require a 'Detailed Landscape and Green Infrastructure Design and Management Plan' (DLGIDMP - satisfying L2) to be agreed prior to reserved matters stage, which I consider further in section 4.

3.2.11 Julian Cooper's evidence starts to engage (at his Section 9) with how the detailed design considerations would evolve, and this is naturally an ongoing discussion that would be placed within the preparation of the DLGIDMP, thereby directly shaping subsequent detailed applications.

⁴ Paragraph 12, page 5 of the SPD

⁵ Paragraph 129, page 83 of the SPD

3.2.12 This approach is one I have a great deal of experience in using, and strongly support. It is capable of ensuring the delivery of the landscape related aspects of the scheme, and create a bridge between site wide strategic guidance, where decisions can only be relatively high level, and detailed design decisions where a precise brief is essential to a consistent and comprehensive solution.

E – Ecology and Wildlife

3.2.13 The SPD sets out two principles under this subject heading, E1 focusing on the delivery of biodiversity enhancements, with a list of opportunities to deliver these. This principle clearly relates to the outline stage, but also relates to future design control and detailed stages.

3.2.14 I recognise that it is common ground that biodiversity net gain is established for the site, but the Council consider that this assessment does not account for the degradation of retained habitats over time. David West considers the ecological aspects of the appeal scheme in more detail at his proof of evidence.

3.2.15 The second principle (E2) relates to the ongoing management and protection of ecological assets through the development process, and therefore relates more to detailed design stages.

A – Access and Movement

3.2.16 The SPD sets out six principles for this topic, including the need for a hierarchy of streets, spaces and routes (A1), integrate into the wider area (A2) and promote alternative modes of transport to the private car (A3). It goes on to prioritise pedestrians and cyclists (A4) provide parking to meet resident needs (A5) and make all buildings and spaces accessible.

3.2.17 These principles are relevant at outline stage (particularly A1-A4) but rely heavily on the coding / control stage and detailed design / implementation to deliver. For example, the principle of a hierarchy of streets, spaces and routes are shown on both the SPD Figure 7 (Access and Movement Framework) and the Land-Use and Access Parameter Plan, but this cannot fix the precise locations or guarantee the quality required by this part of the SPD can be met at outline stage. Instead it needs a commitment to quality through a coding and detailed design process to ensure these principles are realised. This is, in my experience, the only way of delivering these qualitative principles on a scheme of this size.

3.2.18 Turning to what the appeal scheme delivers at outline stage, I consider the application material demonstrates an in-principle commitment to a hierarchy of streets (access parameter plan and Section 6 of the DAS), integrating into its context (access parameter plan), promoting non-vehicular use (bus route and cycle connections) and taking a pedestrian / cyclist first approach to appropriate streets (DAS section 6.2). I consider the meeting parking needs and access to buildings and spaces to be a coding / detailed design matter, as the level of density of this scheme is such that would not preclude the typical parking standards expected.

3.2.19 Detailed evidence on this subject is provided separately by David Bird.

H – Hydrology and Drainage

- 3.2.20 Four separate drainage and hydrology principles are included within the SPD. These include meeting existing run off rates (H1) using various sustainable drainage approaches (H2), using SUDS to promote biodiversity (H3) and encourage recycling grey and rain water (H4). The first three principles relate to an outline stage, but rely on continuing through coding and detailed design stages, whilst the fourth principle is a coding / detailed design matter.
- 3.2.21 In respect of the first three principles, Lee Witts addresses these matters in detail, but it is clear to me that all three are satisfactorily met in principle. Run off rates will reduce below that of the existing green field rates, varied SuDS solutions are promoted in principle and these features are capable of providing biodiversity enhancement as they evolve through the design controls and detailed design stages.

P. Public Open Space and Recreation

- 3.2.22 The SPD provides four separate public open space and recreation principles, including the need for a variety of specific facilities, including the Country Park and various play standards (P1). It goes on to require the management of the Country Park to minimise its impact on breeding birds (P2) that spaces are accessible (P3) and make use of the existing landscape features (P4). The first and last of these principles relate to the outline stage of the scheme, the second is a management consideration and the third is a detailed design consideration.
- 3.2.23 In respect of this application, I consider it to meet the requirements of P1 – it provides the mix of open space and play provision broadly as set out in the SPD, it includes a NEAP and 2 LEAPS (with an additional LEAP within Sandleford West), a variety of nature play trails and equipment and a foraging trail and orchards. In respect of P4, the landscape spaces are largely defined by the existing woodland on site and the opportunity to connect between these, and therefore this approach largely follows that established in the SPD at its Figure 8.

