

**Draft National Park Design Guide
Supplementary Planning Document (SPD)
Adoption Statement of Consultation – December 2011**

Introduction

The New Forest National Park Authority has prepared a Supplementary Planning Document (SPD) to provide design guidance and advice to anyone planning to bring forward development within the National Park.

This Consultation Statement is a record of the consultation undertaken during the preparation of the SPD, prior to its adoption, and has been prepared in accordance with Regulation 17 (1) (b) and 18 (4) (b) of the Town and Country Planning (Local Development) (England) Regulations 2004. The National Park Authority's Statement of Community Involvement also identifies how the National Park Authority will involve the community in the production of SPDs, and the draft National Park Design Guide has been produced in accordance with this.

Purpose of the document

The purpose of the Design Guide SPD will be to supplement the planning policies that relate to design contained in the Core Strategy and Development Management Policies DPD (2010). By providing a framework to achieve high quality design that helps to conserve and enhance the natural and built environment, the Design Guide is expected to contribute to the National Park purposes. It should help to retain and enhance the inherent characteristics and local distinctiveness of the National Park. It is hoped that it will inspire and assist applicants, agents and others to achieve the highest standards of design and sustainability in their development proposals.

Planning policy framework

Development in the New Forest National Park must comply with policies contained in national planning policies, and with those in development plan documents, including the Core Strategy and Development Management Policies DPD. This Design Guide will supplement the Core Strategy policies that aim to conserve and enhance the wealth of individual characteristics that contribute to local distinctiveness, protect the special character of the National Park, and promote the principles of sustainable development.

The key policies within the Core Strategy which are amplified by the Design Guide are Policy DP1 General Development Principles; Policy CP5 Renewable Energy; Policy DP6 Design Principles; Policy CP7 The Built Environment; Policy CP8 Local Distinctiveness; Policy DP9 Residential Density in the Defined Villages; Policy DP10 Replacement Dwellings; Policy DP11 Extensions to dwellings; Policy DP12 Outbuildings; Policy DP16 Redevelopment of Existing Employment Sites; Policy DP17 Extensions to Non Residential Buildings and Uses; Policy CP17 The Land-based Economy; Policy DP19 Re-use of Buildings outside the Defined Villages.

Details of Consultation to Date

The scope of the draft Design Guide has been informed by the consultation process for preparing the National Park Authority's *Core Strategy and Development Management Policies DPD* and the National Park Management Plan. There was consultation on the initial scope and contents of the Design Guide and a formal 6 week public consultation. This Consultation Statement sets out the main formal and informal consultation events undertaken by the National Park Authority in preparing the draft Design Guide.

a. Core Strategy 'Future Matters' Consultation

The process of compiling the evidence base and preparing the Core Strategy and Management Plan began in 2006 when the National Park Authority became an operative planning authority. Under the requirements of the 2004 Planning Regulations, there was a consultation held between November 2006 and January 2007 on the Core Strategy '*Issues and Options*' document which was undertaken jointly with consultation on the review of the New Forest District Community Strategy and the National Park Management Plan, and was entitled '*Future Matters*'. The consultation document set out in detail the key issues for the New Forest and asked for views on both the issues and series of possible options for addressing them.

The consultation included statutory consultees, persons and organisations who had registered an interest in the plan, the Citizens' Panel, the Young People's Panel Survey and the general public. It was distributed by post and email, through advertising on the website, through a notice in the local newspaper, and through an article in the New Forest District Council's news sheet, 'New Forest Today'. A total of 146 organisations and 429 individuals gave their views.

The consultation covered a range of aspects including building design and local distinctiveness. The issues raised included strong support for 'managing and minimising the impact of development pressures in and around the National Park', particularly by 'protecting landscape character and natural habitats through addressing the impact of gradual small scale development'. The vast majority of respondents considered it important to conserve the distinctiveness of the cultural heritage of the area, particularly through supporting local skills and trades, *reflecting local distinctiveness in new development*, and recording oral history, traditions and language. These issues were addressed in the Core Strategy, which outlines the national planning policy guidance on listed buildings and Conservation Areas and also contains a number of policies that seeks to conserve local distinctiveness.

b. Additional Stakeholder Involvement 'New Forest, New Chapter' Events: Consultation Summary

In mid-2007 the Authority set up a series of workshops to discuss the emerging Management Plan and Core Strategy. The *New Forest, New Chapter* workshops were held in the autumn and winter of 2007/2008. They brought together more than 100 people from 70 organisations and interest groups to discuss the direction the National Park should be taking now and over the next 10 to 20 years. A total of 190 local, regional and national organisations were invited to a series of 10 workshops. The workshops took place over the

course of 6 months, looking at a Vision for the National Park, key issues, objectives, selected strategic policies, priority actions and indicators. In addition, a workshop was also held in February 2008 to which all 82 councillors at County, District and Borough level representing wards within and immediately adjacent to the National Park were invited. This consultation informed the development of the draft National Park Plan, which initially combined the Core Strategy and Management Plan.

The consultation covered a range of aspects including building design and local distinctiveness. There was strong support shown for policies to deal with increasing development pressures. This was addressed in the draft *National Park Plan* (2008) by including policies relating to local distinctiveness, the protection of local character and protection from the impacts of development pressure (Objective C2). Subsequently, when it was decided to produce the Core Strategy and Management Plan separately and not together in a National Park Plan, this issue was addressed in the *Core Strategy* by including a number of policies relating to local distinctiveness (CP8), design principles (DP6) and residential density in the defined villages (DP9).

c. Consultation on draft National Park Plan

Following the *New Forest, New Chapter* sessions and meetings with many stakeholders, the Authority published the *draft National Park Plan* in August 2008 for a 12 week consultation. This draft document combined the requirements for the Core Strategy and the National Park Management Plan into a single document. It was circulated to statutory bodies, a wide range of interest groups and organisations and parish councils within the National Park. As well as about 2,000 hard copies that were distributed, a public notice was placed in three local newspapers, and a news release was issued. One hundred posters were produced for display at 39 parish and town councils within or adjacent to the National Park and 14 council and other offices. The consultation was the lead story in the Authority's Park Life newsletter distributed to 90,000 homes. The Plan was available on the Authority's website and received over 25,000 hits. A total of 9,724 responses were received, made up of 2,524 individual responses and 7,200 signatures on a petition which related to the recreational horse keeping aspects of the draft Plan.

