

Comments on the Wadhurst Neighbourhood Plan Design Code- Regulation 16

The Purpose

A design policy background document was provided with the Regulation 14 submission that sets out why it was considered that Wadhurst Parish needed a Design Code. This included the results of the Neighbourhood Plan Household Survey regarding the design of new housing. However, this has not been included with the submission version of the Wadhurst Neighbourhood Plan (WNP).

Within the Design Code it would be beneficial to set out the specific purpose of the code in more detail, for example, when is it intended to be used? The Code aims to address a wide range of development (streets, shopfronts and new developments) but seems to be mostly focused on 'major' new developments. There is very little specifically related to householder extensions, although a short paragraph on extensions has been added since the Regulation 14 stage.

Evidence

The National Model Design Code (NMDC) is quite clear that 'design codes should be prepared in light of information about what is popular locally, **on the basis of evidence**'. Section 1B of the NMDC explains that 'design codes need to be based on an analysis of the area covered' and that the 'purpose of the analysis is to understand the area and inform a vision that will, in turn, form the basis for the code'. Perhaps the key paragraph of the NMDC is paragraph 30, which states that the code making body will '**need to have an understanding of their area informed by up-to-date evidence such as characterisation studies or site analysis, with input from the community, to support design coding**'.

It is noted that since the Regulation 14 stage, a more detailed section on community vision and engagement has been added to The Wadhurst Design Code. This details the public involvement in the Design Code and the key themes emerging from the Create Communities tool. However, there is very little analysis work at the start of the code, for example of historic evolution over time, landscape, route ways/ hierarchy, open space etc. There is a basic level of analysis that needs to be done to underpin the code and this has not been done. For example, Section 1.4 is still only a potted history of events in a timeline, with no clear indication of how they have informed the character and design of buildings and is specific primarily to Wadhurst. On page 13, it states 'Medieval buildings sit alongside Georgian, Victorian and post war structures, *mostly sympathetic to the architectural heritage*.' What does the latter part of this sentence mean exactly? A more precise assessment/analysis of where buildings have been successful or not and why that might underpin the design code and the prescriptive approach it takes, is required.

On page 7 it states that a character assessment has been carried out by the Parish, but this was not submitted with the other documents for consideration as part of the Regulation 14 consultation or Regulation 16 stage. This should have been submitted with the Design Code and a methodology provided for the assessment. Objective 1 of the WNP is to 'influence the provision of

sympathetically designed, high quality housing in accordance with the Design Code that has been prepared for Wadhurst that meets local housing needs while enhancing the distinctive natural and built character of the Parish through justified, sensitive, sustainable development and healthy placemaking. Recognising and protecting the individual and distinctive settlements that comprise the Parish'. Therefore, there needs to be more within the document, or a separate document, to explain what the distinctive character actually is.

The Character Appraisal should set out the character of the different settlements within the parish (social, historical and physical), defining character areas, outlining what needs to change and how to bring about improvements. It should form the cornerstone of the Design Code.

The Character Appraisal and other evidence should then be used to justify each major element of the design code. Other evidence you could use would be the Wadhurst Extensive Urban Survey (EUS) and the draft Conservation Area Character Appraisals for Wadhurst and Pell Green and Cousley Wood.

Other settlements in the Parish

The document appears to have been written primarily with Wadhurst in mind and could better represent other settlements in the parish. There is also very little mention of the rural hinterland e.g. scattered farmsteads.

Coding can either apply to specific area types or apply equally across all areas and this has now been explained on page 15. The document has started to break down the Parish into Area Types but the majority of the code relates to the whole parish rather than specific area types, with the exception of the built form chapter. Within the neighbourhood settlements, it could go further in breaking down the different characters, for example Pell Green has a different character to Durgates, but they have been grouped in the same settlement type. We would suggest that breaking the parish down into Character Areas would enable the character of each settlement to be identified and the code formed from there. An example of this is the [Silkstone Design Code](#), which defines Character Areas, then a more simply defined character area plan is produced upon which it is explained where each different code would apply (page 39). It is noted that since the Regulation 14 stage, a map has been added to page 16 of Wadhurst Design Code to define the boundaries of each area type. However, detail could be added on where each code applies, as in the Silkstone example, thus making it easier for users to see exactly what code applies in a particular location.

Local Heritage

There is a good general emphasis on protecting local heritage but this is not well understood or represented elsewhere in the document. Section 1.4 is quite limited and there could be more added about how the historic development/economic situation influenced the character of the area today.

The 'History of development' seems to address only development of Wadhurst 'town'. Although identifying the character type as 'town centre', Wadhurst is really a village centre and has quite a distinct 'village' character rather than 'town' character. What about the other areas in the WNP area and the relationships to Wadhurst which may influence their character? Are there any other local influences for example the availability of local materials, influence of major landholders, etc? This section could also discuss the influence of the AONB on character?

Many of the settlements developed as separate linear/clustered identities which have ultimately been merged in a lot of cases. There is no discussion of this or how it affects sense of place and could inform design (both in terms of layouts and built form). It might be better to split the code into the settlement characters and address elements that way to capture 'identity' from the National Model Design Code (NMDC).

There is also a pattern of larger dwellings with parklands in the WNP area - SGT Notable Gardens (<https://www.parksandgardens.org/map>): Dewhurst Lodge, Frankham Park, Monks Park, The Mount, Snape, Wadhurst Castle – portions of historic parkland at Whiligh (in neighbouring parish, grade II* house). It would also be beneficial to consider high quality modern architecture e.g. Grade II* Wadhurst Park (John Outram 1982-6).

