

We support, but there are disappointing flaws in the charter we would like the Council to take up with Herts Growth Board:

Page 3 'Growth Agenda' states that HCC are 'planning to build 100,000 homes' etc, but fails to make any reference to the Local Planning Authorities in Herts – which have the responsibility for planning, and work with developers. The Charter is largely intended for LPAs so this is a serious omission.

The Charter fails to mention Herts own Design Review Panel which is critical to a charter.

There are only two pages on 'Design'.

The first paragraph about what 'high quality design' means is utterly inadequate – it does not amplify what is meant by 'how the development works as a place' – which should refer to access for all, connections with facilities, safety, sociability, play, community services, the mixture of business and residential, robust buildings, adaptable buildings, attractiveness, managing parking and waste.

It does not explain what is expected in a masterplanning or urban design process.

It says – 'Developers may also have their own in-house design standards' – yes, but developers' standards are inadequate to ensure long term place-quality. Developers' standards are driven by cost, customers and construction, and standard inflexible house types.

The charter does not refer to the National Design Guide – a key document. The National Model Design Code is not the key reference. This is a serious omission.

The need to submit a Design and Access statement is already covered by NPPF requirements – this is a superfluous requirement.

The most important part of the design pages is as follows:

Major sites will be informed by community engagement and a design review panel as part of the pre-application and planning application process.

Major sites must explain the long-term stewardship strategy for their development.

There should be much more about good-practice community engagement to amplify this.

A pre-application design review panel is a critical requirement and is almost lost in this text.

The Hertfordshire Design Review Panel is set up for this purpose, there are other panels that can be used and none of this is mentioned.

'Long term stewardship' needs amplifying with guidance.

The report to executive

The report has been written by the sustainability officer – it lack urban design explanation.

The report keeps putting greenhouse gases and energy first. It This charter is about quality of development in the round.

The report does not discuss design, nor the concept of place quality. It does not refer to the District Plan references to quality. It should refer to the fact we use the Hertfordshire Design Review Panel, and that developers do not adequately address the independent advice provided.

It accords with EHC planning policy. But the Charter should help to change the way that schemes are conceived and negotiated before planning application.

The report should mention the Cambridgeshire Charter which is a model of a cultural change in development.

Before the report goes to full council, the report should be amended to cover these points.

The recommendation needs to be stronger – not just ‘a material consideration for LPA’, but to help a culture change in development processes.

The encouragement to developers to commit should be much more direct, without stressing ‘voluntarily’.