



Design Guide Supplementary Planning Document

Consultation Statement

June 2022

- I.1. The Design Guide Supplementary Planning Document (SPD) provides further guidance to support the implementation of Local Plan policies, in particular Policy SD5: Design, but also a number of other policies that relate to the design of new development in the National Park. Once adopted, the SPD will be a material consideration for relevant planning applications.
- I.2. This Consultation Statement has been prepared in accordance with Regulation 12(a) and (b) of the Town and Country Planning (Local Planning) (England) Regulations 2012 which states:
- “Before a local planning authority adopt a supplementary planning document it must—*
- (a) prepare a statement setting out—*
- (i) the persons the local planning authority consulted when preparing the supplementary planning document;*
- (ii) a summary of the main issues raised by those persons; and*
- (iii) how those issues have been addressed in the supplementary planning document; and*
- (b) for the purpose of seeking representations under regulation 13, make copies of that statement and the supplementary planning document available in accordance with regulation 35 together with details of—*
- (i) the date by which representations must be made (being not less than 4 weeks from the date the local planning authority complies with this paragraph), and*
- (ii) the address to which they must be sent.”*
- I.3. This statement sets out details of the consultation that has taken place to date which has informed and refined the SPD. It sets out details of how, when and with whom the initial consultations with interested parties and organisations took place and how this has informed the SPD.
- I.4. Following the preparation of the draft SPD, the Authority resolved to undertake a ten week consultation on the Design Guide SPD between 28 June 2021 and 6 September 2021. As part of the consultation, the Authority:
- Published the draft Design Guide SPD on the SDNPA website
 - Made the draft SPD available for inspection at the South Downs Centre during opening hours;
 - Sent emails and letters to persons and organisations on the SDNPA Local Plan mailing list inviting them to examine the consultation documents and make representation on them during the consultation period;
 - Sent emails to consultation bodies identified below, which the Authority considers to be affected by the SPD;
 - Released details of the consultation to the local press via a press release;
- I.5. The Authority considered it appropriate to consult the following consultation bodies on the draft Design Guide SPD:
- Homes England
 - Relevant district and county councils
 - Adur District Council
 - Arun District Council
 - Brighton & Hove City Council
 - Chichester District Council

- East Hampshire District Council
- East Sussex County Council
- Eastleigh Borough Council
- Hampshire County Council
- Horsham District Council
- Lewes & Eastbourne District Councils
- Mid Sussex District Council
- Surrey County Council
- Waverley District Council
- Wealden District Council
- West Sussex County Council
- Winchester City Council
- Worthing Borough Council
- Parish Councils within the National Park
- CPRE Hampshire
- Action in Rural Sussex
- Local developers and Registered Providers
- The South Downs Design Review Panel

- I.6. Consultation responses were received from 43 individuals and organisations. The comments received are summarised in **Appendix I**. Officer comments relating to the responses received and how the SPD has been amended (or not) in response to these is set out in Appendix I.
- I.7. The Town and Country Planning (Local Planning) (England) Regulations 2012 (As Amended) legally require local planning authorities, prior to adopting a SPD, to publish the Consultation Statement and revised SPD for comment for a minimum four week period. This consultation will run for six weeks from 8th May to 20th June 2022.

Appendix 1

Draft Design Guide SPD: Summary of comments received June 28th to September 6th 2021 and officer responses

No.	Location in draft doc.	Person or organisation who made comments	Comment	SDNPA response
GENERAL				
1		Midhurst Town Council	General support for the document	Welcome the support. No Change
2		Cheriton Parish Council	Cheriton Parish Council consider this to be an excellent document	Welcome the support. No Change
3		Harting PC	We welcome the draft Design Guide SPD which we find generally comprehensive and clear.	Welcome the support. No Change
4		Harting PC	We are surprised that the draft Guide, while dealing with development in Conservation Areas (Section 3), does not have a specific section on design of dwellings built or extended outside Conservation areas to expand further on SD30.	Guidance on new dwellings is provided in the document at section C.5.1. SD30 is not strictly a design policy but is principally designed to achieve certain planning objectives for reducing the loss of small and medium sized homes. There is a separate Technical Advice Note on Policy SD30. No Change
5		Greatham PC	Greatham Parish Council support the adoption of this SPD which we consider to be of high quality.	Welcome the support. No Change
6		Whaleback Planning and Design	31 typed pages of comments, mostly negative. Summed up by: <i>'As it stands, the guide is primarily palliative and will have minimal positive impact on design quality in the SDNP.'</i>	Noted Officers reviewed these comments in detail to see where changes could be made.

				However relatively little change to the document was made given the nature of the comments.
7		Selborne PC	Selborne Parish Council wholly supports the very comprehensive document issued by the SDNPA along with the guiding principles.	Welcome the support. No Change
8		Sompting PC	Sompting Parish Council welcome sustainable developments in the area.	Noted No Change
9		West Sussex CC Planning Services	No comments	Noted No Change
10		Selborne PC	There are concerns that there are insufficient resources to ensure adequate enforcement of design quality in development	This is important, but not directly relevant to the content of this document, which sets out design guidance. No Change
11		Greatham PC	The SPD gives almost all its consideration to the site allocated for development. Whilst we understand this approach and the difficulties of considering areas outside this boundary we would welcome additional comment and guidance on the effect of developments on the wider area.	The guidance is not specific to allocated sites and would apply in all locations. No Change
12		Greatham PC	In view of the climate emergency declared in East Hampshire and many other areas of the UK, Greatham Parish Council feel that the SPD could be even stronger on climate measures. Documents such as this often have a long service life and we feel that it would be far better to be stronger on climate at the outset rather than look out of date in a few years' time.	The Sustainable Construction SPD covers this area already. The forthcoming review of the Local Plan is the opportunity to review the Authority's requirements for sustainable construction. No Change
13		Rogate PC	Rogate Parish Council have looked at the Design Supplementary Planning Document (SPD) and considered it was a well thought guide which did not cut across the policies of our Neighbourhood Plan and in many cases enhanced them. We thought there could be more reference and greater weight given to NP's but accepted it is essentially a design guide and not really directly enforceable.	Welcome the support. No Change Added the words: '...as these are part of the development plan along with the South Downs Local Plan' after the fourth line in C.1.21.

14		Winchester City Council	The SPD is a comprehensive document that will provide helpful guidance for applicants and assist planning officers in their assessments of schemes.	Welcome the support. No Change
15		Winchester City Council	The SPD should reflect more closely the National Design Guide and National Model Design Code	The document does already reference both National documents and additionally now has added references to them in the Preface: Design Codes will need to be applied for the largest developments, such as the Phoenix Project in Lewes, or could be applied to discrete areas of the national park but it would be disproportionate to say too much on them for a document which covers all development in the national park, the vast majority of which will not require design coding.
16		Winchester City Council	Although some of the photographs shown are from around the world and it is debatable how applicable these may be to the National Park (eg examples promoting dormers (fig.13.3) and the converted steel framed barn in Devon). Some of the examples would also have a significant cost implication (e.g. underground bin storage in Cambridge, art installation in Manhattan Park).	There are very few foreign examples and South Downs examples have been prioritised but are not always available. Fig.13.3 is from the Goodwood Estate in W Sussex, in the national park. The cost of the examples does not make them bad precedents and are meant to provide inspiration. The underground waste collection system could be a viable prospect on a large scheme with the benefit of saving significant above ground space. No Change
17		Winchester City Council	There should be more on Village Design Statements	The Authority already has separate guidance in the form of the VDS toolkit which it is unnecessary to repeat here. The VDS are mentioned and linked to in this document. No Change
18		Winchester City Council	Hyperlinks do not allow you to return to the same place within the document after viewing them. Backspacing usually returns you to the initial webpage instead	The consultant graphic designer has proposed a solution for the web version of the document which we will explore

19		Winchester City Council	Part 3 does not state 'Part 3' on the headings unlike Parts 1 and 2 do.	As Part 3 (now Part C) is the largest part of the guidance it is more important to highlight the section or chapter with each issue, such as 'Development in Conservation Areas', at the expense of repeating 'Part 3' on every page. No Change
20		Winchester City Council	What are the significance of the blue boxes.	These are explained in introduction but nevertheless now also titled each blue box 'Key Design Principles'
21		Terra Firma	On the whole we welcome the guide and feel it will be useful.	Welcome the support. No Change
22		Terra Firma	It is thorough, but contains so much information it's almost overwhelming in place. It will certainly be a little daunting, particularly the case for one-off, small-scale development, where the applicants / agents are not likely to be familiar with the document.	House Symbol helps small scale applicants focus on relevant sections. New Appendix A provides a new handy checklist or summary of the key design principles to help where you do not want to read the whole document.
23		Terra Firma	It would be good to see more of the example images being in the SDNP and certainly not abroad.	Very few foreign images and SDNPA images prioritised where possible. We have prioritised illustrated examples from within the National Park but this has not always been possible. No Change
24		Terra Firma	Disagree with some of the illustrated examples provided in the document	We are happy that the illustrations help reinforce relevant parts of the guidance. The plans illustrating the design process in fig 5 are not meant to be interrogated in detail as they are extracts that depict how the process moves up the levels of detail. No Change
25		Terra Firma	Is there some guidance needed on how the SDMP expect to see various iterations / concept options presented. Is it a chronological record of the design development, or is it better to explain the design element by element? Does it all need to be put in a mega Design & Access Statement, or something else? Perhaps a few examples would be helpful	The Authority does not want to be too prescriptive about exactly how the design process is presented (Fig 4 is a suggested approach for larger development for instance), as long as the principles of an iterative design process, rooted in evidence, are well demonstrated. Design and Access Statements would be an appropriate place to share this narrative.

				No Change
26		Terra Firma	Make some reference to the purposes and use of the design panel, PPAs and pre-app in developing design?	Design Review Panel is referenced already in Appendix A. PPAs are part of a planning process and not really a design guidance issue. Pre-app is strongly recommended in 2.2 and under Landscape Strategy in 2.3 No Change The link to the Authority pre-app website has been added in B.3
27		Terra Firma	Quite a number of things are “not encouraged” (such as timber close-board fencing, uPVC doors). More accurately it should say that they are ‘discouraged’?	Changed to discouraged at end of C.12.1.6 (from not supported); C.12.1.37 . Changed in C.13.3 blue box c. and C.13.4 blue box b. and d.
28		Terra Firma	The numbering is very confusing as headings and figures have different numbers to paragraphs.	Numbering now simplified
29		Terra Firma	The hyperlinks to the many other guidance documents SDNPA have published are great as long as the links work, i.e. the URLs for the guidance documents don’t change!	The hyperlinks have been checked and updated No Change
30		CPRE Hants	This SPD should be very helpful to planning staff, developers, and those commenting on planning applications, in achieving the high standards of design quality which are essential to good place-making within the SDNP. Accordingly, this Design Guide SPD is fully supported by CPRE Hampshire	Welcome the support. No Change
31		CPRE Hants	There should be more specific guidance on agricultural buildings	New section on new agricultural buildings added Link to SDNPA permitted development in A.1.
32		Midhurst Town Council	General support for the document	Welcome the support. No Change

