

Ashwells Reserved Matters Planning Application ref. 24/07240/REM
Response to the Design Proposals by Ken Cooke RIBA

In a letter to interested parties dated 28 July, the Council invited comments on the Ashwells Reserved Matters planning application. Prior to March 2025, planning application comments received from the public were uploaded on to the Council's website, accessible to everyone. However, in March this year the Council took a decision to stop publishing comments for fear of breaching the data protection regulations (GDPR), and potentially triggering third-party claims against the Council.

Many objections to this change of policy were submitted to Buckinghamshire Council. In response, the then Leader, Martin Tett, advised that the alternative of manually reading all comments received to check for breaches of the GDPR was not feasible because the Council does not have the resources to do so, although in his opinion it was 'stupid' that a third-party is able to complain about someone else's comments, but that is the law.

I believe that my concerns over the design proposals for Ashwells will be of interest to local residents, and in order to reach a wide cross-section of the community, I have put together a package containing my comments on the application and an email sent to the planners, plus images to illustrate some of the design issues which I've raised, which the P&TGRS has kindly agreed to include on its website for general reading. Feedback and debate on this would be most welcome.

Email to the Council's Principal Planning Officer and Case Officer for Ashwells, Adam Smith, 28 August 2025

Attached is my response to Hill's revised Reserved Matters application, Notwithstanding my expectation that Hill's proposals will ultimately gain acceptance as a quality development, as things presently stand there is much still to be done to reach that point. Critical to this is the hope that the Council will find a way of facilitating a more meaningful engagement with the local community. I appreciate that the main thrust of the determination process will be to decide if the application complies with relevant planning policies. However, my concern is that so far, there has been inadequate scrutiny of the design itself, and a general disregard of overall comments by the P&TGRS, and no response at all to the specific comments on design submitted by myself.

To be frank, there has been very little response by the Council to any of the comments submitted by the local community, and Hill clearly has chosen to ignore them in their re-submitted proposals. In short, we have now spent the best part of seven years since the last of the Liaison Group meetings, trying to persuade the Council representatives to take a more proactive approach to design but with very little reciprocal interest. It's not as though there hasn't been plenty of opportunity for design to be prioritised, viz:

- Over a period of nine years, the Council commissioned a series of schemes for Ashwells, from five different architect/planners (Savills Urban Design Studio, Clare Nash Architecture, HTA Design, Haines Gadd Greaves, and now Pollard Thomas Edwards).
- The outline planning permission was granted by the Council for access provisions only, plus fixing of the number of dwellings, supported by an illustrative masterplan scheme that was itself promoted by the Council.
- A draft Design Code was produced which was to have been finalised following the selection of Council's development partner, but this never occurred, and the Design Code was abandoned
- One of the Conditions included in the outline planning Decision Letter covered a 'Master Plan and Design Framework', which set out the requirements for a Reserved Matters application to be submitted in due course.
- This leaves Hill's Reserved Matters application as the concluding part of the formal planning process required to allow the development to proceed.

This then effectively represents the last opportunity for the local community to have a say in the planning and design of Ashwells. The statutory consultation requirement only partly satisfies the need for community engagement. There are several important design matters which require additional information, supported by illustrations of actual design details. This would be achievable only if there was a commitment on behalf of the Council and its development partner to listen more and respond to our concerns than has hitherto been the case.

Whilst acknowledging the scheme's potential, overall the re-submission proposals are disappointing, mainly because they fail to offer any significant design improvements on the original application scheme. The few amendments described in Hill's revised submission amount only to token gestures, which make no reference to the responses to the original application, and if the content of Carter Jonas' covering letter is correct, their responses to your most recent comments on the proposals appear to have already received tacit acceptance.

I have assembled some images of a few of the design ideas which I think would contribute to the architectural detailing, and which could go some way to creating a richer articulation of the built form, and attach these to illustrate my point.

I have previously requested that the design content of the Reserved Matters application should be presented to the local community in order for us to be able, where appropriate, to influence the scheme to be considered in due course by the Area Planning Committee for determination.

