Comments on the Horam Design Guide- Regulation 16.

At the Regulation 14 stage and before, the Council raised a number of concerns regarding the draft Design Guidelines and Codes document, the main concern being that it aimed to be both a Design Guide and Code and that we were not convinced it could be both in its current format, or that it fitted the bill as a Design Code. The Council also queried how successful codes can be in a rural village context, where layout and design have developed more gradually and informally, quite different from an urban setting or a specific development site where codes may work better.

At Regulation 14 the Council also commented on some formatting issues, namely that each guideline or part of a guideline should be numbered which will make it easier to reference the guide. Each guideline now has a number, and each individual part has a letter. The guidelines have also been put into coloured boxes which makes it much easier to distinguish them from the supporting text.

The majority of our comments at Regulation 14 have been addressed and the document has now been extensively revised to remove any reference to coding. The result is a Design Guide that will be invaluable in shaping and guiding future development in the parish and securing a high standard of design. Notwithstanding this, there are some comments which the Council made at Regulation 14 that are still relevant.

Specific Comments

Section 2- other National level guidance that could be mentioned are the Historic England studies and guidance on contextual design in the historic environment may be relevant. See - Good Practice for Design in the Historic Environment: Principles and Case Studies | Historic England https://historicengland.org.uk/advice/planning/design-in-the-historic-environment/ and Promoting a Contextual Approach to New Housing in Historic Places https://historicengland.org.uk/content/docs/planning/design-in-the-historic-environment-report/

Section 3.1- Landscape Setting- Please see our comments on the Landscape Character Assessment regarding the Council's landscape evidence base.

Some of the guidance would have the effect of preventing any major development e.g. on page 71 where it states that 'any extensive development that will alter the existing development form will not be accepted'. At times the document aims to direct where new development should be located e.g. on page 71 where it states that 'new development should propose design that is well contained within the core of the settlement, along the three rural lanes that form the triangle, and along the north side of Foords Lane'. The Neighbourhood Plan does not look at allocating sites- Wealden District Council will allocate sites as part of the forthcoming Local Plan.

DG.01.5- At Regulation 14 the Council commented that this section could be much broader. It seems to be treating development only as larger new housing developments within the setting of heritage assets, but could also address smaller changes to historic buildings themselves, and emphasize retention of historic

features, including on non-designated heritage assets, such as timber windows, etc. Generally, there could be much more emphasis on non-designated heritage assets and protecting their character for the contribution they make to local vernacular and overall character. Also, it could be used to promote use of historic materials and construction techniques which contribute to local vernacular character and sustainability. The Council notes that some changes have been made and part a would include non-designated heritage assets, however this could be re-iterated.

The response in the Consultation Statement states that this section relates to heritage assets in the context of landscape character and settlement pattern, while material and construction techniques are dealt with elsewhere, however, DG.04.6 which covers materials does not promote the use of historic materials and construction techniques or the use of the whole building approach.

D.G.02.2 b states that the footpath networks need to be in place before first occupation of houses on sites. This sounds more like a policy than guidelines and should be rephrased.

DG.03.3 a states 'site new buildings well away from areas liable to flooding'. Please see our comments on the Water Management Background Paper in regards to this.

DG.04.07 this section needs to be very careful with regard to retrofit and upgrades to any existing building of traditional solid wall construction – commonly 'recommended' measures may not always be appropriate on a listed building or any building of traditional construction. Historic England advocate a 'whole house approach' when considering improvements to ensure that energy efficiency works are suitable, robust, well-integrated, properly coordinated and sustainable: see https://historicengland.org.uk/images-books/publications/eehb-how-to-improve-energy-efficiency/ and https://responsible-retrofit.org/. They also provide a range of technical advice for energy efficiency improvements to Historic Buildings: https://historicengland.org.uk/advice/technical-advice/energy-efficiency-and-historic-buildings/. Please also be aware that Listed Building Consent is very likely to be required for many of these enhancements.

There is also an opportunity to more broadly reinforce reuse of existing buildings and locating sensitive new uses within heritage assets where possible – as both an inherently sustainable approach to carbon lifecycle and conservation of heritage assets.

DG.04.07 f- States that solar panels **can** be added, this may not be true and will be determined as part of an application. The Council would suggest this is rephrased.

The second part is labelled 'on retrofits', does this mean existing buildings? If so, the title should be changed.

The minimising construction waste section and the Recycling materials and buildings section- if these are not guidelines then it is not clear what the bullet points in these sections are. They should either be rephrased into supporting text or adapted into guidelines.

There is duplication between the guidance and some of the actual policies in the Neighbourhood Plan e.g. housing mix, the Cuckoo Trail, Suds, Street Lighting. At Regulation 14 the Council queried whether they were needed in both, but they still remain in both at Regulation 16.

At times some of the guidance verges on being actual policy. For example, where it states that affordable housing should be provided in medium and larger developments or where housing mix is discussed on page 99. Also, on page 98 it states that ‘Business areas should be retained to meet employment needs and remain compatible with local amenities’ this sounds more akin to a policy. The Council would argue that as areas such as affordability and housing mix are discussed in the main plan they do not need to be in the Design Guide, other than relating to issues around design.

At Regulation 14 the Council stated that some of the design guidance related to issues other than design guidance. The majority of these have been removed or amended at Regulation 16 however one remains on page 75 at DG.02.1a, where it states that traffic on the A267 should be monitored to establish where pinch points/ congested areas are. DG.02.1 c also relates to future work rather than design guidance per se (the figure numbers are also now incorrect). These parts of the guidelines need to be rephrased.

The numbering of the footnotes does not follow in sequence throughout the document.