33		Friends of Lewes Society	General support for the document, however consider overall length and the way Part 3 is structured, leads to a less accessible document.	Welcome general support. Numbering simplified to help accessibility. In addition, added new Appendix A with summarised design principles as a checklist.
34		Cheriton PC	Comments on specific planning application	This is not relevant to this document as every site and application has its specific issues and characteristics and planning applications are assessed on their individual merits. No Change
35		Friends of South Downs	Document too long if intended for ready reference document for design guidance	The document is quite long, but in specific cases it is expected that particular sections will be more relevant than others. The key design principles are located in the blue boxes at the start of each issue and these are collated in Appendix A. There is therefore the option to focus on these rather than always reading the whole document. No Change
36		Friends of South Downs	Sections are uneven in length – for example industrial buildings is brief but there are pages on parking design despite a dedicated Parking SPD.	This may be true that but usually for good reason. Industrial buildings are not a very large part of the planning case load but the design principles in the document would apply to them. Successfully integrating car parking into new development is nearly always challenging and so more detailed guidance is necessary. Similarly, as green infrastructure is particularly important to the National Park, more detailed guidance is provided here than might be expected in other Authority guidance documents. No Change
37		Friends of South Downs	It would be helpful for everyday use by applicants, if the SPD cross referenced policies in the Local Plan, not just the design policy and other SPDs.	This already occurs at the end of each issue where relevant LP policies are referred to, e.g. 'See also Local Plan policy SD21. ' at end of C.7.1 Rural Highway Design

				Document has been reviewed and a few further references to relevant Local Plan policies added.
38		Friends of South Downs	Target audience applicants or development management? If latter could restructure to serve key groups	Audience is wide ranging but mainly both applicants and development management No Change
39		Friends of South Downs	Font sizes and colour contrasts should comply with design guidance for public documents for users with sight, physical or understanding impairments	The document has been formatted by a graphic design professional experienced in these matters.
40		Friends of South Downs	Need to avoid jargon, e.g. GI abbreviation is used on several pages with no definition - the definition occurs well into the document when dealing with green infrastructure but it is not in the glossary.	GI and BI abbreviations in title of 9.1 Green and Blue Infrastructure Definitions of both also at beginning of this chapter but they are now added to Glossary too
41		Friends of South Downs	Document should say more about affordable housing	Affordable Housing is a planning priority for the Authority as expressed in policy SD28 in the Local Plan and set out in detail in the Affordable Housing SPD. It is not necessary to repeat these or other requirements here. The design guidance and development should not distinguish between affordable and market housing and so specific guidance on the former is not appropriate No change
42		Friends of South Downs	Should the SPD provide a unique table of materials for different types of building based on their status and expected lifespan in the SDNP?	Although there might be some merit in this, lifespan is only one, albeit important, consideration in material selection and it is considered that the document already says enough about materials in chapter C.12. No change
43		Friends of South Downs	Importance of Neighbourhood Development Plan policies should be emphasised more	Added the words: ‘...as these are part of the development plan along with the South Downs Local Plan’ after the fourth line in A.21.
44		Historic England	Generally supportive but believe more specific guidance on the potential impacts of development on specific heritage assets and their settings (apart from Conservation Areas) is needed. The involvement of conservation officers and/or Historic England should be mentioned	This is such a specialist area that the document would not be able to provide detailed guidance on this beyond it being referred to in 3.1.1.2 The following elements should all be

				<p><i>influencing the scheme's site layout:</i></p> <p><i>.History and built heritage</i> <i>e.g. respecting the course of ancient routes, or,</i> <i>views of historic buildings, or restoring</i> <i>characteristic field patterns, or, avoiding any</i> <i>negative impacts on scheduled and listed historical</i> <i>assets.</i></p> <p>Added to line above: 'The early involvement of Authority conservation officers and/or Historic England should be sought.'</p>
45		Arundel Town Council	General support for the document	<p>Welcome the support.</p> <p>No Change</p>
46		Findon PC	FPC felt that the SPD was a comprehensive and very useful document providing information to developers of all sizes regarding the SDNP landscape led approach to development in the National Park, and that the SDNPA was to be congratulated on its work.	<p>Welcome the support.</p> <p>No Change</p>
47		Fittleworth and District Association	The Association warmly welcomes the Design Guide's provisions and congratulates the Authority on its preparation.	<p>Welcome the support.</p> <p>No Change</p>
48		Sustrans	Hi thanks for the opportunity to comment on this crucial document, really impressive and hope that this document helps preserve the unique charm of SDNP	<p>Welcome the support.</p> <p>No Change</p>
49		Sustrans	My only comment is, and apologies if I have missed it when reading through would be that further benefit could be gained if Active travel and Cycling could be at the forefront of travel options for the park. Cycle storage should be designed to make cycle use as easy as car use. Reference LTN/1/20	<p>3.8.1.8 first line, already says that cycle parking should make cycle use as easy as car use.</p> <p>No Change</p> <p>LTN/1/20 now in latest draft</p>
50		Natural England	We very much welcome the additional advice it provides to promote better outcomes for the natural environment, particularly regarding green infrastructure and landscape-led approaches.	<p>Welcome the support.</p> <p>No Change</p>

51		West Meon PC	<p>The purpose of the document is to put the landscape, built and more natural, at the heart of all future development and redevelopment. This is fine but we are not sure the document as a whole is radical enough.</p> <p>We are not sure what Hampshire or West Meon will look like in 25 years' time but this document seems to assume that development may continue as now, but we don't think it will. How we live our lives, cars and public transport, building materials and design won't be like it is today. Will most people still have cars or a car or need a garage? This document doesn't necessarily meet that challenge.</p>	<p>This is a difficult area as the exact ways in which society will change in 25 years is not known. We cannot predict, for example, the future level of car ownership.</p> <p>The Design Guide SPD cannot make new policies and can only interpret existing policies. The Local Plan does get reviewed after around 5 years and that is an opportunity to update policies to respond to societal change.</p> <p>No Change</p>
52		<p>Liz Thomas</p> <p>And South Downs Network</p>	Too much emphasis on very expensive houses and not enough on more ordinary homes.	<p>Generally, the document is aimed at 'ordinary' housing and development across the board and not just high end development. Although it is true some of the examples of good design (winners of South Downs Design Awards) are likely to be expensive. When we achieve further examples being built in the National Park, we will add them to our list of case studies. The design guidance in the document is aimed at development across the board and not just at top end.</p> <p>Modest new housing development in Midhurst added in new landscape-led hint after C.7.2.9</p>
53		Pro-Vision	Requests several detailed questions relating to function and practice of the Design Review Panel be answered or explained in this document.	<p>Design SPD not the place to expand in this way on detail on the DRP. DRP referenced and link to information on Authority website provided where this type of information should sit.</p> <p>No Change</p>
54		South Downs Network	Request referencing NPPF paras.	<p>It is enough to reference the NPPF, National Design Code, National Model Design Code, etc. without reproducing parts of it or referencing specific parts. Also any paragraph numbers subject to change as these documents themselves change.</p> <p>No Change</p>

55		South Downs Network	Zero Carbon Building Design The development of the SDNPA's Sustainable Construction SPD is to be supported but we hope the Design SPD can be more ambitious.	The Design SPD is not the place to create new policy. A review of the local plan is the correct place to consider any such policy changes. No Change
56		South Downs Network	There are a large no. of Design expectations listed in blue boxes for different issues. This is a lot for a developer to take on board. It would be useful to have all these design expectations in the form a checklist	This has been done in new Appendix A.
57		South Downs Network	Suggests revised document be divided into 3 special sections: Large towns Villages Rural settings	The design principles are often relevant to all development (because design needs to be 'landscaped', depending on context the results need to be different in every location) and so a lot of repetition would be involved with this approach. No Change
58		South Downs Network	Requests specific reference to North Street Quarter development	Reference to specific planning applications not always helpful, particularly as in this case, the application scheme is unlikely to be built. No Change
59		South Downs Network and CPRE Hants	Requests specific guidance on design of agricultural buildings.	New sub-chapter on new agricultural buildings (C.5.3) now added.
60		CPRE Hants	We find the illustrations and photographs in the document particularly helpful, and more of these would not go amiss. Sometimes, though, it is not immediately obvious if a photograph is intended to show good or bad design and this needs to be made clearer. The ticks and crosses used with some of the illustrations are very helpful.	We have checked all illustrations to see if clarification needed to spell out whether positive or negative examples
61		Hampshire Constabulary	To provide for safety and security lighting throughout a development should conform to the relevant sections of BS 5489-1:2020.	This reference now made under C.8.2.10
62		David Pain and David Templeman	Dark Night Skies requirements not followed for a specific festival development planning application	A comment on a specific planning application is not relevant to the draft design guidance. No Change
63		Bramber Parish Council	Advise the Authority that the principles of Bramber PC's Neighbourhood Plan Design Guide would apply and we would urge you to consider this.	Link to Neighbourhood Plans already in A.21, p.7 No change

64		Buriton Parish Council	Worried that South Downs Design Guide will override locally produced Village Design Statements (VDSs). Where there is a conflict of advice, the locally provided advice (in the VDS) should always prevail.	<p>The intention is to supplement the utility of Village Design Statements, not to replace or supersede them.</p> <p>The Design Guide aims to provide generic design guidance with principles that would apply across the area but would lead to different design solutions in different locations i.e. a context-led or landscape-led approach. This generic advice is based on well-established design practice and national guidance. The Design Guide purposefully avoids trying to provide locally-specific advice. An applicant should benefit from both generic design advice which sets out the Authority's interpretation of its design policies, as well as referencing the local advice contained in Village Design Statements. There should not be a conflict in most cases. In the rare occasions where this might occur, it would be for Authority officers and members to decide which advice to give the greater weight based upon the circumstances of the case.</p> <p>Added in A.23: 'If the VDS is an adopted Supplementary Planning Document it would sit alongside this document and it should not be assumed that the general design guidance here would automatically override the local guidance in the VDS.'</p>
65		Buriton Parish Council	Document should reference local landscape character assessments	<p>Added in A.23: 'Applicants should check if local landscape character assessments have been made by reliable organisations or groups, to make use of local knowledge.'</p>
66		Buriton Parish Council	The document emphasises large scale development to the cost of smaller developments of up to 10 dwellings	<p>There is a whole chapter on household extensions and of the 52 different issues covered in the Part C Design Guidance, 32 are marked as relevant to small scale developments.</p> <p>No change</p>

67		Buriton Parish Council	There are also matters relating to climate change which could be better addressed in the document. A local issue which often raises its head is that of double-glazing (for energy conservation etc.) on Listed Buildings	Added text in C.13.3.9: ‘unless the case can be made that well designed alternatives, including the use of double or triple glazing, are appropriate and do not have an adverse impact on either the appearance or fabric of the building or on any features of architectural or historic interest..’
68		Jennifer Chibnall	The Design Guide should say more about the need for homes that are affordable	Affordable Housing is a planning priority for the Authority as expressed in policy SD28 in the Local Plan and set out in detail in the Affordable Housing SPD. It is not necessary to repeat these or other requirements here. No change
69		Jennifer Chibnall	Document difficult to navigate, too long, fragmented and repetitive and no sense of basic design principles	Numbering system simplified to aid accessibility. Checklist, with key principles, new Appendix A.
70		Jennifer Chibnall	Non-design professional editor needed to make document more accessible.	To look at where text could be simplified the document has been reviewed by non-design professional colleagues and appropriate changes made. No change
71		Jennifer Chibnall	Connections not made to local plan or neighbourhood development plan policies	Overarching Local Plan policy SD5 (Design) repeated in full in Introduction. Relevant Local Plan policies are referenced throughout the document. There are over 50 NDPs and it would be impossible to refer to the policies in all of them in this document. No change
72		Jennifer Chibnall	‘Other Important Design’ as set out in Appendix A should more clearly be referenced as part of the process of producing a planning application	The introduction to ‘Other Important Design Guidance’ is given a prominent place on p.7 of the Introduction with clear advice to applicants that the local advice, in particular, needs to be referred to and used to inform their applications. Appendix A (now B) expands on this guidance. No change