Best regards
Ken Cooke

K Cooke Response to Revised Ashwells Application 24-07240-REM | Submission of details of access, appearance, landscaping, layout and scale pursuant to outline planning permission 18/05002/R9OUTE for erection of 106 units at Ashwells Field, Cock Lane, Tylers Green Revised Application (registered 25 July 2025)

Kenneth Cooke RIBA
63 St Johns Road
Penn HP10 8HU

27 August 2025

Introduction

First, a reminder of 'The Vision' statement in the Development Brief, adopted July 2017:

The design and layout will need to be imaginative (and) will require a bespoke architectural response. The site will deliver opportunities for exceptional architecture in key locations that benefit from dramatic views.

The scheme as it stands has very good potential, but needs further design development if it is to be outstanding, bearing in mind its crucial significance as part of the future fabric of Penn & Tylers Green. As the largest residential development in the village for half a century, it is not unreasonable to expect that the proposals should be subject to the greatest level of scrutiny by the local community.

The essence of this response to the revised Reserved Matters application, is therefore to urge both Hill and the Council to revisit the design proposals, with the objective of making the scheme the best it can be through constructive community engagement, as already suggested in my follow-up email to the meeting on 12 March 2025 with the Case Officer (Adam Smith). At this meeting, we were given the impression that there had been no formal communication between Hill and the Council's planning team since the receipt of Carter Jonas' letter dated 25 November 2024 confirming the end of the formal consultation period, albeit that responses from some statutory consultees (eg Highways Authority) were still awaited. But we note from the second paragraph of Carter Jonas' covering letter of 18 July 2025, that comments had in fact been raised by the Urban Design Officers in an email to Hill of 14 February 2025 and in subsequent meetings between the Council, Hill, and their design team.

In response to the Council's comments, Hill maintain that at these meetings they had provided further justification for their proposals, concluding that their approach to each of the Council's comments was generally acceptable, and that by submitting revised application drawings, Hill sought to formalise the 'agreements' reached at the meetings. It is this revised application, as registered on 25 July 2025, which is the subject of my response herewith.

Community engagement

Specifically with regard to Hill's proposed 'Design Amendments,' it is stated in the Carter Jonas covering letter, that the substitution of plans had been "*as a result of the formal response to comments raised*" (by the Council). On the subject of 'Materials,' the Carter Jonas letter states that "*This was discussed further in meetings with the Council*". Then in the letter's concluding paragraph, it is claimed by Carter Jonas that the amendments to the substituted documents "*have addressed the comments raised*" (by the Council). None of these exchanges of comments and responses has been shared with the local community. Though it could be argued that we are now free to comment on the revised application, this does not diminish the value of meaningful community engagement. Buckinghamshire Council's '*Statement of Community Involvement*' assures the general public that representations from local people are very important in highlighting material planning considerations, and that we can be assured that all relevant matters raised are fully taken into account. This is not the impression evidenced by the level of consultation over Ashwells. Indeed, from the tone of Hill's response to the Council's comments, the impression given is that this is now a 'done deal'.

Identification of changes made

A total of 32 house-plan substitutions have been made with no specific information provided regarding the changes made, and no means of comparing these 'amended' plans with those in the original application, as these have been removed from the Public Access documentation list. The 'amended' drawings include no specific revision notes, simply noting that these are 'Issued for planning', with a new date and an updated drawing revision number. This makes it virtually impossible to appreciate if the changes have produced design improvements or not.

Design

At the 12 March 2025 meeting we were advised that this Reserved Matters application for Ashwells should focus only on matters relating to planning and design, as most other issues had already been determined by the 12 March 2020 outline 'Permission with Planning Obligation'. With this in mind, I requested that additional supporting information should be submitted to enhance the planning and design proposals, and followed this up with a list of some design ideas to be considered by Hill and their architect, to accompany a future revised Reserved Matters application (see email dated 13 March 2025). Adam Smith confirmed that he had subsequently spoken with representatives at Hill and passed on my request to meet informally to discuss design, having copied to Hill my email and list of ideas. We have received no response to this request.

