

Comments on the Horam Design Guidelines and Codes Document- Regulation 14

Within the first half of the document there is some good baseline analysis of the landscape and settlement pattern as well as access and movement and the character of each settlement within the parish, with good use of maps and photographs to illustrate points. However, we do have some concerns, principally with the second half of the document, as outlined below.

Main concerns

- The document aims to be both a Design Guide and Code. As detailed in our earlier comments, our main consideration is that we are not convinced that it can be both in the current format, or that it fits the bill as a design code. 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 Horam Parish.
- It is queried as to how successful codes can actually be in a rural village context, where layout and design have developed more gradually and informally. It's not the same as the rigidity of an urban setting or a specific development site where codes may work better.
- If it were a design code we would expect it to be a much shorter document, limited to simple, precise, measurable and enforceable rules with illustrated design requirements. If you look at the National Model Design Code (NMDC) it is far more about physical form rather than design specifics/aesthetics of individual houses.
- 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
- Design guides are generally more qualitative and harder to measure. The photos you have used with ticks and crosses e.g. on page 67 and page 83 are far more akin to a Design Guide than Code.
- There are certain elements missing which are key components of design codes. For example there are no Area Types which we would expect to see in a Design Code. This would then lead to the creation of coding specific to each Area Type as well as area wide coding. As an example you could look at the Peacehaven and Telscombe Design Code [here](#).
- It could be clearer what public involvement there has been in the creation of the document. This is a key part of creating a code. A 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'.

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

Other concerns:

Sections 1-4

- Section 1 would benefit from an explanation of what a Design Code is.
- Section 1.2 provides a list of local development/ design issues. It is not clear where these have come from, are they from the public, from a character appraisal?
- Section 2-The NPPG on design should be mentioned. 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/>
- Please see our comments on the Landscape Character Assessment regarding the Council's landscape evidence base.
- Baseline studies - The landscape section could be expanded to include topography, geology, ecology, open spaces? Is a map showing topography and land use possible?
- Heritage is considered only very fleetingly in the baseline studies. The heritage section is very short. We would like to see greater explanation of how the settlement pattern has evolved for each of the different settlements and why i.e. what have the influences been? e.g. geology, available materials, railways, economy, agriculture. Are there any non-designated heritage assets? notable parks and gardens? If there are no Conservation Areas this could be stated. We note the reference to 'Historic Overview, Character and Issues Statement' (2021 Murphy Associates) but could a summary of the historic development of the village be included that then is cross-referenced back to the more detailed document? (This relates to all the settlements).
- Are any of the streets/PROW, particularly in the northern part of the parish corresponding with the AONB, historic routeways: <https://www.highweald.org/downloads/publications/land-management-guidance/routeways.html>?
- Fig 05 could be used to convey the strength of the historic environment generally rather than just identify designated assets. Given the highly dispersed development pattern, historic farmsteads might be identified (available on Heritage Gateway: <https://www.heritagegateway.org.uk/Gateway/> . Historic gardens at Horeham Manor and Stilliands Tower, possibly others seen on the 6" OS maps (south of Maynards Green at The Gables/Coxlow/The Hurst/Horeham Hurst/The Grange). Heritage Gateway also shows the presence of a number of other features such as fingerposts, ironworks/furnace and bloomery sites, WWII 'nodal point', barns, railway features, etc. HER enquiries could reveal others as well. This all builds up a picture of the heritage resource of the area, and strongly informs the vernacular character and appearance within the parish.
- Figure 20-It is not clear from this labelling if the 3-storey flats are part of the Merrydown site. Assuming they are, this will need to be reworded. Is it

possible to show on a map where the Merrydown site is in the village as it is referred to quite a lot throughout the document.

- Page 40 Local Vernacular Section (and the corresponding sections under Maynard's Green and Vines Cross)-Whilst under the heading 'local vernacular' this seems to refer to the general material palettes/textures within the village – do 'concrete roof tiles, mostly on post-war developments' really belong under the heading 'local vernacular'? This seems descriptive rather than clearly informing what is considered to add positively to the character of the area. Were there any local or nearby industries (brick making or similar) that informed the local vernacular? If branching out to 'texture', this could also address public realm elements more generally – paving materials, services and utilities, post boxes, public spaces, etc.
- Trees on village maps- Are they just protected ones shown? This doesn't represent all trees – any street trees and those in garden areas not shown for example – so does that undermine the amount and contribution of them to the rural character? We wonder whether Ancient woodland should be shown also? And also non-designated woodland blocks? Maybe worth some consideration.
- Hamlets, Farmsteads and Rural Areas- This discusses the three hamlets briefly, but seems to miss out the farmsteads and rural areas? Also a bit more limited on the character/ local vernacular perhaps.

