



# **Mid Sussex Design Guide Supplementary Planning Document**

## **Consultation Statement**

**November 2020**

## **1.0 Introduction**

- 1.1 This comprehensive District-wide Design Guide Supplementary Planning Document (SPD) has been prepared in accordance with the principals set out in the NPPF and the recently published National Design Guide to assist landowners, developers, applicants and planners in the process of assessing the design quality of schemes.
- 1.2 As well as providing guidance on planning applications, the Design Guide has been prepared to inform the preparation of the Site Allocations Development Plan Document (DPD), providing information on appropriate design, density and layout.
- 1.3 The scale of housing and employment growth in Mid Sussex is one of the most significant in the region and it is vital that new development in the district is responsive to its local context and is designed to a high standard.
- 1.4 One of the objectives of the District Plan is to ensure new development achieves a high quality of design that reflects the distinctive character of the towns and villages whilst being sensitive to the countryside. District Plan Policy DP26: Character and Design sets out a series of high level design principles that new development is expected to achieve. However, further detailed guidance is needed to secure a step change in the quality of design in Mid Sussex which will also help communities better accept the growth agenda for the district.
- 1.5 This approach accords with Government policy in the revised National Planning Policy Framework (NPPF), which places an increased emphasis on design. Paragraph 124 of the Framework states; *...creation of high quality buildings and places is fundamental to what the planning and development process should achieve.* Whilst paragraph 126 it adds: *To provide maximum clarity about design expectations at an early stage, plans or supplementary planning documents should use visual tools such as design guides and codes. These provide a framework for creating distinctive places, with a consistent and high quality standard of design.* More recently, the Government has also published a National Design Guide which encourages Local Authorities to formulate local design guides to meet the priorities of its communities based on an understanding of local context and an analysis of local character and identity.
- 1.6 The Design Guide SPD supports this policy framework and provides more detailed guidance for all those seeking to develop in the district and sets out detailed design guidance within the overarching framework of Policy DP26: Character and Design. The document is structured according to a series of integrated design themes, including; understanding context, establishing well defined streets and layouts, connectivity, sustainability, and optimising site potential through building heights and housing density that reduces future pressure on development in the countryside. Each of the themes is illustrated with good and bad practice, including through local examples.
- 1.7 This Consultation Statement has been prepared in accordance with Regulation 12(b) of the Town and Country Planning (Local Planning) (England) Regulations 2012.

## **2.0 Early engagement**

- 2.1 Early engagement and informal consultation on the SPD took place in February 2019 with West Sussex County Council Highway Authority (WSSCC HA) who provided advice on parking standards and street layout design and the Design Review Panel who gave feedback around the structure and content of the SPD. Key members of the Mid Sussex Council Planning Committees, the Leader and Opposition Spokesperson were consulted in April 2019 and provided feedback on optimising site potential in town

centres to reduce future pressure on development in the countryside. WSCC and Mid Sussex Council Tree Officers were also consulted in June 2019. Appendix 1 lists those consulted as part of the early engagement.

### **3.0 Public consultation**

- 3.1 The Scrutiny Committee for Housing, Planning and Economic Growth considered the draft SPD at its meetings on the 18 July 2019 and resolved to delegate authority to the Cabinet Member for Housing and Planning to approve the document for public consultation.
- 3.2 The draft SPD was published for a six week consultation between 9 October 2019 and 20 November 2019. The consultation was carried out in accordance with the Statement of Community Involvement.
- 3.3 The consultation draft SPD and associated background documents were available on the Mid Sussex District Council website and could also be viewed at the District Council offices in Haywards Heath and in local libraries and Help Points.
- 3.4 The background documents were:
  - Strategic Environmental Assessment (SEA) Screening Report
  - Consultation notice
  - Community Involvement Plan
  - Equalities Impact Assessment
- 3.5 A standard consultation response form was prepared to assist organisations and individuals in responding to the consultation.
- 3.6 An LDF Alert was issued by e-mail to notify all individuals and organisations that have requested to be kept informed on the progress of planning policy work that the consultation documents were now available and could be commented upon.
- 3.7 A note was also included in Member Information Service to advise District Councillors of the consultation.
- 3.8 Appendix 2 lists the key organisations consulted as part of the public consultation.
- 3.9 The outcomes of the public consultation and actions to address the issues raised were considered and agreed by Scrutiny Committee on 22 January 2020.

### **4.0 Revised draft SPD**

- 4.1 A total of 41 individual respondents commented on the draft Design Guide with 231 individual responses seeking specific changes to different parts of the document. Responses were received from eight Town and Parish Councils, Highways England, Historic England, Natural England, Sport England, South East Water, Thames Water, the Mid Sussex Design Review Panel, three local interest groups, two local architects, five developers, one District Councillor and thirteen members of the public. There were two respondents (Surrey County Council and Southern Water) who had no comments to make.

The representations seeking changes to the document can be grouped around the themes of Detailed Design Issues, Sustainability and the Structure and Format of the document. A summary of the key issues under each of these themes and changes made to the SPD to address the issues is set out below and in more detail in Appendix 3 to this report.

#### Detailed Design Issues:

4.2 A total of 28 respondents (including the Mid Sussex Design Review Panel (DRP)) made comments on detailed design issues, providing 137 individual comments overall on different parts of the draft Design Guide. At its meeting on 22 January 2020 Scrutiny Committee agreed:

- The need for further guidance on residential amenity, extensions and conversions and the need for improved images;
- The need for a separate chapter on Employment Sites with specific guidance on layout, landscaping and the design of buildings relating to this use;
- The need for more detailed guidance on the development of brownfield sites and the inclusion of a reference to the Mid Sussex Brownfield Sites Register; and
- The need to provide more information on appropriate, locally distinctive materials, including suitable modern or contemporary materials and their application.

4.3 Accordingly, the detailed design advice has been expanded and clarified particularly in respect of the final chapters covering residential amenity, household extensions and building conversions. The changes made include:

- The office-to-residential conversion section in chapter 10 proposes guidance on the conversion of post-war office blocks rather than traditional commercial buildings as the former is a more typical occurrence than the conversion of older commercial buildings. The latter is covered by the section that deals with conversions of traditional buildings;
- The Residential Amenity chapter now clarifies how the amenity of future (as well as existing) residents need safeguarding. The daylight / sunlight section now states that it will be necessary to conform to BRE standards;
- Chapter 6 proposes more detail on facing materials, and a section that covers buildings on sloping sites;
- The parking section has been sub-divided with design principles that clearly differentiate between on and off-street parking.

#### Sustainability:

4.4 Some of the respondents, including the DRP, considered that the draft Design Guide should have gone further in addressing the issue of sustainability. At its meeting on 22 January this Scrutiny Committee agreed:

- to the inclusion of a new section on Sustainability in the Introduction to the document to set out the sustainability objectives of the Design Guide;
- to signpost how the Design Guide covers a wide range of interconnected sustainable design themes relating to green infrastructure, biodiversity, trees, sustainable transport, site optimisation and mixed use as well encouraging the

highest standards in the design of buildings to minimise the use of resources and energy;

- that the start of each chapter be amended to indicate how the topic covered in the Chapter helps to deliver a low carbon and climate resilient future for the District.16.

4.5 Accordingly, the contribution that design makes to the sustainability agenda is set out more clearly within the revised document.

#### Structure and Format:

4.6 A number of respondents considered that the draft Design Guide should be more concise and clearer. In response to this, Scrutiny Committee agreed that the document should be reviewed to make it clearer and more succinct, including removing any repetition in the 'reasons' sections and any overlap between chapters.

4.7 In response to the representations, the draft Design Guide has been edited. The "Reasons" sections have been omitted in chapters 3-10 to remove repetition where additional supporting information was included in the "Reasons" sections this has now been incorporated as appropriate in the Design Guide (DG) Principles.

4.8 Finally, to ensure consistency with latest government guidance, references have been made to the National Design Guide (NDG) which was published during the Mid Sussex Design Guide consultation. The NDG sets out 10 characteristics that are cross-referenced in the list of Design Principles under the sub-section of Chapter 1.20. The schedule of changes is set out in Appendix 3.

4.9 Following consultation, the proposed textural changes and amended draft SPD were considered by the Scrutiny Committee for Housing, Planning and Economic Growth on the 29 July 2020; the Committee agreed the images would be updated for Full Council and to recommend the SPD is adopted.

## **5.0 Adoption**

5.1 The SPD was taken to a Full Council meeting on the 4 November 2020, where the District Council agreed to approve the SPD for adoption to be used as a material consideration in the planning process.

5.2 The SPD was published on the Mid Sussex District Council website<sup>1</sup> along with the Adoption Statement and this Consultation Statement.

5.3 In line with Regulations all the documents are available on the Council's website. In addition the Design Guide SPD has also been placed in libraries and the Help Points.

5.4 An LDF Alert was issued by e-mail to notify all individuals and organisations that have requested to be kept informed on the progress of planning policy work that the consultation documents were now available and could be commented upon.

