

SOUTH DOWNS NATIONAL PARK



Easebourne Parish Design Statement (EPDS) Consultation Statement

July 2022

- I.1 A Parish Design Statement (PDS) describes the distinctive character of a village and the surrounding countryside. They are prepared by Town and Parish Councils with the support of the wider community. Community consultation and engagement will establish the key design issues in a local area. This information is used to develop design principles based on the distinctive local character which helps planners, developers and individuals to understand local issues and design aspirations. Design Statements are also used to influence future local design policies and support good planning in order to improve design and support sustainable change.
- I.2 Subject to consideration and testing, a PDS can be adopted as a supplementary planning document (SPD) and will be a material consideration that will be taken into account by decision makers at the Authority and the host authorities¹ when determining planning applications.
- I.3 This Consultation Statement has been prepared in accordance with Regulation 12(a) and (b) of the Town and Country (Local Development) (England) Regulations 2004.
- I.4 This statement sets out the details of the consultation. 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 PDS.
- I.4 The PDS has been prepared by volunteers with the support of Easebourne Parish Council. The volunteer group have carried out an extensive programme of public consultation in the preparation of the PDS separate to the former consultation undertaken by the SDNPA. This consultation has informed the preparation of the PDS and the design guidelines identified. Following the preparation of the draft PDS, the South Downs National Park Authority (SDNPA) resolved to undertake an eight week consultation from 05 April – 17 May 2022. As part of the consultation, the SDNPA:
- Published the draft PDS on the SDNPA website.
 - Sent emails to our Statutory Consultees (including relevant town and parish councils), and other interested parties
- Easebourne Parish Council also notified local residents through a letter drop, posters on local notice boards, Social Media and engagement with local schools.

¹ Host Authorities: Winchester District Council, East Hampshire District Council, Chichester District Council, Horsham District Council and Lewes District Council

I.5 Consultation responses were received from seven individuals and organisations. The comments received are summarised in Appendix I. Responses to comments received and how the PDS has been amended in response to these are also set out in Appendix I.

Respondent List

Respondent number	Respondent Name / Organisation
R1	Cowdray Estate
R2	Midhurst Town Council
R3	Natural England
R4	Historic England
R5	West Sussex County Council
R6	National Highways
R7	Marine Management Organisation

Appendix I

Individual or Organisation making the Representation (Rep Number)	Issue raised	Easebourne Parish Council response	Proposed action
R I	<p>“The National Planning Policy Framework (NPPF) is clear that the planning process should achieve high quality, beautiful and sustainable buildings and places (NPPF paragraph 126). Indeed, to foster such well-designed, beautiful and safe places is to contribute to the 'social' objective of achieving sustainable development, as good design creates better places in which to live and work.!</p>	<p>We agree that NPPF Paragraph 126 is clear that <i>“The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.”</i> and that <i>“Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”</i> We also recognise the paragraph’s assertion of the benefits of <i>“Being clear about design expectations”</i>. We believe this is what we have achieved with our comprehensive Parish-wide consultation and subsequent Parish Design Statement (PDS).</p>	None
	<p>“Whilst the Estate supports the Parish's overall design objectives, we have some concern that the draft document is overly prescriptive and risks being in conflict with the NPPF, which stresses the importance of not</p>	<p>We note Cowdray’s ‘concern’ about the ‘Risk of Conflict’ between the PDS and the NPPF but we don’t see any. We are however cognisant of the mandate from the NPPF for plans to <i>“at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to</i></p>	<p>Text Amended to:</p> <p>Residents are not therefore averse to appropriate contemporary architectural designs and <u>‘appropriate innovation’* where they</u> are respectful of both their immediate and their wider context and showing due</p>

	<p>preventing or discouraging innovation or change.</p>	<p><i>be acceptable.</i>”. We believe we have, at a suitable level, captured and reported on the design expectations of Easebourne’s Parishioners, giving clear examples and preferences where appropriate.</p> <p>We don’t recognise the characterisation of the NPPF’s three references to ‘<i>Innovation</i>’ (Para. 8 – in reference to an innovative economy, Para 81 - in reference to an innovative economy, and Para 130 – in relation to ‘<i>appropriate innovation</i>’) as ‘Stressing’ the importance of ‘not preventing discouraging innovation or change’ which we believe to be a misrepresentation of the aims of the paragraphs. Indeed, by identifying ‘<i>appropriate innovation</i>’ the paragraph implicitly identifies the idea of inappropriate innovation and we hope we have captured and reported clarity from the Parishioners of Easebourne on the distinction between the two.</p> <p>‘<i>Appropriate Innovation</i>’ and change are accepted by the parishioners of Easebourne and encouraged where they add to and enhance the Parish. To emphasis this point we happily amend the text of ‘Objective 2’ from the PDS to read: “<i>Residents are not therefore averse to appropriate contemporary architectural designs and ‘appropriate innovation’ where they are respectful of both their immediate and their wider context and showing due regard to neighbouring properties, local views into, out of, and across the parish, and footpaths that provide scenic walks throughout.</i>” And “Parishioner welcome new</p>	<p>regard to neighbouring properties, local views into, out of, and across the parish, and footpaths that provide scenic walks throughout.</p> <p>Parishioner welcome new developments that aim to integrate into and add to the values of the <u>parish - avoiding demarcations of separateness, difference or exclusivity.</u> <u>Parishioners value friendliness and connection more than status and exclusivity.</u></p>
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		<p>developments that aim to integrate into and add to the values of the parish - avoiding demarcations of separateness, difference or exclusivity. Parishioners value friendliness and connection more than status and exclusivity” These objectives are reflected in our design principles which Identify the elements of the parish that are distinct and need protecting and those which can be enhanced and developed through appropriate innovation and change,</p> <ul style="list-style-type: none">• Design Principle RA3 notes “Existing landscape features should not only be retained and maintained but, where possible, enhanced and new characteristic habitats created.”• Design Principle ES1 notes “The positioning of new developments on individual plots should be chosen to enhance visual variety”,• Design Principle RR2 notes “The rural character of all the approaches to the village should be conserved and enhanced through appropriate gateway measures.”• Design Principle ES2 notes “New building works <u>should reflect and respect</u> the scale, sizes and proportions of adjacent existing buildings, as well as incorporating components, such as doors, windows, dormers and porches which have regard to neighbouring homes.”• Design Principle ES6 notes “The design of frontages and other boundary treatment in new developments <u>should have regard to</u> the established character of the area. The proposed development should not result in the loss of trees, shrubs, hedges or other features which contribute to the special character of	
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		<p>the area”</p> <p>We are confident that the aims and goals of the PDS and the NPPF are fully aligned, in that they (referencing NPPF paragraph 130) Look to developments that:</p> <ul style="list-style-type: none"> • Function well • Add to the overall quality of the area • Are visually attractive • Are sympathetic to local character and history • Are attractive, welcoming, and distinctive places to live, work and visit • accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience. 	
	<p>In respect of the preparation of Design Guides, Paragraph 128 of the NPPF states that whilst their level of detail and degree of prescription should be tailored to the circumstances, they should also allow a suitable degree of variety. There is often more than one way to achieve good Design</p>	<p>In respect of NPPF Paragraph 128’s requirement we believe we have:</p> <ol style="list-style-type: none"> 1. provided maximum clarity about the design expectations of residents 2. been consistent with National Design Guide and National Model Design Code 3. captured and reflected the multiple local character and design preferences and various levels, sometime at a quite high level, sometimes in quite some detail. 	<p>None</p>

