



The countryside charity
Somerset

Creating Places for People – Public Consultation 04/09/23 to 16/10/23

CPRE Somerset welcomes Somerset Council's drive to improve new development in Somerset by placing people at the heart of the design process. As a concerned countryside charity, we are keen to support changes to planning regulations that will produce more sustainable and attractive community-centred housing developments.

Context

The consultation correctly identifies good street design as a key element in creating high quality places and it acknowledges that the combination of outdated car usage forecasts and the over-emphasis on Highways design standards are too often resulting in traffic-centred estate layouts where code-compliant roads and pavements take up a hugely disproportionate area of the site. These sterile 'identikit' estates are commonly not only void of any character and identity - they also perpetuate outdated traffic priorities that result in an appalling waste of land.

Our comments on Somerset Council's draft placemaking and movement design principles are shown in green as follows:

1. *Reduce need to travel via private car (internal trips) by ensuring key facilities and services, existing and proposed, are within a 20 minute walking or wheeling time. Streets should link to existing roads and local services, ensure permeability, connectivity and not turn their backs on neighbours.*

Comment: The impact of cars from new development is largely due to external trips, so delete 'internal trips'. This is to set the bar too low. Twenty minutes' walk is too long for many people. Replace by 15 minutes and a general statement that new development should be genuinely mixed use around streets to build a walkable place.

2. *In towns and more urban areas reduce parking provision in combination with hard and soft travel plan measures and include the provision of car/bike clubs, EV bikes/scooters, EV charging and public transport provision. Incorporate a mobility hub approach with mobility and non-mobility components as suitable for the site. The vision in these areas is for low car ownership and ambitious modal shift enabled by an increase in multimodal travel measures.*

Comment: This misses the opportunity to build greenfield development around really good buses/new stations and connected streets into existing areas, limiting parking to give the clear message that things are changing now. Also, a clear statement is needed regarding fringe-of-town retail and employment where driving is the expectation.

Again, a different model is needed of mixed use, concentrated development as in Poundbury, at a scale where people can walk, and a layout easily serviced by frequent modern buses. We don't really understand what this 'mobility hub' actually is. **Public transport is generally missed out in the discussion.**

3. *Design parking to be unobtrusive in the public realm, avoiding dominance in the streetscene. Allow for the future phasing out of parking to reduce carbon emissions as ownership levels reduce. Prioritise car ports over garages. Secure cycle parking infrastructure is to be provided with well-designed storage facilities either on street or within the property street frontage. Public cycle repair facilities should be incorporated into the scheme.*

Comment: there needs to be a clear statement that locations where new development would be mostly car-based will not be supported, and brownfield sites favoured as closer to walkable services/ public transport. If you choose to build on fields separated from a town, then inevitably house-builders will expect to provide 2-3 parking spaces per home. This means space where back and front gardens should be, are eaten away by an incredible amount of tarmac for parking.

4. *Design an attractive and high quality environment where streets incorporate trees in the highway and green spaces, avoiding large expanses of asphalt. Wherever possible streets should make positive use of existing natural features. Highway trees should be provided in tree pits rather than planters. The design should build in opportunities for biodiversity net gain, green infrastructure, surface water management (permeable surfaces, swales, SUDS) and opportunities to contribute to phosphate mitigation.*

Comment: photos of an attractive and high quality environment need to be given as examples of what to do (and what not to do!). More discussion of the need for pavements!! We also need to show how to incorporate modern bus stops into new development.

5. *Design using natural traffic calming to achieve speeds less than 20mph. Buildings and footways should be located to define junctions. Junction and vehicle movement geometry, sightlines and tracking should be tightened to reduce vehicle speeds with priority given to pedestrians and cyclists*

Comment: again, photos are needed to show what is meant. Otherwise, this is too technical and open to interpretation. Important to mention need to set traffic lights, and design junctions, to make it easy and quick for people on foot or bike to cross.

6. *Careful consideration should be given to how children and parents are to access schools without reliance upon private cars, instead encouraging walking, cycling and public bus use. The design approach to school parking will reflect the desire to maximise active travel movements to school*

Comment: this can be achieved by providing limited parking near schools and having the school part of a normal street as in Poundbury, Wichelstow (Swindon development) etc.