5.5 A note was also included in Member Information Service to advise District Councillors of the adoption.

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<sup>1</sup> [www.midsussex.gov.uk/spd](http://www.midsussex.gov.uk/spd)

**Appendix 1:** Informal consultation stakeholders

**Appendix 2:** Public consultation stakeholders

**Appendix 3:** Design Guide SPD – Consultation Responses

## Appendix 1: Informal consultation stakeholders

Organisations consulted as part of the early engagement and informal consultation between February and June 2019:

Two chairs of the Mid Sussex Design Review Panel
West Sussex County Council Highway Authority – officers
West Sussex County Council Tree Officer
Mid Sussex District Council – officers
Mid Sussex District Council – Councillors: Robert Salisbury, Andrew MacNaughton, Pru Moore, Norman Webster

## Appendix 2: Public consultation stakeholders

Consultation was undertaken in accordance with the Statement of Community Involvement.

A LDF Alert (e-mail) was sent to all who have subscribed to it. This includes those listed on the Key Contacts List available to view on the Mid Sussex District Council website<sup>2</sup>.

Key organisations consulted as part of the public consultation in October and November 2020:

Gatwick Airport
General public (via the Mid Sussex District Council website and LDF Alert)
High Weald AONB Unit
Highways England
Historic England
Horsham and Mid Sussex Clinical Commissioning Group
Housebuilders and developers
Mid Sussex District Council – councillors
Mid Sussex District Council – officers
Natural England
Neighbouring and adjacent local authorities
Registered Providers
Sport England
Sussex Police
Town and parish councils
Water infrastructure providers
West Sussex County Council – officers

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<sup>2</sup> <https://www.midsussex.gov.uk/planning-building/consultation-monitoring/>

## Appendix 3:

### Consultation Responses and changes made to the draft SPD in response

(Paragraph numbers refer to the consultation draft document)

CHAPTER 1		
Section	Explanation for Change	Justification for Change / Consultation Response
Front	Text Omitted as duplicates text within the Overall Objectives Introduction  Also for the sake of consistency, all front pages of the chapters should be treated the same.	Refer to 1.1 below
1.1	1.1.1 now succinctly amalgamates the opening sentence in the front page with the previous 1.1.6 and clearly states that sustainability is a priority in the opening section  1.1.5 Adds the status of the guide which is also incorporated in the sub-heading title	DRP commented: <i>The dominant observation concerns a lack of consistency and clarity in the presentation styles, coupled with a tendency towards literal repetition. This gives rise to the potential for confusion with critical messages being lost amid the plethora of imagery and text.</i>  Reference to sustainability responds to comments below under 1.2
1.2	A new section at the beginning of the document demonstrates that sustainability is a priority and is dealt with comprehensively by setting out the multi-level consideration of this issue.  Sustainability is then picked up continuously as an integrated theme that is referred to at the beginning of all the chapters.	The following respondents considered that it was important to strengthen the guidance on sustainability: CPRE, Cllr Paul Brown, South East Water, Hassocks Parish Council, West Hoathly PC, Mr R Webb, Mr A Pott (Crest Nicholson), Ms L de Lande Long, Mr G de Lande Long, MSDC DRP, Natural England, Mr J. White.
1.3	<i>Who the Guide is For</i> needed to be more prominent in the text and has been moved from the end of the previous sub section 1.5 ( <i>High Quality Design and Innovation</i> ) where it was too hidden and not directly relevant to the sub section.	Clarity / conciseness – refer to DRP comments as 1.1 above
1.4	This section has been moved from the end of the previous sub section 1.6 (the Design Process) to make it more prominent. The section also has been brought forward as it introduces the new <i>National Design Guide (NDG)</i> prior to section 1.5 that deals with the Structure of the Guide with the Design	Responds to Pegasus’s comment that the Design Guide should now illustrate how the principles relate to the National Design Guide rather than BfL12.  Turners Hill PC and Balcombe PC commented that <i>the High Weald Housing Design Guide</i>

	<p>Principles of the MSDG cross-referenced with NDG's ten characteristics.</p> <p>1.4.1 to 1.4.4 edits the previous 1.6.8 to 1.6.13 and updates by referencing the <i>National Planning Policy Framework (NPPF)</i>, the <i>High Weald Housing Design Guide</i> and <i>Village Design Guides</i> as well as the NDG.</p>	<p>and <i>Village Design Guides</i> should be referenced.</p> <p>Clarity and conciseness – refer to DRP comments as 1.1 above</p>
1.5	<p>The <i>Structure of the Guide</i> section has been moved from the previous sub section 1.2 to accommodate the above sub sections for the above reasons.</p> <p>1.6.1 updates the previous sub section 1.2.8 by explaining the cross referencing of the NDG design characteristics (instead of the BfL) as well as the development types covered in the MSDG. This also allows the table under figure 1C to occupy the entire pages 10-13.</p> <p>1.6.2 – 1.6.8 is the same as the previous 1.2.1-1.2.7 except that it less prescriptively states that the design principles should normally be followed rather than must be followed.</p>	<p>Responds to Pegasus's comment that the Design Guide should now illustrate how the principles relate to the National Design Guide rather than BfL12.</p> <p>This is a Design Guide with design principles that are recommended guidelines not prescribed requirements that cover every situation; this change also reflects concerns raised by a number of consultees about a number of design principles being over-prescriptive including the last three chapters.</p>
1.6	<p><i>Opportunities and Constraints</i> has been edited as much of the previous text is included in the overview of the District in chapter 2.</p>	<p>Refer to the same DRP comments as 1.1 above.</p>
1.7	<p><i>The Value of Good Design</i> is unchanged except:</p> <ul style="list-style-type: none"> <li>- It has been moved from previous sub section 1.4</li> <li>- Para 1.4.3 has been amended to reflect Sports England's comments</li> <li>- The first 2 paragraphs previously under sub section 1.5 (<i>High Quality Design and Innovation</i>) is now included in this section as the rest of this text is now section 1.3 (refer above).</li> </ul>	<p>Balcombe PC commented that the previous sub section 1.5 could be shortened</p> <p>Sports England stated that Paragraph 1.4.3 (now 1.7.3) should make reference to good design considering opportunities to incorporate inclusive active environments that can have a positive impact on physical health as well as people's wellbeing and mental health.</p>
1.8	<p><i>The Design Process</i> is mostly the same except <i>Planning and Policy Guidance</i> is now located under 1.4 (refer above) and 1.8.5 has been edited</p>	<p>Refer to the same DRP comments as 1.1 above.</p>
1.9	<p><i>Who to Talk to</i> is mostly the same except that 1.9.1 has been edited and amalgamates previous subsections 1.7.1-1.7.5.</p> <p>Paras 1.9.2 + 1.9.3 have been swapped around as it reads better this way round</p>	<p>The reference to the DRP's ToR responds to Pegasus's suggested Amendment: Further clarification should be provided on this point to make it clear if this covers all schemes, for schemes of a particular size, or type and if the Design Review process is in place of or runs</p>

	<p><i>Design Review</i> now references the DRP Terms of Reference re: types of schemes under consideration.</p> <p>Highways England: M23 and A23” added to the list of Relevant Statutory Authorities and Organisations (figure 1F previously 1.4) requiring initial engagement.</p>	<p>parallel to design advice received from officers during the pre-application process.</p> <p>Highways England specifically requested this inclusion under figure 1F</p>
<b>CHAPTER 2</b>		
<b>Section</b>	<b>Explanation for Change</b>	<b>Justification for Change / Consultation Response</b>
Front	<p>Text Omitted as duplicates text within the Introduction</p> <p>Also, for the sake of consistency, all front pages of the chapters should be treated the same.</p>	<p>DRP commented: <i>The dominant observation concerns a lack of consistency and clarity in the presentation styles, coupled with a tendency towards literal repetition. This gives rise to the potential for confusion with critical messages being lost amid the plethora of imagery and text.</i></p>
2.1.1 to 2.1.5	<p>Concisely edits the text previously in the front page and incorporates in the main text</p>	<p>DRP commented: <i>The dominant observation concerns a lack of consistency and clarity in the presentation styles, coupled with a tendency towards literal repetition. This gives rise to the potential for confusion with critical messages being lost amid the plethora of imagery and text.</i></p>
	<p>DG1 Now incorporated under section 2.3 and amalgamated with previous DG2-4 (refer to 2.3 below)</p>	<p>Refer to the DRP comments as 2.1.1 above.</p>
2.2.1 to 2.2.8	<p>Text has been edited in response to DRP’s comments regarding duplication of text and consistency of approach across the chapters.</p> <p>Section 2.2 has been amended.</p> <p>Text updated to refer to latest guidance.</p>	<p>Refer to the DRP comments as 2.1.1 above. Cllr Paul Brown was also concerned about the previous wording stating: <i>The statement that the District is crossed by railway lines is misleading.</i></p> <p>HW AONB Guide endorsed since the Consultation</p>
2.3 / DG1	<p>Principle DG1 concisely amalgamates the previous DG1-4 and omits unnecessary repetition, that helps by placing it more prominently at the beginning of the section to give it more status. It also now refers to the sustainability agenda.</p>	<p>Refer to the DRP comments as 2.1.1 above.</p> <p>The following respondents considered that it was important to strengthen the guidance on sustainability: CPRE, Cllr Paul Brown, South East Water, Hassocks Parish Council, West Hoathly PC, Mr R Webb, Mr A Pott (Crest Nicholson), Ms L de Lande Long, Mr G de Lande Long, MSDC DRP, Natural England, Mr J. White.</p>
2.4	<p>Has been amended to reflect the health and well-being dimension of the countryside</p>	<p>Health and well-being is a strong theme that underlies Sports England consultation response who say that good design should consider the</p>