Identity

The Design Code could also helpfully adopt/use identity from the NMDC. The NMDC explains this as 'The identity of a place comes not just from the form and appearance of the buildings and spaces but also from the way that it is planned, its natural environment and the use of its buildings. This includes the way that it responds to the character of the local area and the design of its buildings and public spaces.' This is really the 'sense of place' and 'identity of buildings', including typologically and in relation to the historic patterns and types of uses, economy, local materials etc. which inform the unique identity of each of the settlements. This is where the evidence base and character studies are so critical – they provide the evidence and justification behind why such prescriptive requirements are actually tied to local character or identity somehow. For instance, where forges were important historically, there may be a distinct pattern of ironwork features which it would be beneficial to preserve and continue the legacy. There also has to be some awareness that this design code will only apply where planning permission/listed building consent is actually required - so will only apply to new developments or heritage buildings (where the significance is also going to influence considerations).

Many of the settlements developed as separate linear/clustered identities which have ultimately been merged – there is no discussion of this or how it affects sense of place and could inform design (both in terms of layouts and built form). It might be better to split the code into the settlement characters and address elements that way to capture 'identity' from the NMDC.

The level of Prescription.

Much of the Design Code does not seem to allow for contextual design or responding to local sites/areas based on historic patterns of development/use or innovative modern design. The aim of a Design Code is not to take planning judgement out of the process altogether.

Design Codes should be more about form, be measurable and rule based and should not need to control the fine detail of architecture (design guides by their nature would be more qualitative). Design codes would generally relate to a specific site or if it related to a Parish, would be more loose-fit and less detailed, to ensure that all design opportunities are covered on a more general basis, given the size and the different design opportunities there are in a large area, such as Wadhurst Parish. A design code needs to allow for a level of flexibility to ensure deliverability and allow innovative design in certain circumstances. Flexibility 'comes from creating space for design within loose-fit, but fixed, parameters'¹.

Whilst the Wadhurst Design Code begins by looking at form it does then go into considerable design detail, down to the colour of door furniture for example. Certain requirements are very prescriptive and could lead to the homogenisation of the area. The guidance from the Office for Place, which you have included at the end of your submitted consultation statement does state that 'Codes must set requirements to which a design can unambiguously conform or not conform (this will be based on words like, 'must', 'will' and 'required'). Guidance can also be usefully included but this must be made clearly distinct from the codes (guidance will use words like, 'should', 'could', 'would', 'generally' etc.). We are not disagreeing with this but would query whether some of the Wadhurst Design Code is more akin to guidance than coding and that the language should be adjusted accordingly.

Community Aspirations

Certain requirements are more akin to policy / community aspirations, in which case, is the design code the right place for these? These have been picked out in the table below.

Consultation

It is not clear what consultation has taken place specifically on this design code prior to the Phase 2 Regulation 14 consultation document. For example have the AONB unit been involved in the design code? What comments have they made? Have East Sussex County Council been consulted on the Design Code? It would also have been useful to liaise with the Council's Conservation Officer during this process.

Conflict with WDC Local Plan Policies

There is some conflict between some of the Design Code and the Wealden's adopted Local Plan as outlined in our detailed comments in Appendix A below.

Our detailed comments from Regulation 14 still remain but for ease of reference we have provided these at Appendix A below.

¹ [RIBA article on Design Codes. January 2023.](#)

Appendix A

Wadhurst Design Code Section	Design Code	Comments
		<p>A section on the planning context, at national and local levels, would be informative at the beginning of the code document.</p> <p>A methodology for how the Design Code was produced would also be useful.</p> <p>The list of chapters on page 22, section 1.6 is not correct and does not match the document or the contents page.</p>
<p>2.Built form- 2.1 Density</p>	<p>Infill development is permissible within the town centre though not in gardens and as long as other policies are followed.</p> <p>Residential density should average at least 35 dph (dwellings per hectare) in the town centre.</p> <p>Neighbourhood housing density in new developments should average at least 20 dph across the site whilst reflecting the grain and density of the area in which it is being proposed and should follow the traditional hierarchical grouping of buildings seen in the High Weald with lower densities being used to help make the transition to the edge of</p>	<p>Contradicts 'saved' policy GD1 of the Wealden Local Plan (1998) - within development boundaries, new development will be permitted.</p> <p>This approach also contradicts with draft policy WAD1 in the WNP on residential windfall development being supported within development boundaries.</p> <p>Wadhurst have identified a blanket approach requiring density to be at a min 35dph or 20dph dependent on location. This contradicts Spatial Planning Objective (SPO) 14 of Wealden's Core Strategy, which states that housing densities should be compatible with a particular location and the High Weald AONB Design Guide: New development should reflect the historic density and grain of the area in which it is being proposed. It also encourages a variation of density across the site.</p> <p>New text has been added to this since the Regulation 14 stage, adding that new developments should reflect the density of the area</p>

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	<p>the site away from the core area.</p> <p>There is no minimum housing density for rural areas.</p>	<p>in which is located. Nonetheless, this could contradict the minimum density part of the code which still remains.</p> <p>For information, the Council's Regulation 18 Local Plan in its draft form is likely to take a similar approach to the Wealden District Core Strategy Local Plan and not be prescriptive on density, so that a site's density can be considered based on character etc.</p> <p>What is the morphology of town centre/neighbourhood/rural hamlet based on specifically? Could you use an example of each type of settlement in the NP area to better inform the code/illustrate this? Cousley Wood appears to have a linear form? What about outside of rural hamlets, where isolated historic development may exist?</p>
2.2 Building Types and Forms	Development in the town centre must not contain detached buildings.	<p>Not sure why this has been added? There is no evidence behind this in the document. In addition, the town centre is not clearly defined. Exactly which area is being referred to?</p> <p>'Must' is too prescriptive. Development should be relevant to surrounding character etc. This statement does not seem to allow for contextual design or respond to local sites/ areas based on historic patterns of development/use or innovative modern design.</p> <p>The diagram further on shows 'wide' types of buildings. Could one of these not be a detached building?</p>

