

Strategic Planning and Projects Group  
North Hertfordshire District Council  
PO Box 10613  
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**By email only**

16<sup>th</sup> February 2024

UAC080/KH

Dear Sir or Madam,

**RE: Response to Consultation Draft Sustainability  
Supplementary Planning Document**

These representations are submitted on behalf of Urban&Civic Ltd (U&C), the development partner (with Hertfordshire County Council) of the Baldock Sustainable Extension, allocated in the North Herts Council (NHC) Local Plan 2011-2031. U&C welcomes the opportunity to engage in the preparation of the draft Sustainability supplementary planning document (SPD).

As the master developer delivering a major strategic residential development within Hertfordshire, we have made a commitment to the Hertfordshire Development Quality Charter and accordingly will work to exceed minimum sustainability regulations and standards in the most viable way possible. The Vision Statement prepared as part of the Strategic Masterplan aspires Baldock to grow in an environmentally, socially and financially sustainable way through exemplary design, construction and operation, including commitments such as to be net zero in operational carbon emissions from buildings.

It is understood that the draft SPD aims primarily to:

- identify design and energy efficiency measures which can result in minimising emissions, energy use and waste; whilst also amenable to biodiversity and adaptable to a changing climate; and
- provide a consistent approach to assessing planning applications in respect of the above provisions and aspirations.

It is agreed that, in the context of the ever increasing amount of guidance and best practice on this subject, there is an evident need to provide clear guidance and standards on sustainable development for developers, landowners, urban designers, architects and other stakeholders. Such guidance should be accessible to a wide-ranging audience. Therefore, it is agreed that

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the completion of a (series of) checklists may be one method of accomplishing this.

This checklist approach including 'tiered' targets are a useful tool for all involved in the development process to aim to improve performance against sustainability targets.

It would be clearer if the SPD and accompanying checklists could:

- Include a short section introducing each checklist within the appendices covering how to use the checklist; who should use the checklist i.e. planning applicants; and how the checklist will be used by the local planning authority e.g. as a planning validation requirement.
- Be refined to include a "check box" for each theme and/or measurement in order to indicate whether this has been met or not. It may be beneficial to include a "clarifications" column where applicants can offer comment on each answer or signpost to relevant technical documentation.
- Remove or rename the "checklists" at the end of each topic section as these appear to offer more of a summary of potential measures for each technical area. The document may be more legible if all checklists are kept within the appendices for completion by applicants.

It is stated that NHC sees the document forming good practice guidance for householder and minor planning applications (page 9). What is not clear however, is the status of the document for major planning applications. Is the SPD guidance only for larger schemes, are any elements mandatory, and are there different expectations for major applications in terms of documentation and performance? At present, the status and role of the document are not sufficiently clearly set out to answer these questions. U&C recommends that 'option b' is adopted, with there being a self-assessment checklist for applicants, which would then be subject to a light touch review by NHC. U&C would welcome clarification within the SPD which provides guidance in relation to what such a "light touch review" would comprise.

Finally, the purpose of 'Appendix F' is unclear. It appears to suggest that all types of development should cover the extensive list of considerations and therefore does not offer any distinction by development type. Some of these considerations are vague and/or not likely to be relevant in all cases (e.g. site appraisal, re-use of buildings). U&C therefore recommends that Appendix F should be removed from the SPD.

The SPD states on page 9 that "*The SPD does not form part of the Development Plan and so cannot introduce new planning policies or add unnecessary financial burden upon development*". From experience across U&C's strategic site portfolio, achieving the majority of the Gold and some of the Silver standards would be spatially or technically difficult to achieve, and/or add considerable financial burden if they were to become an explicit requirement for major development. U&C therefore wish to comment on the following specific measures in the below table:

<b>Theme / Measure</b>	<b>U&amp;C Response</b>
Passivhaus / LETI, aiming for net zero carbon (page 19)	A sound evidence base will be required to justify a requirement to meet such a standard and it is considered that this SPD may not be the most appropriate way to secure this.
On-site Low Carbon and Renewable Energy	20% renewable energy (Silver); and 50%+ reliance on renewable energy (Gold) whilst admirable to aim for, these percentages are considered to be a very high target to achieve on major schemes.
Sustainable Transport	Seek to achieve 50% sustainable travel – this is very hard to achieve with complex behavioural changes required in addition to provision of the schemes listed within the

	<p>checklist. It is suggested therefore that 'Gold' would be the more appropriate level.</p> <p>Digital mobility systems providing real time access to public/private transport is also a particularly onerous target.</p> <p>In contrast, ensuring every home is within short walking distance of public transport; segregated cycle/footways and integrated with green infrastructure is considered good practice and may be applicable to 'Silver'.</p> <p>EV Charging point 1 per dwelling – increasing kW rating through Bronze, Silver, Gold. The increasing requirement may be hard to meet on a larger scale.</p> <p>General agreement to NHC's approach to parking, including evidence-based use of maximum parking standards where public transport provision is exemplary.</p>
Whole Life Carbon Assessment (WLC)	Completing the whole life carbon template at the pre-application stage with updates at subsequent stages of the application process to demonstrate how the development will reduce overall emissions against the Silver and Gold targets will be both financially and technically onerous.
Biodiversity Net Gain (BNG)	30%+ BNG will be a significant hurdle to meeting the 'Gold' standard.
SuDs	Challenging for a scheme to achieve better than greenfield (pre-development) run off rates and for the system to not discharge into combined sewers to meet 'Gold'.
Water efficiency	The residential and non-residential Gold targets are technically difficult to achieve and financially prohibitive.
Development in vicinity of nationally/ locally designated sites	The references to a requirement for a 12m buffer around designated sites appears to be applicable to all grades on the biodiversity checklist (page 28). However in Appendices A (major residential applications) and C (major non-residential applications) this is applicable to grades Silver and Gold only. It is recommended these measures are consistent throughout the document.

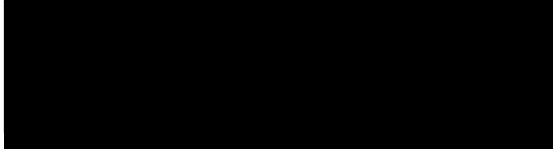
## Conclusions

It is considered that the overarching aims of the draft Sustainability SPD are positive and admirable. How such aims are achieved through specified measures and assessed via a checklist warrants further consideration to better understand how this might work in practice. The applicability of many of the specified measures will vary between both type and scale of development. Without clarity on these matters, and a clear evidenced link to Development Plan policies, the SPD can only justifiably be adopted as good practice guidance.

U&C would also be supportive of some acknowledgement within the SPD that the sustainability credentials of new development, whilst important, are just one material consideration in planning decisions and must be balanced against other wider benefits, as well as viability considerations.

U&C welcomes opportunities to discuss sustainability strategies with NHC, and to identify ways in which committed new housing developments can be designed and delivered in a way that they minimise impacts upon climate change and represent genuine sustainable development.

Yours faithfully,



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