73		Jennifer Chibnall	In relation to Lewes one small error, the 'flatted development in Lewes' p.37, shown with electric car charging points serve town houses rather than flats	Corrected title to photo
74		Eric Croft	Discussion on various development and design topics, recent applications, local incidents and general questions	Noted. Nothing specific to respond to in relation to a particular part of the document No change
75		EA	No time to comment	Noted No change
76		Lewes District Council	Overall, we welcome the positive guidance that will help to provide a landscape-led approach to development proposals that will ensure that new development makes a positive contribution to the character and appearance of Lewes District within the South Downs National Park.	Welcome the support. No Change
77		Whaleback Planning and Design	Particularly supportive of the need to define a "Landscape-Led" approach to Design (page 7) and reference to the importance of working as part of "Multi-disciplinary teams" (page 8) from the early stages of a development project, which includes officers, developers, statutory consultees and the local community.	Welcome the support. No Change
78		Whaleback Planning and Design	Overall, we believe that the SPD should add specifically local methodologies and detail to universal aspects of good design, omitting generic design guidance. We support much of the locally specific guidance outlined in the document but wish to highlight several specific areas where we believe the SPD is less helpful and should be subject to further review.	The document does provide an Authority-wide methodology which is the 'landscape-led' approach to design. Beyond this it does not provide locally-specific guidance as this is already inherent in the landscape-led approach which is a response to context and local character. Generic guidance is necessary even if it replicates national guidance elsewhere as it is valuable to have design guidance that the Authority believes important all available in one place. No change
79		Friends of Lewes Society	General support for the document, however consider overall length and the way Part 3 is structured, leads to a less accessible document.	Welcome general support.

				Simplified numbering system and added new Appendix A with summarised design principles as a checklist.
	PART 1: INTRODUCTION			
80	Front Cover	Buriton Parish Council	The front cover of the draft document is felt to be rather “urban” and not at all typical of the national park. It is hoped that the final document will have more appropriate images for the vast majority of the rural settlements ...	2 of the 4 images are taken from villages (Ditchling and Cocking) Picture of housing development on R. Ouse in Lewes replaced with image of Follers Manor Gardens, Alfriston.
81	Preface	Eric Croft	The Act does not say conserve and enhance the essential character of the landscape; it does not refer to landscape. It does refer to natural beauty, wildlife and cultural heritage equally and it is to that you must commit and define in guidance.	The document does set out the 2 purposes and duty in fig 1 and so the commitment is clear. Conserving and enhancing the character of the landscape is another way of saying we need to protect and enhance natural beauty, wildlife and cultural heritage as we define landscape as including all these. No change
82		Whaleback Planning and Design	The aspirations of the SPD are supported but introduction is too prescriptive with emphasis on good design which most applicants seek to deliver anyway	Although it is true that many applicants do seek good design, even those applicants sometimes need guidance on what the Authority is likely to consider good design. Unfortunately, not all applicants have good design as a priority. No change
83	Preface	Terra Firma	We find the first two sentences of the first paragraph very negative – we would suggest they don’t set the tone well – almost confrontational!	Development in the National Park should be seen as a privilege. Would anyone want to support the notion that mediocre design proposals should be acceptable? No change
84	Preface	Thakeham Homes	Thakeham notes that the preface to the draft Design Guide states that “Mediocre design proposals will not be acceptable”. This is again repeated in Part 3, Chapter 2, wherein at 2.1 b. it is stated that “...simply replicating mediocre design in the locality will not be acceptable”. The term ‘mediocre’ is considered subjective and is not	It is both true that the term ‘mediocre’ is subjective but that it is also the opposite of what we can call ‘good design’. The Design Guide’s purpose is to make the concept of ‘good design’ less subjective. Development which fails to follow most of the Authority’s key design

			found within the South Downs Local Plan (2019) or within the National Planning Policy Framework (NPPF) (2021).	principles is much more likely to be judged by the Authority as mediocre or poor design. No change
85	Preface	Terra Firma	Use of 'anywhere designs' rejected in the preface at pages ... and yet some of the illustrations used seem to be exactly this: illustration page 39, ornamental planting example page 43, figs 7.1, 7.3, 7.10 & 7.11	The illustration on p.43 is comparing hedges with fences and therefore the built form is there as a reference point to indicate that the boundaries are enclosing rear gardens. The houses could be typical twentieth century development but they are not very relevant. It is unlikely anyone is going to misunderstand that the houses indicated there are meant to demonstrate best design practice. 7.1 shows a low key road approach very well 7.3 is clearly labelled as inappropriate (it is meant to show bad practice) 7.10 and 7.11 are sketches which illustrate good practice. No change
86	1.10	Terra Firma	1.10 Reference to National Design Guide needs updating – new version 2021	Updated to latest version
87	1.11	Terra Firma	Add reference to the National Model Design Code 2021?	Updated to latest version
88	1.12	Terra Firma	Again add reference to SDILCA and any local LCAs at new point after 1.12?	Links to SDILCA and LCAs in Green Infrastructure but SDILCA link added in Appendix A
89	1.14	Terra Firma	Should the emphasis be on preservation and enhancement of the NP's landscape rather than the built heritage?	This para focuses on built heritage but A.13 already sets out the importance of landscape which is repeated in policy SD5. No change
90	1.6	Eric Croft	Last line applies to planners as well as applicants	Disagree as the applicant has to demonstrate to the case officer their understanding of the character and how that informs the design proposal. No change
91	1.6 illustration	Jennifer Chibnall	Questions the use of bird box illustration on p.5	This is a standard SDNPA illustration that the consultant graphic designer inserted on his own initiative.

				Changed from bird boxes to 'New Winery at Rathfinny Estate, Whiteway, Alfriston'
92	1.18	Eric Croft	Too much emphasis on landscape and townscape whereas this is not part of National Park purposes.	Disagree. Landscape and townscape character are critical to the quality of the national park environment and therefore central to design guidance for new development. No change
93	1.20	Eric Croft	Need to provide more weight to Neighbourhood Development Plans	Added the words: '...which are a statutory planning document and carry the same weight as local plans.' after the fourth line in A.21.
94		West Meon PC	Need to clarify weight of NPs	Added the words: '...as these are part of the development plan along with the South Downs Local Plan' after the fourth line in A.21.
95	1.20 and 1.22	Storrington and Sullington Parish Council	Pleased to see emphasis on Neighbourhood Plans and Village Design Statements	Welcome the support. No Change
96	1.20	Storrington and Sullington Parish Council	We are pleased that neighbourhood planning gets a mention in in section 1.20. However, we are very concerned that the importance of neighbourhood plans is diminished by the wording in this paragraph 1.20. Please would you amend the paragraph to point out that neighbourhood plans are a statutory planning document and carry the same weight as local plans? As such a "neighbourhood development plan" is part of the statutory development plan for the area it covers, and it has the same legal status as a local plan.	Added the words: '...which are a statutory planning document and carry the same weight as local plans.' after the fourth line in A.21.
PART 2: DESIGN PROCESS				
97		Friends of Lewes Society	The Society supports the landscape approach to design in Part 2 and the need for proportionality, iteration and consistency is to be commended when assessing proposed schemes in the wider landscape context. However, at the more detailed level of consideration of this document, more commonly used terms such as "Townscape", "Context" and "Local Character" are more relevant to the assessment	It is appreciated that for some the term 'landscape-led design' is problematic when applied in urban areas. However, although the term townscape is not used, context is in the 1. Evidence Gathering paragraph on p.8 and a character study is mentioned as necessary here.

			of proposed schemes within existing built-up areas and local communities.	In the first line under 1. Evidence Gathering on p.9 'townscape' is explicitly included in the term 'landscape evidence.' No change
98		Fittleworth and District Association	Section 2 should discourage pastiche, as distinct from respecting the character of an area	Although the word 'pastiche' is avoided, the spirit of this suggestion is captured we feel by the need for design to be landscape-led generally and by the sections in chapter 13 which provide guidance for 'traditionally –inspired' building design. No change
99	Fig.5	Kim Wilkie	Shouldn't slope and drainage be at the very front of the analysis on page 10? The illustrative diagrams don't even show contours and, as we have noted on a number of the panels, the rolling topography of the Downs makes the relationship with slope and the significance of ridges absolutely critical. The issues on 'Orientation' (p13) should start with topography. As a bare minimum, the design guide should insist on accurate contour plans and surface water flows as a first stage in any plan.	The diagrams in fig 5 are illustrative and not meant to be read in detail. They indicate the process and the evolution of design from analysis, concept onwards I increasing stages of detail. Added in caption for fig 5: '...indicating the process of Design Stages 1-5.' In fact the plans referred to do have arrows indicating direction of level change but the key to the graphics is purposefully cropped to show that the plan is not meant to be interrogated. The more general point about the need for plans to have contours is agreed, certainly for multiple unit or large building developments. Added text: in C.1.1 blue box: a. 'The landscape strategy should help determine the capacity of the site and hence the appropriate developable area for the development. b. All layout or landscape plans for multiple unit or large building developments should have accurate contour plans and information about surface water flows.'

				Single dwelling proposals should have levels on the site and contours for the site context clearly shown on relevant plans
I00		Kim Wilkie	It would also be good to talk about the potential to use retaining walls integrated into buildings to settle structures into their landscape. The brutal levelling of sites, especially for agricultural buildings and roads, is often missed in two-dimensional architects' plans.	C.2.1.7 and fig 2.6 do cover this issue to some extent. Added text in new C.2.1.8: 'Where topography is a significant part of a site's character, the potential to use retaining walls integrated into buildings to settle structures into their landscape should be explored, in preference to insensitive levelling of land to create uncharacteristic plateaus.'
I01		Kim Wilkie	More guidance on the character and viability of agricultural land	The SPD needs to focus on providing design guidance for what constitutes development. The countryside edge (section C.1.8) and farmstead development (section C.5.2) is covered by the guide. The wider countryside outside settlement boundaries (except for isolated replacement dwellings) is largely free from development (that requires planning permission) and therefore is beyond the realistic scope of the document. No change
I02	2.1	Sheila Marshall	Some suggestions on local character and proposes more detail on what this consists of in each of Downland Villages	Unfortunately the Design Guide is only providing generic design guidance relevant to the whole national park and not to individual places. The 'landscape-led' or context-led design approach means that this critical work, studying what the local character is, will be the Authority's expectation in all locations. No change
I03	2.1	Sheila Marshall	Views of villages from the downs and vice versa very important. New development should 'blend in' to the context	All agreed and the Design Guide includes the importance of views and the need for new development to become part of the landscape. No change
I04	2.1	Sheila Marshall	Good mix in dwelling sizes needed.	Agreed. This is a common objective in determining planning applications It would be too prescriptive to require this in absolutely all circumstances but,