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	Development in neighbourhood settlements should be mainly terraced or semi-detached.	<p>This is in general conformity with the High Weald AONB Housing Design Guide; however, development should be aligned with surrounding character.</p> <p>How does this fit in relation to types of houses (number of bedrooms) required in the Parish and draft Policy WAD 2 of the WNP?</p>
	Building in new developments must not exceed three storeys with the top floor consisting of a loft level with proportionately sized dormers.	Is in general accordance with the High Weald Design Guide, but where is the local evidence for this?
	Town centre developments should normally be wide fronted (wider than 8 metres) rather than narrow fronted (below 8 metres) to fit the character of existing buildings.	Evidence for this? 'Wide-fronted' relates to the morphology of the town and its pattern of growth. This policy could therefore be much more informed by analysis of historic development.
	There should be a variety in the grouping of houses to contribute to a village character.	Accords with design generally. However, some of the rural hamlets in the NDP area have linear character - would these be approached in the same way?
	Variable, small setbacks can be used for differentiation between homes and for urban texture.	Is at slight variance with the High Weald AONB Design Guide which states that there should be a relatively consistent level of setback visible in each street scene.
2.3 Blocks	<p>Development blocks should be designed to create walkable and safe neighbourhoods.</p> <p>Infill development must conform to existing block patterns, the establishing of</p>	<p>Walkable neighbourhoods are encouraged in both design guides and is in accordance with the National Design Guide.</p> <p>This appears highly prescriptive and tailored to certain scale/type of development and the 'town centre'</p>

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	<p>new blocks is likely to be in the neighbourhood settlements.</p> <ul style="list-style-type: none"> • Blocks should be between 50m and 100m in length to give many direct walking routes. • Cul-de-sacs should not be used unless no other option exists. <p>Development blocks should have an irregular, rural character [then sets out the design principles for block design]</p> <p>Garden walls or hedges of modest height...</p>	<p>settlement. What about other contexts?</p> <p>Is in accordance with the High Weald AONB Design Guide and National Design guide but needs explanation/ local evidence.</p> <p>Surely the character will differ depending on where the development is located. How are you defining rural character?</p> <p>This could better address the differing character of garden walls in different settlements (e.g. materials, distinctive coping designs, openings, heights/widths, etc).</p>
2.4 Building Lines	<p>The high street and other town centre streets should have a continuous building line set close to the street.</p> <p>In neighbourhood settlements, the building line can be set further back from the street.</p> <p>Where homes border a footpath, narrow land or court rather than a street, a small setback of as little as one metre from the footpath or lane should be sufficient.</p> <p>Along a street, setbacks should be no less than two metres to provide a buffer</p>	<p>Again, this seems to address only the 'town centre' type and 'neighbourhood' type with little regard to the rural hamlet (as well as isolated rural contexts or farmstead settings etc.) and no real applicability to the settlements specifically.</p> <p>Is in general accordance with the High Weald AONB Design Guide: In the AONB buildings are typically disposed to create a strong and positive frontage aligned with the carriageway reflecting the function and status of routeways, solar orientation, and topography.....</p>

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	<p>between houses and noise and pollution from passing vehicles.</p> <p>Where a street or footpath is curved, the setback can vary considerably between houses, between one to four metres. This can be more appropriate than rotating the houses.</p>	<p>New buildings should similarly be positioned to define and reinforce the street layout. However, this does not mean that continuous, solid built frontage is required; permeable frontage is characteristic of the High Weald, with twittens and pathways leading from the street.</p> <p>The code sets out specific measurements of 1m / 2m and 1m-4m. This is too prescriptive on its own. However, a qualifier such as 'unless specific circumstances dictate otherwise' could be added to provide the required flexibility.</p>
2.5 Front Gardens	<p>Variety between different front gardens is strongly encouraged. Front gardens should usually be enclosed by a brick or stone wall, a hedge, or in combination with an iron railing. However, smaller gardens, especially those abutting footpaths, do not necessarily have to be enclosed.</p> <p>Bin stores should be tucked away behind garden walls.</p> <p>Driveways should be permeable.</p>	<p>Is in general accordance with the High Weald AONB Design Guide and Wealden Design Guide.</p> <p>These appear to be addressing a particular type of housing which will predominantly be found in the larger villages or 'town centre' character areas. Avoid parking in front gardens, leading to erosion of character?</p> <p>Are in accordance with Wealden and High Weald AONB Design Guides.</p>
2.6 Height	<p>New buildings in the town centre should be no more than three storeys high with the third storey within the roof void with dormers. This should apply regardless of the building type or use.</p>	<p>This only refers to Wadhurst Village centre. Why? Under 'building types and form' you have stated that all buildings in new developments should not exceed three storeys. This needs to be clarified and the incorrect code removed. Why just new</p>

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	<p>The underside of the eaves should be at least 4m high from the natural ground level but less than 5m.</p> <p>Ridge heights should be determined by the angle of roof pitches.</p>	<p>buildings? What about roof extensions? Evidence.</p> <p>It is not clear if this just applies to buildings in the town centre, or elsewhere? Either way, this is too prescriptive.</p>
2.7 Extensions	<p>Extensions should fit in and feel part of the original building, using the same palette of materials.</p> <p>The roof pitch of a multiple storey extension should match that of the original building.</p> <p>Extensions should not infringe on the privacy of neighbouring houses.</p>	<p>This section has been added since the Reg 14 consultation.</p> <p>Use of 'should' here is generally helpful as there may be circumstances where you will take a different architectural approach /design, use different materials/or vary the roof pitch etc. This could be written as 'Proposals for traditionally designed extensions should be given preference'. Part of the accompanying policy could then suggest that where other considerations dictate a different approach, these should be fully explained in a supporting statement. This would avoid the need to be so specific about elements such as roof pitch.</p>
3.Identity of Buildings	General points	<p>There is an attempt here at a brief character appraisal but this needs to form part of a wider appraisal of the whole Neighbourhood Plan Area. The National Design Guide states that development should respond to existing local character and identity you therefore need to define/ appraise what the existing character is and not just in the High Street.</p> <p>Are there different styles in different parts of Wadhurst, where such</p>

