

## Summary of Consultation Responses and Broad Actions to address these

Draft Mid Sussex Design Guide SPD – Detailed Design Issues			
Total respondents: 28	Supporting comments: 20	Total comments: 137	Requesting amendments: 117
Main Issues Raised			
Statutory Respondents			
<ul style="list-style-type: none"> <li>• <b>Historic England</b> supports the intention to provide guidance to householders and developers to ensure the highest standards of design are incorporated in planning new large-scale developments, residential extensions and alterations.</li> <li>• <b>Sport England</b> requests reference to its 'Active Design' guidance document which they consider is particularly relevant to Design Principles (DG) 11, 12, 15, 19, 24, 25, 26, 29 and 34. Good design should consider opportunities to incorporate inclusive active environments that can have a positive impact on physical health as well as people's wellbeing and mental health.</li> </ul>			
Town and Parish Councils			
<ul style="list-style-type: none"> <li>• <b>Balcombe Parish Council</b> supports most of the Design Principles, though suggest some points of clarification, including reference to village design guides, more guidance on design in villages, that the parking section is complex, with some contradictions. Concerned there is overlap and duplication between some sections.</li> <li>• <b>Bolney Parish Council</b> is in full support of the Design Guide which will ensure that all future developments in Mid Sussex are built to a high quality.</li> <li>• <b>Burgess Hill Town Council</b> considers some phrases are too vague: 'coarse grain and fine grain'; 'improving legibility'; 'rationalise parking'.</li> <li>• <b>Hassocks Parish Council</b> welcomes the Design Guide SPD. In particular, the need to avoid pastiche design, and the need for sustainable buildings for both new homes and alterations.</li> <li>• <b>Haywards Heath Town Council</b> supports the adoption of clearer planning design guidelines which will hopefully encourage the delivery of a more modern and welcoming visual townscape for future communities. Appreciates the significant reference to its Neighbourhood Plan.</li> <li>• <b>Horsted Keynes Parish Council</b> welcomes the Design Guide SPD as a means of promoting better quality planning applications and higher standards of design in new development.</li> <li>• <b>Turners Hill Parish Council</b> welcomes this SPD and agrees with many of the points raised. Have concerns over the lack of reference to Neighbourhood Plans and requests that greater consideration is given to the design needs of rural villages.</li> <li>• <b>West Hoathly Parish Council</b> considers that the Design Guide is focused on town design and should reference the High Weald AONB Design Guide principles relating to small villages.</li> </ul>			
District Councillors			
<ul style="list-style-type: none"> <li>• <b>A District Councillor</b> highlights that providing useful routes both within the development and connecting with neighbouring public rights of way. Requests that the lack of connection between East Grinstead and Haywards Heath / Burgess Hill by railway or major road is mentioned in the East Grinstead section.</li> </ul>			
Other Local Organisations			
<ul style="list-style-type: none"> <li>• <b>Campaign to Protect Rural England</b> congratulates MSDC on the production of a very practical, informative and clearly expressed guide, which has their support.</li> </ul>			

Suggests guidance should discourage standard designs by volume house builders when they are not altered to meet local context. Considers that the relationship between this guide and equivalent guides in the South Downs National Park or the High Weald AONB is not clear. They also propose a number of changes to the Design Guide Principles related to biodiversity, hedgerows, parking, open space and its maintenance, public realm, affordable housing and dwelling space standards. Request that greater clarity is provided on the role of the Mid Sussex Design Review Panel (DRP).

- **Gatwick Airport Ltd** requests that regard is given to aerodrome safeguarding considerations.
- **East Grinstead Town Local Action Team** raises issues with regards to on/off-street parking; adoption of roads; access for emergency and service vehicles and traffic calming measures. Considers that the new development at Queens Walk, East Grinstead does not successfully integrate with the townscape and that 20mph speed limit on roads on new development may be desirable but is extremely difficult to achieve without numerous traffic calming measures.