R – Renewable Energy

- 3.2.24 I do not consider these principles in my analysis. The aspects identified in the SPD include using the latest construction techniques and embedded technologies (R1), decentralized power (R2) and a Code to deliver the Code for Sustainable Homes requirements (R3), as they are technical and not spatial in nature. Chris Garratt addresses these in a separate proof of evidence.

N – Neighbourhoods

- 3.2.25 The SPD sets out a single principle relating to neighbourhoods, requiring the site to deliver two new neighbourhoods (identified by A and B) in response to the surrounding character and context.
- 3.2.26 The SPD goes on to explain and justify this approach - 'Sandleford A' having a more structured urban grain and a density of above 30 dwellings per hectare, with 'Sandleford B' being more organic and approximately 30 dwellings per hectare. Overall, it suggests a density range of 30-50 dph, which is appropriate for this location.

- 3.2.27 I consider the establishment of two separate neighbourhoods as potentially positive idea, but this is more due to their separation via the valley and being framed by the woodland. In truth, they will not function as separate neighbourhoods, because their scale does not support separate community or convenience infrastructure. Instead they would function as subtly different character areas, which in itself is a reasonable approach.
- 3.2.28 Moreover, the contextual analysis and character guidance is mixed. To the north of 'Sandleford A' lies both a low-density organic area and a medium density orthogonal arrangement. However, the actual development area of 'Sandleford A' is notably affected by the organic shapes of the retained woodland, and I do not consider a more structured character to fit particularly comfortably with these site assets. Sandleford B in contrast is larger and less spatially constrained by existing woodland, and perhaps a slightly more regular arrangement of blocks and streets would be expected, but this doesn't mean it need not be informal and organic.
- 3.2.29 Furthermore, the difference between 'approximately 30 dph' and 'above 30dph' isn't really sufficient to shape a different character, and it doesn't sit particularly accurately with the density range identified as being 30-50dph⁶, although I do consider that wider range appropriate and provides scope for more character variation.
- 3.2.30 Notwithstanding these points (which can be addressed at coding stage), this matter is appropriate to be considered at outline stage, but it can only be controlled and realised at coding and detailed design stages. On the basis of the appeal scheme being aligned with the development areas of the neighbourhoods as set out in the SPD, I consider this principle to be satisfactorily addressed at this stage in the process.
- 3.2.31 My Figure 3 at Appendix A compares the SPD's Figure 9 (Neighbourhood Areas) with the scheme proposal – using the illustrative layout to enable a visible comparison between the two pieces of information.

F – Community Facilities and Services

- 3.2.32 This section of the SPD provides two principles, including the need for a range of facilities accessible to existing and future residents (F1) and the design and layout of the community facilities will respond to the character of the neighbourhood (F2). The former is a matter that should be addressed by the outline application, the latter is a matter of detail for the design code and detailed design stages.
- 3.2.33 In regard to L1, the appeal scheme:
1. Provides a 2FE Primary School.
 2. Safeguards land for the expansion of Park House School.
 3. Delivers a local centre with an appropriate mix of uses, including A classes (up to 2150m² GIA), Office (up to 200m²), residential and leisure (up to 500m²). This range provides for indoor community, a place of worship, small scale retail, library and healthcare.
 4. Provides a variety of Neighbourhood and Local Play areas.

⁶ 3rd para on page 51

3.2.34 I consider the range and amount of uses provided to be appropriate as a maximum for the amount of dwellings provided, and consider it meets the requirement of the SPD at outline stage. Having been involved in the design and delivery of these type of facilities, I believe a more current approach would be a single purpose building with greater flexibility, with separate retail units with residential above. The outline application would not restrict the development of the neighbourhood hub at Design Code stage.

3.2.35 My Figure 4 at Appendix A identifies the location of these facilities.

U – Urban Design Principles

3.2.36 The SPD sets out seven principles relating to this topic, that cross reference (to some degree) with Figure 13 – Masterplan Framework. These relate to development responding positively to its context (U1), create a series of streets and spaces that are well defined (U2), public realm being an integral and accessible design component (U3). The scheme will be accessible with good off-site links (U4), legible (U5), with buildings and spaces allowing for adaptation (U6) and providing variety and choice (U7).

3.2.37 Almost all of these principles relate to the outline stage, although the majority of them simply overlap with other principles already set out or to follow. The only exception is the adaptability of buildings and spaces, which is a detailed design matter and management and variety and choice, which is down to the mix of dwellings and the detailed design of the neighbourhood hub.