The consultation covered a range of aspects including building design and local distinctiveness. The key issues raised included suggestions that greater emphasis was needed on conserving and enhancing the historic built environment in the National Park. There was also general support for buildings of high quality design, particularly on previously developed land. These issues were addressed in the Core Strategy, which contains a section on Listed Buildings and Conservation Areas, setting out the framework for the management of the areas through Character Appraisals and Management Plans. They were further addressed by the inclusion of Policies CP7 (Built Environment); CP8 (Local Distinctiveness) and DP6 (Design Principles) that support high quality design. It was also recognised that these issues would be covered by the preparation of the Design Guide SPD.

d. Consultation on preparation of draft Design Guide.

Following the National Park Plan consultation, the development of the Design Guide was informed by discussions in early 2009 with interested parties, consisting of representatives

of a group of local design professionals, the Beaulieu Estate and the New Forest Association. A draft framework of ideas was produced for comment on its scope and content. There was further informal communication with the representatives of the design professionals about the Guide's scope and content in 2009, and then a workshop was held with these interested parties in the summer of 2010 to discuss a simple format for the document including an Introduction, a description of key principles, and a Directory of detailed considerations. The following key issues were raised during this period of informal consultation:

Issues discussed	How these are considered in the Design Guide.
Concern that there was little scope shown for high quality contemporary design and examples of contemporary buildings.	Selected examples of contemporary buildings and materials are included in the Guide.
Clearer explanation of terminology is required	Contents developed to use as clear and accessible language as possible.
A number of specific technical design issues were raised, such as the impact of cumulative extensions and comments about the appropriateness of materials	Assessed and incorporated, where appropriate
Keeping development small scale, avoiding suburbanisation and the cumulative impacts of development changes.	The importance of scale is discussed throughout the Guide. Suburbanisation is covered in Section 2, and the whole Guide addresses the cumulative impacts by attempting to avoid a loss of the distinctive local character of the area
Document should not be too technical, long and complicated.	The Guide has a simple structure which includes an Introduction, an outline of the principle messages, and detailed guidance for proposed developments in a Directory.
Some issues raised about the detailed content such as examples of buildings that could be included, and issues such as outside lighting, building conversions and tree advice	Assessed and incorporated, where appropriate.

The Authority's *Submission draft Core Strategy & Development Management Policies DPD* was published in February 2010 for a statutory 6 week period of consultation. During this consultation representations were received relating to the planning policies which are covered by the draft Design Guide. Following independent examination, the National Park Authority formally adopted the Core Strategy in December 2010. This provided the statutory framework for producing a draft Supplementary Planning Document for design guidance that supplements policies in the adopted Core Strategy.

Meetings were held in late March and early April 2011 with all four of the Parish Quadrants, to which all Parishes (which are either fully or partially within the National Park) were invited. At each meeting an overview of the proposed scope and contents was presented and the timetable for the Guide's production was outlined.

The following issues were discussed at the meetings:

Issues discussed	How these are considered in the Design Guide.
Need to clarify the links between the Design Guide SPD and Village Design Statements	Outlined in the Introduction to the Design Guide
The Design Guide should include some guidance on conservatories, light pollution and boundary treatments	Guidance on conservatories and boundary treatments are covered in the Directory.
The Design Guide should include guidance on how to successfully incorporate small scale renewable energy features within development proposals	Guidance on renewable energy can be found in both Section 2 and the Directory.
It should provide support for the Authority in dealing with creeping suburbanisation, which affects the Park's character	This is a key theme throughout the Design Guide, and covered specifically in Section 2.
Clarification was requested over what weight the document will have once adopted, and whether Planning Inspectors will need to take it into account in planning decisions.	A full description of the planning status of the Design Guide is described in the Introduction
It was questioned whether there would be local examples of good design	Where possible local examples have been used.
Would the Design Guide cover the design of buildings and boundaries used by recreational horse keeping?	A separate SPD is being produced to cover all aspects of Horse Related Development.

There was a request at each meeting (and subsequently to all Parishes by e-mail) for a response about the proposed contents and scope of the Guide to assist the NPA in preparing the Draft Guide for formal consultation. Parish Councils were asked to consider the following questions:

- a) Is the scope of this Guide appropriate? Are there any other elements of the built environment which should be included?
- b) Are there particular features of the built environment that reflect high design standards and enhance the New Forest's distinct character?
- c) Are there any examples of these in your Parish?
- d) What elements of development can result in suburbanisation and don't fit in within the New Forest?

The following issues were raised:

Issue Raised	How these are considered in the Design Guide.
The proposed purpose and contents, and its status as a SPD were welcomed.	Noted
Aspects of the Conservation Area Character Appraisals should be included in the Design	Where appropriate this has been done.

Guide	
The inclusion of guidance on land and garden enclosure was encouraged	The Guide covers fencing, gates and hedging
Suggestions were made for the inclusion of certain types of building / architecture	Communities will have the opportunity to put forward appropriate case studies to be featured on the web site as examples to inspire others.
Commercial advertisements can lead to inappropriate suburbanisation	The Guide covers the design aspects of signs and lighting.
A question was raised whether the design guide was needed.	The Guide specifically covers why the guidance is needed.
There is no particular local character, as there are a huge variety of different building styles and ages. Local distinctiveness is due to the natural environment, not the buildings themselves.	The Guide does not seek to encourage one style of building over another, and recognises that buildings should sit comfortably within the landscape

Strategic Environmental Assessment, Habitats Regulations Assessment.

Under the requirements of European legislation – namely the Strategic Environmental Assessment Directive 2001/42/EC and the Habitats Directive 92/43/EEC – there is a requirement to perform a ‘screening’ exercise to determine whether these assessments are needed. These ‘screening’ exercises have been done and the screening report for a Strategic Environmental Assessment (SEA) found there were no significant environmental effects, and therefore a SEA is not needed. The screening exercise for a Habitats Regulations Assessment did not identify any aspect of the draft Design Guide SPD which is likely to have a significant effect on European sites and therefore a further detailed appropriate assessment is not considered to be required.

Sustainability Appraisal

A Sustainability Appraisal for the draft Design Guide has not been prepared as the Town and Country Planning Regulations 2009 removed the requirement for a Sustainability Appraisal for an SPD and it is considered that it would not have significant effects that are not covered in the Sustainability Appraisal prepared for the Core Strategy DPD.

e. Formal public consultation on the draft Design Guide SPD.