### Architects / Developers / Planning Agents

- **Crest Nicholson** consider there is bias in the document towards encouraging more contemporary residential development, which while welcomed, needs to recognise that volume house builders are more reliant upon standardised traditional housing types. More encouragement is needed for contemporary materials.
- **DMH Stallard** consider that it is difficult for small sites to provide positive development edges and that the guidance on bin and cycle storage is too prescriptive as are the suggested materials for hard landscaping. Requests that Principles DG55 and DG56 relating to building conversions acknowledges rights to carry out works under permitted development.
- **Jake White Architects** commends the ambition of the document. Advises that greater flexibility is needed for high quality design e.g. in adhering to the building line, where some positive extensions can be made. Need for greater emphasis on brownfield development not just in relation to large scale development. Exemplars of projects showing contrast between new and old should be included.
- **Jenny Lewin Architects** has issues with Chapter 8, in particular, that it is too prescriptive and simplistic. Considers that the Guide inappropriately encourages demolition rather than retrofit and re-design and that flat roofed 'Georgian' style dormers can be appropriate.
- **MSDC's Design Review Panel** praises the guide, but has a number of comments. Recommend that: there is a separate Employment Chapter and reference to the new National Design Guide. Considers that the treatment of building alterations (chap. 7 – Residential Amenity, 8 – Household Extensions and 9 – Building Conversions) are disproportionately lightweight. Opportunity missed in suggesting only coarse grained areas have potential for change; this neglects brownfield site development as well as lower density areas such as the suburbs. Further coverage needed of Brownfield development.
- **Pegasus Group submitted the same rep. on behalf of both Persimmon Homes and Thakeham Homes.** They recommend a number of textual changes for clarity and as the document can be too prescriptive in areas. These changes include a definition of larger schemes; reference to the National Design Guide; clarity on when schemes are referred to the Design Review Panel and definition of small rear court parking. A number of comments and suggested amendments are also made with regards to front threshold parking; movement networks; street enclosure; refuse areas; tree planting; materials; affordable housing; innovative design; public realm and open space.
- **Rodway Planning** considers the Design Guide to be a generic document that

lacks the detail that would guide the applicant and the design team. Greater reference should be given to the National Design Guide. While applicants are required to understand the context, this is undermined by the priority for perimeter block development as the only suitable typology which can reduce the opportunities for rhythm or reflecting the local grain. More useful guidance for a variety of scenarios and therefore typologies is needed. More information on materials is also needed.

### **Residents**

- Need to ensure consideration and protection are given to character homes which are not Listed or included in Conservation Areas.
- No guidelines to prevent inappropriate garden grabbing.
- Cumulative impacts of developments need to be considered.
- East Grinstead map – suburban should be semi-rural.
- Adoption of roads should be agreed at an early stage in the design process.
- Guidance discourages off-street parking and recommends on-street parking – this is opposed by multiple respondents.
- Streets should not be designed for play.
- Footways should not be used by cyclists.
- Fails to address the risk presented by permitted development.
- Concerns over encouragement for high density development and tall buildings, with reference to Haywards Heath.

### **Officer Recommended Actions**

- Include reference to the National Design Guide in place of Buildings for Life (BfL).
- Include reference to Village Design statements.
- Ensure that terms including 'coarse' and 'fine grain' are clearly defined. Review the need for a glossary of terms.
- Comprehensively review chapters 7-9 (Residential Amenity, Household Extensions and Building Conversions).
- Include greater reference to Brownfield Sites and the MSDC's Brownfield Sites Register.
- Provide a separate chapter for Employment Sites with further guidance on the layout, landscaping and design of buildings.
- Provide further guidance on office to residential conversions where prior approval relating to the changes to the external appearance of the building is required.
- Include more information on appropriate, locally distinctive materials, and application of materials including suitable modern/contemporary approaches.
- Review the document to ensure it strikes the right balance between setting clear guidance and not being overly prescriptive so that it does not stifle innovation.
- Ensure the reasoning for the approach to parking is clearly explained.
- It is not recommended that there is a change to the principle of positive development edges and perimeter block development for all the good design reasons explained in the draft document, and that they are supported by other best practice documents.
- It is not recommended to include further reference to rural development. The Design Guide already cross references the High Weald AONB Design Guide and South Downs Local Plan and also provides guidance relating to development that has a rural context through case studies and examples.