Encouraging is one thing, but limiting parking accomplishes the trick! We acknowledge that this approach is more difficult with rural schools where pupils come from a wider catchment area with limited choices for walking, cycling or public transport.

7. *Material palettes are to be simple, take the local context into account (not just black top). Material attractiveness, reducing carbon emissions as well as durability and ease of maintenance are to be considered.*

Comment: this is perhaps where solar tiles for roofs (they look very much like ordinary roof tiles) come into the discussion. Let's have some photos of these 'material palettes' to show what is meant.

8. *Design should seek to minimise street clutter and keep footways and cycleways clear of infrastructure. Lighting, signage and public EV charging should, where possible, be fixed onto a structure.*

Comment: signposts for wayfinding should be provided as part of the infrastructure for walking and cycling. Maps of large new development areas showing walking and cycle routes should be part of the infrastructure too, e.g. at entrances to the new area.

9. *Consider services and lighting at an early design stage to avoid impact on placemaking features like street trees and the quality of the movement network. Consider whether lighting is required (dark skies). Undefined strips of land should be eliminated at the design stage by fully allocating land to private ownership, highway adoption or stewardship with clear definition of public and private land.*

Comment: In urban areas, it is important to light all streets and pavements for the safety of pedestrians and also cycle routes, bus stops etc. In villages it may be appropriate for some new housing estates to have some lighting but we must protect dark skies in rural areas eg use low bollard lighting which doesn't shine upwards.

10. *Consideration should be given to incorporating waste storage facilities to ensure sufficient storage capacity, convenient access and design solutions that complement the wider development.*

Comment: what about rubbish bins including recycling bins. They are ugly but could be kept out of site by building enclosed areas for them.

11. *Within rural areas, the importance of safe connectivity within and between communities and facilities/services will be recognised whilst taking into account factors including landscape, character, appearance and ecology.*

Comment: We would prefer wording like the following instead:

In rural areas preference will be given to schemes where 'safe connectivity' can be demonstrated, whilst taking into account factors including landscape, character, appearance and ecology. Some villages may have an existing footway on the lane next to the proposed development site connecting to village facilities, whilst some lanes may be wide enough to allow a footway to be built. In some cases alternative pedestrian routes may be considered suitable if there are safe, accessible and convenient village paths connecting the site to village facilities.

12. *Ensure early engagement with and input from people with responsibility for approvals throughout the whole planning and delivery process.*

Comment: we fully support early consultation, not only with planning officers but crucially also with stakeholders, including parish councils, local residents and community groups.

Further general comment:

Urban Design Principles

Whilst every one of the above principles is important in its own right, we would respectfully ask the council to combine them into an integrated and illustrated urban design code for new housing development to ensure that the vision is delivered effectively by the planning process.

Streets in housing developments become community spaces when they are enclosed and overlooked by homes. When designed properly, they are places for safe enjoyment, social interaction, and neighbourhood identity. Well-designed places are 'owned' by neighbours overlooking them and foster a common sense of pride and social responsibility that ensures they are well maintained and safe for all users, including children.

The council's vision statement, whilst expansive on movement, is less ambitious about the importance of space and placemaking in housing developments. We would welcome policies in the new local plan that require developers to incorporate placemaking in their estate road designs and to demonstrate compliance with the National Design Guide.

Placemaking

Streets and spaces in housing developments vary in character and identity. Fast, traffic-centred, wide roads are not only unsafe and wasteful in land use; they also lack character and opportunities for placemaking. Slower, narrow, and sinuous road layouts typical of courtyard and cluster developments are safer for all users and help create attractive spaces with unique identities and character.

The national housing emergency calls for ever-increasing numbers of affordable homes, a county-wide challenge that could place local planning authorities under pressure to support higher density solutions, not only on town centre sites, but also for settlement edge developments. Innovative street design and creative placemaking are critical elements of high-density housing design that not only reduce demand on finite land resources but also benefits the countryside by curbing urban sprawl. A more restrictive control on land take for estate roads as well as support for novel movement solutions will release more site area for homes and shared open space, including critically important biodiversity areas.