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		<p>prescriptive requirements could be detrimental to character?</p> <p>It is important to consider that sometimes differences and new design can add character to an area.</p>
3.1 Facades	<p>A core palette of these colours should be kept on all façade treatment.</p> <p>Hung tiles must be traditional clay tiles in traditional Sussex colours and should be sourced from manufacturers using local clay.</p> <p>In conservation areas, weathered hung tiles should be used, either reclaimed or new but aged by the manufacturer. Weathered tiles can also be considered for new construction.</p> <p>In larger developments, variety should be used and can be achieved by using various ornamental tiles for cladding such as club, bullnose, fishtail, arrowhead, diamond and snubnose tiles.</p>	<p>This is in accordance with the High Weald AONB Housing Design Guide.</p> <p>Aged/ pre-weathered tiles are not always of appropriately high quality or necessary. Tiles weather on their own and should also be allowed to.</p> <p>Identity is not always determined by variety. Indeed, consistency of design can also provide strong identity and the code should allow for this.</p>
3.1 Weatherboarding	<p>Weatherboarding must be made from sustainably sourced timber and should predominantly be painted white or occasionally in a dark natural finish. Light coloured timber must be stained a dark, natural tone.</p> <p>Weatherboarding should be used as cladding on the first</p>	<p>Stained timber is not appropriate in all contexts – emphasis should be on defining what creates the local character and responding to that rather than overtly specifying.</p>

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	<p>floor up to the eaves of the roof. Examples of full height weatherboarding are found in Wadhurst and so full-height weatherboard cladding can be used when appropriate to the context.</p> <p>Weatherboarding must be horizontal and not vertical.</p>	<p>There are some contexts where vertical weatherboarding may be an appropriate design response or part of a contemporary interpretation and used to signal differences between new/old. Saying that new weatherboarding must be horizontal is overly prescriptive.</p>
3.1 Bricks	<p>When using brick, red brick must be used for all new buildings and should be locally sourced and manufactured from local clay. This ensures authenticity of colour and the unique folding on the bricks associated with local brick stock.</p> <p>Burnt headers can be used to add variety and Flemish bond brickwork can be used to give a sense of architectural heritage.</p> <p>Engineering bricks must not be used as the primary type of brick</p> <p>Cut bricks can be used to simulate a Flemish bond to accommodate a cavity wall.</p>	<p>Again, overly prescriptive and emphasis should be on responding to locality. Could also encourage use of traditional/historic bonding patterns and jointing profiles.</p>
3.2 Roofs	<p>Roofs should be finished in traditional 10" x 6", plain, clay tiles. Grey slate should only be used as a second choice alternative.</p>	<p>The requirement for specific tile sizes is too prescriptive.</p> <p>Grey slate used only as a second-choice alternative is disingenuous.</p>

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	<p>Slate roofs must be capped with natural slate plain angle ridges.</p> <p>Clay roof tiles must be in traditional Sussex colours and should be sourced from manufacturers using local clay to ensure this.</p> <p>Roof pitches must be between 35 & 50 degrees.</p> <p>For the sake of variety, any new multi-home development over five homes must include a combination of at least two of the three different types of roofs; (1) pitched roofs with gable ends, (2) hipped roofs and (3) roofs with hipped gables.</p> <p>The primary roofs of buildings must not be flat.</p> <p>Gable ended roofs can have decorative barge boards if suited to the design of the building which must be in a period style.</p>	<p>This is an important part of the national narrative regarding the increased availability of non-local materials as afforded by the railway and improved transportation networks generally. Slate is often used on subservient buildings or might be an intrinsic part of a Victorian building. Emphasis should be on responding to local character and patterns, which is predominantly clay tiles.</p> <p>Some slate roof pitches can be lower than 30 degrees historically.</p> <p>Variety for variety's sake in terms of roof forms does not appear to have any particular value and could stifle good housing solutions in an area where only gables are predominant form for example.</p>
3.3 Windows	Windows should be constructed from timber. Steel or aluminium can be used as a like-for-like replacement on a	This is understandable in historic buildings/settings and traditional materials, details and mechanisms will be required on heritage assets and in Conservation Areas but is this

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	15-35% of a façade for best proportions.	and proportions of windows as well as solid wall vs. fenestration.
3.4 Doors	<p>Residential doors must be constructed from timber.</p> <p>Door panelling is common in the town and can be used as decoration to add texture.</p> <p>Door furniture such as handles, knockers, escutcheons and post slots should normally be black.</p>	<p>Exclusive use of timber too prescriptive. Encourage retention and repair of historic and/or characterful timber doors where they contribute positively to the area.</p> <p>Panelled doors vs. braced and ledged doors and other forms have associations with particular architectural styles and periods.</p> <p>Door furniture could be brass or black– ideally would not be shiny/chrome, etc.</p> <p>This goes to local character and identity. If you are wanting to apply these prescriptive requirements more broadly, it has to be tied to local character or the historic identity somehow. As above, there also has to be awareness that this will only apply where planning permission/listed building consent is actually required - so will only apply to new developments or heritage buildings (where the significance is also going to influence considerations). You need to be cognisant of the nature and level of control related to requirements for permission.</p>
3.5 Porches	Enclosed porches are a distinctive feature of houses in Wadhurst. Porches on new developments should be enclosed and must have double pitched roofs. Porch roofs can be gabled or hipped.	Too prescriptive
3.6 Utility Boxes	Where meter box locations are visible from the street, they must be placed as low	The emphasis on inconspicuous locations and providing screening/boxing is understandable