				<p>following the 'landscape-led' approach to design it would often be a design aspiration, reflecting local character.</p> <p>No change</p>
105	2.1	Eric Croft	Objects to the use of word 'proportionality' and 'iteration'. Needs to be plainer English	<p>To clarify 'proportionality' added words 'amount and complexity of' in</p> <p>'the amount and complexity of evidence required to describe the character of the site and its context will depend on the...' in B.1.</p> <p>To clarify 'iteration' changed to:</p> <p>'reviewing and changing layouts/designs and revising them in response to new evidence or critical feedback to improve the design and gains from the site.'</p>
106		Whaleback Planning and Design	<p>The term "Iteration" is defined on page 8, describing the review and changing of layouts and designs as a development concept progresses.</p> <p>It is not clear if the Authority expects this to be shown within all planning applications. We support the need to evidence key design decisions and explain how a development concept has been informed, although the level of evidence required should be proportionate to the scale, nature, and extent of the development as proposed.</p>	<p>We agree that proportionality is important which is why we make the first point before 'iteration' in the same paragraph.</p> <p>No change</p>
107	2.1	Eric Croft	Development leads to destruction of biodiversity normally so show where this does not happen on green field sites	<p>'Biodiversity net gain' is possible and desirable on many sites including green field sites. This is not just about quantity of green space but the nature of the habitats created/retained.</p> <p>The case studies referred to on the Authority website, such as for Syngenta development, show how good design can lead to an improvement in green infrastructure/biodiversity. As greenfield site case studies become available they will be added to provide precedents for this issue, including the biodiversity net gain score which follows the new national metric.</p> <p>No change</p>

108	2.2	Terra Firma	<p>Page 8 Small Scale Development:</p> <ul style="list-style-type: none"> • Reference to LVIA / LVAs too? • 2.2 (1) in addition to local plan, neighbourhood plan etc, add SDILCA and LCAs too. • Seems to imply that ‘small scale development’ such as a single dwelling should undertake a public consultation and engagement exercise – doesn’t feel proportional approach. 	<p>We do not want to provide an exhaustive list of possible evidence sources here. In practice the case officer would suggest relevant extra evidence that might be needed depending on circumstances LVIA for instance not always necessary.</p> <p>Suggestion is that a design proposal would benefit from talking to neighbours, Parish etc., it is not binding</p> <p>No change</p>
109	2.2	West Meon PC	<p>Need to define what a ‘large development’ is.</p>	<p>This will partly depend on its context. 10 dwellings in West Meon will seem more significant than in the middle of Petersfield for instance but 10 dwellings is a common figure used as a trigger for further requirements by planning authorities. A scheme of 200 homes is very large for the national Park but may not be deemed so elsewhere. Because this is too difficult to define without knowing the local context, it is best left to common sense and the principle of ‘proportionality’ (i.e the level of evidence required by applicant is in proportion to the scale and sensitivity of site and development). This is an important aspect the SPD espouses.</p> <p>New text in B.3: ‘Schemes of 10 units or more could be considered ‘larger’ developments although this partly depends on the context (10 units would normally be more significant in a village location than in a town centre, for instance) and in practice the principle of a proportional approach to the design process would apply as the size and complexity of the development increases.’</p>
110	2.2	Whaleback Planning and Design	<p>This is not serving as design guidance and is requiring a lot of the reader to work through it.</p>	<p>This is not design guidance on specifics but the Authority wishes to set out some guidance on process as some applicants fail to demonstrate how the early design stages relate to the finished proposal. Good</p>

				practitioners will have less need for such guidance and will therefore not be delayed by it. No Change
I11	2.2	Whaleback Planning and Design	Does BNG apply to small scale development? BNG is a specific methodology and not considered proportionate for small scale sites.	Yes it applies to all development (save householder applications) but in a proportional way. Natural England have a small scale metric from one dwelling upwards. New link added to shortly to be published SDNPA Biodiversity Net Gain Interim Guidance
I12		Whaleback Planning and Design	9. Consultation and Engagement How does this add to the scope of contextual inquiry? How do you act on the evidence gathered?	Observing or surveying how people use a space or area is very valuable evidence that should inform the design. e.g. mapping desire lines, hearing local views on what they value – e.g. views of Downs or a certain tree. Or learning about experience such as localised flooding. No Change
I13		Whaleback Planning and Design	Various detailed criticisms of plans indicated on p.10	The diagram is meant to be an illustration of the design stages and is purposefully not designed to be interrogated in its detail No Change
I14	2.2	Winchester City Council	Page 8, 2.2 (4) Concepts: Should similarly refer to Policy SD5 and Part 3 of the SPD as the ‘concepts’ paragraph of the larger scale development does on page 9.	In the interest of keeping this simple, the need to collate all relevant local plan policies is already mentioned under Evidence Gathering in B.2. No Change
I15	2.3	Terra Firma	<ul style="list-style-type: none"> Reference to LVIA / LVAs too? In addition to the aspirations, the vision also needs to also include the aims, purposes or duties of the development (to provide housing etc.). This is where the client brief fits in. 2.3 (1) in addition to local plan, neighbourhood plan etc., add SDILCA and LCAs too. 	New GLVIA link in Appendix B The client aspirations are already a given but may need to be shaped by the evidence. This would be part of the vision. SDILCA already referred to in Appendix C No change
I16	Fig 5	Terra Firma	<ul style="list-style-type: none"> The concept and sketch design diagrams don’t appear to follow the analysis through very well and may need refining. <ul style="list-style-type: none"> Local guidance images – include LCAs 	These diagrams are purely illustrative to show the process they are not meant to be scrutinised in detail Local guidance shown is just an example, not meant to be exhaustive. No Change

	PART 3: DESIGN GUIDANCE			
117	3.1.6 -	Whaleback Planning and Design	Guidance generally too prescriptive	All guidance subject to context and the landscape-led approach. Generally things like perimeter blocks, avoiding backing on of relatively small gardens onto the countryside and transition to countryside (sometimes including appropriate GI 'buffers') are good practice but not in all cases. No Change
118		Whaleback Planning and Design	We question if buffers between development and the countryside are always correct and characteristic.	This is not what is being said. 'Settlement pattern and edges i.e. what works for the site and is characteristic of the area, including settlement edges and buffers to countryside.' This is the opposite of being prescriptive, but buffers will sometimes be part of the solution. No Change
119	3.1.2 Blue box f.	Thakeham Homes	Disagrees with 1.2 f. which says: <i>Where possible, larger residential developments (20 homes and above) should have more than one vehicular access to avoid large cul-de-sacs and to improve permeability.</i> Regularly developments of 150+ homes are served adequately off a single vehicular access point.	This key design principle is qualified by the words 'where possible'. In some circumstances, other design or planning objectives might also override this general desire to avoid long cul-de-sacs. As good practice however, the ideal would often be to allow for alternative access points to larger developments Reference to '(20 homes and above)' deleted.
120	3.1.2 Blue box	South Downs Network	1.2 (i) (in blue box) states "The routes and amenity of existing rights of way should be respected." This wording is obscure and unhelpful. Much clearer and firmer guidance needs to be given. The SPD should explain that rights of way should be integrated into the 'circulation plan' and layout of developments so that they are inviting to pedestrians and benefit from natural surveillance. They should be of generous width, attractively landscaped and well signposted"	Change in blue box i. : word 'respected' changed to 'protected or enhanced'
121	3.1.2	South Downs Society	Firmer guidance needed	See change above for blue box i.

	Blue box i.			
I22	3.1.2.1	South Downs Society	The SPD should explain that rights of way should be integrated into the circulation plan and layout of developments so that they are inviting to pedestrians and benefit from natural surveillance.	Quality of routes covered by Appendix D which is referred to in C.1.2.6 No Change Added text in C.1.2.1: (PROWS) ‘...should be integrated into the circulation plan and layout of developments’
I23	3.1.2.1	British Horse Society	<p><i>“3.1.2.1 Existing routes of public rights of way should be respected and only in justified circumstances will a diversion be acceptable. The amenity of such routes also needs to be respected.”</i></p> <p>We believe that the wording of this needs to be stronger: “Existing public rights of way must be protected or enhanced” (by raising the status of the path to bridleway or restricted byway, for example, to encompass more user groups.</p> <p>As most users of the PROW network are using them for leisure purposes, the amenity of the route is important but the <i>character</i> and <i>recreational</i> value of the route needs to be <i>protected</i> too.</p>	<p>We are not using the word ‘must’ as the document is providing guidance not new policy.</p> <p>In C.1.2.1 Adding words ‘protected or enhanced’ instead of ‘respected’</p> <p>Adding ‘character and recreational value’ to amenity value</p>
I24	3.1.2.1	West Sussex Local Access Forum	Same points as above	Same response as above
I25	3.1.2.1	Whaleback Planning and Design	Refer to footpaths as people could think that PROWs refer to roads.	Public Rights of Way is the correct term to use as this includes all users such as cyclists and equestrians and non-footpaths such as bridleways. No Change
I26	3.1.2.5	South Downs Network	<p>Add reference to the government's guidance for local authorities on designing high-quality, safe cycle infrastructure: Cycle infrastructure design (LTN 1/20) Cycle infrastructure design (LTN 1/20) - GOV.UK (www.gov.uk)</p> <p>We suggest a modification to the SPD to cover cycling infrastructure design with specific reference to the government's design guidelines.</p>	<p>Added reference to the Government guidance at end of C.1.2.4</p> <p>The Government guidance is aimed at Highway Authorities, which the SDNPA is not. It would therefore not be appropriate to expand the Design SPD to accommodate detailed design advice on cycle infrastructure, which is already covered by the Government guidance.</p> <p>No Change</p>

127	3.1.2.5	South Downs Network	We would ask that you include design advice and support for bus infrastructure.	<p>New text in C.8.2.18: ‘Although bus shelters generally do not require planning permission, the Authority would still encourage a landscape-led approach to their design. They can be an opportunity to use locally characteristic materials, such as local stone or timber and use traditional craftsmanship. There are also many examples of bus shelters with green roofs.’ New photo of timber bus shelter in Selborne, fig 8.26</p>
128	3.1.3.1 Blue box b.	Whaleback Planning and Design	This refers to solar collection but might refer to solar gain.	<p>Added ‘solar gain’ in b.</p>
129	3.1.3.4	South Downs Network	<p>We are concerned with this phrase in 3.1.3.4: “in the most visually sensitive locations, PV may not be appropriate”.</p> <p>Solar tiles are a good alternative in such situations</p>	<p>C.14.4 and fig. 14.8 already talks about solar tiles. There is already an internal link in C.1.3.4 to C.14.4</p> <p>No change</p>
130	3.1.4	Whaleback Planning and Design	<p>We welcome general guidance on the importance of achieving appropriate densities, although this subsection of the guidance appears to be written principally with rural developments in mind, where there is an aspiration to deliver lower overall densities with a focus on green infrastructure. For developments in built up areas, such as Petersfield, Midhurst and Lewes, the SPD should show a greater acknowledgement of the role those higher densities of development can play in delivering sustainable and viable forms of development and sustaining local services and facilities.</p>	<p>Rural developments are very important in the National Park. Urban density is not neglected however. The first line in the blue box says ‘development density should aim for efficient use of land...’.</p> <p>The example in the landscape-led hint is in Midhurst next to the town centre.</p> <p>No change</p>
131	3.1.4.3	Whaleback Planning and Design	Guidance has made several references to buffering - which is not a quality of development in the South Downs	<p>Although sometimes the term is controversial the principle of a reduction in intensity including sometimes GI on the countryside edge can be appropriate, although not in all cases. This is not the same as screening development which is not generally supported, except in those cases where the development is unavoidable and is visually harmful.</p> <p>No change</p>

