

Regulation 16 Response to Design Guide from WDC

Parish Council/Steering Group comments in red

General Points

This repeats WDC Reg 14 comments almost verbatim - therefore need to refer to Ninfield's response in the NNDP Consultation Statement.

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. The officer who we discussed this issue with has since left the organisation.

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. Not essential to understanding the guide, the document needs to be read as a whole, impractical to make every individual topic self-explanatory as would mean a large amount of repetition.

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. The guidelines do refer to the buildings in the whole parish but as the bulk of new development is in and around the village it makes sense to concentrate on it.

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; **These other settlements are mostly much larger (or have many more buildings of heritage value) and therefore warrant and have the resources to produce much more detailed design guides.**

- 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. **The Character Assessment was a key document used and referred to extensively by the Design Guide sub-group.** 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. **The Design Guide was an integral part of all public engagement as detailed in the Consultation Statement. Design & Development was a specific topic for online discussion very early on. In addition, specific questions were asked about design in the survey (Q21 and Q27). The Design Guide was on the Parish Council Website alongside all the other documents and this was advertised extensively. The Design Guide was also part of the Exhibition we held for residents.**

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

Recommendation

The contents page is quite long at two pages. The contents page could be condensed.

6 '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' 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. This section needs to be rewritten.

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. **Where there are direct quotes from the HWDG these are in quotation marks and quite clear.**

24 'Consider the impact not only on designated heritage assets, such as Listed Buildings, but also on nondesignated heritage assets such as other historic buildings and areas, features including routeways, banks, ditches, hedges, woods, trees and field patterns.'

Needs to also refer to the setting of heritage assets by name.

Consider splitting this into 2 and having a separate group of guidelines for 1.heritage assets/ works affecting heritage assets and 2.biodiversity assets.

40 'Use the detailed High Weald colour study' Is this too prescriptive bearing in mind that most of the houses in the parish are outside of the AONB? This guideline needs to be reconsidered. The title of the study is the High Weald AONB colour study. **This quote and the Design Guide generally are not prescriptive but aimed at raising awareness and encouraging designs/materials that are more appropriate to this rural area, both reinforcing the vernacular and avoiding the mediocrity of 'anywhere' designs and materials. Most of the village lies in close proximity to the AONB and the Character Assessment evidence indicated to the Steering Group that the HW colour study is appropriate because it attunes with traditional buildings in the village and also much of the non-estate housing.**

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, **As above, this is not intended to be prescriptive but aimed at encouraging the best standards wherever possible.** Agree there are some examples of slate roofs locally but they are not typical of the local vernacular.

42 Signage and Lighting. There is some duplication here with the dark skies policy, are both needed?