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	<p>as possible on the wall or preferably housed in a ground chamber.</p> <ul style="list-style-type: none"> • Meters should be concealed by vegetation or bin stores. • For detached or semi-detached houses where the meters are wall mounted, the meters must be located at the side of the house. 	<p>but the requirement to be on side elevations is overly restrictive and does not allow for responding to context or heritage significance.</p>
3.7 Boundary walls/fences	<p>Low-level, timber picket fencing is traditional in Wadhurst and should be used for boundary fencing. The fencing should be painted white but can be left natural. Low fences can be used in conjunction with hedges.</p> <p>Closeboard timber fencing should not be used.</p> <p>Concrete and wire fencing must not be used.</p> <p>Boundary walls facing the street should be constructed from clay brick.</p>	<p>Local evidence? In all of Wadhurst and surrounding settlements?</p> <p>Is in accordance with Wealden Design Guide and High Weald Design Guide.</p> <p>Too prescriptive.</p>
3.8 Shopfronts, including fascia and cornice, shop blinds and awnings, pilasters, stallrisers, lettering, windows and doors, hanging signs, security shutters,	<p>New shopfronts need not be pastiche replicas of historical styles but a similar vernacular can be achieved simply by including certain key elements as outlined in the following code....</p>	<p>Generally ok in terms of encouraging the traditional elements but is still overly prescriptive in areas (not all fascia's require a cornice). Could be more practical in emphasising proportions, materials, responding to host building, treatment of signage, etc. Specifying colours and fonts could stifle creativity and branding/image, but there needs to be a balance between corporate</p>

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electronic devices and cooling fans, materials and colours		<p>identity and sympathetic response to settings.</p> <p>Address lighting on fascia's/ hanging signs? Also appears to primarily address Wadhurst centre – small shops in other locations?</p> <p>Protection of shopfronts where they contribute to heritage if shops are converted to other uses, etc.</p> <p>Quite a lot of this information is already included within the Wealden Design Guide (WDG), is it therefore necessary to repeat it here? Again it really needs some nuance and would not need to repeat everything in the WDG as it seems to be doing, but provide any basis for going that one step further.</p>
4. Movement 4.1 The Street Network	<p>A connected street network provides a variety and routes for moving around. It should be direct, allowing people to make efficient journeys. Direct routes make walking and cycling faster and more enjoyable.</p> <p>New developments must consider connectivity, taking future development into account. This will prevent developments becoming isolated and impermeable.</p> <p>Each street should have more than one connection to another street.</p>	<p>This is in accordance with the Wealden Design Guide Chapter 7 page 36.</p> <p>The degree of connection in a new development is often the key to success. New routes should connect into existing routes and movement patterns</p> <p>The approach here where it suggests that 'New developments 'must' consider....' is a better approach and could be applied elsewhere in the document. Essentially, rather than being so prescriptive, saying 'new development must consider....' and requiring applicants/developers to evidence how they considered the different elements and how it fits in with the local character/vernacular/identity would be a better approach.</p>

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	Some streets and lanes can be for pedestrian and cycle access only.	<p>Is in accordance with the Design Guide Chapter 7 page 36:</p> <p>Pedestrians and cyclists should generally be accommodated on streets rather than routes segregated from traffic. Being visible to others affords a greater sense of security. However, short pedestrian and cycle-only links are generally acceptable if well designed.</p>
4.2 Public Transport	<p>New homes should be no more than 5 minutes' walk from a bus stop on a good frequency bus route. (10 minutes' walk to a train station)</p> <p>New bus routes should aim to pass through large new developments or close to small developments.</p> <p>New bus shelters must be built at new bus stops. The design of the shelters must reflect the Wealden architectural aesthetic and add to the town's character.</p> <p>New bus shelters should be constructed of timber or a combination of timber and brickwork. Timber weatherboarding can be used and is recommended as a material. Steel,</p>	<p>Is this timescale feasible to be that specific given the nature of Wadhurst parish? The town and country planning association and others talk to a '20-minute neighbourhood'.</p> <p>This would be dependent on whether there is an economic case for the bus company and would need to be considered on a case by case basis.</p> <p>Is in general accordance with SPO7 of Wealden District Core Strategy Local Plan. We would want to see noticeable improvements in journey quality for those people making trips on foot, bicycle or by public transport. However, it is outside the remit of a Neighbourhood Plan and Design Code to require this. We suggest you seek clarification from ESCC to understand whether this can be achieved.</p> <p>Design of the shelters should be appropriate to their context and siting.</p>

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	aluminium or plastic shelters must not be used.	
4.3 Street Hierarchy	<p>All streets in residential areas must adhere to Manual for Streets design principles.</p> <p>All new streets must enable safe movement for all residents including mobility impaired people, visually impaired people, and people with non-visible disabilities.</p> <p>Pavements must have a width of at least 1.6m.</p> <p>Streets should be designed according to the following hierarchy of users [pedestrians first].</p> <p>Then goes on to list street hierarchy in Wadhurst.</p>	<p>Is in accordance with the draft design strategic policy for the emerging Wealden Local Plan.</p> <p>It is not clear why this width has been chosen? Might not always be achievable in some historic contexts. Historic pavements and materials should be protected where they exist. Identify any locally distinctive treatment (cobble, edging setts, etc.).</p> <p>Is in accordance with SPO7 of the Wealden District Core Strategy Local Plan - wanting to see noticeable improvements in journey quality for those people making trips on foot, bicycle or by public transport.</p> <p>Is in accordance with the Wealden Design Guide Chapter 7, page 34.</p> <p>This is in accordance with the High Weald AONB Design Guide - new streets should be arranged to form a clear hierarchy, following the historic tradition of being determined by their movement function.</p>
4.4 Walking and Cycling Routes	The Wadhurst high street in the town centre is heavily trafficked during most of the day. Understanding where	How can we require applicants to do this if development does not relate to the High Street? Should this be a community aspiration instead?