		opportunities to incorporate inclusive active environments that can have a positive impact on this. Sports England along with Public Health England launched revised guidance 'Active Design' which they consider is relevant to a number of the DG's design principles.
2.5.6 - 2.5.11	Previously 2.5.6 – 2.5.13 - Coarse and fine grain development patterns are given more explanation	BHTC's response states that 'coarse grain and fine grain' are too vague and need clarification.
2.5.12 + 2.5.13	Previously 2.5.14-2.5.16 – "Edwardian" is added to reflect the subtitle. The paragraphs have been combined here.	Refer to the DRP comments above
2.5.15	Previously 2.5.23 / References to examples of nucleated and linear settlements have been omitted.	Ms S Chapman consultation response challenges the description of Ardingly being a linear settlement
2.5.17	Previously 2.5.27-28 / Changes made to make the text more concise	Refer to the DRP comments above
2.6/ 2.6.2 –2.6.4	Previously 2.5.31-34 – Concisely edits the text	Refer to DRP's comments above
	Constraints section moved so that it is together with the Opportunities section where it can be read together; it also needed a sub-section number	Refer to DRP's comments above
2.6.7	New text added to refer to the emerging HH Masterplan	To update the document with the latest guidance
2.6.8	Constraints section moved adjacent to the Opportunities section. The section has been expanded to provide a clearer explanation of the key points including references to the Conservation Areas and listed buildings which characterise HH.	For clarification / To improve the organisation of the document
2.6.9	For the sake of clarity Opportunities is also now prefixed with "Development". This section has been significantly edited as much of the content was repeated in ch5 and in the subsequent sub sections on BH and EG.	Refer to DRP's comments above as per 2.1.1
2.6.10 - 2.6.13	Previously 2.5.39-43 Concisely edits and re-orders the text	Refer to DRP's comments above as per 2.1.1
2.6.17	Constraints section moved (adjacent to the Opportunities section). The section has been slightly expanded to provide a clearer explanation of the key points including	For clarification / To improve the organisation of the document

	references to the Conservation Areas and listed buildings which characterise BH.	
2.6.18+ 2.6.19	For the sake of clarity Opportunities is also now prefixed with “Development”. This section has been edited to reduce the duplicated text which was previously repeated in chapter 5 and in the sub sections on HH and EG.	Refer to DRP’s comments above
2.6.20 - 2.6.24	Previously 2.5.48-52 - Concisely edits and re-orders the text so that it is historically chronological.	Refer to DRP’s comments above
2.6.28	Constraints section moved (adjacent to the Opportunities section). The section has been slightly expanded to provide a clearer explanation of the key points including references to the Conservation Areas and listed buildings which characterise EG.	Refer to DRP’s comments above
2.6.29	For the sake of clarity Opportunities is also now prefixed with “Development”. This section has been significantly edited as much of the content was repeated in ch5 and in the sub sections on HH and BH.	Refer to DRP’s comments above
2.7 / DG2	This Principle is re-titled DG2 (instead of DG5 because DG1-4 have been amalgamated) and is placed more prominently at the beginning of the section. It now incorporates the previous 2.6.1 in its introductory paragraph.	Refer to DRP’s comments above
<b>CHAPTER 3</b>		
<b>Section</b>	<b>Explanation for Change</b>	<b>Justification for Change / Consultation Response</b>
Front	Text omitted for the sake of consistency and clarity. The introductions for all the chapters sit better in the main text and have been taken out of the front pages as they provide unnecessary duplication.	DRP commented: <i>The dominant observation concerns a lack of consistency and clarity in the presentation styles, coupled with a tendency towards literal repetition. This gives rise to the potential for confusion with critical messages being lost amid the plethora of imagery and text.</i>
3.1	A new sub heading has been created for the introduction. This section more clearly explains the content and organisation of the chapter including the use of a concept plan to illustrate the principles, while also specifically identifying the sustainability considerations relevant to this chapter	Natural England commented: <i>The SPD may provide opportunities to enhance the character and local distinctiveness of the surrounding natural and built environment; use natural resources more sustainably; and bring benefits for the local community, for example through</i>

		<p><i>green infrastructure provision and access to and contact with nature.</i></p> <p><i>DRP: The subject (sustainability) needs to be addressed much more ambitiously and to cover subheadings including lifespan, biodiversity, renewable energy sources and Passivhaus design amongst others.</i></p>
3.2 / DG3	<p>Previously 3.1 / DG6</p> <p>The Reason section has been removed and incorporated within the DG Principle where it adds explanation. The last paragraph has been added to explain the sustainability benefits associated with green infrastructure.</p>	<p>Natural England as per 3.1 above and also: <i>This SPD could consider making provision for Green Infrastructure (GI) within development. This should be in line with any GI strategy covering your area.</i></p> <p><i>DRP: The 'Reasons' sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p> <p>The reference to GI and healthy lifestyles responds to Sports England's message to consider the <i>opportunities to incorporate inclusive active environments that can have a positive impact on physical health as well as people's wellbeing and mental health.</i></p>
3.2 / DG4	<p>Previously 3.1 / DG7</p> <p>The Reason section has been deleted as it did not add significantly to this DG and overlapped with DG26. Instead there is a cross reference to DG 26</p>	<p><i>DRP: The 'Reasons' sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p>
3.2 / DG5	<p>Previously 3.1 / DG8</p> <p>The text has been updated to provide further examples of types of SuDs.</p> <p>The sustainability benefits of SuDs has been made clearer.</p> <p>Reason section has been deleted as it was repetitious</p>	<p>Updated for clarity</p> <p><i>DRP: The 'Reasons' sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p> <p><i>DRP: The subject (sustainability) needs to be addressed much more ambitiously</i></p>
Case Study 1	<p>Added reference to the centrally positioned open space incorporating trees, and the buildings positive relationship with the boundaries and countryside as this is relevant to the principles in this chapter.</p>	<p>Provides further relevant explanation of the featured example</p>
3.2/DG6	<p>Previously 3.1 / DG9</p> <p>The Reason section has been edited and added as an introduction to the DG Principle.</p>	<p><i>DRP: The 'Reasons' sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p> <p>CPRE's response:</p>

	A sentence has been added that states: <i>New development should establish ecological networks that are more resilient to current and future pressures.</i>	<i>We suggest that para 1 should say: Applicants should Delete: “seek to” deliver a net biodiversity gain as a minimum requirement of any development Add: “including by establishing coherent ecological networks that are more resilient to current and future pressures”. These changes will ensure conformity to NPPF para 170(d).</i>
3.2/DG7	Previously 3.1 / DG10  The text has been reordered to achieve more clarity and meaning. Both the High Weald and the S Downs are now mentioned in the opening sentence.	CPRE: <i>Please add a reference to the High Weald AONB after the South Downs National Park in para 3. The setting of both is equally important and sensitive. That addition will also ensure consistency between the guidance and Local Plan policy DP16 (last para).</i>  Balcombe Parish Council: <i>A bit vague and could be more clearly illustrated with good/ poor examples.</i>
3.3/DG8	Previously 3.2/DG11  The Reason section has been edited and added as an introduction to the DG Principle.  The added text <i>coordinate with open spaces and green links</i> is included as it contributes to the emphasis on green infrastructure (refer to DG3 above).	DRP: <i>The ‘Reasons’ sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i>
3.3/DG9	Previously 3.2/DG12  The Reason section has been edited and added as an introduction to the DG Principle.  The text has been revised in the first para to include <i>active lifestyles</i> to respond to Sports England’s advice	Sports England advised that text should be included that referred to: “developments should encourage sustainable and active lifestyles...”
3.3/DG10	Previously 3.2/DG13  The Reason section has been largely omitted except for the inclusion of the reference of cul de sacs in the parenthesis	DRP: <i>The ‘Reasons’ sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i>
3.4/DG11	Previously 3.2/DG14  The Reason section has been omitted as it needlessly duplicates.  The DG Principles has been re-ordered and edited to allow it to read better and to allow the exceptions section in the last paragraph	DRP: <i>The ‘Reasons’ sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i>

	to correspond with the guidance in chapter 5	
<b>CHAPTER 4</b>		
<b>Section</b>	<b>Explanation of Change</b>	<b>Justification for Change / Consultation Response</b>
Front	Text omitted for the sake of consistency and clarity. The introductions for all the chapters sit better in the main text and have been taken out of the front pages as they provide unnecessary duplication.	DRP commented: <i>The dominant observation concerns a lack of consistency and clarity in the presentation styles, coupled with a tendency towards literal repetition. This gives rise to the potential for confusion with critical messages being lost amid the plethora of imagery and text.</i>
4.1	A new sub heading has been created for the introduction based on the text previously on the front page. It identifies the sustainability considerations relevant to this chapter.	DRP: <i>The subject (sustainability) needs to be addressed much more ambitiously and to cover subheadings including lifespan, biodiversity, renewable energy sources and Passivhaus design amongst others.</i>
4.2 / DG12	Previously 4.1 / DG15  The Reason section has been removed and text incorporated within the DG Principle.	DRP: <i>The 'Reasons' sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i>  DRP: <i>The dominant observation concerns a lack of consistency and clarity in the presentation styles, coupled with a tendency towards literal repetition.</i>
4.3 / DG13  4.4/ DG14	Previously 4.2 / DG16  The previous DG16 has been divided because it incorporates two different principles (positive frontages and enclosure): a separate principles are now proposed for each topic.  The Reason section has been removed and the text incorporated within the DG Principle.	DRP: <i>The 'Reasons' sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i>  DRP: <i>The dominant observation concerns a lack of consistency and clarity in the presentation styles, coupled with a tendency towards literal repetition.</i>
4.5/ DG15	Previously 4.3 / DG17  The Reason section has been removed and the text incorporated within the DG Principle.	DRP: <i>The 'Reasons' sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i>
4.5/DG16	Previously 4.3/DG18  The Reason section has been removed and the text incorporated within the DG	DRP: <i>The 'Reasons' sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i>