Section 5

- DC.01.1- Guideline 2-Could give more guidance on what development within the AONB will need to demonstrate- see policy EN6 of the 1998 Local Plan 'development in the AONB will only be permitted if it conserves or enhances the natural beauty and character of the landscape. Particular care will be paid to the siting, scale, layout and design of development'.
- Guideline 5- Setting of heritage assets need to be referred to. More could be made of the use of heritage assets/ features both designated and non-designated and historic landscapes to inform development as referred to in the High Weald AONB Design Guide DG1 'Historic patterns of growth offer the best precedent for adding new development that is in character'.
- DC.01.2- Guideline 3- Second point - There are some circumstances where an abrupt edge is required, for example for road safety. Also, this reads quite negatively 'clash' maybe turn this round to sound more positive – i.e. you would like to see more green. Need to remember that this document will (if adopted by WDC, as part of the NDP) form part of the WDC development plan, therefore it should not be derogatory. This also needs to be addressed in other places where new development and its design is criticised.
- DC.01.3- Guideline 1-Opportunity to add something here about farmstead developments or more rural sites where there may be different considerations.
- Some of the guidance/ coding 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 72 where it states that new development should be contained within the core of the settlement, along the three rural lanes that

form the triangle. Wealden District Council will allocate sites as part of the forthcoming Local Plan.

- The Important views and landmarks section from page 72 overlaps with the main Neighbourhood Plan document which also covers views. Also the views shown on the map here are different to those listed in the views policy. We would suggest removing this section as it is covered elsewhere, or at the very least removing the map and photos and relating the resulting code back to the views as listed in the policy.
- DC.01.5 Needs to make reference to the setting of heritage assets by name. Would be useful to include a list of the Listed Buildings in the parish in an appendix.
- 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 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.
- Guideline 4- There is some confusion in this statement- existing open spaces, vegetation and trees may not form part of historic development. Consider changing to 'new development should respond to/ be informed by the historic form'...
- Guideline 6- Does this relate to all new development or just that which may impact on the historic environment? This should promote good design without being overly prescriptive. This doesn't seem to allow for contemporary approaches or innovative modern design.
- DC.02.2- Guideline 2- This sounds like a policy rather than guidelines. Maybe say 'should ideally' or alter wording to make it a guideline.
- Cycle parking- some of these guidelines are too prescriptive e.g the size of the door on cycle sheds, minimum garage sizes. Maybe you could state what you would like to achieve instead.
- DC.03.2- Guideline 6- This needs further explanation, what is meant by green assets? Access to where?
- DC.03.3 Guideline 1- please see our comments on the Water Management Background Paper.
- Permeable Paving- Could clarify that permeable paving does not work on certain soils eg clay.
- Guideline 6- Would be good to identify any locally distinctive patterns or examples where historic features exist.
- DC.04.1 Guideline 1- 'In addition, the new development should be suitable to successfully sustain agriculture and woodland management' What does this mean, needs further clarification.
- DC.04.3 A large proportion of the guidelines under building heights actually relate to roofs and rooflines- consider a separate heading. Building height also has a relationship to profile of the buildings and their architectural treatment – slightly taller building may be advantageous over squatter building which is encumbered by dormers or rooflights. Traditional steeper pitches sometimes

leads to 'taller' buildings but would be more appropriate. Hierarchy of built form with higher status buildings potentially being taller, etc.

- 'Pedestrian and cycle movement should be a priority and taken into account in larger development schemes' This is repeated elsewhere in the document. Consider removing.
- Infill sites within historic curtilage and setting of heritage assets may not always be appropriate – should include some reference to understanding significance of heritage assets and contribution that setting makes in proposing any infill development within their settings. Perhaps this needs to suggest that 'infill' should generally follow the main building lines unless there are other circumstances dictating (for instance, reuse of outbuildings behind the main building line, etc).
- DC.04.4 What is the value of differentiating between side/rear extensions rather than just referring to extensions? Presumably the principles would apply to porch extensions which might be to the front?
- 'Buildings should front onto streets. The building line should have subtle variations in the form of recesses and protrusions to enhance the rural context'. The building line should be informed by / respond to historic development pattern – not always necessary for this to be varied and this doesn't clearly state whether it means in relation to the elevational treatments of the buildings themselves or the relationships of buildings to one another.
- DC.04.7- It is very unclear in this section what is guidelines and what is supporting text.
- We are pleased to see that there is some distinction made here between 'existing' and new build homes, but 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.
- Roof solar panels should respond to character of the host building and will not be appropriate in all instances, particularly on heritage assets. Favour less exposed locations (within roof valleys, rear roof slopes, possibly on outbuildings rather than the main building) – need to account for aesthetic impacts.
- The minimising construction waste and recycling materials and buildings sections are more akin to policy than design guidelines.

