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Planning Policy and Conservation
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20th February 2020

Dear Planning Policy and Conservation Team

Arun District Design Guide SPD consultation draft

CPRE Sussex, the countryside charity, welcomes the draft Arun District Design Guide (the Design Guide.) The importance you attach to good design in transforming places, enhancing lives and improving the natural environment is rightly given. We agree with your view, expressed in the Introduction, that

“Despite the opportunities that the District has to offer, many recent schemes have been developed according to a largely standardised and generic set of blueprints and design principles, driven by shareholder profits rather than what is best for the people and communities of Arun. These developments arguably lack innovation, character, quality and future adaptability, and ignore the unique characteristics of the District that were present prior to their construction.”

This aligns with the findings of a recent report commissioned by CPRE which I have enclosed. Entitled ‘A Housing Design Audit for England,’ the report found that 75% of new housing development across England was of ‘mediocre’ or ‘poor’ design and that less affluent communities are ten times more likely to get worse design.

We fully support the intentions of the Design Guide in driving up standards of design to achieve better outcomes from development. There is much to applaud in this document so we are reserving detailed comments to areas where we think improvements could be made;

The Design Guide is proposed as a Supplementary Planning Document. We would prefer design policies to have the full weight of development plan documents, although we recognise that there is probably too much detail in the Design Guide for it to be included as part of the normal development plan. Future versions or revisions to the Local Plan should refer to the Design Guide.

Although household extensions and building conversions are probably too small for the 'Natural Environment' element, we would like to see some sort of smaller scale requirements for these schemes. Simple measures, such as planting, bird and bat boxes could be achieved as a minimum and it would be helpful for sections M and N to incorporate this. Further ideas are given in the enclosed CPRE Sussex document 'Biodiversity Enhancement in New Housing Developments.'

In section B.02 we would like the policy requirements for engagement with neighbours and the general public to be strengthened. We believe that meaningful consultation with local people can support innovation. Our 'Making Places' project highlights this (<http://www.cpresussex.org.uk/campaigns/making-places>) This is also true of section O.01 where there should be a requirement for major schemes to demonstrate how local people have been engaged in placemaking and 'shaping' the scheme.

Section E.03 Biodiversity needs to be more ambitious in requiring a 'net gain' in biodiversity, not merely 'increased and enhanced biodiversity wherever possible.'

In section H.03 we would like to see a requirement for a net increase in tree planting, instead of replacing lost trees, in order to support the council's declaration of a 'climate emergency.'

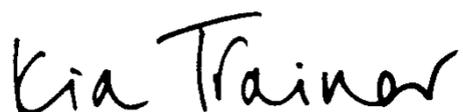
Section K.01 should also be strengthened in order to support the council's declaration of a 'climate emergency' – for example the requirement to 'Set targets for energy and carbon reductions beyond the relevant Part L Building Regulations' is far too vague. A minimum level for targets should be given.

It would be helpful if section S.01 gave more support to community-led housing. There are a number of emerging Community Land Trusts in the district.

The Design Guide encourages medium and higher densities nearer to town centres, which is broadly in line with the NPPF. However, this may encourage wastefully low densities away from town and village centres. The key consideration in these cases should be whether the development can be well serviced by public transport, walking and cycling; as well as whether a new scheme can fit in well with the landscape and established local character.

I hope that these comments are helpful.

Yours sincerely,

A handwritten signature in black ink that reads "Kia Trainor". The signature is written in a cursive, flowing style.

Kia Trainor

Director, CPRE Sussex