	Principle where it adds explanation and omitted where there is duplication	DRP: <i>The dominant observation concerns a lack of consistency and clarity in the presentation styles, coupled with a tendency towards literal repetition.</i>
4.6/DG17	<p>Previously 4.4/DG19</p> <p>The Reason section has been removed because of duplication except for the list of Traffic Calming Measures that are included in the DG Principle. The previous para 4.4.2 has been included in the introduction section (refer above) because it links the overall design and sustainability objectives and does not need repeating here.</p> <p>Reference to cycling and WSCC guidance has been added.</p> <p>The 3<sup>rd</sup> para deletes <i>line of</i> in response to Persimmon's comments</p>	<p>DRP: <i>The 'Reasons' sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p> <p>DRP: <i>The dominant observation concerns a lack of consistency and clarity in the presentation styles, coupled with a tendency towards literal repetition.</i></p> <p>BH Town Council response: <i>The Committee noted the valuable guidance in the document 'West Sussex Cycling Design Guide' (August 2019 – prepared to deliver the aims of the adopted West Sussex Walking and Cycling Strategy 2016-2026) and suggested that a reference to this guide be included as a design requirement under DG19</i></p> <p>Persimmon response: <i>A 'line of trees' imposes a certain character(s) on every street and limits diversity of character and interest in the townscape. Emphasis should be given to creating a diversity of street typologies, which reinforce their function and legibility, including tree planting in some instances, as part of achieving this objective. Suggested Amendment: 'Streets should be well defined and use trees and landscaping where appropriate to reinforce their function and legibility'.</i></p>
4.7/DG18 - DG20	<p>Previously 4.4/DG20</p> <p>The parking section has been amended and divided into 3 DG Principles to reduce the text within each box and make it clearer. As elsewhere, the Reasons section has been removed, and the text omitted where there is duplication and incorporated where it adds.</p> <p>Ms L De Lande Long's comments electric charging points cannot be included as they introduce a new requirement that is not referred to in policy DP21</p>	<p>DRP: <i>The 'Reasons' sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p> <p>DRP: <i>The dominant observation concerns a lack of consistency and clarity in the presentation styles, coupled with a tendency towards literal repetition.</i></p> <p>Mr F Berry: <i>Much of the detail and examples contained within this Design Guide appear to discourage off - street parking and actually recommends on - street parking. This is contrary to the objective, and parked cars will</i></p>

	<p>Car clubs were previously mentioned; it is now referred to as a way of reducing parking.</p> <p>DG19 is a new DG Principle which looks specifically at off street parking covered by previous DG20.</p> <p>The 2nd sentence has been re-drafted to make it clear that parking should not dominate the streetscape.</p> <p>A definition has been provided of what is meant by 'small' in the context of rear courtyard parking.</p> <p>DG20 – The 2<sup>nd</sup> para has been added which states: <i>On-street parking must be designed to minimise its visual impact. Parking bays are normally most discreetly laid out in parallel, rather than right-angles, with the street kerb.</i></p> <p>The 1<sup>st</sup> para has been amended and states that: <i>to avoid it dominating the street, on-street parking should be well landscaped and incorporate generous safeguarding areas around trees and shrubs to protect them from pedestrian as well as vehicular movement and provide for private defensible space at the front of dwellings.</i></p> <p>The 3rd para includes an explanation of why right-angle parking should be limited.</p>	<p><i>dominate the street environment and views from the new houses.</i></p> <p>Balcombe PC: <i>Parking is a very complex section, with some contradictions.</i></p> <p>Persimmon and Thakeham Homes: <i>Principle DG20 'Integrate parking...' requires 'Rear courts will need to be small in scale'.</i>  <i>Suggested Amendment: It would be useful to define what 'small' comprises.</i></p> <p>Ms L De Lande Long: <i>Car club and electric charging points: Any development, not just 'larger' ones, that includes apartment blocks should provide electric charging points so that those residents are not debarred from charging an EV at home.</i></p>
4.8/DG21	<p>Previously 4.6</p> <p>The text has been edited for brevity and clarity.</p>	<p>DRP: <i>The 'Reasons' sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p> <p>DRP: <i>The dominant observation concerns a lack of consistency and clarity in the presentation styles, coupled with a tendency towards literal repetition.</i></p>
4.8/DG22	<p>Previously 4.6</p> <p>The 2<sup>nd</sup> bullet point has been changed (in italics) to respond to DMH Stallard comment. It now states:</p> <p><i>Carefully designed and located where so they are neither visually obtrusive nor</i></p>	<p>DRP: <i>The 'Reasons' sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p> <p>DRP: <i>The dominant observation concerns a lack of consistency and clarity in the</i></p>

	<p>where they obstruct the passive surveillance of the street <i>and avoid having a deadening impact on the façade or threshold.</i></p> <p>The reference to MSDC Waste Storage and Collection Guidance was previously contained in the omitted Reasons section</p>	<p><i>presentation styles, coupled with a tendency towards literal repetition.</i></p> <p>DMH Stallard: <i>Principle DG22 and 23 (NB: should read DG24) discuss bin and cycle stores and indicate that external stores would usually be inappropriate. This fails to take into account the impact that internal bike stores can have on the creation of active frontage and in our view is too prescriptive when there are acceptable means of accommodating external bin and bike stores within development (although clearly not appropriate in every case).</i></p>
4.8/DG23	<p>Previously 4.6</p> <p>Unchanged except for the reference to <i>consideration of their location must take place early in the design process</i></p>	<p>DRP: <i>The ‘Reasons’ sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p> <p>DRP: <i>The dominant observation concerns a lack of consistency and clarity in the presentation styles, coupled with a tendency towards literal repetition.</i></p>
4.8/DG24	<p>Previously 4.6</p> <p>The Reason section has been removed and the text incorporated within the DG24 where it adds explanation and omitted where there is duplication.</p> <p>The previous para 4.6.4 now provides the introduction to DG24. The 2<sup>nd</sup> sentence has been edited for the sake of brevity/clarity.</p> <p>The 2<sup>nd</sup> para has been prefixed that <i>In houses</i> cycle parking should normally be accommodated within the rear garden, car port, garage or outbuilding as it needs to be distinguished from apartments that are considered in the 3<sup>rd</sup> para.</p>	<p>DRP: <i>The ‘Reasons’ sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p> <p>DRP: <i>The dominant observation concerns a lack of consistency and clarity in the presentation styles, coupled with a tendency towards literal repetition.</i></p> <p>DMH Stallard: <i>Principle DG22 and 23 (NB: should read DG24) discuss bin and cycle stores and indicate that external stores would usually be inappropriate. This fails to take into account the impact that internal bike stores can have on the creation of active frontage and in our view is too prescriptive when there are acceptable means of accommodating external bin and bike stores within development (although clearly not appropriate in every case).</i></p>
4.9/DG25	<p>Previously 4.7</p> <p>The Reason section has been incorporated within the DG25 where it adds explanation and omitted where there is duplication.</p>	<p>DRP: <i>The ‘Reasons’ sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p> <p>DRP: <i>The dominant observation concerns a lack of consistency and clarity in the</i></p>

	<p>Additional text added to the first sentence which now reads: <i>Open spaces make an important contribution to the character of an area and “encourage healthy lifestyles”....</i></p> <p>The 3<sup>rd</sup> para has been organised as bullet points for the sake of clarity/brevity.</p> <p>The 4<sup>th</sup> para has been added re: land for productive use for residents.</p>	<p><i>presentation styles, coupled with a tendency towards literal repetition.</i></p> <p>Sports England: <i>DG26 page 76 should refer also to taking opportunities to create environments and facilities that provide for and encourage inclusive activity for all age groups and abilities.</i></p> <p>CPRE: <i>On larger developments (e.g. 300+ homes), we would urge you to promote that some public realm land be set aside for productive use by residents: e.g. land (to be communally owned) for allotments, orchards, children’s riding school, etc. This also chimes with policy DG36 (Sense of place).</i></p>
4.9/DG26	<p>Previously 4.7</p> <p>The Reason section has been incorporated within the DG26 where it adds explanation and omitted where there is duplication.</p>	<p>DRP: <i>The ‘Reasons’ sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p> <p>DRP: <i>The dominant observation concerns a lack of consistency and clarity in the presentation styles, coupled with a tendency towards literal repetition.</i></p>
4.9/DG27	<p>Previously 4.7</p> <p>The Reason section has been incorporated within the DG27 where it adds explanation and omitted where there is duplication.</p> <p>The guidance is now less prescriptively worded.</p>	<p>DRP: <i>The ‘Reasons’ sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p> <p>DRP: <i>The dominant observation concerns a lack of consistency and clarity in the presentation styles, coupled with a tendency towards literal repetition.</i></p> <p>Persimmon and Thakeham Homes : <i>Principle DG27 ‘Enhance the environment and sense of place through tree planting and soft landscape’ requires in the 1st para, second sentence that ‘Tree planting and soft landscape should be provided on all street types as a matter of principles’. This is too prescriptive</i></p>
4.9/DG28	<p>Previously 4.7 + part of DG27 reasons section</p> <p>The Reason section has been removed and previous para 4.7.18 incorporated within DG28.</p> <p>The text has been amended in line with officer’s recommendations and to</p>	<p>DRP: <i>The ‘Reasons’ sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p> <p>MSDC’s Tree Officer and WSCC’s Trees and Woodland Officer’s requirements.</p>