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	<p>pedestrians need and want to cross the street is important in ensuring that amenities can be reached easily and safely. Multiple safe crossings over the high street should be created at direct and popular crossing points.</p> <p>Cul-de-sacs should be avoided unless on a tertiary street type for accessing small developments.</p> <p>Pavements suitable for walking and wheelchair use must be provided.</p> <p>Frequent places to stop, rest or chat should be provided.</p> <p>New developments should incorporate safe and direct cycling and walking routes to connect to main roads or the town centre and its amenities. On busy trafficked routes and fast roads segregated cycle lanes should be used.</p>	<p>Something CIL money could go towards in discussion with ESCC highways?</p> <p>Please note if you want to use CIL money you would need to demonstrate it is required as a result of new development.</p> <p>Corresponds with the High Weald AONB Design Guide.</p> <p>This is good practice.</p> <p>Is in accordance with the High Weald AONB Design Guide and the National Design Guide.</p> <p>Is in accordance with the High Weald AONB Housing Design Guide and the National Design Guide.</p>
4.5 Car Parking	<p>Parking for high streets, community and commercial uses should be concentrated at either end of the high street. This can increase provision and free up the central street itself for a safer more pleasant pedestrian environment and reduced congestion.</p> <p>Disabled access standards must be met.</p>	<p>Is this not a community aspiration rather than something for a design code? Overall, this section is overly prescriptive.</p> <p>General good practice.</p>

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	<p>Residential parking should not obstruct the building line. Parking spaces should not protrude beyond the building line.</p> <p>On street parking should be parallel not perpendicular. It can be at an angle of 45 degrees if necessary.</p> <p>Courtyard parking spaces in developments should not exceed 12 spaces in one courtyard. This is to prevent residential parking provision feeling like a car park and helps reduce anti-social behaviour.</p> <p>Trees and other vegetation should be provided to break up the visual impact of cars. This should be done in public and private spaces.</p> <p>Parking can be peripheral in new developments. This can save space and creates opportunities for car-free areas in the centre of the development.</p> <p>Parking must not be on any part of a pavement.</p>	<p>This is in accordance with the Design Guide Chapter 7 page 43: Parking in the front curtilage of the dwelling should be minimised to avoid breaking up the continuity of the street frontage -Is also in accordance with the High Weald Design Guide page 17.</p> <p>The Design Guide Chapter 7 is not so specific: There are many options for accommodating car parking on streets, either parallel to one side, both sides, at right angles or angled.</p> <p>The Design Guide Chapter 7 states courtyards need to be carefully designed and integrated to avoid car dominated spaces and should ideally accommodate no more than 10 spaces. The High Weald Design Guide suggests they should serve no more than 5 dwellings. Why have you picked 12?</p> <p>Is in accordance with the draft design strategic policy of the emerging Wealden Local Plan, which states that parking needs to be sensitively integrated. Is in accordance with the Design Guide Chapter 7- planting should be employed to prevent cars from dominating the street scene.</p> <p>Is in accordance with the draft design strategic policy, which states that parking needs to be sensitively integrated and the Wealden Design Guide Chapter 7, page 42 -the car should be secondary to the pedestrian/cyclist.</p>

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		Parking would not normally be designed to be on part of the pavement
4.6 Cycle Parking	<p>Dedicated cycle parking is minimal in the town centre and should be improved, especially with the growth of e-bikes. Enabling cycling to the town centre can help to free up space for residents who need to use private vehicles.</p> <p>Developments should provide bicycle storage in communal protected areas or back gardens.</p> <p>Public bike parking should be prominently located as close to amenities as possible and must ensure a clear 1.6m minimum pavement width is maintained.</p>	<p>Is this not a community aspiration? Something CIL money could go towards in discussion with ESCC highways?</p> <p>Is in general accordance with the Design Guide Chapter 7 page 39: The design of residential developments should make provision for storing bicycles. This should either take the form of wall racks or, preferably, the provision of an enclosed ground floor space.....It is preferable, safer and more secure for cycle parking to be accommodated within the curtilage of a dwelling or within the envelope of a building.</p>
4.7 Services and Utilities- Refuse Collections	<p>New developments must be designed with the resident first. They must not be designed around refuse vehicles.</p> <p>Refuse collection options for new developments should be one of the options shown below.</p> <p>In-curtilage provision: With detached or semi-detached</p>	Refuse vehicles do have to be taken into account when designing developments, including road width, turning points etc. Otherwise there are issues with collecting waste.

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	<p>houses, this can be provided to the side or rear of the property.</p> <ul style="list-style-type: none"> • For terraced housing, collection should either be from the rear, or a bin store must be provided at the front. <p>An alternative for terraced housing as well as for flats is communal provision. Reference should be given to guidance on carry distances and distances to collection points.</p> <ul style="list-style-type: none"> • These can be underground if the Council collection permits. 	
4.7 Bin Enclosures	<p>A range of bin solutions can be used. Whether they are individual or communal bins. New developments must not have bins visible at the front of the house.</p> <ul style="list-style-type: none"> • Refuse storage, whether in wheelie bins, larger communal bins or bagged, should be concealed to help maintain the quality of the streetscape. • Bin enclosures must be constructed from timber or brick. • If stored at the front of the house, the bin store should be concealed behind a wall or hedge where possible. 	<p>Is in accordance with the Wealden Design Guide Chapter 7 page 41: wheelie bins and stores should be inconspicuous from public view....be located where they can be screened from the street and neighbours by structures, buildings and planting.</p> <p>-Is in accordance with the High Weald AONB Design Guide: A simple area in front of the home but screened by a boundary hedge or fence allows bins to be stored close to where they need to be without being an eyesore. For apartments, waste stores and cycles stores should be integrated into the building. Should this not be possible, dedicated stores in timber, arranged as an outbuilding to the rear of the building, should be provided.</p>
5. Public Space- 5.1 Streets	New development should contribute to the character of the street on which it is located. This character will be different depending	Is in accordance with the draft design strategic policy for the emerging Wealden Local Plan.