General Points

- Needs to reflect what is special about Horam Parish. Sometimes the guidance/ code is quite generic.
- Designing out crime and designing for people with disabilities is given little specific mention.
- There is duplication between the coding/ guidance and some of the actual policies in the Neighbourhood Plan e.g. housing mix, the Cuckoo Trail, Suds, Street Lighting. Do you need them in both? At times some of the guidance/ coding 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 102. Also, on page 101 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.
- There is some duplication within the design guide/ code. For example charging points are discussed both on page 124 and on page 88. Also DC.02.2 and DC.02.3 contain some very similar points. DC.04.8 overlaps with quite a few of the other chapters.
- Note that weatherboarding doesn't seem to feature very much at all in examples of existing vernacular material use, but you are proposing its use as acceptable? May need double checking.
- Some of the design guidance/coding relates to issues other than design guidance e.g.:
 - On page 70 where it states that speed limit signs should be placed along roads- this is out of the control of applicants.
 - On page 76 it states 'an opportunity should be sought for the parish of Horam to identify buildings of local importance following the published Historic England Guidance'.
 - Another example is on page 78 where it states that 'traffic on the A267 should be monitored and managed to maintain free flows'.
 - On page 80 it states that the Cuckoo Trail shall be maintained and enhanced, by whom?
 - On page 95 where it states 'Develop a flood risk management plan for the upper sections of the River Cuckmere impacting on the parish'.
 - On page 98 it states that small recreation spaces should be investigated, but by whom?
- At times the document becomes overly prescriptive, for example on page 91 where it defines the size of the door on a cycle shed. Yet at other times it becomes too vague, for example on page 98 where it states that substantial recreational space should be provided.

Minor Issues that need correcting:

- The objectives on page 8 do not match the groupings of objectives in the neighbourhood plan.
- P14-The Direction of Travel Consultation Document was produced in 2020, the consultation took place from 23rd November 2020 to 18th January 2021

- The Wealden Core Strategy was adopted in 2013 and covers the period 2013-2027
- I have checked the Historic England website and there only appears to be 20 Listed Buildings in Horam- I can't find a reference to Furnace Farmhouse on the website.
- In Chapter 2 where you have policy and design guidance there are some errors in the sections some documents have been placed in e.g. The High Weald Housing Design Guide has been placed in the National level and the RTP1 document has been placed at a district level. The East Sussex Character Assessment has been placed at the District Level.
A large proportion of the guidelines under building heights actually relate to roofs and rooflines- consider a different heading.

Formatting Issues:

- Consider the use of paragraph numbers, particularly for the section on codes, and/ or numbering each guideline under each code e.g. I, ii, iii, iv. This will make it much easier later on to reference the guide.
- At times it is hard to differentiate between the supporting text and the actual guideline or code, numbering would help or you could consider putting the actual guideline/code in a coloured box- see the [Tenterden Design Code](#).
- The hyperlinks do not work.
- The footnotes are all labelled 1 rather than following sequentially.
- Maps need to be properly referenced if taken from other sources.
- Numberplates need to be redacted in photos.
- The document should be accessible.

Next steps:

If you are aiming to create a Design Code:

- Then the document from Section 5 onwards needs to be shortened and amended to reflect better what is in the NMDC. More coding work needs to take place and illustrations added. Flexibility needs to be applied to something so far reaching. Area types/ character areas should be used.
- As explained in the RIBA article '*A solution can be a set of district-wide design principles in an overarching chapter, which is then followed by specific design codes which address local priority design issues. By the end of the process local stakeholders must be able to clearly see the thread running between local character, current issues, and design code solutions*'. The first part of the document does explain the local character and does briefly explain what the design issues are in section 1.2. (although we would question whether the second point, the prospect of further substantial housing growth, is a design issue per se). The coding should then attempt to resolve these issues but at the moment the coding/ guidance extends far beyond these issues.

If you are aiming for a Design Guide:

- All reference to it being a Design Code need to be removed.
- You will need to address the concerns raised above, for example duplication and contradiction with the policies in the neighbourhood plan, being overly prescriptive, covering issues other than design guidance.

- Address the terminology. If it is guidance the language should reflect this.

There may be a way of combining both a design guide and design code, for example using coding for streets, building lines, heights, car-parking, materials etc., and having separate guidance for the basics of good design but they would need to be clearly distinguishable. The Peacehaven and Telscombe Design Code referred to above, has coding for each area type/ character area but also General Design Principles which will apply across the whole plan area.

We would be happy to discuss our comments set out above ahead of the Regulation 15 submission. In the meantime we hope you find our comments on the Horam Design Guidelines and Codes document helpful.