At the Planning and Development Control Committee Meeting on 16 August 2011, the draft New Forest National Park Design Guide SPD was approved for public consultation. The six week public consultation period ran from Friday 9 September until Friday 21 October 2011 and in line with the requirements set out in the Town and Country Planning (Local Development) (England) Regulations 2004 the Authority publicised the public consultation through the following methods:

- Copies of the consultation document and relevant supporting information was sent directly to over 160 statutory and general consultees, including local stakeholders, design professionals, large building firms, landowners, housing associations and all

local authorities, town and parish councils within and adjacent to the National Park.

- The document was also made available for inspection at the Authority's office, and was available to view and download from the Authority's website throughout the consultation period.
- Public notices advertising the six week public consultation were published in three local newspapers covering the geographical area of the National Park at the start of the consultation period.
- The Authority's press release, issued at the start of the consultation period, resulted in articles in the Daily Echo, Stour and Avon Magazine and the Lymington Times.

List of those consulted

In accordance with the relevant planning regulations and the Authority's adopted Statement of Community Involvement (2007), the Authority consulted the following bodies on the consultation draft National Park Design Guide SPD.

Parish Councils (including adjacent parishes)

ASHURST and COLBURY PARISH COUNCIL
BEAULIEU PARISH COUNCIL
BOLDRE PARISH COUNCIL
BRAMSHAW PARISH COUNCIL
BRANSGORE PARISH COUNCIL
BREAMORE PARISH COUNCIL
BROCKENHURST PARISH COUNCIL
BURLEY PARISH COUNCIL
COPYTHORNE PARISH COUNCIL
DENNY LODGE PARISH COUNCIL
EAST BOLDRE PARISH COUNCIL
ELLINGHAM, HARBRIDGE AND IBSLEY PARISH COUNCIL
EXBURY AND LEPE PARISH COUNCIL
FAWLEY PARISH COUNCIL
FORDINGBRIDGE TOWN COUNCIL
GODSHILL PARISH COUNCIL
HALE PARISH COUNCIL
HORDLE PARISH COUNCIL
HYDE PARISH COUNCIL
HYTHE AND DIBDEN PARISH COUNCIL
LANDFORD PARISH COUNCIL
LYMINGTON AND PENNINGTON TOWN COUNCIL
LYNDHURST PARISH COUNCIL
MARCHWOOD PARISH COUNCIL
MELCHET PARK & PLAITFORD PARISH COUNCIL
MILFORD ON SEA PARISH COUNCIL
MINSTEAD PARISH COUNCIL
NETLEY MARSH PARISH COUNCIL
NEW MILTON TOWN COUNCIL

REDLYNCH PARISH COUNCIL
RINGWOOD TOWN COUNCIL
SOPLEY PARISH COUNCIL
SWAY PARISH COUNCIL
TOTTON And ELING TOWN COUNCIL
WELLOW PARISH COUNCIL
WHITEPARISH PARISH COUNCIL
WOODGREEN PARISH COUNCIL
BURTON PARISH COUNCIL
DOWNTON PARISH COUNCIL

Local Authorities (including adjacent authorities)

Hampshire County Council
Wiltshire Council
New Forest District Council
Test Valley Borough Council
Dorset County Council
Southampton City Council
East Dorset District Council
Christchurch Borough Council

Statutory and Specific Consultation Bodies

English Heritage South East
English Heritage South West
Environment Agency
Natural England
Department for Transport
SEEDA
South West RDA
Wiltshire Primary Care Trust
NHS Hampshire
The Homes and Communities Agency
The Coal Authority
Hampshire Police Authority
Wiltshire Police Authority
BT Group
Mobile Operators Association (MOA)
Mobile Operators Association
Southern Gas Networks
Sembcorp Bournemouth Water Ltd
Scottish and Southern Energy Plc
National Grid
Wessex Water

General Consultation Bodies

Age Concern Hampshire

Atlantic Housing Association Ltd
Breamore Estate
Beaulieu Estate
Cadland Estate
Changing Lives Partnership
Churches Together in Ringwood and District
Commoners' Defence Association
Community First, New Forest
Country Land & Business Association
Court Farm
CPRE Wiltshire
Cranborne Chase & West Wilts Downs
AONB
Crown Estate
Defence Estates
English National Park Authorities Association
Equality and Human Rights Commission
Exbury Estate
Fordingbridge Society
Forest Holidays
Gypsy and Traveller Unit - Hampshire
Gypsy and Traveller Unit - Wiltshire
Gypsy Council
Hampshire Association of Local Councils
Hampshire Coalition of Disabled People
Hampshire Constabulary
Hampshire Council for Voluntary Youth
Services
Hampshire Deaf Association
Hampshire Federation of Residents'
Associations
Hamptworth Estate
Hants and Isle of Wight Strategic Health
Authority
Home Builders Federation
Hyde Housing Association
Longdown Management Ltd
Lymington Society
Lyndhurst Residents Association
McCarthy & Stone (Developments) Ltd
Meyrick Estate
National Farmers' Union
New Forest Association of Local Councils
New Forest Bird Group
New Forest Consultative Panel
New Forest Disability Information Service
New Forest Equestrian Association
New Forest Primary Care Trust
New Forest Village Shops Association

Norman Court & Sowley Farms Ltd
Persimmon Homes South East
Pylewell Estate
Sandy Balls Estate
Somerley Estate
Swaythling Housing Society
Synergy Housing Association
Test Valley Partnership
Renewable UK
Western Challenge Housing Association
Wiltshire Wildlife Trust
World Wide Fund for Nature (WWF) New
Forest Group
New Forest Association
Forestry Commission
Hampshire & IOW Wildlife Trust
National Trust
New Forest Access for All
New Forest Friends of the Earth
The Verderers of the New Forest
CPRE Hampshire
New Forest Business Partnership
Energy Saving Trust
Colten Developments Limited
Linden Homes
Taylor Wimpey
Raglan Housing Association
Warrens Estate
New Forest Trust
Campaign for National Parks
New Forest Tourism Association
Friends of Brockenhurst
RSPB
DUA Architecture LLP
John Pardey Architects
Perring Architecture and Design
Perring Architecture and Design
Moxey Associates
Lymington Design Associates Ltd
Gdonvito Architects
D Bray
C Oldroyd
N Down
Robbins Design
Magnus Strom Architects
Columba Cook Architects
Martyn Wheatley Architects
David Wright Architectural Design

Summary of the responses to the public consultation

Responses were received from 22 individuals and organisations, who together made just over one hundred individual comments. These included responses from five Parish Councils; Campaign for National Parks; the New Forest Commoners Defence Association; the New Forest Association; the New Forest Business Partnership; Natural England; three design professionals and five local residents.