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	<p>where the street sits in the street hierarchy and the context in which it is located.</p>	<p>There is probably some overlap here between 'street furniture' and 'public realm' (so including things like bus shelters, lighting, bollards, benches, paving, kerb materials, defibrillators, wayfinding/signage, etc). Could be worth doing an audit of the different areas and identifying historic fixtures/fittings which it would be desirable to retain/reinforce in line with 'sense of place' and identity, even if not in a conservation area per se. This is the power of the design code and could be used much more effectively with appropriate supporting evidence for why these prescriptive requirements are relevant to the local area.</p>
<p>5.1 Street furniture including bins, benches, lighting, plastic bollards.</p>		<p>Most of these points are supported within the Wealden Design Guide up to a point. However, the design code is even more prescribed. Could emphasise that the Parish Council will work with ESCC or providers to achieve high-quality solutions in the Conservation Area, but this may be too much for everywhere within the Parish.</p>
<p>5.1 Street Signage</p>	<p>Street signage throughout Wadhurst must be kept to essential signage only to maximise space for pedestrians and reduce street clutter. Signs should be combined on shared posts.</p> <p>Out-of-town signage should be placed on traditional East Sussex fingerposts painted white with black detailing.</p>	<p>Is in accordance with the Design Guide Chapter 8 page 11, which states that signage should be strictly controlled and combined where practicable to reduce clutter. Is in accordance with the High Weald AONB Design Guide page 21.</p> <p>ESCC are responsible for this. It may be the case that this would need to be funded externally (e.g. using CIL monies). This would therefore be more appropriate as a community aspiration.</p>

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5.1 Electric vehicle chargers	<p>Electric vehicle chargers must be discreet, preferably housed within existing structures such as lamp posts.</p> <p>Charging points must not obstruct pedestrian walkways or intrude on existing pedestrian or cycling space.</p>	Is in accordance with the National Design Guide and draft design policies of the emerging Wealden Local Plan.
5.1 Public Realm Materials	<p>Brick pavers should be used as a paving material on the high street. Bricks should be locally sourced and made from local clay to preserve the character of the town centre.</p> <p>Brick pavers in red or grey can be used for streets in new developments in neighbourhood settlements.</p> <p>Tarmac should not be used as a paving material for footpaths.</p>	<p>Is broadly in accordance with the Design Guide Chapter 8, page 7, which is positive regarding the use of traditional materials such as bricks and paving, and negative about the use of tarmac.</p> <p>Is broadly in accordance with the High Weald AONB Design Guide: the use of grey asphalt should be limited.</p> <p>Is this relevant and appropriate to the whole Parish?</p>
5.2 Public Spaces	<p>In Wadhurst, the small market square bordered by the High Street, Blacksmith's Lane and Church Street presents an opportunity to reinstate an outdoor market in the town centre. A new market would serve as an attraction to visitors, a retail opportunity to local businesses and a unique place of which the community could be proud.</p> <p>The square currently houses 11 car parking bays. Some or all of these should be re-provided elsewhere in the town</p>	<p>Is in accordance with SPO2 of the Wealden District Core Strategy Local Plan- using Wealden's environmental, heritage and cultural assets to encourage suitable tourism development and support inward investment.</p> <p>-Is broadly in compliance with 'saved' policy TM1 of the Wealden Local Plan (1998).</p> <p>However, is this more an actual policy/community aspiration than to do with design?</p>

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	centre if a permanent or part time market returns to the square.	
6. Nature	Development must enhance the natural as well as the built environment.	Is in broad accordance with 'saved' Policy LR5 of Wealden Local Plan (1998) and the High Weald Design Guide.
6.1 Green Infrastructure	The High Weald AONB Management Plan should be read in addition to this code.	The Design Code is not the place to suggest what other design guides/ plans should be read.
	Green spaces should be linked by safe and enjoyable walking and cycling routes	Is in accordance with the National Design Guide.
	Street trees should be planted every 8-15 metres on streets.	The draft public realm policy for emerging Wealden Local Plan requires tree lined streets in accordance with the NPPF, but this does not specify distance or symmetry. The distance is considered overly prescriptive and there should be some flexibility where this cannot be achieved.
	Street trees can be planted symmetrically on both sides of the street. This is to provide a sense of enclosure and symmetry to the street.	Is in broad accordance with 'saved' policy EN12 of the Wealden Local Plan (1998)-the Council will seek to retain and enhance the contribution of trees and woodland areas to landscape character, including the amenity value of trees in built up areas. The Design Guide Chapter 8, page 9, is broadly supportive of using new tree planting to form part of the structure of development. However, how would this symmetry ever be enforced?
	Existing wildlife corridors should be used and (where necessary) expanded with new corridors to improve	Is in accordance with SPO11 of the Wealden District Core Strategy Local Plan- will work with others to enhance the district's geodiversity

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	<p>local ecosystems' resilience.</p> <p>Green spaces should follow the principle of little and often rather than be concentrated in one area of a development</p> <p>Allotments can be considered for development outside the town centre.</p> <p>New homes should be no more than 10 minutes walk to a park or green space.</p>	<p>and biodiversity by creating a coherent network of green infrastructure, especially in and around our towns, that can better support wildlife and reduce the impact of climate change as well as improving human health through increased accessibility. Is in accordance with policy WCS13 of the Wealden District Core Strategy Local Plan (2013)- Green Infrastructure</p> <p>Design Guide Chapter 7 page 50: developments should create a hierarchy of varied open space types. National Design Guide- should be a hierarchy of spaces.</p> <p>The draft natural environment policies of the emerging Wealden Local Plan encourage sustainable food practices.</p> <p>Accords with latest open space study.</p>
6.1 Light Pollution	Environmental statements should include a survey of species of conservation significance as listed in the UK Biodiversity Action Plan that may be sensitive to light. In addition, a light spill map showing levels as low as 0.5 lux should be produced. The aim should then be to mitigate light pollution to achieve no net increase in light pollution on wildlife habitats.	<p>It is not the place of the design code to detail what should be included in an Environmental Statement.</p> <p>Broadly complies with 'saved' policy EN29 of the Wealden Local Plan (1998), although, it goes into much more detail which required light spillage to be minimised. -Could require developers to adhere to ILP Guidance note. It requires lighting to not cause an unacceptable impact on wildlife.</p>