3.2.38 Taking each principle in turn, the appeal scheme:

1. Responds to the green infrastructure assets and Country Park through the park edge character set out at CA3, although the evolution of that edge character will be subject to the design code and detailed design stages (U1).
2. Creates a series of streets that broadly relate to the primary and secondary street network as set out in the SPD. This is developed further in the DAS (pages 62-64), and should continue to be developed further at design control and detailed design stages (U2).
3. The public realm is established through the street hierarchy, the key spaces and green corridors and the retained woodland and Country Park. These areas are all established in the outline application materials, but rely on further coding and detailed design stages to be fully addressed (U3).
4. Provide off site links to Monks Lane (vehicle / bus / cycle / pedestrian), Newtown Road (vehicle and cycle/pedestrian), and Warren Road (pedestrian, cycle and vehicle) (U4).
5. The precise arrangement of street networks will not be established at outline stage, but the intention set out in the DAS identifies a legible network, subject to its detailed resolution (U5).

3.2.39 I therefore find the appeal scheme to deliver what would be expected at outline design stage in respect of the urban design principles.

3.2.40 My Figure 5 at Appendix A compares the SPD's Figure 13 (Masterplan Framework) with the scheme proposal – using the illustrative layout to enable a visible comparison between the two pieces of information.

C – Character and Appearance

3.2.41 The SPD states that the character and appearance of Sandleford is defined by a combination of the two neighbourhoods (A and B) and the character areas. It then sets out ten principles relating to character and appearance, although this is perhaps better described by being broken down into its type of guidance, which I set out below.

3.2.42 **Street Types** – CA1 and CA2 sets out guidance for the main access street and residential streets in respect of its design principles, movement requirements, scale/ type of buildings addressing it and landscape treatment. This type of guidance is sufficient to give a broad indication of character, but needs more detailed coding to ensure a fully comprehensive approach.

3.2.43 **Key Edges** – CA3 and CA4 identifies a consistent edge treatment to the Park Edge and Monks Lane and takes a similar approach to that provided for the Street Types. This is a less successful approach as the character of these edges is not clearly set out and a coding streetscene / elevation is the typical way of providing this.

3.2.44 **Character Areas** – CA5 sets out guidance for the Wash Common area to the south west – it identifies this area as shared surface with a Manual for Streets led approach. This is the only character area specifically identified, and it offers a slightly different but compatible level of guidance with the Sandleford B neighbourhood (although the distinction of which guidance takes precedent is not clear).

3.2.45 **Places** – CA6 sets out the local centre guidance. I consider this location a key 'place', and the landscape, public realm, community facilities and mix of uses are all critical components. The guidance follows a similar pattern which is led by highways, building height and landscape tables that sets out basic information.

3.2.46 **Landscape Elements** – CA7, 8, 9 and 10 all relate to landscape aspects (Valley Crossing, Woodland, Valley Corridors and Country Park) and only high-level design principles are provided.

3.2.47 I would describe these series of principles as a first step towards the design control stage. They are helpful at this early stage to reinforce a sense of structured placemaking, that in turn influences an outline planning application and can then be taken on and developed at the coding stage, but should not be perceived as fit for purpose coding information.

3.2.48 I consider the key information this section provides to have only high-level requirements for the outline planning stage, these being:

3.2.49 In respect of **Street Types**, providing sufficient space for the Main Access Street (CA1) typology to be deliverable. Residential Streets (CA2) are less relevant and the character is described, but their arrangement can evolve at the coding stage. Overall demonstrating

an appreciation for the hierarchy of street types is required. I consider the appeal scheme to meet these requirements, largely through the DAS⁷.