		<p>4. demonstrated that the people of the parish are open to a ‘Degree of variety’, indeed the opening design statement for the enhancement of the settlement states “ES1: The positioning of new developments on individual plots should be chosen to enhance visual variety”. This reflects the feedback we received that recognises that Easebourne is not the same as other places and should be developed accordingly, as well as the fact that on the small scale its historic development has been piecemeal and full of variety giving the parish an ‘Evolved’ feel rather than a ‘Planned’ feel.</p> <p>We don’t feel therefore we have been over prescriptive but have identified the characteristics of the town most beloved of the residents, which they feel <u>should be further enhanced</u>, and protected; as well as aspirations that provide the direction of travel for future change.</p>	
	<p>In our view, a number of the guidelines, including ES3 (for "home owners to use traditional materials and repair techniques and carry out routine maintenance where possible") and VS {"Hedges should be of a traditional nature intermixed with other species characteristic of the local area") are contrary to the NPPF's more flexible approach, unless it is made</p>	<p>We can’t evidence any greater degree of flexibility in the NPPF than that documented in our PDS design principles. Aspirational design principles that look to maintain historic materials and methods are suitable caveated with ‘Where Possible’ in recognition of pragmatic constraints.</p>	<p>In the interests of clarity, we have rearranged the wording for ES3 to bring the ‘Where Possible’ caveat to the front of the sentence.</p>

	<p>clear that some variation or innovation in design is not ruled out.</p>		
	<p>We would also observe that some development within the Parish is likely to take place through the benefit of Permitted Development Rights under the Town and Country Planning (General Permitted Development) (England) Order. Therefore, expectations that the guidance will control detailed matters such as fence design (for example, V3}, may be unrealistic. However, we agree that there is a role for the guidance to help encourage consistency in quality of design, and the approach to these finer details often makes a significant difference to overall effect.</p>	<p>As a team we recognise that not all the design principles will be enforceable in all situations, rather we see them as a self-consistent, policy-compliant reflection of the views of the parishioners on how they would like to see their parish evolve. As such we recognise that they may be of interest to residents, developers, and decisions makers such as the planning authority.</p> <p>Details of who may find the document of use are noted in the section: "Who this Document is For".</p>	<p>None</p>
	<p>The guidance should also respect other design considerations, including the need for security, safety, privacy and sustainable/low carbon design objectives, which all contribute to 'good design'.</p>	<p>There was some reference by parishioners to 'safety' and 'sustainability', but this was in reference to traffic and was therefore treated as out-of-scope except in the case of Gateway Measures under Section 4. There was no reference to 'privacy' or 'Low Carbon'. More broadly, 'Security' was mentioned twice in parishioners' feedback, both in terms of negative connotations associate with the</p>	<p>None</p>

		<p>impact on the parish of any new and large housing developments. These were broadly incidental to the major themes and therefore didn't make the final cut. There was no feedback in pursuance of a requirement for enhanced security measure in the town. We understand that these issues are considered and covered by the South Downs Local Plan and other planning Policy Documents.</p>	
	<p>We also note that some guidelines are unclear and therefore could be misinterpreted, for example ES9 which seeks for boundaries, accesses, demarcations, building scales and proportions to "reflect inclusion in the parish and not separateness or exclusivity", and RR2, which seeks for the rural character of the approaches to the village to be conserved and enhanced through "appropriate gateway measures"; both would benefit from further clarity.</p>	<p>We accept the ambiguity of the design Principle ES9 and have reworked it to provide further clarity. We also recognise that the reference to 'Gateway Measures' is not common parlance, but this is an established term in the planning world and can easily be googled by anyone unsure of the meaning of the term.</p>	<p>ES9 now Reads: <i>"Boundaries, accesses, demarcations, building scales and proportions should reflect a sense of 'belonging to' the parish and not a 'separation from' the parish - new developments should never be separated from the existing settlement by excessive boundary treatments."</i></p>
R2	None		
R3	None		
R4	None		
R5	None		
R6	None		

R7	None		
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