According to Carter Jonas, the revised Reserved Matters application seeks to make some non-material design amendments "*to increase the amount of architectural detailing*". On examination of the amended drawings now submitted, these consist of the following:

- Increasing the use of red brick, from 23 to 43 houses
- Additional brick detailing
- Adding precast window surrounds 'to certain house types'
- Adding Juliet windows 'to certain house types'

Selection of brick types: The increase in the overall proportion of homes finished in red brick is to be welcomed, but with two reservations: (1) the Council Planners have commented that "buff and light gault bricks are not characteristic of the local area and should be avoided for the most part, or used for very limited detailing in brickwork"; and (2) an unintended consequence of the amended distribution of brick types is to impact adversely on the concept of 'tenure blind' shared ownership, as it creates a degree of inequality because of a perceived differentiation between the larger 4-bed/5-bed detached houses with a majority (84%) finished in light gault/mid-buff brick, and the smaller semi-detached houses mostly (88%) finished in red brick. This is emphasised by the proposal to concentrate the red brick finished homes in a "central band", which is now almost entirely made up of smaller red-brick 2-bed/3-bed semi-detached shared-ownership houses, which potentially compromises the principle of tenure blind 'affordable' homes. (It should be noted that the increase in red brick from 'nearly 22%' to 'over 43%' is wrong – should be 40.5%, viz. 43 out of 106.)

Detailing: 'Additional brick detailing' appears to consist of randomly added extra 25mm projecting brick headers, though discovering exactly where these are in the amended drawings, is difficult, as they are not mentioned specifically in the revisions column. Likewise, the additional precast window surrounds achieve very little in providing any meaningful "increase in the amount of architectural detailing", as claimed. The Material Key is repeated identically on every house type drawing, regardless of whether any of the items listed apply to that particular house type or not, and therefore it's impossible to ascertain whether anything has been added or removed as part of the 'amendments'.

Juliet windows: It is recognised that the use of Juliet windows enhances natural light and air flow, and improves the area of vision of external views. But access beyond glass doors on to *actual* balconies would add space and amenity to what are otherwise quite small rooms. The provision of balconies on some houses, where the context allows, would also add to the overall architectural variety of the development.

Other observations on design

- Just 4 house type drawings (Rev C2/C3 dated 23.08.24), have been retained unamended on the Public Access list. Is there a reason for this?
- Assessment of the 'amendments' is severely restricted where these are said to have been "added to certain house types". More information on changes to specific house types is needed in order to carry out a proper assessment.
- There has been no improvement in the quality of the CGI images - a missed opportunity to convey a more convincing impression of the architectural detail.
- Important illustrations such as the site sections and elevations remain unchanged. It is common practice on developments of this scale to provide 'street scene' drawings to illustrate the overall appearance.
- The Reserved Matters Design & Access Statement is still the same as that dated 23 August 2024
- The Planning Statement has not been updated.
- Energist's 19 December 2023 Energy Statement remains unchanged, with no response to the critical comments on energy design on page 6 of my response to the original application.
- Of particular concern is the absence of any graphic illustration of the way in which PV panels are to be incorporated, other than mention in the DAS that these will be recessed, in line with the roof tile finish.

Other comments on planning and design, remain as set out on page 4 of my 14 November 2024 response to the original Reserved Matters application, and still apply. On page 6 are some observations on energy design, which suggest that greater consideration be given to orientation and shading, but nothing has changed.

Tenure mix

Design and tenure mix are closely related. Size also plays a part in ensuring that affordable homes are indistinguishable in design, quality, and external finishes from market-rate homes. The Development Brief requires that the proposals for Ashwells need to provide for a mix of dwelling size, type and tenure that meets the identified housing needs of the community, in line with Core Strategy Policy CS13. Penn & Tylers Green Resident Society's 2 December 2024 response to the original application, drew attention to 3 aspects of the affordable housing provision on the Ashwells site:

- how the proposed size, type and tenure of homes match local housing needs?
- percentage of market value to be offered to shared ownership buyers (ie affordability ratio)?
- preference given to buyers with local connections

The revised application does not address any of the tenure issues raised.

Conclusion

In submitting this response, my expressed wish is to try and make a good scheme even better. Even in the best hands, getting design right is no easy task. As the design emerges, it's better that it should avoid focussing on subjective aesthetics, and instead allow the design to be scrutinised against some basic principles: Is it honest? Does it have design integrity? Will its users find it easy to navigate? Is it environmentally friendly? Does it capture the essence of its context? Will it stand the test of time? If we can apply this doctrine to Ashwells, we'll be on the way to a result we can all be proud of.