- 3.2.50 In respect of **Key Edges**, the outline requirement is restricted to a recognition of the informal nature of the Park Edge (CA3) requiring positive frontage and for Monks Lane (CA4) being able to avoid long blocks facing this edge that would lead to terraced form, and that space exists for the necessary movements. All other aspects are relevant at Design Code stage. I consider the appeal scheme to meet these requirements through recognition at Section 7 of the DAS⁸.
- 3.2.51 In respect of **Character Areas**, Wash Lane (CA5) is beyond the scope of the appeal scheme application and is not applicable, although it is self-enclosed and this does not hinder its deliverability.
- 3.2.52 In respect of **Places**, other principles relate to the mixed use centre (CA6), and the outline only needs to establish this use in an appropriate location, with an appropriate mix, the Main Access Street running through it and a positive outlook on the importance of this space in generating a sense of community. These requirements are all met by the appeal scheme through the parameter plans and the DAS⁹.
- 3.2.53 In respect of **Landscape Elements**, there is little new information in this section of the SPD, with the landscape and public open space principles overlapping considerably. It requires the retention of key trees, the consideration of views, and the sensitive design of the valley crossing (CA7). It also requires the appropriate buffers to ancient woodland (CA8) avoiding unnecessary movement / use adjacent to these features, and retaining the undeveloped character of the Valley Corridors (CA9). CA10 requires the provision of the Country Park, with consideration given to views, biodiversity and connectivity. This part of the SPD does require considerable attention at the design control stage (where the need for a Detailed Landscape and Green Infrastructure Design and Management Plan to include the Country Park – see L2 and L3 at page 32 of the SPD – in effect forms a quasi landscape code).
- 3.2.54 Overall, this part of the SPD has relatively modest requirements of an outline planning application relates to the outline application stage, with the majority of information relevant to this stage for information, but has most relevance to coding and detailed design stages. Notwithsatnding this, I consider the appeal scheme to meet its requirements.
- 3.2.55 My Figure 6 at Appendix A compares the SPD's Figure 14 (Character Areas) with the scheme proposal – using the illustrative layout to enable a visible comparison between the two pieces of information.

3.3 Conclusion

- 3.3.1 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

⁷ Pages 62-64 and 70-73 of the DAS

⁸ Pages 74-77 of the DAS

⁹ Pages 78-79 of the DAS

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.

- 3.3.2 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.
- 3.3.3 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.
- 3.3.4 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.

4 ANALYSIS OF KEY ISSUES

4.1 Introduction

4.1.1 I consider the key issues relating to the second reason for refusal are:

Comprehensive Development – how does the character and structure of the appeal scheme and the allocation as a whole be realised in a co-ordinated and consistent way?

Design Control Mechanisms – how can the aspirations and objectives of the SPD be delivered through the use of Design Coding to assist with delivering comprehensive development.

4.2 Comprehensive Development

4.2.1 Having analysed the 2015 SPD in detail (see section 3 and Appendix B), I consider that the majority of the principles are simply addressed through ‘downstream’ design controls (which I deal with further below). However, there are a number of specific considerations that require specific identification (I also set these out at Figure 7).

4.2.2 **Sandleford B** – this Neighbourhood as defined by the SPD covers both the appeal scheme and Sandleford West. I have separately identified the overlap between ‘Sandleford B’ and Wash Lane, with the latter effectively removing itself from the control of ‘Sandleford B’. This therefore leaves a relatively modest extent of Sandleford West that is located within ‘Sandleford B’ neighbourhood, which (due to the position of the primary school to the south east of Sandleford West and the open space to the north) only interact between the separate land ownerships across a single block.

4.2.3 I consider the ability to deliver a consistent and co-ordinated approach to this neighbourhood can be achieved through a design code that establishes the full details for each neighbourhood. This would enable a consistent approach to delivering Sandleford B, simply through using the same design code condition.

4.2.4 **Main Access Street** – this route connects through the appeal scheme and Sandleford West and requires a consistent approach to its precise alignment and its typology, character and design. The SPD sets out an indicative street typology, and the appeal scheme DAS replicates this (at page 63). The detailed alignment, design, character and enclosure of built form fronting onto this street will all need careful guidance to ensure consistency of approach, and this type of guidance should be provided within a design code, with key stakeholder involvement and agreement.

4.2.5 As above, a consistent approach to the layout, design and character of the Main Access Street can be delivered through a design code with an appropriate planning condition.

4.2.6 **Park Edge** – this edge type wraps around the southern edge of Sandleford West and the appeal scheme and requires a consistent treatment. The interface between this edge on the differing land ownerships is broken up by the 1FE primary school, and its visibility is notably reduced due to the positioning of the retained existing woodland relative to this edge. In reality therefore this edge type will not be seen in combination between land ownerships, but that is no reason why the approach to this edge type should not be

consistent, and a design code would set out how this would take place, to be in accordance with the SPD (CA3).

- 4.2.7 **Neighbourhood Centre** – the ability of the neighbourhood centre to deliver a highly accessible heart for the scheme is an important principle that is repeated within the SPD (F1, F2, U7, CA6). I have been involved in the design and deliver of similar centres many times and the detailed consideration of the community uses, their operation and management and how these can be delivered comprehensively to create a meaningful composition at an early stage, whilst allowing space for this to grow and adapt through time is always central to its success. This will be no different here, and this should be the subject of a specific part of the design code, to explore further the community need, key stakeholders views, the function, form, ownership and management of the mixed use, the timing of its delivery how adaptation can be accommodated, how a genuine mixed use can be delivered and how accessible it is. A design code approach is the right way to ensure the requirements of the SPD is achieved.