Five responses were supportive of the draft Design Guide, including the majority of the responding Parish Councils, Natural England and the Campaign for National Parks. There were three objections from design professionals and the New Forest Business Partnership, together with a range of comments, some of which were broadly supportive, some that raised concerns, and some suggesting improvements. Three of the statutory consultee bodies responded but stated that they had no comments to make about the Guide. It is noted that the vast majority of consultees who received the draft Guide did not feel the need to respond raising any concerns with its content.

Summary of the main issues raised during the public consultation

A number of respondents gave general support for the purpose and format of the Guide and its benefits for guiding decisions on planning applications. Some also identified the benefits of specific aspects of the guide including benefits to landscape character, biodiversity, and illustrations and local examples that make it user friendly.

Some of the concerns expressed relate to the Guide being considered overly prescriptive; that it focuses specifically on traditional buildings; and it suggests costly solutions.

In relation to concerns about the Guide being prescriptive, the Authority considers that the Guide intends to seek sustainable solutions that are most appropriate to the locality, local distinctiveness and the National Park. The Guide looks to provide positive examples but is not intended to be prescriptive or show every solution. The Guide will have linked on-line case studies in the National Park which will provide the opportunity for architects, designers and local communities to show good design in context using evolving technologies and sustainable practices.

The Aims of the Guide clarify that it does not seek to encourage one style over any other, and that the focus is not solely on existing traditional buildings. In accordance with national planning policy the Guide clearly states that when set in context contemporary design can also complement existing character and location.

The Guide seeks to address the appropriateness of design in the locality and the best solution may not be the most costly.

Concerns regarding illustrations and photographs have been considered and some have been amended.

In addition there were a range of comments on the content of the Guide. For example: it was suggested that a greater emphasis should be placed on nature conservation; a number of detailed comments related to adding further guidance, links to other documents and further aspects of understanding sites and their surroundings. Some comments related to the appropriateness of Core Strategy policies rather than the amplification of specific policies which is the purpose of the Guide. Clearly it is beyond the remit of a Supplementary Planning Document to change policies in a recently adopted development plan.

The need for a Design Guide is questioned in some comments. The document sets out the reasons for needing a Design Guide. Many local authorities, including National Parks, prepare design guides, reflecting the importance of new development making a positive contribution to the local area.

Summary of main amendments to the Design Guide

After consideration of all of the views received a number of changes have been made to the Guide. The principal changes are:

- The introduction has been amended to make a more direct reference to the National Park purposes and give a greater emphasis to the natural environment that provides the context for the document.
- In relation to 'Appreciating the Locality', clarification has been provided in relation to the use of the Landscape Character Assessment of the area.
- In the 'Initial Assessments' section of the Directory the importance of considering surrounding areas and any specific designations has been added, together with reference to access and any adjoining public access. Also, the 'Ecology' section has been expanded to provide greater detail to be taken into consideration in developing schemes. Also in the 'Initial Assessments' section of the Directory, under 'analysis' bullet points and the associated line drawing have been simplified and replaced, respectively.
- The reference to dwelling flexibility has been removed from the 'Commoning' section. Internal layout is a matter that can be considered in relation to individual applications.
- In the 'Surroundings and Settings' section of the Directory clarification has been added that the Authority has to consider the conservation and enhancement of biodiversity when determining an application.
- Reference to integrating green infrastructure, footpaths, cycleways and bridleways has been added in the 'Rural Enhancements' section of the Directory.

List of individual responses

The tables on the following pages summarise the main issues raised in the individual responses and also outline how these have been addressed within the Design Guide SPD.

Ref No.	Respondent	ref no.	Support comment object	Draft Page no	Comments	Proposed Amendment / NPA Response
1	Local Resident	101	comment	p.55	The connection between the photograph and content on page 55 is not clear.	Agreed, a more appropriate photograph has been substituted.
		102		P.47	To avoid thick mortar joints and encourage the use of traditional methods, recommends the use of lime mortar	Reference to lime mortar has been included on p.47. Text added: "<i>In some circumstances the use of lime mortar may be appropriate to give a traditional appearance.</i>"
		103		p.56	It needs to be made clear that this recommends the use of suitable grass or living plants for green roofs and walls, and not simply painting them green.	Noted, this has been clarified. Text added: "Buildings can recede into the natural landscape using green or living plant roofs and walls,"
		104			Modern 'up and over' garage doors look out of place on garages designed in traditional style and built with traditional materials	Already covered on p.65
2	National Grid	201			No comment	Noted
3	Coal Authority	301			No comment	Noted
4	Campaign for National Parks	401	Support		Welcomes that the principles to achieve locally distinctive development are explained with locally specific examples.	The support for explaining ways to achieve locally distinctive development is welcomed.

402	The fact that local communities can nominate development that they believe to be successful will celebrate good practice and counteract concerns from architects and developers that National Park status will be more onerous.	The support for involving local communities is noted.
403	The Guide is heavily focused on rural development. This could be a weakness when aiming to raise standards within suburban locations. How does the Guide apply to existing suburban locations in the Park?	The Guide applies to the whole of the National Park, including the villages. The principles set out in the Guide will be taken into consideration as appropriate throughout the Park.
404	There is no link to the Landscape Character Assessment, which would be a valuable tool for designers in bringing forward schemes.	A description of how to use the Character Assessments has been included on p.6. Text added: "<i>It is important to understand the unique sense of place described in these Character Areas to ensure development fits in.</i>"
405	Another aim could be to use the Guide for clients commissioning projects and for planners and architects to communicate to clients what it is that makes the Forest distinctive.	These are intended to be covered by the existing Aims of the Guide.