ASHWELLS

Creative design suggestions

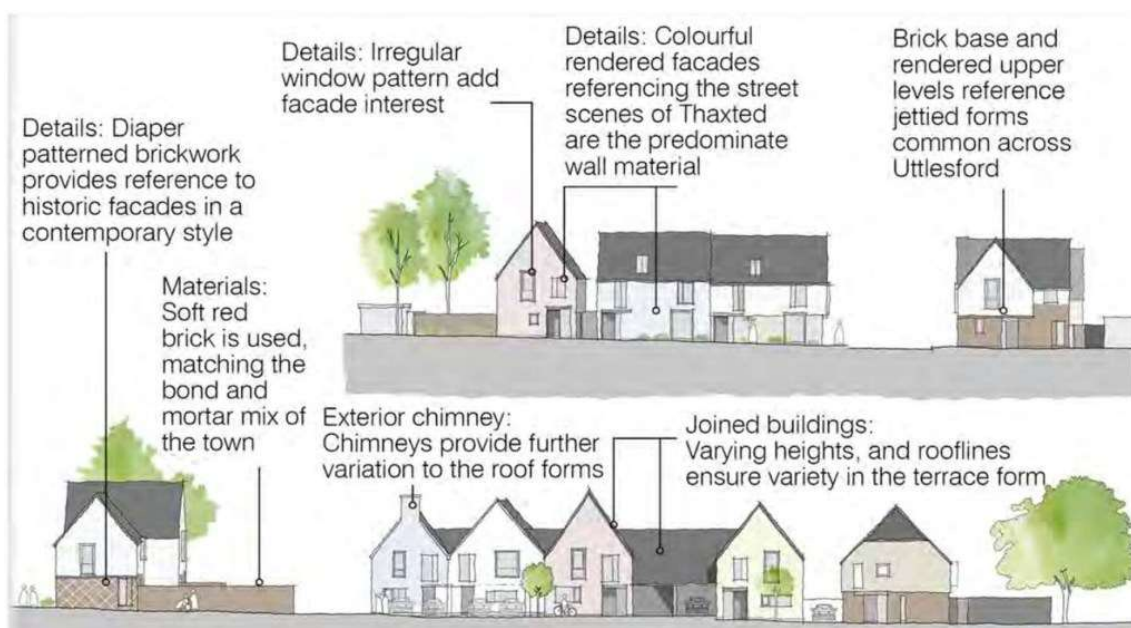
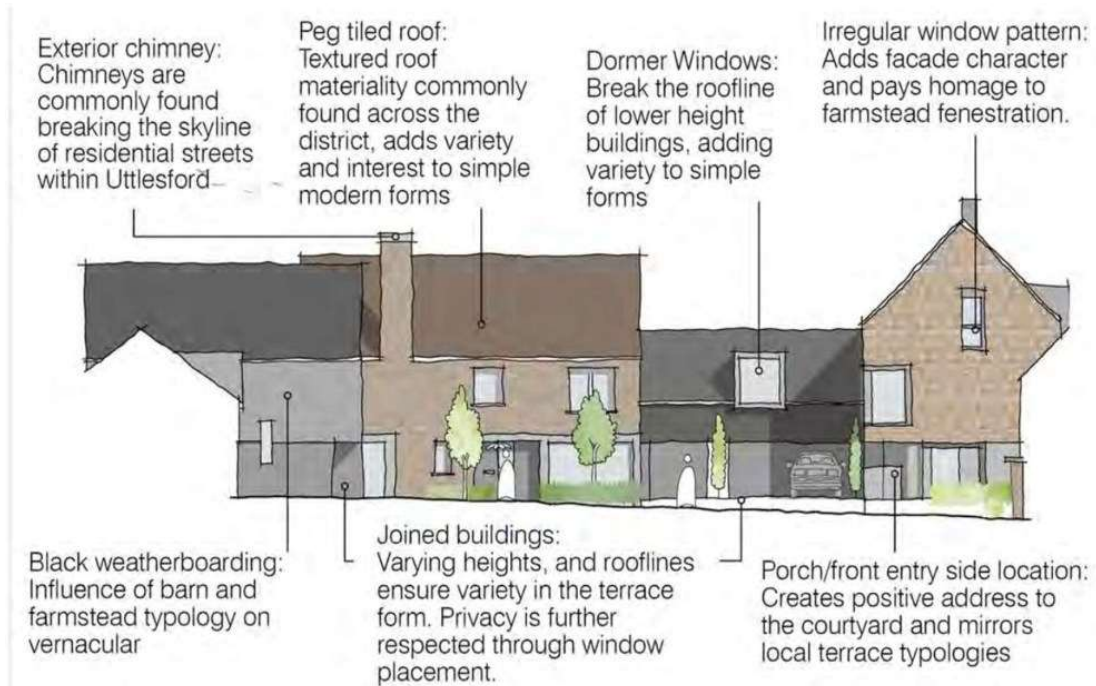
The presentation of PTE's architectural proposals for Ashwells would be better understood if more information was provided on the design of the houses. The appearance of the houses as illustrated by the Site Elevations and CGI perspectives do not do credit to the fundamentals of the scheme. The street elevations as shown in 4.9 of the DAS are much better, but still do not convey any detailed information about any of the features and components which have contributed to the design development. Illustrated below are examples of the way in which a more informative presentation might be provided.