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	<p>Dark sky compliant street lighting below 3,000 Kelvin (....) must be used after dark. The more damaging wavelengths of light increase with the Kelvin (K) or how blue the light is (lights with Kelvin above 3,000). Softer and warmer lights, with lower Kelvin ratings are less disruptive to wildlife.</p> <p>Motion detectors should be used on street lighting. Fit street and road lamps with dimmer switches and motion detectors. This is so that their brightness is reduced when there are fewer pedestrians and vehicles. Motion detectors can be used to turn lights off completely when there is no human activity nearby.</p> <p>Light spillage should be limited. Directing lights or allowing light to spill sideways or upwards towards natural habitats such as hedgerows, trees, water bodies and grassland should be avoided. Globe luminaires and other luminaires that emit light at angles greater than 70° should not be used.</p> <p>Avoid shining lighting on water. Lighting near water should be minimised and where necessary, water should be shielded to prevent the artificial light from shining directly onto the surface of the water.</p>	<p>The guidance note does not refer to kelvin. Is in accordance with the High Weald AONB Design Guide page 21: should use passive infrared lights and low-level bollard lighting. Advice required from ESCC.</p> <p>In Conservation Areas, lighting colour and hours of operation should be responsive to the character of the area.</p> <p>It is likely that emerging policies of the Wealden Local Plan will look to require control mechanisms to dim or switch off external lighting schemes when not required.</p> <p>Broadly agrees with guidance note. Is in accordance with Design Guide chapter 8, page 13- lighting should be designed to minimise light spillage and glare. -Is in accordance with the High Weald AONB Design Guide, page 21.</p> <p>Guidance note does not mention water specifically.</p>

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6.2 Water and Drainage	<p>Sustainable Drainage Systems (SuDS) must be integrated into new developments to minimise flood risk, improve ground water quality and create attractive spaces for people and wildlife. SuDS are also associated with improved mental health among residents who live close to them.</p> <p>SuDS should not be seen as isolated features. They are a good way of creating blue corridors that connect existing or future habitats such as wetlands or reedbeds. When creating wildlife corridors, SuDS schemes can be incorporated in ways that can also create better places to live.</p> <p>Create safe SuDS. Shallower rather than deeper SuDS provide more</p>	<p>Is in accordance with the Design Guide Chapter 4, page 13 which states: Developers should actively seek to incorporate sustainable drainage options into their proposals. Planning applications for major developments should include a 'Sustainable Drainage Assessment' as part of the design concept and layout. (Note: guidance now says will rather than should).</p> <p>Could this also be expanded so that considerations of water/drainage apply to alterations to existing sites, particularly in light of climate change? Flooding and extreme weather is a considerable threat to historic environments and all other existing buildings. All of these policies seem aimed only at new housing developments, when there may be opportunities to do this when extensions are subject to planning permission for example.</p> <p>Is in accordance with the draft climate change policies of the emerging Wealden Local Plan, which requires the incorporation of multifunctional green and blue infrastructure to help manage flood risk, address overheating and enhance and protect biodiversity.</p> <p>Is in accordance with High Weald AONB Design Guide page 12: Swales and ponds must be designed to offer an ecological as well as an amenity value. -Is in accordance with the National Design Guide.</p> <p>Important to note that depth is linked to geology. We try to encourage open features for ease of maintenance</p>

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	<p>benefits for people and wildlife. Where ponds feature as part of SuDS schemes, ponds must be designed safely and should have as much natural surveillance as possible. Low reeds and shrubs must highlight the water edge and provide a barrier to swimming.</p> <p>Driveways must be built from permeable paving.</p> <p>Unadopted streets and footpaths should be built from permeable paving.</p> <p>Where possible, peripheral parking areas should be permeable, with a preference for grass blocks or similar.</p>	<p>etc., but depth will be dependent on what is needed to reach a solution. This will need to be considered on a case by case basis.</p> <p>Both of these points are dependent on the geology. There must be a permeable rock layer underneath to allow this to work. It is site specific.</p> <p>Can you clarify why grass blocks as opposed to other surfaces?</p>
6.3 Biodiversity	<p>Native wildflowers should be planted in place of grass in communal green spaces.</p> <p>Rapidly establishing species should be planted. Common knapweed, bird's foot trefoil, selfheal, Oxeye daisy, and red clover can establish rapidly and provide immediate benefits for people and pollinators. Yellow rattle can also help with initial meadow creation by competing with grass species that might otherwise compete with the wildflowers</p>	<p>The Design Guide Chapter 8, page 8 is supportive of the use of wildflowers. Surely a combination of both would be good? Grass will be needed in some instances and grassland also has benefits for nature especially good quality grasslands.</p> <p>Is in broad accordance with Policy WCS12 from Wealden District Core Strategy Local Plan on biodiversity- the Council will prevent a net loss of biodiversity, ensure a comprehensive network of habitats, and work with partners to maximise opportunities to ensure habitats, biodiversity features and ecological networks are maintained, restored, enhanced and where possible be created to achieve a net gain in biodiversity and sustain wildlife in both rural and urban areas.</p>

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	Invasive non-native species must not be planted.	High Weald AONB Design Guide - should be encouraging native wildflowers. These may not establish quickly but should be encouraged.