132	3.1.4	Whaleback Planning and Design	<i>'LANDSCAPE-LED HINT Designed density should respond appropriately to area's characteristic density.'</i> This is not necessarily the case but is a convention of UK planning.	This is why the word 'appropriately' is used and the guidance is not prescriptive in this regard. No change
133	3.1.6	Whaleback Planning and Design	Guidance to prescriptive on perimeter blocks which are not characteristic of South Downs.	Perimeter blocks are good practice and are found widely across the National Park. As always the guidance stresses the importance of context and the landscape-led approach. No change
134	3.1.7	Hampshire Constabulary	Figure 1.9 shows a dwelling without defensible space to the front and side, however, other places within the guidance advocate defensible space about a dwelling. This figure should be amended to show defensible space to the front and side of the dwelling. Indeed all dwellings should sit within an area of defensible space.	Fig 1.9 has been amended to show some defensible space such as cobbles/planting around buildings shown.
135	3.1.7	British Horse Society	We would support the aspirations in blue box c., h. and i., but would also emphasise that public rights of way are (or can be) a form of Green Infrastructure. Therefore a "GI buffer," in the form of a new bridleway surrounding or traversing a development, would also be of benefit to local people and provide better connectivity to the wider rights of way network.	Welcome the support but in para C.9.1.2 PROW already listed as part of the definition of GI. No Change
136	3.1.8	CPRE Hants	Another area of particular interest to CPRE Hampshire is the edge of settlement boundary with the countryside, which has often been unsympathetic in historic development. Section 1.8, therefore, has our particular support.	Welcome the support No Change
137	3.1.8 blue box c., h., i.	West Sussex Local Access Forum	Support all these key design principles	Welcome the support No Change
138	3.1.8.3	British Horse Society	<i>"- As buildings have always been an integral part of the National Park landscape, the objective is not to generally screen off new development, but to make sure that it integrates well with both the countryside and the existing settlement. This can be assisted by the enhancement of green infrastructure links from the countryside and into the new development."</i>	The existing text already makes the point about GI links from dev to countryside. No Change

			See the comments regarding GI buffers above. New development should not create a dead end or obstacle for those wishing to enjoy the rights of way network on foot, bike, horseback or, indeed, by carriage.	
I39	3.1.8.3	West Sussex Local Access Forum	Agree with this and support this statement	Welcome the support No Change
I40	3.2	Terra Firma	What is status of blue boxes?	They distil the issue into key design principles. Clarified by adding title to blue boxes: 'Key Design Principles'
I41	3.2	Whaleback Planning and Design	The Design Guide is disproportionately promoting historic reproduction, which is not progressive and does not engage in issues of sustainability and ecosystem services.	Disagree- the Guide specifically states that it is neutral on style and more interested in quality. No Change
I42	3.2.1	Terra Firma	2.1 states that " <i>standard house types that... replicate mediocre design in the locality will not be acceptable</i> ". How is 'mediocre design' determined?	By the applicant hopefully in the first instance, but ultimately it is required of us in our role as Local Planning Authority. No Change
I43	3.2.1.7 Fig 2.6	Simon Ward	Figure 2.6 on page 17 shows 'new homes' at West Dean. I built these when I was the Estate Manager at West Dean (1991–2012). They are in fact single bedsit student rooms for West Dean College	Corrected
I44	3.2.2	Terra Firma	How is 'positive character' or 'positive built form' determined? Needs to be clearer.	We are not attempting to define this here but in practice it will be measured against the key design principles in the document, backed by nationally prescribed guidance, such as the National Design Guide No Change
I45	3.3	Friends of Lewes Society	The Society supports the guidance in Part 3.3 with respect to development in Conservation Areas. It is particularly pleased that the guide seeks to avoid the use of uPVC windows and fascia cladding, which the Friends of Lewes has campaigned for over many years.	Welcome the support. No Change
I46	3.3	Friends of Lewes Society	The SDNPA has adopted the Lewes Conservation Area Management Plan as planning policy and we consider that reference to this document would be helpful in this section.	It would not be appropriate to single out a reference to the Lewes CAAMP above all others. In para 3.3.0.7 it says: '...It is worth checking if there is a recent conservation area appraisal for the settlement...' . This would apply to Lewes CAs too.

				No Change
147	3.4	Friends of Lewes Society	Friends of Lewes support the guidance in section 3.4 on Household Extensions. Would like reference to their document 'Lewes - Dormer Windows: Friends of Lewes Planning Advice Note, March 2017' in Appendix A.	There are too many locally-produced guidance notes on specialist issues to make it sensible to try to list them all in this document No Change
148	3.4	Whaleback Planning and Design	This is like any other design guide - not specific to the SDNPA - makes it an unrewarding read as it tells us little about the distinct qualities of the place.	This is not area specific guidance but does focus on design principles, (many of which are not necessarily original and can be applied elsewhere too) that this Authority considers important and align with Local Plan policies. And the Park's Purposes and duty. No Change
149	3.4	Fittleworth and District Association	There should be a section on design guidance for conservatories	The document is already quite long and many conservatories do not need planning permission (they may be 'permitted development') and therefore fall outside the scope of this document which is aimed at guiding design of development that can be influenced through the planning system. Added the following text in C.4.0.1: 'Some extensions, such as porches and conservatories, may not need planning permission (see SDNPA guide to permitted development) but should still follow the landscape-led approach to design by responding to context and the local character.'
150	3.4.0.3	Whaleback Planning and Design	'3.4.0.3 Whether the extension is at the front, rear or side, it should be designed to be: subservient in mass, bulk and form to the existing property' This is not necessarily the case but just reflects a habit or convention that has built up in planning.	Whether conventional or not, it is recognised good practice. No Change
151	3.4.1.1	Buriton Parish Council	There seems to be some confusion in terminology / meaning between 'roof lights' and 'skylights' on pages 19 and 20 (e.g. 4.1 d & e; 3.4.1.2 and 3.4.1.3 and figure 4.1)	In fact the terms 'roof lights' and 'skylights' are interchangeable and these are commonly used for any windows located in the roof. The most technically correct term for what is referred to in the document is 'roof

				windows'. All references to 'skylights' and 'roof lights' in the text have been changed to 'roof windows'.
152	3.1.4.2	Whaleback Planning and Design	Dormers can look good when not lined up with windows below and why are eyebrow dormers and mansards more acceptable	Because sometimes too many or too large dormers are too visually impactful. As usual, depends on context. Dormers that don't line up could be acceptable if they are locally characteristic. No Change
153	3.4.2 blue box d.	Whaleback Planning and Design	This design principle might apply to other house types (as per sketch of detached house in fig 4.6). Too prescriptive	Changed text in d. to : 'Side extensions should normally be set back from the main building to retain its dominance; avoid a mismatch of new and old materials; and (for semi-detached houses) maintain the original main building symmetry.' This is guidance, and so in the minority of cases where a flush extension is likely to be acceptable, it can be set aside. In most cases it should apply however. No change
154	3.4.2.7	Whaleback Planning and Design	What about green roofs? It seems SDNPA is prioritising traditional reproduction and is not engaging sufficiently with Ecosystem Services.	Added: 'Flat, green roofs may sometimes be acceptable, depending on context and main building style.' in C.4.2.7
155	3.5	Friends of Lewes Society	Friends of Lewes support the design guidance set out in Part 3.5 with respect to Development Type. However, it considers that there are two more development types that should be considered for inclusion in the SPD, i.e. conversion of retail premise to residential use And garden rooms.	Although such extra specific guidance could be useful, given the concerns of the current length of the document and the relatively small numbers of such developments further sub chapters on these two subjects are not considered necessary. No Change There are too many locally-produced guidance notes on specialist issues to make it sensible to try to list them all in this document No Change
156		Whaleback Planning and Design	Limited guidance on when and why a farmstead approach should be taken.	Added para: Farmstead Typology for New Build

				<p>Development.</p> <p>C.5.2.12 A farmstead typology is not normally the appropriate approach for new residential development. An exception might be where buildings relate to significant land management uses and achieve an authentic response to local farm character.</p>
157	3.5	South Downs Network	Should have separate guidance on tourist sites either for events or for those of a more permanent basis like Drusillas near Alfriston and festivals like Boom town.	<p>This is too specialist to warrant extra space in the design guide which in this chapter only covers the most common development types.</p> <p>No Change</p>
158	3.5.2.4	British Horse Society	Support this para but “protect and enhance” should be used rather than “respect”. “Footpath” should be replaced with “Public Rights of way.	<p>Both suggestions have been actioned</p>
159	3.5.2.4	West Sussex Local Access Forum	Same points as immediately above	<p>Same response as above</p>
160	3.5.5 Blue box a.	Whaleback Planning and Design	<p><i>‘Large non-residential buildings will need to use design techniques to reduce the building mass or apparent mass to integrate them successfully into residential areas characterised by more domestic scale buildings.’</i></p> <p>This kind of approach results in McCarthy and Stone-type developments - such as that in Petworth. 'Breaking up' massing through contrived devices is rarely successful in architectural terms and is not a characteristic of traditional architecture.</p>	<p>Disagree. Sometimes larger buildings do need architectural techniques to reduce their perceived mass, e.g. create the impression of a number of buildings clustered rather than one enormous building.</p> <p>No Change</p>
161	3.6.1.1	Whaleback Planning and Design	<p>3.6.1.1 states that <i>“New development grain should relate back to evidence of local settlement form and history...”</i></p> <p>Too prescriptive as higher density might be justified in a modern development in contrast to historically low density on a site.</p>	<p>The term ‘relate back to evidence’ should not be confused with ‘must follow the exact historical or contextual density’. The history of the site and more importantly, the density of development around the site are all important factors that should be considered as well</p> <p>No Change</p>

162	3.7.0.3	British Horse Society	Agree with this para but add equestrians to list of users Also equestrians with physical challenges.	Adding 'able-bodied equestrians and those with physical challenges'
163	3.7	Hampshire Constabulary	The Public Realm is one of the main drivers of Anti-Social Behaviour (ASB) complaints to Hampshire Constabulary. Badly designed streets, inappropriate connectivity, poorly sited Public Open Space (POS), and inappropriate fittings within the public realm create the environment, which makes ASB more likely to occur. To reduce the opportunities for crime and disorder (ASB), within section 7 Public Realm we would ask that the requirement to reduce the opportunities for crime and disorder is clearly made. We would ask that a paragraph worded as below or with words so as to convey the same meaning is added: "The public realm should be designed to maximise the opportunities to reduce crime and disorder"	Add para after C.7.0.3 to say "The public realm should be designed to reduce crime and disorder"
164	3.7.1	Whaleback Planning and Design	Encouraging to see the promotion of the principle that roads should be kept as narrow as possible and that they should be framed by built form or landscape elements. Notwithstanding that there is also a section on Streets at 7.2, it would be appropriate to omit the word 'Rural' because, with perhaps one or two minor modifications, the approach in 7.1 could apply to the design of all general purpose highways.	Welcome the support C. 7.1 Rural Highway Design guidance needs to be distinct from C.7.2 streets, which would apply to urban areas too. No Change
165	3.7.1	South Downs Network	We believe this document and any reference in the proposed design SPD needs to be updated to take account of safety for non-motorised vehicle users.	Chapter C.7.1 and Roads in the South Downs emphasise how design needs to protect and enhance the rural character of these routes. The safety aspect is very important but is already amply covered by the highway authority responsible for those routes in its area. It is not necessary for the Design SPD to provide specific guidance on the safety aspects of road and route design. No Change
166	3.7.1	Cheriton PC	Rural Roads chapter should put more emphasis on reducing speed	Blue box g. does require development to slow traffic down through appropriate design measures. The Highway Authority would also have a role in ensuring