4.3 Design Control Mechanisms

- 4.3.1 As referred to at section 3 and above, I view the delivery of the SPD's aspirations and requirements through a series of stages, from vision to delivery. My SPD analysis schedule, contained at Appendix B, describes these stages as 1. Outline Planning Stage, 2. Design Control Stage, 3 Landscape and Ecology Management Plan Stage and 4. Detailed Design/Implementation Stage
- 4.3.2 Identifying separate stages does not obviate the need to consider how key design elements should evolve through these stages, but does highlight that some subjects can only be fixed or agreed beyond the outline application stage. It is standard practice to establish principles at outline stage, whilst identifying how design control stages will allow these principles to be realised, and to enable their scope to be agreed in advance.
- 4.3.3 In this case, I consider there to be a need for two separate design control mechanisms, and a further management mechanism, these being:
- 4.3.4 Firstly, the **Design Code** (subject to a separate Planning Condition) should be a single document that covers the application site and has two discrete elements. The first is a Coding or Regulating Plan that acts as a single point of reference for all following coding material. This is a spatially accurate plan that maps on all of the various character elements (as per SPD Section F with further development in some areas to be agreed) and acts as the main source of control for example fixing the alignment of the Main Street, or the precise width of the green corridors through the development area. The second element would provide detailed coding information that builds on Section F of the SPD and the outline application DAS, establishes the detailed guidance required and sets out the mandatory elements clearly to ensure a cohesive scheme is designed and delivered.
- 4.3.5 The code should reflect the approach taken by the new National Model Code, even though this document is for consultation its definition of the ten characteristics of a well-designed place are aligned with the National Design Guide and should, in my view, shape the structure of the code.

- 4.3.6 It must also focus on the key aspects identified above that need specific reference as they require close co-ordination between the appeal scheme and Sandlesford West.
- 4.3.7 The code should control all land-use, movement and landscape elements that sit within the Proposed Development Footprint Residential area as identified on the land use parameter plan (14.273/PP02 RevH1), as well as the Local Centre and the Proposed Main Access Road (indicative alignment).
- 4.3.8 Secondly, the **Detailed Landscape and Green Infrastructure Design and Management Plan (DLGIDMP)** (subject to a separate Planning Condition) should cover the whole of the planning application, but only for the green infrastructure areas as identified on the Green Infrastructure Parameter Plan (14.273.PP03 RevG1), excluding the green links as these sit within the developed area and their requirements should be addressed by the Design Code.
- 4.3.9 This approach would ensure the Design Code is coordinated with the DLGIDMP to address the various landscape related development principles as set out in the SPD, whilst ensuring no overlap or gaps in control occur. This approach is not entirely aligned with SPD development principle L2 (which requires this information for each character area or phase) however that terminology is a little unclear and to my mind it's more appropriate to have a fully integrated approach that then directly shapes detailed applications than have a series of phase by phase Management Plans.
- 4.3.10 Finally, a separate **Landscape and Ecology Management Plan** (subject to a separate Planning Condition) would govern the detailed maintenance and management arrangements of the landscape elements considered in both the Design Code and the DLGIDMP. This approach would allow this latter document to focus on detailed design guidance, and would allow the LEMP to be the single source of information for all landscape and ecology related aspects of the application. This approach would allow alignment with the Environmental Statement, and avoid confusion.

4.4 Conclusion

- 4.4.1 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.
- 4.4.2 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.
- 4.4.3 My conclusion in this regard is:
1. The SPD provides a really helpful context for comprehensive development – it sets out a comprehensive series of development principles that must be met within the allocation. Many of these 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 control, management 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.

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

4.4.5 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.

4.4.6 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.

5 CONCLUSION AND SUMMARY

5.1 Policy and Guidance

- 5.1.1 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.
- 5.1.2 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.
- 5.1.3 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.
- 5.1.4 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 SPD¹⁰. 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.

5.2 SPD Audit

- 5.2.1 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.
- 5.2.2 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.

¹⁰ At paragraph 140 of the SPD

- 5.2.3 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.
- 5.2.4 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.

5.3 Analysis of Key Issues

- 5.3.1 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.
- 5.3.2 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.
- 5.3.3 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 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.
- 5.3.4 I also consider the subject of Design Control Mechanisms further.
- 5.3.5 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.

5.3.6 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.

5.4 Policy Compliance

5.4.1 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.

5.4.2 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.

5.4.3 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).

5.4.4 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.

5.5 Overall Conclusion

5.5.1 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.

5.5.2 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.

5.5.3 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.