	suggest tree species appropriate for different hierarchy of streets	
4.9/DG29	<p>Previously 4.7/DG28</p> <p>The Reason section has been removed (and throughout the Guide) and the text, except where stated below, has been omitted because of duplication.</p> <p>The first para cross references soft landscaping as this also needs coordinating.</p> <p>The second para adds <i>surface materials, maintenance and management</i> as they are relevant considerations. Other changes are for clarification purposes. The last sentence under previous para 4.7.21 in the Reasons section has been added.</p> <p>The Surface Materials section now states that: <i>concrete or tarmac should “normally be coordinated” with other surface materials “as well as soft landscaping” as otherwise their uniform appearance and sharp finish can undermine the character of a new development.</i></p> <p>The Lighting section has been edited to avoid repetition.</p> <p>The public art section has been edited / amended and now states: <i>On larger schemes there is often an opportunity to incorporate public art in the proposals.</i></p>	<p>DRP: <i>The ‘Reasons’ sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p> <p>DRP: <i>The dominant observation concerns a lack of consistency and clarity in the presentation styles, coupled with a tendency towards literal repetition.</i></p> <p>Persimmon and Thakeham Homes : <i>Principle DG28: ‘Deliver a high quality, co-ordinated and attractive public realm’ identifies that ‘Concrete or tarmac should be used with caution as their uniform appearance and sharp finish can undermine the character of new development’. This statement needs to be more balanced, recognising that natural stone, setts or cobbles or brick are not viable or appropriate in many locations, and that the objective of a coordinated and attractive public realm can be achieved using concrete and tarmac as part of a considered and holistic public realm strategy. Suggested Amendment: ‘Natural stone either as flags, setts or cobbles or brick may be the most appropriate, especially in historic and rural locations. Where concrete or tarmac are used, these should form part of a considered and holistic public realm strategy that include other materials and planting to ensure a co-ordinated and attractive public realm.’</i></p> <p>DMH Stallard: <i>Principle DG28 seeks to prescribe what materials are appropriate for hard landscaping within different contexts and it is considered this is inflexible. It should be clarified that public art is only expected to be provided on major (10 – 300), strategic or mixed use development proposals. Clearly the provision of public art should not be expected on minor residential proposals or extensions.</i></p>
4.9/DG30	<p>Previously 4.7/DG29</p> <p>The Reason section has been removed to avoid duplication.</p>	<p>DRP: <i>The ‘Reasons’ sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p> <p>DRP: <i>The dominant observation concerns a lack of consistency and clarity in the</i></p>

		<i>presentation styles, coupled with a tendency towards literal repetition.</i>
Refer to chapter 7	Previously 4.8/DG30  Incorporated in a new chapter 7 along with the previous 6.3/DG40	DRP: <i>It is felt that a separated chapter centred on 'Employment' related buildings would be of use, enabling a clearer focus on this key development category. At present two pages at the end of Chapter 4 addressing commercial buildings is considered inadequate.</i>
<b>CHAPTER 5</b>		
<b>Section</b>	<b>Explanation of Change</b>	<b>Justification for Change / Consultation Response</b>
Chapter Title	The chapter title has been changed with <i>Community</i> substituted for <i>Mixed-use</i>	DRP commented: <i>Chapter 5 - 'Site Optimisation and Community Focused Layouts' - is also queried. Site optimisation is an important element of the Guide but specifically integrating  Community seems inappropriate. Community should be at the heart of all chapters.</i>
Front	Text omitted for the sake of consistency and clarity. The introductions for all the chapters sit better in the main text and have been taken out of the front pages as they provide unnecessary duplication.	DRP commented: <i>The dominant observation concerns a lack of consistency and clarity in the presentation styles, coupled with a tendency towards literal repetition. This gives rise to the potential for confusion with critical messages being lost amid the plethora of imagery and text.</i>
5.1/DG31	The name of the sub-title has been changed as <i>planning for increased density</i> is a clearer explanation of the guidance.  This is the introductory section that provides the overview of the chapter, as with the other introductions it makes the link with the relevant sustainability considerations more explicit.  DG31's title has been shortened for purposes of clarity.  The following additional text has been included as brownfield sites in town centres do present an opportunity for increasing density. <i>"sites close to town centres that have been identified in MSDC's Brownfield Register as having the capacity to accommodate additional scale of development"</i>	DRP: <i>The subject (sustainability) needs to be addressed much more ambitiously and to cover subheadings including lifespan, biodiversity, renewable energy sources and Passivhaus design amongst others.</i>  DRP: <i>The 'Reasons' sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i>  Mr J. White: <i>I feel that there should be more emphasis on brownfield sites. Where there is support for it, it seems to be focused towards large scale development which  necessitates the use of sites which are in poorly served locations. Much more emphasis needs to be placed on sites in good urban and sub-urban locations which will  help mitigate the need for development that will cause excessive burden on roads, schools,</i>

	<p>The Reason section has been omitted as it duplicates.</p>	<p><i>surgery's etc. There is no reference to any brownfield register, or any council ambition to produce one.</i></p>
<p>5.2/DG32+33, 5.3/DG34</p>	<p>Previously 5.1/DG32 + DG33</p> <p>While the content covers the same ground this part of chapter 5 has been reorganised for clarification reasons and to reduce repetition.</p> <p>DG32 and 33 have been given a separate section entitled Town Centre Intensification to clearly distinguish it from Urban Extensions that is considered separately under section 5.3 and the new DG34. The two case studies are also separated so they relate to the appropriate section / DG principle.</p> <p>The Reason section has been incorporated within DG32 to 34 (as appropriate).</p> <p>The guidance on town centres in the new DG32 now cross refers to the analysis in sections 2.5 and 2.6 which set the framework for the location and acceptable height and massing for the town centres. Figures 5B, C, D have also been relocated from section 2.5 to 5.2 as they illustrate the locations where intensification is appropriate.</p>	<p>DRP commented: <i>The dominant observation concerns a lack of consistency and clarity in the presentation styles, coupled with a tendency towards literal repetition. This gives rise to the potential for confusion with critical messages being lost amid the plethora of imagery and text.</i></p> <p><i>DRP: The 'Reasons' sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p>
<p>5.4/DG35</p>	<p>Previously 5.2/DG34</p> <p>First sentence added in order to make clear the sustainability benefits of mixed-use schemes</p> <p>The remainder of DG35 has been re-organised for the sake of clarity.</p> <p>The Reason section has been removed as it duplicates text in the DG</p>	<p>DRP: <i>The 'Reasons' sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p> <p>DRP: <i>The subject (sustainability) needs to be addressed much more ambitiously and to cover subheadings including lifespan, biodiversity, renewable energy sources and Passivhaus design amongst others.</i></p>
<p>5.4/DG36</p>	<p>Previously 5.2/DG35</p> <p>The Reason section has been removed (and throughout the Guide) and the text incorporated where it adds explanation and omitted where there is duplication.</p>	<p>DRP: <i>The 'Reasons' sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p>

	<p>The previous para 5.2.5 and part of 5.2.4 has been included as an introduction to DG36.</p> <p>The sentence re: v narrow buildings has been omitted as it is ill-defined.</p>	
<b>CHAPTER 6</b>		
<b>Section</b>	<b>Explanation of Change</b>	<b>Justification for Change / Consultation Response</b>
Front	Text omitted for the sake of consistency and clarity. The introductions for all the chapters sit better in the main text and have been taken out of the front pages as they provide unnecessary duplication.	DRP commented: <i>The dominant observation concerns a lack of consistency and clarity in the presentation styles, coupled with a tendency towards literal repetition. This gives rise to the potential for confusion with critical messages being lost amid the plethora of imagery and text.</i>
6.1	A new sub heading has been created for the introduction incorporating edited text previously in the front page	Refer to DRP comment above
6.2/DG37	<p>Previously section 6.4/DG41</p> <p>To ensure sustainability considerations are given appropriate priority this section has been moved from the end to the beginning of the chapter and has been expanded to include additional points raised by consultees.</p> <p>Principle DG37 also now accommodates the previous “Reason” section in the introductory paragraphs.</p> <p>The introductory paragraphs now make reference to the <i>Government’s Future Homes Standard</i></p> <p>The DG now emphasises that the Council welcomes innovative and inventive designs that respond to the sustainability agenda by minimising the use of resources and energy both through building construction and on after completion.</p>	<p>DRP: <i>The ‘Reasons’ sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p> <p>The following respondents considered that it was important to strengthen the guidance on sustainability: CPRE, Cllr Paul Brown, South East Water, Hassocks Parish Council, West Hoathly PC, Mr R Webb, Mr A Pott (Crest Nicholson), Ms L de Lande Long, Mr G de Lande Long, MSDC DRP, Natural England, Mr J. White. These include the following comments:</p> <p>The DRP: <i>The subject (sustainability) needs to be addressed much more ambitiously and to cover subheadings including lifespan, biodiversity, renewable energy sources and Passivhaus design amongst others.</i></p> <p>Ms de Lande Long: <i>It is commonly agreed that addressing climate change is one of the most urgent issues facing humanity. Given the contribution of CO2 emissions involved in housebuilding, I was shocked to see how little emphasis is placed here on the importance of low carbon, energy efficient design. Sustainability is mentioned as point number 9 of 11 in the overall objectives and receives no</i></p>