5	Milford on Sea Parish Council	501	Support	A very comprehensive document for guiding decisions on planning applications	The support for its role in guiding planning decision is noted.
6	Environment Agency	601		No comment	Noted

7	Local Resident	701	Comment	If the New Forest is to retain its value as a wildlife habitat, the unfettered use by dog owners needs to be curbed, especially during the spring and summer to protect ground nesting birds. Housing and population growth bring greater pressure from dog walking. Recommends that action is taken to limit the damage done by dogs on the New Forest.	This is covered by the National Park's Recreation Management Strategy and is not appropriately addressed through the Design Guide. The Design Guide does not address the location of development, which is guided by Core Strategy policies.
8	New Forest Association	801	Comment	The NFA share the view expressed by Respondent 14 (below) that the Design Guide should show more regard to the influence of buildings and associated paraphernalia on the flora and fauna in the National Park.	The Design Guide already makes reference to biodiversity and landscape features in new development. Further reference has been added to consider the immediate surroundings of the site and other nature conservation issues (see Respondent 14 comments below). The Core Strategy policies seek to reduce the impact of development on the flora and fauna of the Park.
		802		It is not clear to the NFA how much reliance can be placed on Policy CP1 of the Core Strategy which refers to new housing development located within 400 metres of the New Forest Special Protection Area. If this policy is observed strictly, then the NFA concerns with the draft guide are reduced.	The Design Guide does not address the location of development and therefore does not expand upon Policy CP1 of the Core Strategy. Policy CP1 forms part of the statutory development plan, and will be used as appropriate for relevant planning applications.
9	New Milton Town Council	901	Support	Generally, this is a well thought out and presented document. The extensive use of diagrams makes it very user friendly for the householder applicant.	The general support for the document is welcomed. The recognition that it will be easily accessible for household applicants supports the view expressed in comment 1602 that the Guide should be accessible to all.

902	p.22	paragraph 2 entitled Cultural Heritage – ‘Off site impacts’ should be termed generically and not be detailed as though a specific assessment is only required if historic boundaries or archaeological features are present nearby.	Agreed. Amendments made to text. Text added and changed: "Consider off-site impacts such as drainage works, highway access improvements and service provision" is moved to paragraph above. "Retain archaeological, historic and architectural features, considering impacts, for example, on historic boundaries." Title on page 22 changed from " Historic and natural features " to " Understanding features ".
903	p.22	paragraph 3 entitled Ecology – It would be worthwhile reiterating the necessity for native planting in this section to improve ecological value, and more importantly advertise the NPA leaflet available to give specific advice.’	The encouragement for native planting is noted and is highlighted elsewhere, such as in the section on Rural Enhancement. No change made, as p.22 relates to site assessment in general.

10	Fording- bridge Town Council	1001	Comment	The Guide makes no reference to it applying in neighbouring areas outside the National Park. It is recommended that the Introduction to the Guide clarifies this. This is particularly important for towns such as Fordingbridge which is commonly referred to as the “Gateway to the New Forest” but having only a small part of it’s parish within the National Park boundary. Areas such as this could be seen by developers as an easier option in terms of planning policies, leading to an increase level of applications which would not meet the standards required within the National Park boundary.	Design Guide will only apply to areas within the National Park. Section 62 of the Environment Act 1995 confirms that in exercising or performing any functions in relation to, or so as to affect, land in a National Park, any local authority (including district and parish councils) shall have regard to its purposes.
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11	DUA Architecture	1101	Object	We applaud the desire to promote high quality design within the National Park.	The support for promoting high quality design is noted.
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1102		The Guide should not attempt to define good design by looking at individual elements of traditionally constructed buildings as this results in a sentimental rather than visionary document.	The Guide addresses the form, scale, materials, details and setting of a range of different buildings, not just traditional buildings.
1103		Many of the illustrations are of dwellings which are uninhabitable or do not meet today's standards.	None of the dwellings shown are considered to be uninhabitable and schemes can deliver today's standards.
1104	p.24	The report is full of contradictions; for instance the affordable housing featured on page 24 contradicts all the guidelines noted elsewhere.	These are considered examples that respond to the guidance.
1105		The joy of many of our towns and villages is that they contain a mix of buildings from different ages, honestly expressed. To simply repeat past forms and styles is insulting and dishonest.	The Aims of the Guide on p.4 clarify that the Guide does not seek to encourage one style over any other, and that the focus is not solely on existing traditional buildings. It clearly states that when set in context contemporary design can also complement existing character and location. There are contemporary examples throughout the Guide.
1106	p.26 / p.44	Pages 26 and 44 feature illustrations of particularly weak design.	The illustrations on these pages are considered to demonstrate appropriate examples.
1107		Straw bales are NOT a traditional building material.	Agreed. This reference has been moved to under contemporary materials.
1108		The 'Building Features' section on sustainability, renewables and eco-effective schemes is very weak and should be written with greater knowledge of these matters.	These sections give an introduction to the issues, rather than seeking to provide detailed information which is widely available elsewhere.

1109		This is a manifesto for all things old fashioned.	The Aims of the Guide on p.4 clarify that the Guide does not seek to encourage one style over any other, and that the focus is not solely on existing traditional buildings. It clearly states that when set in context contemporary design can also complement existing character and location. There are contemporary examples throughout the Guide.
1110		Concerned that much of the New Forest's housing stock has been converted to holiday use, and coupled with the Park's Core Strategy, this Design Guide will act as a catalyst in converting the remainder to the same status.	It is not considered that the Design Guide will promote the conversion of properties to holiday use. Less than 3% of the Forest's housing stock is second home or holiday lets.
1111		Considers that the local authority is not sufficiently qualified to produce this guidance, and wider collective wisdom should be attained.	The Guide has been developed through liaison with interested parties and through public consultation.