				<p>new road development is built to appropriate design speeds.</p> <p>C.7.1.2 also covers traffic calming measures. To give this extra emphasis the clause is added at end of second line in C.7.1.2: ‘...which all have a traffic calming effect.’</p>
167	3.7.1.1	Fittleworth and District Association	Define ‘trunk road’	<p>Changed text replacing ‘trunk roads’ with ‘main roads used for long-distance travel’:</p> <p>‘C.7.1.1 Although main roads used for long-distance travel outside settlements need to be designed mainly for road traffic safety and flow in mind, most other roads and routes in the National Park (the vast majority) should be treated as rural lanes and byways in accordance with the ‘Roads in the South Downs’ (RSD).</p>
168	3.7.1.2	Fittleworth and District Association	We greatly welcome the provision in para 7.1.2 that "Roads running through the heart of settlements should be treated as streets for people"	<p>Welcome the support.</p> <p>No Change</p>
169	3.7.1.2	Highways England	Paragraph 3.7.1.2 of the DGSPD outlines that A roads running through towns and villages should be treated as ‘streets for people’ as well as facilitating traffic flow. The paragraph continues, outlining that this can be achieved through design interventions (such as road surface changes, narrowing of the road width, and placing of buildings and trees providing greater enclosure). It should be noted that any proposed changes to the SRN need to be discussed and approved by Highways England through the appropriate channels.	<p>The Highway Authority would automatically be consulted on all Strategic Road Network proposals and so there is no need to state this in the design guide.</p> <p>No Change</p>
170	3.7.1.2	Whaleback Planning and Design	At 3.7.1.2 it is curious that there is no mention of pavement in the context of discussing the need for a clearly delineated area for pedestrians.	<p>This is because pavements, although sometimes necessary (in the middle of villages, for instance), do not reflect or contribute to the character of rural roads generally.</p> <p>No Change</p>
171	3.7.1.3	Thakeham Homes	Thakeham supports that sensitive design is important within rural locations within the National Park, however it should be noted that any access works provided for development will be required, for safety and technical reasons, to be in accordance with Hampshire, West Sussex	<p>There can be a tension between the strict adoption of highway design principles and the need to preserve the rural character of the area’s roads.</p>

			and East Sussex County Council's Highways' standard design principles. It is suggested therefore that the draft Design Guide is not the correct mechanism to determine what is considered 'over-engineered', however there is the opportunity to advise on how junctions can be sympathetically designed.	It is also understood that the Highway Authorities have an important role in adopting new road junctions to developments and that safety is one of their key concerns. There needs to be a dialogue between all parties in the spirit of the Roads in The South Downs but this Design Guide sets out the Authority's approach from a landscape character perspective. No Change
172	3.7.2	Whaleback Planning and Design	We are also supportive of the approach to the design and layout of streets set out in 7.2. In addition to the existing references to sections 1.5 and 1.7, it would be helpful for there also to be a backwards reference to section 1.2 (Access and Permeability).	Added this cross reference to C.1.7 in C.7.2.6
173	3.7.2 landscape-led hint	Whaleback Planning and Design	On page 30, 'Landscape-led Hints' includes the statement: A character study of a street should influence the design of any hypothetical future development nearby. There is concern that this might limit creativity and/or promulgate design which is not of the highest quality.	The word 'influence' is key as this is not a prescriptive requirement to copy what is existing. No Change
174	3.7.3 and 3.7.4	Hampshire Constabulary	POS at 7.3 Public Open Space – we note the following: a. Figures 7.10 and 7.11, both show areas of POS, neither is enclosed and it appears that the equipment shown in figure 7.11 is out of scale for its location. b. To reduce the opportunities for crime and disorder all areas of POS should be enclosed by a robust boundary treatment, perhaps hoop topped railings approximately 1m high. There should be at least two entry / exit points within the boundary treatment.	The sketches are schematic and not meant to be completely accurate in all respects (such as scale of equipment). Play area in fig. 7.11 is shown enclosed with at least 2 access points. Not all POS should be enclosed and if, for instance the local village greens are open, then there could be a strong case for following that unenclosed character in new POS. No Change
175	3.7.3 blue box c	Whaleback Planning and Design	This seems entirely without grounding as every context will be different.	The word 'generally' is key as this implies that this may not apply to all cases. No Change
176	3.7.3 blue box f	Whaleback Planning and Design	Public art usually adds to clutter and is not an essential requirement of good urbanism.	Disagree. It doesn't have to add to clutter, if designed well, can be inspiring and promote distinctiveness and local connections to a place and its history. No Change

177	3.8	Whaleback Planning and Design	Guidance should include something on 'remote car parking' which has some benefits.	Added new paras C.8.1.20 and C.8.1.21: Communal 'remote' car parking
178	3.8.1	Whaleback Planning and Design	Need more encouragement for minimising car ownership and use	Car parking numbers largely set by SDNPA parking Standards as set out in the Parking SPD. Therefore guidance focuses on best ways of integrating the car parking. Non-motorised alternatives to car use is promoted in section C.1.2. No Change
179	3.8.1	Whaleback Planning and Design	Need more encouragement for remote car parking as part of a planned approach as opposed to 'conveniently located for the dwellings they serve' (blue box e.).	The guidance does not preclude the use of 'remote' car parking. The key word is 'conveniently'. This could mean that a short walk for some car parking, particularly for second car spaces, or some other method of making the location convenient might make parking provision which is not very close to the dwelling appropriate. The opposite of design principle e., i.e. if all the car parking were not conveniently located, would not be acceptable. This would be assessed on a case by case basis. No Change
180	3.8.1.18	Whaleback Planning and Design	We believe also that general references to 'bicycles' should be replaced by 'cycles' to promote parking facilities suitable for family cycles, cargo cycles, tricycles and other adapted cycles.	Changed 'bicycles' to 'cycles' in C.8.1.22 Otherwise all other references already say 'cycle'.
181	3.8.2.14	Storrington and Sullington Parish Council	Support principle of underground segregated waste on large urban development sites	Welcome the support No Change
182	3.8.2.21, fig 8.27	Jennifer Chibnall	In relation to Lewes one small error, the 'flatted development in Lewes' p.37, shown with electric car charging points serve town houses rather than flats	Corrected title to photo to refer to town houses

183	3.9.1.c. blue box	British Horse Society	<i>GI should be designed at different scales from links out to GI beyond the site and strategic networks as well as at a more detailed level.</i> We support this statement. GI, in the format of 'green corridors,' must provide links in strategic networks of PRow and recreational routes for ALL users <i>including</i> equestrians.	It has already been acknowledged that equestrians are in the user group for PRow and GI but this requirement covers all GI including GI not accessible for people (i.e. just for wildlife). No Change
184	3.9.1.c. blue box	West Sussex Local Access Forum	Support this key design principle	Welcome the support No Change
185	3.9.1.d. blue box 3.9.1.3 and 3.9.1.6	British Horse Society	3.9.1.d. blue box Support this requirement 3.9.1.3 Support mention of PRow 3.9.1.6 Support encouragement of recreation opportunities	Welcome support No Change
186	3.9.1.15	Natural England	We support point 3.9.1.15 which suggests that BNG measures should be landscape-led. Include a specific measurable target for biodiversity net gain. 10% is expected to be the minimum according to the Environment Bill but we would strongly support considerations to go beyond this. Provide more clarification regarding Biodiversity Net Gain to make it clear that it is expected over and above meeting wider biodiversity good practice for planning and development	More detailed advice and the Authority's expectations for BNG will be provided in latest Authority guidance. No Change
187	3.9.1.15	Natural England	The 'Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol' jointly produced by Natural England and your Authority should be referenced within the design guide to ensure it is followed where appropriate	Link to this document inserted under C.9.1.25 and in Appendix B
188	3.9.1.17	Buriton Parish Council	Document should say more and show photos of bat and bird boxes and reference bee bricks	This has already been updated in C.9.1.9 and in new fig 9.1 Added reference to bee bricks added in C.9.1.9
189	3.9.2	Friends of Lewes Society	Trees – support this section	Welcome support No Change
190	3.9.3	Friends of Lewes Society	Sustainable Drainage –welcome its inclusion but suggest it could be improved by robust editing and reformatting, to include the key design	The SDNPA requirements are set out clearly in blue box at start. Sources of tech guidance already included.

			expectations, SDNP requirements, sources of technical guidance plus relevant local photographs of sustainable drainage.	Unfortunately good local built examples are not yet easy to find No Change
191	3.9.3 blue box f.	Southern Water	Support the reference made in Section 9.3 to the need for new development to follow the drainage hierarchy (page 40). One small point would be that perhaps if the hierarchy was numbered 1-4 it would make it more clear that drainage to a combined sewer is the least favoured option.	Numbers added as requested.
192	3.9.3	Friends of Lewes Society	Some captions to illustrations need improving.	Captions have been checked and improved where necessary.
193	3.9.3	Friends of Lewes Society	The need for SuDs to be maintained in perpetuity needs to be addressed in the SPD.	Point i. in the blue box does require a maintenance plan to cover operational stages. Plan Policy SD49 requires flood adaptation to be funded and maintained in perpetuity and the Design Guide chapter on SuDS refers to this policy. Now added 'in perpetuity'
194	3.9.3.3	Adur and Worthing Councils Facilities and Technical Services	<p>"3.9.3.3 Drainage approaches for schemes within the South Downs National Park are expected to: „ Be landscape-led" I worry that the interpretation of this by some at the national park is already leading to drainage design not being engineering led, i.e. solutions are being pushed for by officers which physically will not work on the basis of them fitting in with the landscape. I fully agree that where possible suds should be open features and deliver multiple benefits, but ultimately they still have to work and meet WSCC LLFA policy requirements.</p> <p>It would also be beneficial to state that applicants should discuss requirements with local district and borough engineers.</p>	<p>The SuDS approach does not compromise on the need to attenuate flow rates and volumes of water associated with a particular site ('engineer-led'). This is covered in points d. and h. in the blue box. The SuDS approach aims to additionally achieve the other design objectives of enhanced water quality, landscape amenity and biodiversity. The term 'landscape-led' here (as in all other parts of the document) means that the drainage strategy needs to respond well to its context.</p> <p>An additional para added as new C.9.3.1: 'New development must have a drainage strategy that deals efficiently with predicted water volumes and flows and applicants should discuss requirements with local district and borough engineers, but wherever possible, the Authority favours a Sustainable Drainage System (SuDS) Approach.'</p>