	<p>The additional principles have been included</p> <ul style="list-style-type: none"> <li>• <i>Incorporating high levels of insulation in combination with air tightness</i></li> <li>• <i>Incorporating ground or air source heat pumps;</i></li> <li>• <i>The use of low flow technology in water fittings, rainwater harvesting systems and grey water recycling systems to reduce water consumption to 110 litres/person/day (maximum)</i></li> <li>• <i>Maximising solar gain</i></li> </ul> <p>The DG now requires applicants to demonstrate how the principles have informed their design.</p> <p>Policy framework provided by DP39: Sustainable Design and Construction is now referred to.</p> <p>The Wilmington Way example is now included at the beginning of the chapter and expands upon how the roof design maximises solar collection.</p> <p>However more changes have not been made because an SPD cannot introduce new policy and is constrained by the District Plan and policy DP39 and by para 34 of the NPPF. As per para 26 of the February Committee report there are no changes to the DG seeking the inclusion of specific carbon reduction standards such as Passivhaus standards.</p>	<p><i>significant mention until p.99 (Section 6) of the 146 pages. The description of ‘sustainable buildings’ at 6.4 is lamentably short on detail by comparison with the amount of detailed example devoted to most other aspects of design in the guide...For example, the orientation of the buildings should also be linked to the suitability of roof positions for solar panels.</i></p> <p><i>Mr J White: No reference to future homes initiative..... No mention of super-insulated buildings, passivhaus or passivhaus principles this is disappointing as it is often discussed in relevance to schemes before the panel.</i></p> <p><i>Mr de Lande Long: Bullet points under DG41 do not go far enough in support of incorporating renewable energy provisions. They should not only include "Orientation and design of buildings to maximise daylight and sun penetration" but also "Orientation and design of roofscape to maximise potential installation of PV or solar heating panels at maximum effective orientation".</i></p> <p><i>CPRE: This DG41 guidance, or equivalent guidance, should be expanded to address energy efficiency retrofitting expectations in the case of building modifications, extensions, conversions etc.....Doesn't DG41 need to be better reconciled to Local Plan policy DP39? E.g. DP39 requires design to ensure that water use is limited to water use to 110 litres/person/day .....We are surprised that DG41 fails to recognise that renewably sourced timber framed houses can be as thermally efficient as brick buildings, often more so.</i></p> <p><i>Cllr Paul Brown: Every new dwelling that is not built to Passivhaus or equivalent net zero energy performance indicators, contributes to an increase in CO2 emissions. Therefore the layout and design of the roof-scape should allow for and maximise the opportunity for solar energy collection.</i></p>
6.3/DG38	<p>Previously section 6.2/DG38.</p> <p>The introductory sentence of the new DG38 incorporates the Reason section</p>	<p>DRP commented: <i>The dominant observation concerns a lack of consistency and clarity in the presentation styles, coupled with a tendency towards literal repetition. This gives rise to the potential for confusion with critical messages</i></p>

	<p>of the previous design principle DG36 as it sets the historical background for why it is important to respond to the context of the place.</p> <p>DG38 has been amended to make a clearer link between architectural integrity and the need to respond to the character of the existing built form, while also giving more emphasis to good quality contemporary design.</p> <p>The Reason section has been removed as it has throughout the Guide. In this case it duplicates.</p> <p>The Façade and Elevations sub section has been removed for clarity and consistency reasons as the guidelines are better covered in other sections (Balconies is now a separate sub section / Utility meters and rainwater downpipes are covered in Accommodation of services / Chapter 2 Character study reference is now in DG38 / application of materials in Facing Materials).</p> <p><u>Window Design</u> covers the same ground as the previous Windows sub section stating that the choice of window design should be determined by the overall design approach. However, it has been expanded to take on board comments received and is more clearly presented in bullet point form.</p> <p><u>Balcony Design</u> was previously included under the Façade and Elevation sub section however it has been given its own sub section with more design advice provided.</p>	<p><i>being lost amid the plethora of imagery and text.</i></p> <p><i>DRP: The 'Reasons' sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p> <p><i>Mr P. Hewitt comments: The Guide should bring forward much greater detail regarding materials as it seems light in content. Many Guides provide character assessments that include extensive details regarding materials, features such as windows, doors and chimneys etc</i></p> <p><i>Mr A. Potts (Crest Nicholson) comments: There is a move to explore a slightly more modern approach to façade treatment (I'm loath to call it contemporary) which entails the use of floor to ceiling fenestration and simpler porch formats but still within a traditional envelope. I think that it might be worth the design guide picking up on this direction as I'm seeing more of this approach currently coming to the market both in terms of what we are designing as well as our competitors.</i></p> <p><i>Clr Paul Brown: the layout and design of the roof-scape should allow for and maximise the opportunity for solar energy collection.</i></p>
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	<p><u>Roof Design</u> is now more comprehensively covered, and includes gable-fronted houses.</p> <p>The guidance now states that shallow-pitched roof profiles, visible crown-topped roofs and inconsistent roof pitches should be avoided.</p> <p>Sustainability/orientation considerations now cross-referenced with DG38 and Wilmington Way case study example.</p> <p>The 1<sup>st</sup> and 2<sup>nd</sup> paras of the original sub section are omitted as they duplicate advice contained elsewhere</p> <p><u>Chimneys</u> sub section - The second sentence in 6.3.11 now defines the conditions in which chimneys are encouraged (<i>where they positively contribute to the architecture and perform a function</i>) rather than just saying they will be encouraged. 6.3.15 also states that <i>Chimneys or stack features can be used in modern ways such as part of a sustainability strategy for thermal stacks to aid ventilation in summer, to as flues.</i></p> <p>Rather than prescribing where the chimneys can be located, the guidance now states that it should be guided by both external design and internal layout</p> <p>.</p> <p><u>Dormers and Rooflights</u> has been significantly extended because it will replace the current Council guidance and because this section is also relevant to the Building Extensions chapter 8 (where a cross reference link is now included). The new text states:</p> <p>The guidance now states that dormer windows should normally be visually subordinate to the roof slope, and explains how this can be achieved, The guidance also now explains that</p>	<p>The Council has current guidance on dormers that will be replaced by the MSDG. This has been incorporated in an updated form where it is still appropriate.</p> <p>This section is also relevant to the Building Extensions chapter 9 (and a cross reference link is now included).</p>
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	<p>rooflights can be an appropriate substitute for a dormer.</p> <p><u>The Facing Materials</u> sub section has been expanded to explain the application of materials on traditionally-designed and contemporary buildings. It also states that materials should be consistently applied to all sides of the building, and that render should be avoided as a principal material as it is not typical to Mid Sussex.</p>	
6.4/DG39	<p>Previously 6.1/DG36 - This section has swapped order with the previous section as 6.3/DG38 is better placed before as it deals holistically with building design.</p> <p>The guidance on height and scale in DG39 has been expanded to respond to the type of concerns raised by Ms Rendall.</p> <p>This section now explains more fully how architectural articulation can help to break down scale, this includes through vertical articulation, set-back top floors and stepping down the height of the building adjacent to lower scale frontages.</p> <p>There is now no sub sections as the text within the apartment and corner buildings section are now covered under section 6.5 as they are more appropriately considered under Active Frontages. There are some aspects that are dealt with elsewhere including chapter 5 (intensification of town centres) and chapter 8 (north facing flats).</p> <p>The Reason section has been removed (and throughout the Guide) and text incorporated at beginning of DG38 where it relates to sense of place and omitted where it duplicates or lacks relevance/clarity.</p>	<p>DRP commented: <i>The dominant observation concerns a lack of consistency and clarity in the presentation styles, coupled with a tendency towards literal repetition. This gives rise to the potential for confusion with critical messages being lost amid the plethora of imagery and text.</i></p> <p>DRP: <i>The 'Reasons' sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p> <p>Ms D. Rendall: <i>Dismayed to see so many buildings around HH station and neighbouring roads designated for high rise development. I have always enjoyed the human sized scale of our town. There are a few buildings, which have been poorly designed, but the scale of their replacements should be kept at 3 storeys, to avoid creating cold, shadow-casting and loss of the sense of place, if the views of the surrounding countryside are lost.</i></p>
6.5/ DG40	<p>Section 6.5 covers the previous design principle DG37 but has been reorganised to reduce an otherwise over-long DG Principle (with the addition</p>	<p>DRP commented: <i>The dominant observation concerns a lack of consistency and clarity in the presentation styles, coupled with a tendency towards literal repetition. This gives rise to the</i></p>