12	Local Resident	1201	Support / Comment	The proposals in the draft guide appear to be sensible	The general support for the document is welcomed.
		1202		When is the Design Guide to be applied? (Provides examples of both inappropriate and sensitive development).	Once adopted, the Guide will apply to all new development in the National Park.
		1203		States that insensitive alterations are being allowed, such as replacing hedges with close boarded fencing, and brick piers and entrance walls built on the boundary of an ancient hill fort ditch and bank.	Not all alterations such as these will require planning permission, but the Design Guide is intended to provide best practice.
		1204		Concerned that local families have been refused permission for small alterations / small new buildings, when large buildings are permitted.	The Design Guide is intended for all scales of development that fit with Core Strategy development policies

		1205	p.4	Does not believe that the building in the photograph should be used as an example if the NPA would not allow it to be brought up to 21 Century standards, suitable to be lived in.	This is considered to be an example of local vernacular and any proposed development should be appropriate for the building in this context.
		1206		The New Forest should not become a theme park for tourists and holiday homes, and there should be more regard to local families.	The Guide aims to maintain and enhance the Forest's rural landscape, natural environment and built character

13	Local Resident	1301	Support / Comment	The Design Guide is well done, but a few years too late as large amounts of close boarded fences have already been erected and hedges have been dug out and replaced by fencing.	The general support for the document is welcomed. It is recognised that there has been a desire for such a document for a number of years.
		1302		Concerned that developers seem to get away with demolishing properties and then obtaining retrospective planning permission.	Core Strategy Policy DP10 outlines the approach to replacement dwellings and this is amplified in the Design Guide.
		1303		Concerned that local families have been refused permission for modest dwellings. Also concerned that just because there are only a few left, very small properties could deteriorate and fall into disrepair if improvements are not permitted. Believes that local young people deserve to live in the village.	The Design Guide is intended for all scales of development that fit with Core Strategy development policies

14	Local Resident	1401	Comment	NPA guidance documents should start with reiteration of the two purposes of national parks, adding that the exceptional biological value of the New Forest makes wildlife conservation specially important. In particular, the purposes explain what the Design Guide should contain and why. The objective of design is not merely to please the human eye but to fulfil the Authority's duty to conserve nature.	Greater emphasis and additional wording about the National Park's purpose has been added to p.1. Text added: conserving and enhancing ...".... the natural beauty, wildlife and cultural heritage of the National Park. It is intended that the Design Guide will contribute to this. "
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- 1402 The greatest reservation about the Consultation Draft is that it does not adequately demonstrate the importance of the National Park's obligation to nature conservation in relation to planning decisions. This Consultation Draft needs major strengthening to emphasise the importance of nature conservation (of which biodiversity is just one element). Thus the statement on page 1, "The New Forest National Park was designated for its beautiful landscape" is a misleading half-truth which requires at least equal emphasis to be placed on the Forest's biological value. Nature conservation should be a major determinant in a Design Guide; yet it is substantially neglected in the current Draft instead of having at least as much prominence as human visual impact, which the Draft handles with commendable skill.
- It is considered that the issues and impacts of development on nature conservation are adequately covered. The Design Guide must be read in conjunction with the suite of policies contained in Chapter 5 of the Core Strategy covering the Natural Environment. **Reference to "The New Forest National Park was designated for its beautiful landscape." has been removed.** A broader description of the natural environment is included in the Foreword.
- 1403 Emphasises the importance of the enclosed landscapes of the New Forest in supporting and providing alternative habitats for the wildlife of the SSSI. Identifies that large gardens can provide an important role in supporting nature conservation, but also highlights that increased numbers of households per unit area have an adverse affect. Recommends that the Guide must make clear the damage development causes to nature conservation and that, in some circumstances, development is not permissible. States that development substantially reduces a site's contribution to biodiversity both individually and in combination with nearby sites inside and outside the New Forest SSSI. Detrimental effects are (1) to the garden itself; (2) to the composite ecosystem comprising neighbouring gardens; and (3) to the adjacent SSSI.
- It is considered that the issues and impacts of development on nature conservation are adequately covered in the Guide. The Design Guide must be read in conjunction with the suite of policies contained in Chapter 5 of the Core Strategy covering the Natural Environment.

1404		The Guide should reiterate Policy DP9 of the Core Strategy, giving effect to government policy. The text in paragraph 7.33 of the Core Strategy should be reproduced in the Design Guide.	Policy DP9 is referenced on p.3 of the Guide, and the issues raised in paragraph 7.33 of the Core Strategy are matters which the Guide takes into account in assessing the area and site.
1405		The Guide should consider the impacts on gardens and include an explanation that contiguous gardens often comprise ecosystems whose importance is increasingly recognised. The Guide should make it clear that it is therefore important to take into account potential effects of development on (a) the garden itself, (b) the shared ecosystem of inter-relating gardens of which the site is a part, and (c) the adjacent SSSI. The Guide should recommend seeking local biological advice, resorting to employing an ecological consultancy only if local knowledge cannot be accessed. As the Guide should be directed to minimising the effects of development on nature conservation, it should contain a full statement of those effects so that everyone is aware of the effects to be avoided or minimised. The Guide should draw attention to the detrimental effects of adding more vehicular traffic on Forest (ie unmade) roads, dogs, pesticides, close-boarded fences and ill-informed tidiness. These impact on hedgehogs in particular, but it is suggested that satisfying the requirements of bats and hedgehogs would go a long way to satisfying most other species.	This is covered in broad terms on p.61. It is not possible for the Design Guide to go into this level of detail and to cover every eventuality. More detailed guidance will be available on the website.
1406	p.1	Suggests that this page needs to properly represent nature conservation	Amendments have been made to p.1 - see 1401,1402.
1407	p.1	Commends the warning about suburbanisation.	Support for the Guide's approach to suburbanisation is welcomed.

1408	p.1	Suggests that new buildings should be designed to attract purchasers empathetic with the New Forest, and deter second and holiday homes.	This is outside the control of planning authorities.
1409	p.2	Under 'How to use the Guide' developers should be told to consult the Core Strategy, as development proposals need to be consistent with the details and context of the Core Strategy (as the guide does not supersede this)	This is addressed on p.3. Clearly the role of a SPD is to support the Core Strategy policies rather than replace them.
1410	p.3	Greater emphasis is required for the statement, "It is essential that any development proposal conforms to the details and context of the Core Strategy policies". It is important that developers are directed more firmly to the Core Strategy and do not imagine that they have only to act in conformity with this Guide	The reference to the Core Strategy is considered adequate, but clarified by Text changed : "It is essential that any development proposal conforms to the details and context of the Core Strategy policies".
1411	P.4	The passage following "Specifically the Guide aims to:" needs rewriting to give proper recognition to the first purpose of National Parks	The following has been added to reflect this on p.4. Text added : "Maintain and enhance the Forest's rural landscape, <i>natural environment</i> and built character....."
1412	P.5	The passage under "Landscape character" is good but the reference to "the mosaic of buildings" needs to include reference to the importance of gardens (see 1403,1404,1405). There is value in the statutory recognition that areas within 400m of an SSSI need special protection from development.	An amendment has been made to the reference. Text added : "Within this context, the mosaic of buildings <i>and their setting</i> in the landscape....."
1413	p.6	The concepts covered under "Development character" require greater elaboration and explanation. eg. sources of light pollution must be avoided within 400m of the New Forest SSSI, development should be avoided where it adds to vehicular usage of Forest and other unmade roads, and should be avoided where it may impose suburban sterility at sites hitherto	It is not possible for the Design Guide to go into this level of detail and to cover every eventuality. Where appropriate, further elaboration has been provided elsewhere in the Guide (eg. light pollution is covered on p.69/70)