## Draft Mid Sussex Design Guide SPD – Sustainability Issues

<b>Total respondents:</b> 22	<b>Supporting comments:</b> 3	<b>Total comments:</b> 62	<b>Requesting amendments:</b> 59
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### Main Issues Raised

#### Statutory Respondents

- **Natural England** references the importance of Green Infrastructure and biodiversity, and the opportunities to enhance local character and local distinctiveness through the design of new development.
- **South East Water** seeks more emphasis on the reduction of water consumption in Principle DG41 (energy efficient and sustainable design). They also request additional text to encourage high water efficiency in new dwellings.
- **Sport England** suggests a number of minor additions to text relating to the relationship between the built environment and health and wellbeing, and seeks further design guidance for walking and cycling infrastructure.
- **Thames Water** proposes additional text related to sustainable surface water drainage.

#### Town and Parish Councils

- **Burgess Hill Town Council** recommends that a reference to the recent West Sussex Cycling Design Guide should be included as a design requirement under principle DG19 (providing active streets that are defined by buildings rather than roads). They also request that DG41 (energy efficient and sustainable design) be revised to include specific achievable sustainability targets for zero carbon emissions.
- **Hassocks Parish Council** considers it is necessary to set a numeric figure for energy efficiency standards of new build homes and any large extensions based on Passivhaus standards, and request additional guidance related to insulation.
- **West Hoathly Parish Council** requests that more emphasis is given to Climate Change.

#### District Councillors

- **A District Councillor** highlights the importance of Passivhaus standards or net zero energy performance indicators and that DG41 (energy efficient and sustainable design) should include options for solar and thermal energy collection and storage. Consider there should also be convenient storage for bicycles, provision of electric charging points in both private and public settings. Greater support is needed for public transport and cycling infrastructure. Case Study Two St Margaret's Convent, East Grinstead is not a good case study and could have been delivered at a much higher density with less reliance on cars.

#### Other Organisations

- **Campaign to Protect Rural England** requests that sustainable development and energy efficiency guidance should extend to building alterations. They also propose a number of changes to the Design Guide Principles related to sustainability, including that new homes should be built as close as possible to zero emission requirements; Principle DG41 should address energy efficiency retrofitting and reference that water use is limited to 110 litres/person/day.

#### Architects / Developers / Planning Agencies

- **Crest Nicholson** highlight the need for further guidance on the positioning of solar panels, car charging points, SuDS and tree planting.
- **Jake White Architects** considers demolition / rebuild projects should require a significant improvement in efficiency and site density to justify the environmental cost of demolition. Disagrees with requiring all PV arrays to be integrated systems. No mention of super-insulated buildings or Passivhaus principles. BRE diagram showing a passive stack system looks good, but this is not current thinking on green building. No reference to the Government's Future Homes Standard

initiative.

- **MSDC's Design Review Panel** consider that the absence of a separate chapter on sustainability is severe oversight. The subject should be considered more ambitiously and cover headings such as lifespan, biodiversity, renewable energy sources and Passivhaus design. The opportunities presented by brownfield sites needs wider consideration beyond the town centres. Retrofit and refurbishment need encouragement.
- **Rodway Planning** feel that more guidance should be given regarding the issue of resilience and lifespan.
- **Pegasus Group submitted the same rep. on behalf of both Persimmon and Thakeham.** They suggest amendments with regards to solar shading, car clubs, electric charging points, tree planting and landscaping.