	<p>of Addressing Corners). It now just includes just the main principles in the introductory para of the previous DG37 with a list of bullet point list that references the subsequent sub headings</p> <p>The subsequent text is now outside the principles box and covered by sub sections (as per section 6.3) which deals with Apartment Buildings / Addressing Corners (which has been moved from DG36 – refer above) / Building Entrances / Boundary Treatment.</p> <p>The Apartment section covers paras 2+3 in the previous DG37.</p> <p>The Addressing Corners section covers the same text that was previously contained less relevantly in DG36. it also includes a paragraph that states:</p> <p><i>6.5.5 The rear elevations of corner houses are often more visible than other houses because of the gap in the street frontage to accommodate the rear garden. Additional care therefore also needs to be given to its articulation.</i></p> <p>The Boundary Treatment section includes additional text that states that while boundaries should be reflective of their area, <i>this should be balanced with the need for natural surveillance</i>. The Building Entrances section now includes a less prescriptive advice on canopies.</p>	<p><i>potential for confusion with critical messages being lost amid the plethora of imagery and text.</i></p>
6.6/DG50	<p>A new section has been included that looks at the implications of building on sloping sites.</p> <p>This section has been added as the District is characterised by its undulating topography and typically most new development sites require the building design to address the sloping conditions.</p> <p>Building Regulations require dwellings and gardens that can be easily accessed at front and back.</p>	

	If inadequate consideration is given to this then the enabling work necessary to make houses, gardens and parking spaces accessible may undermine the quality/attractiveness of the building frontages, their street thresholds and the rear gardens may be compromised because of the additional enabling work that may necessitate the need for retaining walls or more hard-edged and engineered spaces	
6.7	<p>Section 6.7 covers the same ground as the previous design principle DG39. The previous Reason section now provides the introductory paragraph. The following additional paragraph has been included as the positioning of rainwater pipes is a common issue and has been re-located from the deleted Façade and Elevations in the previous section 6.2:</p> <p><i>Rainwater downpipes can positively contribute to the articulation and rhythm of a façade by defining the plot widths of semi-detached and terraced houses or can be employed to help reduce the scale of apartment buildings through careful and regular positioning within the façade.</i></p>	<p>DRP commented: <i>The dominant observation concerns a lack of consistency and clarity in the presentation styles, coupled with a tendency towards literal repetition. This gives rise to the potential for confusion with critical messages being lost amid the plethora of imagery and text.</i></p> <p>DRP: <i>The 'Reasons' sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p>
Refer to chapter 7	The Commercial Buildings section (previously section 6.3) is now incorporated under the new Employment chapter 7 along with previous 4.8/DG30	DRP: <i>It is felt that a separated chapter centred on 'Employment' related buildings would be of use, enabling a clearer focus on this key development category. At present two pages at the end of Chapter 4 addressing commercial buildings is considered inadequate.</i>
<b>CHAPTER 7</b>		
<b>Section</b>	<b>Explanation of Change</b>	<b>Justification for Change / Consultation Response</b>
7.1	An introduction has been added setting out the anticipated growth in this sector.	As it opens a new chapter.
7.2/DG51	<p>Previously 4.8/DG30</p> <p>The first para has been amended and now refers to the size and scale of commercial buildings as being an added consideration in terms of their impact</p>	DRP: <i>It is felt that a separated chapter centred on 'Employment' related buildings would be of use, enabling a clearer focus on this key development category. At present two pages at</i>

	<p>upon the surrounds. Where it is adjacent to the countryside, it also states that a Landscape Visual Impact Assessment should be undertaken.</p> <p>The bullet points provide additional clarification of the previous points. For example, the reference to rationalise parking has been omitted and instead it refers to: <i>Parking and servicing softened/screened with vegetation and located at the rear of buildings where it has less impact upon the public realm.</i></p> <p>The last sentence of the previous DG30 refers to the impact upon residential amenity. This has been omitted as it is covered by chapter 8.</p> <p>The Reason section has been omitted in line with the rest of the document and because it does not significantly add to the DG principle.</p>	<p><i>the end of Chapter 4 addressing commercial buildings is considered inadequate.</i></p> <p>DRP: <i>The 'Reasons' sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p> <p>Burgess Hill Town Council: <i>The Committee stated that the following phrase was too vague: page 83, DG30, 'rationalise parking'.</i></p>
7.3/DG52	<p>Previously 6.3/DG40</p> <p>Re-named sub heading to distinguish it from the other sub headings in this chapter</p> <p>The text has been edited for reasons of clarity and a sentence has been added about the need to consider the: <i>careful selection of facing materials that blend with the surroundings and/or complement existing adjacent buildings.</i></p> <p>The reason section has been deleted as it duplicates</p> <p>A sentence has been added to ensure cross reference to DG37 on sustainability</p>	<p>DRP: <i>It is felt that a separated chapter centred on 'Employment' related buildings would be of use, enabling a clearer focus on this key development category.</i></p> <p>DRP: <i>The 'Reasons' sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p>
<b>CHAPTER 8 (previously chapter 7 in the Consultation document)</b>		
<b>Section</b>	<b>Explanation of Change</b>	<b>Justification for Change / Consultation Response</b>
Front	Text omitted for the sake of consistency and clarity. The introductions for all the chapters sit better in the main text and have been taken out of the front pages	DRP commented: <i>The dominant observation concerns a lack of consistency and clarity in the presentation styles, coupled with a tendency towards literal repetition. This gives rise to the</i>

	as they provide unnecessary duplication.	<i>potential for confusion with critical messages being lost amid the plethora of imagery and text.</i>
8.1	A new sub heading has been created for the introduction with an edited version of the text previously on the front page.	As above
8.2/DG46	<p>Previously 7.1/DG42</p> <p>The guidelines in DG46 been expanded to provide further clarity.</p> <p>DG46 now states the following additional factors can have an impact on privacy: topography and the relationship of the parking, gardens, front defensible space, balconies with the adjacent buildings/dwellings; the position and arrangement of habitable rooms.</p> <p>The following additional guidance is proposed: <i>Because they are usually more visible, the privacy of ground floor flats should particularly be considered, and the provision of dedicated private rear gardens will often be necessary.</i></p> <p>The Reason section has been removed as duplicated text in the DG.</p>	<p>DRP: <i>The content of Chapters 7, 8 and 9 appears lightweight and disproportionate.</i></p> <p>DRP: <i>The 'Reasons' sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p>
8.3/DG47	<p>Previously 7.2/DG43</p> <p>The guidelines in DG47 have been edited where appropriate for the sake of clarity and brevity.</p> <p>The guidelines have been caveated with the word <i>normally</i>.</p> <p>The Reason section has been incorporated into DG47.</p>	<p>DRP: <i>The content of Chapters 7, 8 and 9 appears lightweight and disproportionate.</i></p> <p>DRP: <i>The 'Reasons' sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p> <p>Persimmon and Thakeham Homes: <i>Principle DG43 'Provide attractive and usable external amenity space for all homes' states 'All dwellings should have access to private outdoor amenity space'. A more flexible approach should be considered in the context of where development is taking place and access / proximity to high quality outdoor space. This model has been pursued elsewhere with success and does not undermine efficient use of land in key locations.</i></p>
8.4/DG48	Previously 7.3/DG44	DRP: <i>The content of Chapters 7, 8 and 9 appears lightweight and disproportionate.</i>

	<p>The guidelines in DG 48 have been edited where appropriate for the sake of clarity and brevity.</p> <p>In addition, it has also been updated to refer to BRE Standards which are the relevant standards for daylight/sunlight.</p>	<p>DRP: <i>The dominant observation concerns a lack of consistency and clarity in the presentation styles</i></p>
8.5/DG49	<p>Previously 7.4/DG45</p> <p>The guidelines in DG 49 have been edited where appropriate for the sake of clarity and brevity. DG49 now states the following additional mitigation measures to reduce noise and air/light pollution:</p> <ul style="list-style-type: none"> <li>- <i>Using landscape features (including trees and earth mounding) to absorb noise/air pollution and deflect light; and</i></li> <li>- <i>Avoiding parking where it will create noise and headlight nuisance from vehicle movements.</i></li> </ul>	<p>DRP: <i>The content of Chapters 7, 8 and 9 appears lightweight and disproportionate.</i></p> <p>DRP: <i>The 'Reasons' sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p>

**CHAPTER 9 (previously chapter 8 in the Consultation document)**

<b>Section</b>	<b>Explanation of Change</b>	<b>Justification for Change / Consultation Response</b>
Front	<p>Text omitted for the sake of consistency and clarity. The introductions for all the chapters sit better in the main text and have been taken out of the front pages as they provide unnecessary duplication.</p>	<p>DRP commented: <i>The dominant observation concerns a lack of consistency and clarity in the presentation styles, coupled with a tendency towards literal repetition. This gives rise to the potential for confusion with critical messages being lost amid the plethora of imagery and text.</i></p>
9.1	<p>Previously 8.1 - This Section has been amended where appropriate for the sake of clarity and brevity.</p> <p>Additional paras set out the sustainability /environmental advantages of extensions as they provide the opportunity to re-purpose rather demolish.</p>	<p>DRP: <i>The content of Chapters 7, 8 and 9 appears lightweight and disproportionate.... If it is decided to proceed with 7,8 and 9 as an integral part of the Guide, the Panel would wish to address a number of concerns. These include (the need for) encouragement to retrofit and refurbish.</i></p> <p>Ms Lewin: <i>The guide as it stands inadvertently encourages demolition rather than retrofit and re-design..... No examples or mention of the re-purposed, recycled, re-furbished house extended and given a new identity where the extension is intentionally not read as such</i></p>