195	3.9.3.5	Adur and Worthing Councils Facilities and Technical Services	" „ Permeable surfaces (such as gravel or permeable paving). All new hard surfacing should be permeable or drain to adjoining land that is permeable unless there are sound justifications otherwise. " Unfortunately this seems to be being misinterpreted by some too. It would be preferable to state "Unless sound justification otherwise, roads and driveways should be permeable. Pavements should be permeable or shed to surrounding permeable ground." There appears to be some misconceptions that roads shedding to surrounding ground without sufficient controls is acceptable.	Amended text to: "Unless sound justification otherwise, roads and driveways should be permeable (such as gravel or permeable paving). Pavements should be permeable or shed to surrounding permeable ground."
196	3.9	Adur and Worthing Councils Facilities and Technical Services	It would be good to include a link to the WSCC policy for the management of surface water within the "other guidance" section. Policy for management of surface water	Link added to 'other guidance'
197	3.10.1 Blue box a.	Thakeham Homes	We do not believe there should be size requirements for back gardens, instead requirements for open space across the site as a whole.	These are minimum garden size and overlooking distances from bedroom to bedroom which are in line with what many other planning authorities require and are modest. In practice, there may be some scope for pragmatism on a small scale on large developments or in some town centre locations, but for most new family homes, minimum standards remain necessary. No Change
198	3.10.1 Blue box a.	Whaleback	<i>a. Houses with 2 and more bedrooms should usually have a private amenity space of at least 60% of the internal floor space of the house.</i> What is the basis for this metric? Surely it is different in different contexts	This is a rule of thumb minimum size to achieve gardens which are acceptable for the scale of house. Recent Covid times have highlighted the need for private amenity space even more. In practice, there could be particular circumstances where this minimum standard could be waived, but it would be a starting point for most scenarios and contexts. No Change

199	3.10.1.4	Lewes District Council	In relation to the section on residential amenity, we support the para 3.10.1.4 of the SPD where it confirms that exceptions to these rules might be appropriate where homes directly front onto or are near open green space or in town centre locations with a tight urban grain. We would request that similar exceptions for development in town centre locations are made throughout the rest of the SPD so as not to prevent design of development reflecting the character and identity of its urban surroundings.	<p>The residential amenity exceptions are relevant to town centres. Otherwise it is difficult to see what specifically the design guide should be saying beyond the need to respect the local context (as in all other locations). In practice this can mean more freedom to reflect the existing eclectic nature of a town centre like that in Lewes. The SPD would not be more restrictive in this sense.</p> <p>No Change</p>
200	3.10.1.4	Whaleback Planning and Design	Requiring N-facing rear gardens to be longer than 10m is too prescriptive.	<p>Blue box b. says should 'generally be extended to avoid excessive shading' without quantifying. Para C.10.1.4 suggests 'ideally be longer than 10m..'. This is sufficiently flexible language to allow a context-specific assessment and is therefore not overly prescriptive.</p> <p>To clarify further, C.10.1.4 has additional text (shown in red):</p> <p>Rear gardens for two storey houses that are north-facing should ideally be longer than 10m as otherwise a large part of the garden will be cast in the shadow of the house for large parts of the day.</p> <p>Exceptions to these rules might be appropriate where homes directly front onto or are near open green space or in town centre locations with a tight urban grain and the minimum garden length figure could be reduced for bungalows and extended for higher buildings proportionately.</p>

201	3.10.1.4	Lewis & Co Planning on behalf of Generator Group	<p>These matters are briefly referred to in Paragraph 3.10.1.4 of the SPD: “Exceptions to these rules might be appropriate where homes directly front onto or are near open green space or in town centre locations with a tight urban grain.”. However, greater flexibility needs to be built into the policy itself (rather than the supporting text) to ensure that the more historical plot types and densities found in towns such as Lewes and Petworth are recognised and reflected in the design of new developments. In order to avoid the potential erosion of heritage characteristics by the blanket application of space standards, Policies 10.1 (Private Gardens), 10.2 (Communal Gardens), 10.3 (Balconies) and 10.4 (Privacy & Daylight) should re-worded to provide greater recognition of historical urban site restrictions so that the guidance is more balanced. In turn, this will help to avoid the under provision of housing on previously developed sites and reduce the pressure to develop greenfield land in urban fringe and rural locations.</p>	<p>There is a slight misunderstanding as the Design Guide is interpreting policies and not making new ones. The blue box points are key design principles and are all subject to the particular character of the site and its context.</p> <p>The document does provide minimum space standards for the issues mentioned but this is guidance for most situations and does not preclude the possibility of standards being relaxed if there are legitimate design or planning reasons to do so.</p> <p>These standards are designed to provide minimum acceptable living environments for residents and so should be seen as the default minimum requirements to be applied unless there are particular site-related reasons to not do so.</p> <p>No Change</p>
202	3.10.1.5 - 3.10.1.7	Thakeham Homes	Supports encouragement of front gardens	<p>Welcome support</p> <p>No Change</p>
203	3.10.	Hampshire Constabulary	Figure 10.3 shows the front of a dwelling with a recessed front door. To reduce the opportunities for crime in this situation the recess should be wide (twice the width of the door) a light should be fitted in the ceiling above the door. The front garden should be enclosed by a robust boundary treatment.	<p>Although supported as a general principle and in most cases not all new homes will be expected to have front garden boundaries, especially if there is already a tradition of this in the area of homes with front doors straight onto streets.</p> <p>The illustration does already show a recess wider than front door and it would be quite prescriptive to insist on at least double the width in all cases.</p> <p>No Change</p> <p>A light could be fitted in this situation and is now shown on an amended sketch</p>
204	3.10.2 blue box a	Whaleback Planning and Design	Communal residential gardens should consist of at least 20m2 of usable open space per resident too prescriptive and not feasible for dense flatted development.	<p>Changed from ‘per resident’ to ‘per dwelling’</p>

205	3.10.4 blue box b.	Whaleback Planning and Design	Too prescriptive, define what is meant and why difference for existing and new development. Suggest exceptions where no overlooking.	Distinction as more sensitive when existing dwellings affected. Definition is clear in para C.10.4.1, i.e. distance measured between opposing rear windows. If no overlooking then this problem is obviated. No Change
206	3.11	Storrington and Sullington Parish Council	Support emphasis on native hedges and trees in place of close board fences where appropriate	Welcome support No Change
207	3.11.1.9	Hampshire Constabulary	Hedging on its own does not provide a secure boundary treatment. If it is to be used as such (to enclose a private space) it must incorporate a robust boundary treatment.	This is true and is mentioned elsewhere in the document. The last line in this para will be amended with ‘.. and in conjunction with e.g. a post and weldmesh fence where security is needed. ’
208	3.11.1.10	Thakeham Homes	Supports encouragement of hedgehog highways	Welcome support No Change
209	3.12	Harting PC	Surprised at absence of mention of local clunch/malmstone	The document is not meant to provide an exhaustive list of local materials found in the national park. It would be up to the applicant to identify the local materials. However reference to malmstone added at end of C.12.1.19: ‘ Clunch ’ or malmstone in combination with brick, is a characteristic feature of building design in settlements situated on or near the Upper Greensand ridge at the foot of the South Downs scarp slope, such as Harting. ’ A photographic example has been added.
210	3.12.1.b Blue box	Friends of Lewes Society	Replace and <u>justified for technical reasons</u> ”. In place of the underlined section the Society would prefer “and appropriate to their context”.	This suggestion is accepted and the change has been made.
211	3.12.1.1	Friends of Lewes Society	ADD after “Village Design Statements” “and guidance documents produced by local amenity societies”.	This suggestion is accepted and the change has been made.
212	3.12.1.7	Whaleback Planning and Design	– ‘ <i>The main building material in the South Downs Area has traditionally been red brick</i> This is not a helpful statement. The main building material has not been red brick – but those materials which relate to local geology and woodlands. Timber, lime, brick, tile, stone - all are equally valid in	Added the qualification: ‘.. particularly in the last two centuries ’

			their contexts. Brick may now be more numerous due to C19 and C20 building but it is not the most characteristic of the area.	
213	3.12.1.15	Friends of Lewes Society	Raking of mortar joints is not a traditional technique and is not suited to all types of bricks, especially where the bricks are soft and absorbent. It should only be used for new construction, or where the existing building has raked out joints.	Figure 12.4 showing different mortar pointing missing. This has been reinstated. This passage and photos are purely meant to show how much appearance of brickwork is influenced by how mortar is finished. It is not advocating any particular technique. No Change
214	3.12.1.18	Friends of Lewes Society	Fig 12.10 We believe this shows beach cobbles, not 'cobbled flint'. Fig 12.11 shows knapped <u>squared</u> flint Fig 12.12 should explain that flint shards (called gallets) are incorporated in the mortar. Who would know what galletted flint is?	Change to 'river cobbles' Change to 'knapped squared flint' Added '(flint shards incorporated into the mortar)'
215	3.12.1.21	Friends of Lewes Society	We believe the second photo shows blue headers, not MTs. There are far better buildings to illustrate their use; most are red.	For the avoidance of doubt we have sourced an alternative photo of a building with mathematical tiles
216	3.12.1.29	Friends of Lewes Society	ADD "a darker plinth is traditional to conceal splash back and wear & tear."	Have added "a darker plinth is traditional to conceal splash back and wear & tear." And '(see fig. 12.23)'
217	3.12.1.32	Friends of Lewes Society	Last sentence: change for clarity to "Timber cladding on north facing or shaded locations should generally be avoided to prevent damp staining."	Have changed to "Timber cladding on north facing or shaded locations should generally be avoided to prevent damp staining."
218	3.12. 2	Friends of Lewes Society	Preamble: reference should be included to permeability,SUDs etc. Repairs, making good after utilities works should always use matching or compatible materials. In paved areas tarmac or concrete repairs will rarely be acceptable. Traditional granite and stone kerbs should be retained wherever possible.	Added new C.12.2.4: 'Some materials need to be selected for their permeability as part of SuDS systems, such as gravels, permeable blocks (with nibs to retain gaps) or porous asphalts (made porous by building with open-graded friction coarse aggregate).' The latter can be surfaced with bonded aggregate, using stone matching what is found locally, to provide a more rural finish.'
219	3.12.1.27, fig. 12.22	Jennifer Chibnall	Questions appropriateness of rusted steel as appropriate as this product not produced in Lewes at Ironworks	This may be taking materiality and links to site too literally. The point is that this industrial aesthetic is more appropriate here (than in some other locations in

				the National Park.) given the industrial heritage of the site. No Change
220	3.12.1.38 and 3.12.1.38	British Horse Society	Support these requirements but would add that gates need to be well-maintained and kept open when not needed.	These are not issues within the remit of a Design Guide No Change
221	3.12.1.38	Amberley Society	Illustrate a Sussex Field gate which would have been the traditional design in Sussex	Added illustration, fig 12.32.
222	3.12.2	British Horse Society	Support this statement	Welcome support No Change
223	3.12.2	Friends of Lewes Society	Preamble: reference should be included to permeability, SUDs etc. Repairs, making good after utilities works should always use matching or compatible materials. In paved areas tarmac or concrete repairs will rarely be acceptable. Traditional granite and stone kerbs should be retained wherever possible.	Added new para after C.12.2.3: ‘Some materials need to be selected for their permeability as part of SuDS systems, such as gravels, permeable blocks (with nibs to retain gaps) or porous asphalts (made porous by building with open-graded friction coarse aggregate).’ The latter can be surfaced with bonded aggregate, using stone matching what is found locally, to provide a more rural finish.’ Added new para after C.12.2.17: ‘Making Good Making good after works, such as for repairing or laying underground utilities, should always use matching or compatible materials. In paved areas, tarmac or concrete repairs will rarely be acceptable. Traditional stone kerbs should be retained wherever possible.’
224	3.12.2.3	West Sussex Local Access Forum	Routes should also be suitable for their purpose.	We already say they need to be robust but have added: ‘...applicants are expected to use a simple palette of robust surface materials that are fit for purpose and that relate to those most commonly used...’
225	3.12.2.5	Storrington and Sullington Parish Council	Support this paragraph on keeping PROWs and rural roads as simple as possible, including the absence of pavements in many cases	Welcome support No Change

