

Regulation 16 Response to Design Guide

General Points

It is clear that an attempt has been made to respond to our pre Regulation 14 comments, particularly in the early sections, and that the guide has been made more locally specific than it initially was, with the use of local examples and photos. There is a good, detailed section on national design guidance on pages 5-6. However, despite our comments at Regulation 14, the Guide from page 24 onwards is still heavily reliant on the High Weald AONB Housing Design Guide with large tracts of text and all of the headings taken from it. Whilst understanding that the High Weald AONB Guide is a detailed, recent, design document, it covers a wide area and more work is needed to make the guide locally specific.

It is debateable whether the High Weald AONB Guide should be referenced at all, given the majority of the parish is outside the AONB but it is noted that the Parish Council does argue their case for using it on page 9 and within the Consultation Statement. However, the District Council consider this would not justify copying the guide verbatim. We asked at Regulation 14 whether the Design Guide had been discussed and shared with the AONB unit as they may have dealt with similar situations where part of the Parish is in the AONB and part is outside. We have not received a response on this point.

Generally, it would be helpful for points to have further justification. For example, if the guide states that dwellings should be no more than two storeys in Ninfield then it needs to be justified/ explained why. The Character Appraisal and photos can be used as evidence to support the guidelines. The guide has started to do this but each point would benefit from further justification. For example, on page 40 there is a guideline stating 'characteristic of Ninfield, in addition to full height brick buildings, are tile-hung buildings' yet the photos of tile hung buildings in the village, which would help to provide justification for the guideline, are on page 20.

Once the design guide starts on page 24 there needs to be an introduction to each topic area rather than just a list of bullet points. This needs to explain what the bullet points are. Are they what new development proposals should do? I.e. all new development should....or all new development including extensions to existing buildings should....or some guidelines for landscaping on new developments are.....or as part of new developments we would like to see... This would assist users in applying the design guide.

The guide is quite Ninfield centric but there are other settlements within the parish that should be included. Also there is a large rural hinterland with scattered farms etc.

In our Regulation 14 comments we suggested that consideration is given to the use of paragraph numbers, and/ or numbering each guideline under each heading e.g. i, ii, iii, iv. This would make it much easier later on to reference the guide. This has not been carried out.

Relationship with the Character Appraisal

At the Regulation 14 stage the District Council suggested that it would be of great benefit for the Parish Council to look at other design guides e.g. [Battle](#), [Ilminster](#), [Eye](#), [Chiddingfold](#). The [Little Shelford](#) Design Guide is a good example of how the guidelines have stemmed from the character analysis including photos. They all have certain things in common;

- They use their introduction to set out aims for the Design Guide.
- They use an analysis of the existing settlement to ascertain what are the key elements that form the local distinctive character e.g. in terms of pattern and layout of buildings, building height, key architectural details, materials and what the community most value. Some of this work has already been carried out in the Ninfield village character assessment.
- They then use this to create the guidelines for how new development should enhance the existing character, often using photographic examples of both good and bad design to demonstrate this. The guidelines should stem from the evidence rather than be pre formed and finding the evidence to fit.
- Both the photographic examples and the supporting text to each guideline should justify why a guideline is included.
- There is usually some form of public engagement.

Currently the Ninfield Character Assessment is quite separate from the Design Guide. Opportunities could have been taken to use it as evidence for the guidelines, or to form guidelines specific to particular character areas. Attempts have been made to add local detail to the guide, for example, the first part of the guide does look at what gives Ninfield its sense of place and local examples with photos have been slotted in to the guidelines. However, this is generally not translated into the guidelines themselves. Because the guidelines are taken from the High Weald AONB Design Guide which covers a much larger area, and are not formed from the Character Assessment, an opportunity has been missed to create a Design Guide truly specific to Ninfield.

There is no evidence that any public engagement has been carried out specifically on the Design Guide.

Specific Points

Many of the smaller points that the District Council commented upon at Regulation 14 have been addressed. Those that have not been addressed are included in the following table:

Page	Comment	Suggested Change/ Recommendation
	The contents page is quite long at two pages.	The contents page could be condensed.
6	<p>‘However, this has not been adopted by WDC as supplementary planning guidance because of the absence of any associated policy in an up-to-date Local Plan’</p> <p>We may not have adopted the document but it has been published and officers do refer to it and use it. It’s still a material consideration. The fact the Local Plan is out of date makes no difference to whether we adopt the document or not.</p>	This section needs to be re-written.
7	It needs to be made clear when you are quoting from the High Weald Design Guide e.g. in paragraph 4	References should be clear, ideally using the Harvard system or footnotes but whichever method is used the referencing should be consistent.
	The Design Guide	
24	‘Consider the impact not only on designated heritage assets, such as Listed Buildings, but also on non-designated heritage assets such as other historic buildings and areas, features including routeways, banks, ditches, hedges, woods, trees and field patterns.’	<p>Needs to also refer to the setting of heritage assets by name.</p> <p>Consider splitting this into 2 and having a separate group of guidelines for 1.heritage assets/ works affecting heritage assets and 2.biodiversity assets.</p>
40	<p>‘Use the detailed High Weald colour study’</p> <p>Is this too prescriptive bearing in mind that most of the houses in the parish are outside of the AONB?</p>	<p>This guideline needs to be reconsidered.</p> <p>The title of the study is the High Weald AONB colour study.</p>
40	‘The local vernacular is best reinforced by using small module clay tiles with a camber closely resembling traditional hand-made tiles so as to avoid an entirely flat surface’	Too prescriptive. The local vernacular includes a wide range of materials and for roofing this would also include traditional slates,

Page	Comment	Suggested Change/ Recommendation
42	Signage and Lighting. There is some duplication here with the dark skies policy, are both needed?	