<p>9.2/ DG49</p>	<p>Previously 8.3 + 8.4/ DG46+48 + 49</p> <p>DG50 combines previous DG's and has been amended where appropriate for the sake of clarity and brevity and in order to allow cases to be determined on their meritsDG49.</p> <p>The DG now makes clear that <i>are two general approaches to extending a property:</i></p> <ul style="list-style-type: none"> <li>• <i>Designing in the style of the existing building by closely matching its facing materials, architectural features, window sizes and proportions.</i></li> <li>• <i>Designing in a contemporary style that takes its cues from key aspects of the existing building that might include its underlying form and proportions, facing materials, window design and other specific architectural features. The success of this approach is particularly reliant on high quality facing materials and finishes, and this will normally need to be demonstrated through detailed elevations and section drawings.</i></li> </ul> <p><i>Both approaches can create well-designed extensions that can be mutually beneficial to both the house and the wider area.</i></p>	<p>DRP: <i>If it is decided to proceed with 7,8 and 9 as an integral part of the Guide, the Panel would wish to address a number of concerns. These include the inference that extensions and details (such as dormers in section 8) should follow strict guidelines</i></p> <p>DRP: <i>The dominant observation concerns a lack of consistency and clarity in the presentation styles, coupled with a tendency towards literal repetition. This gives rise to the potential for confusion with critical messages being lost amid the plethora of imagery and text.</i></p> <p>Ms Lewin: <i>Too prescriptive, simplistic, outdated and suggest that the only way to extend a house is by a dropped ridge line side extension - Page 130..... Many traditional houses which would be regarded as desirable heritage have been extended from one era to the next in ways that are shown with a 'not allowed' cross..... Photo examples show period houses and say that the original house must always be the dominant element - this is not a universal truth..... It is perfectly possible to continue ridge lines through to good effect in many situations.....A blanket ban on flat roof dormers ignore the success of well-proportioned lead-topped Georgian flat roof box dormers and long low Arts and Crafts dormers as a form that can be successfully used</i></p> <p>DRP: <i>The 'Reasons' sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p>
<p>9.2/DG50</p>	<p>Previously 8.5 / DG50+51</p> <p>The previous DGs on front and side extensions have been combined in DG50 as they both principally impact upon the street scene.</p> <p>and the DG now omits or re-phrases guidance in order to allow cases to be determined on their merits:</p> <p>Previous guidance on Front extensions replaces the following guidelines "<i>When located close to a neighbouring property, front extensions or porches</i></p>	<p>DRP: <i>If it is decided to proceed with7,8 and 9 as an integral part of the Guide, the Panel would wish to address a number of concerns. These include the inference that extensions and details (such as dormers in section 8) should follow strict guidelines</i></p> <p>Ms Lewin: <i>Too prescriptive, simplistic, outdated and suggest that the only way to extend a house is by a dropped ridge line side extension - Page 130..... Many traditional houses which would be regarded as desirable heritage have been extended from one era to the next in ways that are shown with a 'not allowed' cross.....</i></p>

	<p><i>should not normally project more than 1.4 metres in front of the dwelling.</i></p> <p><i>They should normally be designed with a pitched roof.” With: “They (front extensions) are less likely to be acceptable in streets with a strong consistent building form as they risk disrupting the underlying order.” And “</i></p> <p><i>Where front extensions are considered acceptable, they should normally be limited to a modest single storey extension that reflects the character of the existing property unless it can be otherwise be demonstrated that a larger addition enhances the quality of the street frontage, for instance by repairing a building that has been previously insensitively altered.”</i></p> <p>The Reason section has been deleted.</p>	<p><i>Photo examples show period houses and say that the original house must always be the dominant element - this is not a universal truth..... It is perfectly possible to continue ridge lines through to good effect in many situations.....A blanket ban on flat roof dormers ignore the success of well-proportioned lead-topped Georgian flat roof box dormers and long low Arts and Crafts dormers as a form that can be successfully used</i></p> <p><i>DRP: The ‘Reasons’ sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p>
9.2/DG51	<p>Previously 8.5 / DG52</p> <p>This Section has been amended where appropriate for the sake of clarity and brevity.</p> <p>The Reason section has been deleted</p>	<p><i>DRP: If it is decided to proceed with 7,8 and 9 as an integral part of the Guide, the Panel would wish to address a number of concerns. These include the inference that extensions and details (such as dormers in section 8) should follow strict guidelines</i></p> <p><i>DRP commented: The dominant observation concerns a lack of consistency and clarity in the presentation styles, coupled with a tendency towards literal repetition. This gives rise to the potential for confusion with critical messages being lost amid the plethora of imagery and text.</i></p> <p><i>DRP: The ‘Reasons’ sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p>
9.2/DG52	<p>Previously 8.5 / DG53</p> <p>A cross reference is now included as the guidelines in ch6 under Dormer Windows and Rooflights are also relevant which together with this section pick up previous guidance on loft conversions and roof extensions The guidance has been amended where appropriate for the sake of clarity and</p>	<p><i>DRP: If it is decided to proceed with 7,8 and 9 as an integral part of the Guide, the Panel would wish to address a number of concerns. These include the inference that extensions and details (such as dormers in section 8) should follow strict guidelines</i></p> <p><i>Ms Lewin: Too prescriptive, simplistic, outdated and suggest that the only way to extend a house is by a dropped ridge line side extension</i></p>

	<p>brevity and in order to be less prescriptive.</p> <p>The text in the Reason section has now been incorporated in DG51.</p>	<p>- Page 130..... Many traditional houses which would be regarded as desirable heritage have been extended from one era to the next in ways that are shown with a 'not allowed' cross..... Photo examples show period houses and say that the original house must always be the dominant element - this is not a universal truth..... It is perfectly possible to continue ridge lines through to good effect in many situations.....A blanket ban on flat roof dormers ignore the success of well-proportioned lead-topped Georgian flat roof box dormers and long low Arts and Crafts dormers as a form that can be successfully used</p> <p>DRP: <i>The 'Reasons' sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p>
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**CHAPTER 10 (previously chapter 9 in the Consultation document)**

Section	Proposed Changes	Justification for Change / Consultation Response
Front	Text omitted for the sake of consistency and clarity. The introduction has been moved from the front page to the main text to reduce duplication.	DRP commented: <i>The dominant observation concerns a lack of consistency and clarity in the presentation styles, coupled with a tendency towards literal repetition. This gives rise to the potential for confusion with critical messages being lost amid the plethora of imagery and text.</i>
10.1	<p>A new sub heading has been created for the introduction.</p> <p>The introduction edits the text on the front page for the sake of brevity and clarity. It now includes more emphasis on the sustainability benefits of conversions.</p> <p>For clarity DG53 relate to conversions of traditional buildings and DG54 relates to the conversion of office buildings to residential use.</p>	<p>As above</p> <p>DRP: <i>The content of Chapters 7, 8 and 9 appears lightweight and disproportionate .... If it is decided to proceed with 7,8 and 9 as an integral part of the Guide, the Panel would wish to address a number of concerns. These include (the need for) encouragement to retrofit and refurbish.</i></p> <p>DMH Stallard: <i>Principle DG55 and DG56 appears to refer principally to the conversion of historic commercial, religious or leisure buildings but this is not reflected by the title for each 'principle'. Clearly the requirements for converting a modern commercial building should (subject to its context) be much less onerous than conversion of a historic building.</i></p>
10.2/DG53	Previously 9.1 + 9.3 / DG54+55	DRP commented: <i>The dominant observation concerns a lack of consistency and clarity in the</i>

	<p>This chapter has been made clearer and more concise with DG53 covering the principles behind the conversion of traditional buildings with duplicated text omitted</p> <p>A sentence has been added on contemporary alterations in response to the comments from Balcombe PC.</p> <p>Where appropriate the Reason section has been incorporated in DG53, otherwise it has been deleted.</p>	<p><i>presentation styles, coupled with a tendency towards literal repetition. This gives rise to the potential for confusion with critical messages being lost amid the plethora of imagery and text.</i></p> <p><i>DRP: The 'Reasons' sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p> <p><i>Balcombe PC: modern features can integrate well with conversion of barns, stables, older buildings very well so long as the distinct nature of the addition is made as in the principle of extensions.</i></p> <p><i>DRP: If it is decided to proceed with Chapters 7,8 and 9 as an integral part of the Guide, the Panel would wish to address a number of concerns. These include the inference that extensions and details (such as dormers in section 8) should follow strict guidelines</i></p>
10.3/DG54	<p>Previously 9.3/DG56</p> <p>Following the DMH Stallard objection Principle DG54 has been reframed to deal with conversion of office to residential. DG56 recognises that office to residential conversions fall within PD.</p> <p>Traditional commercial buildings are uncommon in the District; furthermore, as they are bespoke designs it is difficult to generalise about them; for these reasons they are not included in DG54 but are covered by DG53 alongside all traditional building conversions.</p> <p>The Reason section has been omitted as it has throughout the Guide. However, the second para of the previous DG and para 9.3.2 is incorporated.</p>	<p><i>DMH Stallard: Principle DG55 and DG56 appears to refer principally to the conversion of historic commercial, religious or leisure buildings but this is not reflected by the title for each 'principle'. Clearly the requirements for converting a modern commercial building should (subject to its context) be much less onerous than conversion of a historic building. These principles should also acknowledge rights to carry out works under permitted development.</i></p> <p><i>DRP: The 'Reasons' sections have questionable relevance and their stand-alone benefit is not clear. Their value should be reviewed.</i></p>