		rich in our native fauna. Unless the Guide makes each of these points firmly, it is inadequate to refer merely to retaining trees on p.8.	
1414	p.19	A biological element needs to be included in the "Area Analysis" and this should include seeking local knowledge.	The importance of considering surrounding areas has been added to p.19. Text added: "Surrounding designations eg. Sites of Special Scientific Interest (SSSI), Sites of Importance for Nature Conservation (SINC), County Wildlife Sites etc and general impacts on nature (verges may have SSSI designation)." A link to a website that shows the natural conservation designations has been added.
1415	p.21	The concepts covered under "Nature" and "Wildlife" require greater elaboration and explanation to prompt developers about what to look for - examples are cited.	Some examples have been added. Text added: "Nature: Wildlife eg. Bats, badgers, bird species and reptiles."
1416	p.22	The "Ecology" section needs to make reference to seeking local knowledge for biological information.	Professional advice is considered essential.
1417	p.22	The Guide needs to spell out how "development should maintain and enhance biodiversity", particularly as it is considered that development of the footprint of a dwelling together with garages, outbuildings and hard standing for patios and driveways reduce the area available for native species.	This is considered to be addressed on p.61 and p.62.
1418	p.25	Suggests that while considering the scale and character of neighbouring buildings, the ratio of building footprint to uncovered garden area should be no greater than surrounding properties. Higher housing density can be detrimental to many animal species.	Core Strategy development policies cover housing density and the building footprint.

1419	p.36	The Draft states that "Outbuildings need to be distanced from boundary and neighbour impacts. They should not compete in size with the main building". To avoid ambiguity this should read "Garages and other outbuildings must be commensurate in size with the main building and situated nearer to it than to the boundaries of neighbouring properties. Lighting, if essential, should be sited not to illuminate neighbours' gardens."	Existing wording is considered appropriate.
1420	P.45	External lighting should be avoided unless essential and, even then, must not impinge on neighbours. Windows in roofs need fitting with blinds to avoid light pollution and interference with species such as bats and moths.	Ways of including lighting are covered on p.69/70.
1421	p.53	The encouragement of natural boundaries is commendable	The support for natural boundaries is welcomed.
1422	P.53	Preference for hedges should be emphasised, and gaps at ground level in close boarded fences should be recommended for wildlife to pass through.	Reference to hedges has been included on p.54. Close boarded fences are not encouraged. Text added: "Encouraging natural boundaries, <i>such as native species hedges</i> , for enhanced"
1423	p.61	This section is fundamental and should appear earlier in the document. Recommends replacing the term 'biodiversity' with 'nature conservation'. Believes that the website referred to requires updating to reflect the respondent's comments.	Further information will be available on the website.
1424	p.65	Commends the avoidance of high impact security lighting but it is not clear what is meant by "well dispersed, concealed lighting" or that it would be satisfactory.	It is considered that the existing wording is appropriate.

1425	p.70	The excellent panel on page 70 deserves greater prominence.	Noted. A separate heading has been included.
1426		A case study of a development is provided to highlight some of the issues raised. Raises doubts about imposing conditions on planning permissions; raises concerns about the timing of surveys, illegal building, close boarded fencing, reduction in garden size, and reduction of biodiversity by laying garden to lawn. The case study shows that development can run counter to the intentions of the planning authority, and as currently worded the advice on p.61 may be largely ignored by developers - recommends that the advice on p.61 is made mandatory.	Case Study noted. New wording has been added to p.62 to reflect the local authority's duty to consider the conservation biodiversity. Text added: "All local authorities have to consider the conservation and enhancement of biodiversity when determining a planning application. As part of the application process a detailed checklist is provided on www.newforestnpa.gov.uk."

15	New Forest Commoners Defence Association	1501	Support / Comment	Welcomes the NF NPA Design Guide SPD in general as a well set out and thorough guide covering a broad range of design issues within the New Forest National Park, on a broad level.	The general support for the document is welcomed.
		1502		Concerned about the emphasis placed on re cycling and re use of buildings without consideration to costs (see pages 41, 43, 53 & 54 of consultation document). Commoners often have to maintain and develop holdings on restricted budgets and therefore this is not always a viable option if appropriate replacement is a more economic proposition.	Core Strategy policies support the re-use of existing buildings outside the four defined villages. The Guide intends to seek sustainable solutions that are most appropriate to the locality, local distinctiveness and the National Park, and need not be the most costly. Rural building practices which are given as examples are some of the most sustainable, simple to maintain, and less likely to become obsolete.
		1503	P.53/ P.54	Concerned at the emphasis placed on restoring existing buildings (page 53/54), particularly in respect of redundant or dilapidated agricultural buildings, as this can be more time consuming, expensive (see point above), and will often fall short of the maximum efficiency or practical use required for modern	Core Strategy policies seek to protect and maintain local vernacular buildings that contribute to the character of the area.

agricultural working methods and requirements.

1504			Modern, Cost Effective Agricultural buildings are required to support commoning and although they may not initially be ideal from a landscape character perspective, due consideration should be given to the overall contribution commoning makes to the landscape character and quality of the New Forest and surrounding areas.	All new development will be required to achieve the highest standards for design, external appearance and location.
1505	P.43		Concerned with reference made on page 43: Commoning / Smallholdings: Dwelling Flexibility 'preferred layouts' for commoners housing. The association is not aware of any specific preferred layouts for such dwellings other than the maximum size constraints and examples of past dwellings that have been developed under the Commoners Dwelling Scheme. We would suggest that the development of a set of preferred layouts for commoners dwellings with all interested parties is an 'opportunity' for future development rather than an existing accepted guide.	Agreed. Reference to 'preferred layouts' removed. Text changed: <i>"Dwelling flexibility There are several preferred layouts for commoners housing that allow for progressive enlargement and adaptability,"</i>
1506			Dwellings built under the Commoners Dwelling Scheme may also have to take into consideration the other interests of commoners and morphology of the holding and are therefore likely to be case specific (see New Forest Commoning Review 2007) and we feel that recognition should be given to this within any design guide.	All new development should be considered in context as set out earlier in the Guide. The Commoners Dwelling Scheme has recently been reviewed and forms the initial basis for proposals.