226	3.13.	Friends of Lewes Society	FoL disagree with the use of the term 'landscape-led' when referring to built form, architecture etc.	The SDNPA and this document make it clear that the definition of 'landscape' being applied includes 'townscape' and buildings. Context is already set out as the main consideration for considering the suitability of architectural style in the first para C.13.1.1. No Change
227	3.13	Whaleback Planning and Design	Various detailed points on traditional window design	Although not disputed, this section is trying to provide some broad principles for new buildings that attempt to use traditional styles and is not meant to provide guidance on authentic replicas of traditional window design (which might be required in listed buildings, for instance). No Change
228	3.13, fig 13.1	Friends of Lewes Society	Both buildings are conversions	Caption changed to: 'Existing traditional river warehouse buildings converted sympathetically for residential use. The new buildings in fig.13.2, on the same river, reflect a similar scale and form'.
229	3.13, fig 13.2	Friends of Lewes Society	we would question whether the illustration is a good example of "Locally Characteristic Scale".	As the new caption above refers to this, the view is that the river warehouse provides the locally characteristic scale which the new development has used appropriately. No Change
230	3.13, landscape-led hint.	Friends of Lewes Society	On pages 59 & 60 there is use of the caption "Landscape-Led Hint" which we suggest is inappropriate as it refers to a local material and two window styles used in Lewes.	Use of caption 'landscape-led hint' is appropriate as the buildings are part of the landscape. No Change
231	13.3	Harting PC	We welcome the recommendations on window design and note at 3.13.3.9 the requirement that windows in listed buildings should be 'very faithful to traditional forms'. We would, however, like to see an explicit admission that well designed double glazing may be appropriate in a listed building. This has been a significant issue in our parish where the default position is that applicants have been refused permission in almost all circumstances for any form of double glazing, however	New text in C.13.3.9: When dealing with listed buildings and some other important traditional buildings, it is likely that windows which are very faithful to traditional forms will be required. unless the case can be made that well designed alternatives, including the use of double or triple glazing, are appropriate and do not have an adverse impact on either the appearance or fabric of

			sympathetically designed. We believe that, in light of concerns over climate change, a review of this approach is overdue.	the building or on any features of architectural or historic interest.
232	3.13.3 Blue box d.	Buriton Parish Council	There is so much in the document that some of the more important things can easily be lost or missed by readers. As an example, the importance of windows being taller than they are wide (unless this is not locally characteristic) is hidden away on page 59 in section 13.3(d) - but this 'simple' matter is often so very important	The fact that this design principle is in the blue box (and repeated in Key Design Principles in Appendix D) shows that it is considered important. No Change
233	3.13.4.9	Whaleback Planning and Design	Garages don't necessarily need to be recessed and can add character:	There will always be exceptions but as a general rule in new development this is a good principle. No Change
234	3.13, fig 13.32	Friends of Lewes Society	Fig 13.32 on page 62 refers to "Lewes Town Hall", accompanied by a photograph of the Depot Cinema, which is an obvious mistake.	Not clear what version of doc this refers to as in latest version this is correct No Change
235	3.14.4	South Downs Network	Design SPD should make specific references to summer cooling of homes, more focus on heat pumps and other alternatives to gas central heating.	Not the right document for these matters which are covered in the Sustainable Construction SPD. No Change
236	3.14.4	Thakeham Homes	Thakeham has pledged that from 2025, every Thakeham home will be zero carbon in lifetime operation, therefore we generally support the current wording of these sections to encourage a reduction in carbon emissions. We recommend additional wording is included in these sections regarding the consideration of building orientation in order to maximise solar PV on new developments.	Welcome support We are not prescriptive about how applicants achieve the sustainable construction requirements and would not want to dictate building orientation purely for this objective. Solar collection already mentioned as a factor for consideration in section C.1.3 No Change
237	3.14.4	West Meon PC	Not enough on sustainable construction guidance.	Not the right document for these detailed matters which are covered in the Sustainable Construction SPD. No Change
238	3.14.4	Winchester City Council	draft SPD does not appear to refer to the SDNPA Climate Change Strategy and Action Plan and specifically address how the layout of developments should be address climate change issues in the beginning section of the SPD	The SDNPA Climate Change Strategy will inform both potential changes in the review of the Local Plan and any subsequent update of any separate SPD guidance in this important area. The Design Guide can only interpret existing policies. No Change

239	3.14.4	Winchester City Council	Also need more on climate change and ecosystem services	These issues are separately covered by the SDNPA Sustainable Construction SPD and Ecosystem Services TAN both of which are linked to in this document. No Change
240	3.14.4	Natural England	Suggests SPD should provide guidance on how development can reduce mains water consumption	This is already covered by the SDNPA Sustainable Construction SPD. No Change
241	3.14.4	Portsmouth Water	Suggests further encouragement for reducing mains water consumption to below 100 litres/person/day.	This is already covered in the Sustainable Construction SPD. No Change
242	3.14.4	SE Water	We strongly encourage SDNPA to include a new target of 110 litres per person per day (or lower) instead of the current mandatory target of 125 litres per person per day within the current building regulations.	This target already in Local Plan policy SD48 and covered by Sustainable Construction SPD No Change
243	3.14.4	Harting PC	The SPD should provide guidance on how alterations and extensions to existing buildings including those of historic importance.	This is an important subject, but too specialist for this document to be able to provide comprehensive guidance on. The variables are too great to be able to provide advice that will apply in every case and generally the Authority is not prescriptive on how applicants achieve sustainability targets (subject to the same design quality constraints). It may be something the Authority will need to revisit in a future Sustainable Construction SPD update. No Change
244	3.15	Whaleback Planning and Design	Could this not simply rely on the DNS TAN? Otherwise, guidance is being duplicated and it is just too much to have to deal with - if supplementary info is needed then update the TAN.	Guidance for both Sustainable Construction and Dark Night Skies dealt with in a lot more detail in separate SDNPA guidance documents but as they are so fundamental to design of new development it is important for these issues to have a presence in this document too. No Change
245	3.15	South Downs Network	We ask you to strengthen your Design SPD to emphasize the need for the reduction in light pollution and compliance with the National Park's Dark Skies policy.	This area is already covered by Local Plan policy SD8, the SDNPA Dark Night Skies Technical Advice Note and

				its importance is emphasized in the Design SPD document already, by devoting a chapter to it. No Change
246	3.15	Harting PC	SD8 – Dark Night Skies. We welcome the section on Dark Night Skies and note its cross-references to the Dark Night Skies Technical Advice Note. However, we and others would welcome more detail on how light spill can be reduced beyond the use of low transmittance glazing. Perhaps section 13 might include more detail on design of roof lights and provide more detail on using well designed dormers wherever suitable in order to supplement the advice in 3.4.1 in relation to roof extensions.	This level of specific detail would be better dealt with in a revision of the Dark Night Skies Technical Advice Note or links from that document to other guidance on this topic. There simply is not the space in this document (already quite long) to provide detailed advice on every specialist area. No Change
247	3.15	Terra Firma	The point 15(a) very restrictive and not practical. The guidance needs to acknowledge that external lighting may be required for safety reasonsand unlikely to affect dark skies. This section should address light spill from large scale fenestration (such as illustrated as a 'good examples on page 26 case study 3 and page 52 fig 12.25)	This is qualified with 'where possible' as external lighting is not always necessary. Where it is clearly necessary, the applicant can then engage with officers on making it as dark skies compliant as possible. The detail of relevant mitigation measures is already covered in Dark Night Skies TAN so inappropriate to repeat too much detail here. No Change
APPENDICES				
248	Appendix A	Natural England	The 'Sussex Bat Special Area of Conservation Planning and Landscape Scale Enhancement Protocol' jointly produced by Natural England and your Authority should be referenced within the design guide to ensure it is followed where appropriate	Added in Appendix C
249	Appendix A	Chichester District Council Environmental Protection	It is considered that Appendix A should make reference to the Planning Noise Advice Document: Sussex March 2021 (attached for convenience). Noise mitigation commonly needs to be considered at the design stage of developments. Increasingly consideration shall be given to ventilation and overheating considerations in tandem with noise mitigation. This is highlighted in the Noise Advice Document. Acousticians, architects and other professionals increasingly need to liaise in order to develop sustainable design.	Added in Appendix C

			https://efaidnbmnnnibpcajpcglclefindmkaj/viewer.html?pdfurl=https%3A%2F%2Fwww.chichester.gov.uk%2Fmedia%2F23119%2FPlanning-Noise-Advice-Document%2Fpdf%2FPlanningNoiseAdviceDocument.pdf&clen=846273	
251	Appendix A	Chichester District Council Environmental Protection	Reference could be made to West Sussex parking standards so they can be considered at the design stage of developments: https://www.westsussex.gov.uk/media/1847/guidance_parking_res_de v.pdf	This has been superseded by the SDNPA Parking Standards SPD. No Change
252	Appendix A	Portsmouth Water	Portsmouth Water has produced development guidance for groundwater protection which can be found on our website at https://www.portsmouthwater.co.uk/developers/groundwater-protection/	Link added in Appendix C
253	Appendix B	Whaleback Planning and Design	A design methodology is the most important part of the guidance but has been put in the appendix. A good methodology, that integrates landscape and built environment analysis, Ecosystem Services and sustainability is invaluable and should be developed further. This could constitute the main part of the guide - with the methodology applied to a series of typological examples to show how it works.	Support welcomed but the guidance document needs to move relatively quickly to the specific guidance without too much preamble at the start. For this reason the process Part 2 is relatively broad brush with the more detailed points made in Appendix C. No Change

Appendix 2

Draft Design Guide SPD: Summary of comments received May 8th to June 20th 2022 and officer responses

Person or organisation who made comments	Comment	SDNPA response
Sussex Heritage Trust, Findon Parish Council, Hampshire Constabulary, CPRE and Provision	General support for the document	Welcome the support. No change recommended
Eric Croft	Some wide ranging criticisms, some of which relate to planning principles and the role of the planning authority which are beyond the scope of the document.	No change recommended
Eric Croft	Should clearly define 'landscape' and landscape-led	The document already clearly defines both these on page 7. No change recommended.
Provision	Suggested adding qualifying word such as 'generally' for specific statements to make them less prescriptive	Added word 'generally' in one instance: Section C.10.2 on communal gardens states that ' <i>communal residential gardens should generally consist of at least 20m² of usable open space per dwelling</i> '. In a second instance the word 'generally' had already been inserted in a later version of the document:

		Section C.13.4.12 states that ‘garages are <i>generally</i> best recessed from the main building’.
Southern Water	Suggest we add reference to new guidance on the types of SuDS that may or may not be adopted by Water and Sewerage companies under ‘Other Guidance’.	Suggestion accepted and change made
Midhurst Town Council	Suggested more be said about need to maximise access to public transport	Section C.1.2 (Access and permeability) now says: <i>c. Opportunities for improving access to public transport should be taken where possible.</i>
Historic England	Would prefer more emphasis on need to minimise impacts on heritage assets	To reinforce the point an extra key design principle in the blue box in Section C.3 (Development in Conservation Areas) reads: <i>i. minimise the negative impacts on heritage assets, including conservation areas, listed buildings, historic parks or gardens or scheduled monuments and their setting.</i>