Additionally, here some ideas to be considered by the Architect, descriptions of which could accompany the plans and elevations and be supported by additional design development sketches, similar to those above.

- Welcoming step-free entrance integrated into front of house
- Secure parking space for buggy/mobility scooter
- Doorstep seating to promote neighbour contact
- Adaptable internal planning
- Knock-out floor section to allow future lift installation
- Integrated charging point
- Sound absorbing enclosure for air source heat pump
- Storage shed doors wide enough to allow easy access for cycles
- Concealed bin storage
- Built-in water butt/grey water harvesting
- Variation of rooflines to create interesting built form
- Roof forms respond to orientation, and allow for solar panel integration
- Concealed/integrated rooftop PV panel array
- Solar shading device for south-facing windows

See sketch examples overleaf

Ken Cooke
13 March 2025



Images taken from other projects by the Ashwells architects, Pollard Thomas Edwards



Brise soleil in brick



Brick used to combine texture and form



Projecting pre-cast window surrounds



Use of brick to create variety



Using brick to define the architecture



Brickwork design provides a visual link between two houses

Brickwork detailing

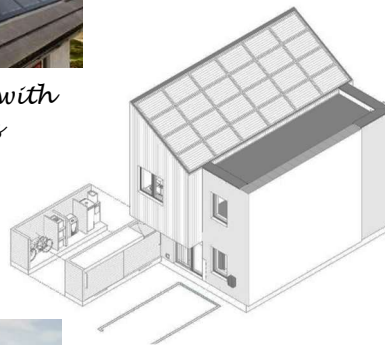
Images assembled by K Cooke



PV panels flush with roofing tiles



PV panels as an integral part of the architecture



Rooftop PV panels



PV roof tiles



Integrated solar system



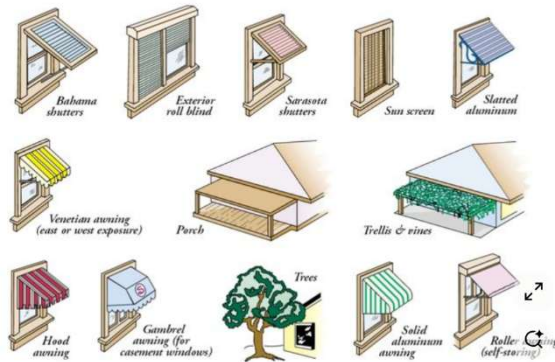
Overhanging roof and deep window reveals



Retractable awning



Loggia for shaded outdoor relaxation



Window shading devices

Shading for housing

Images assembled by K Cooke

*What light through yonder window breaks?
It is the east, and Juliet is the sun.
Arise, fair sun, and kill the envious moon
[Juliet appears at the window]
"O Romeo, Romeo, wherefore art thou Romeo?"*



Extended balcony



As proposed for Ashwells



Walkout balcony alternative



Skylight balconies



Juliet balconies



Front porch seating to encourage social contact

Images assembled by K Cooke



A bit of everything to make life better!



Integrated Bin enclosures