#### Residents

- Support the aim of the Design Guide to deliver a low carbon and climate resilient future for Mid Sussex.
- Much greater emphasis or ambition should be given to sustainability and low carbon, energy efficient design as this is one of the most urgent issues facing society. Sustainability is short on detail compared to other design issues.
- Lack of reference to insulation.
- Lack of reference to ground source heat pumps.
- All developments that include apartment blocks should provide electric charging points and solar panels.
- Building orientation should be encouraged to support solar panels.
- Greater reference to decentralised renewable energy systems.
- Need to protect PROW in greenfield developments.

#### Officer Recommended Actions

- Include reference to the recent West Sussex Cycling Design Guide and also Dept of Transport best practice guidelines. The Design Guide will also reference the forthcoming work on Local Cycling and Walking Infrastructure Plans (LCWIPS) that are being developed.
- Provide a new section in the introduction to the Design Guide on Sustainability.
- Highlight and emphasise at the start of each topic chapter how this particular topic helps to deliver a low carbon and climate resilient future for the District as well as comprehensively reviewing the references to sustainability throughout the document.
- No change recommended in response to including specific carbon reduction standards such as Passivhaus standards. While the Design Guide already seeks to encourage the highest standards, Government advice makes it clear in the new Future Homes Standards that higher standards will be delivered through the Building Regulations starting in 2020 and planning policies should not duplicate other regulatory regimes.

## Draft Mid Sussex Design Guide SPD – Structure and Format Issues

<b>Total respondents:</b> 10	<b>Supporting comments:</b> 2	<b>Total comments:</b> 32	<b>Requesting amendments:</b> 30
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### Main Issues Raised

#### Statutory Respondents

- **Highways England** ask that it is added to the list of Relevant Statutory Authorities and Organisations.

#### Town and Parish Councils

- **Balcombe Parish Council** suggests changes to the length and layout of the document to make it more concise.

#### Other Organisations

- **Gatwick Airport Ltd** request that they are included in the list of relevant statutory authorities and organisations.

#### Architects / Developers / Planning Agencies

- **DMH Stallard** suggest amendments to Fig. 1.1 relating to the contents matrix at the start of the document which sets out which Development Principles are applicable to the different development types.
- **Jake White Architects** considers the design of the document is well laid out but breaking the last three sections into a second volume or addendum documents would avoid a reduction in the overall quality of the former sections. Ideally a document like this should only highlight high quality design and images.
- **MSDC's Design Review Panel** cite a lack of consistency and clarity in the presentation styles, coupled with a tendency towards literal repetition. They suggest a number of changes to the presentation of information, particularly towards the beginning of the document, including the contents matrix. Also highlight features which they consider are not helpful, such as 'Reasons' and 'How to use' sections. They consider that chapters 7-9 are too 'lightweight' while other chapter headings are confusing due to overlapping topics which could be consolidated. Reduced number of images, presented at a larger scale, would aid clarity, as would a separate "Employment" section. Tick / cross system is too prescriptive and harms scope for innovation. Question whether individual architect practices should be credited against images.

#### Residents

- The Design Guide is thoughtful and well set out with good and bad examples illustrated.

### Officer Recommended Actions

- Review the document to identify opportunities to make the document more clear and succinct, including reviewing the need for the 'Reasons' sections and any overlap between chapters.
- Update and include additional guidance and images relating to the last three chapters 7-9 (which cover Residential Amenity, Extensions and Conversions). It is not considered appropriate to separate these chapters into a second volume, as they are integral to achieving high quality design across the District.
- It is not recommended that the tick/ cross image system, which illustrates good and bad design examples, be removed as these images are very useful for applicants and Development Management officers in understanding what constitutes high quality design and how to avoid common pitfalls of poor design.
- Improve the quality, consistency and relevance of the images.
- Review the contents matrix and opportunities to improve the navigation of the document including the incorporation of a separate "Employment" section.