16	Minstead Parish Council	1601	Object / Comment	Much of the guide provides useful advice on how to make new developments, large or small, fit in with the existing area. However some of it is unhelpful and misleading and could create problems rather than avoid them. In many cases the principle of 'less is	The Guide intends to seek sustainable solutions that are most appropriate to the locality, local distinctiveness and the National Park. It provides examples but is not intended to be prescriptive or show every solution. The Guide will have linked on-
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more' could be applied, with more reliance on general principle rather than subjective prescriptive advice. The Guide emphasises form over function, tries to create the traditional, and on occasions may be less effective than the simple key policy statements it is trying to re-enforce.

line case studies in the National Park (as noted in Annex 1) which will provide the opportunity for architects, designers and local communities to show good design in context using evolving technologies and sustainable practices.

1602

We would like to ensure that the guide is accessible to all. Those who are not well off and are not commercial interests that have access to professional advice may need more help to point them in the right direction. The NFNPA should try to ensure that all applicants are clearly pointed at the guide and offered informal advice from a planning officer before the application is submitted. Often the guide seems to point to expensive solutions which look nice rather than the most effective. This has the effect of further establishing the Forest as the home of the well-off middle class.

The Guide is intended to be accessible and will be available to those considering new development. The Guide intends to seek sustainable solutions that are most appropriate to the locality, local distinctiveness and the National Park, and need not be the most costly. Rural building practices which are given as examples are some of the most sustainable, simple to maintain, and less likely to become obsolete.

1603

p.8 /
p.57 /
p.13

Throughout the guide the emphasis is on the appearance of the design rather than its ability to perform a function effectively. Somehow it has been decided how things should look and everyone is forced down that route no matter what the function of the building is. At no stage is the functionality and efficiency of the design given prime consideration. This seems to us to be changing the fundamental nature of The Forest in an effort to make it conform to a predetermined visual template. Examples of this are:
Windows p8 – At no stage in the guide is the performance or cost of the window placed ahead of its appearance. This seems wrong. What is wrong with plastic if it does an efficient job at an affordable price? We fail to understand the fixation on small windows

The Guide intends to seek sustainable solutions that are most appropriate to the locality, local distinctiveness and the National Park, and need not be the most costly. Rural building practices which are given as examples are some of the most sustainable, simple to maintain, and less likely to become obsolete. **Advice to consider other energy saving solutions, such as insulation, has been added to p.59.**

with clear glass and hardwood frames.
Solar Panels p57 - the emphasis is simply on appearance. No weight is given at all to considering the efficiency and reliability of the panels.
Varying sized buildings to conceal a spreading floor plan p13 - The idea that this can improve efficiency of heating by allowing zoning seems to fly in the face of logic given the detrimental effect of increasing the surface area to volume ratio.

1604

One of the characteristics of Minstead is a lack of local distinctiveness. All kinds of different buildings exist, grand manor houses, commoners cottages, 1950s council houses, 1960s houses, thatched cottages, converted barns, tin shacks, etc. etc. The attempt to say that the lack of local distinctiveness in fact is the local distinctiveness seems pretty pointless, as the logical conclusion of this is that to preserve local distinctiveness anything goes. General guidance on scale and character are helpful, but much advice seems over prescriptive and may actually serve to confuse and overcomplicate matters.

Even though the Design Guide recognises that there is a variety of development within the Park, the National Park is considered to have a distinctive character. The Guide seeks to avoid development which would individually or cumulatively erode the Park's character or result in a gradual suburbanising effect

1605

p.33 / On many occasions we find the guide to be too
p.34 prescriptive. It tries to define things far too closely and
p.19 seems to be intent on making everything look exactly
p.63 / the same. There seems to be some over-riding
p.68 chocolate box image of how things should look,
attempting to create the traditional where it never was
before. Traditional conservatories, oak framed
outbuildings etc. The Forest has become what it is
partly through a lack of anyone trying to decide which
buildings make a positive contribution and which
constitute inappropriate development. Some of the
advice seems highly subjective and perhaps
represents current fashion rather than good design.
Examples of this are:
Conservatories p33-34. - We do not recognise the
concept of a 'traditional conservatory' within the
Forest. To a great extent they are a recent trend and
the guide seems simply to be aimed at providing a
very expensive 'chocolate box' look.
Area Analysis p19 – Surely the existing buildings
define the local character and neither lend to or
detract from it. This type of judgement can only be
made about new buildings which will change the local
character.
Screening glazed areas with timber slats p40 – this
example makes the appearance worse, increases the
cost, and creates a monolithic structure - it is so
subjective that it should be omitted.
Rural enhancement p63-68. Much over prescriptive
advice – what plants to put in your garden p66 & p68.
What surfacing to use for paths and driveways p68.
What edging to use for paths and driveways. If granite
sets with fluted terracotta edging don't represent
suburbanisation then what does? Sheds p65 – what
is non-traditional or non-rural about a shed? P65 –
what are urban doors, windows and gates?

The Guide intends to seek sustainable solutions that
are most appropriate to the locality, local
distinctiveness and the National Park. It provides
examples but is not intended to be prescriptive or
show every solution. The Guide will have linked on-
line case studies in the National Park (as noted in
Annex 1) which will provide the opportunity for
architects, designers and local communities to show
good design in context using evolving technologies
and sustainable practices.
To avoid excess detail and help clarity **in the Area
Analysis section the diagram has been replaced
with a photograph and the text has been
simplified.**

1606

p.46 /
p.49
p.67 /
p.68
Sometimes different sections of the guide seem to offer conflicting advice. Examples include - Windows and their frames p46 & p49. P46 recommends subdivided glazing, p49 recommends structural glass without frames. Edging of paths. P67 recommends irregular edges, p68 plaited and fluted terracotta.

The Guide shows a wide range of examples and opportunities and thus demonstrates that the intention is not to be prescriptive.

17 Whiteparish
Parish
Council

1701

Support

The Parish Council considers the consultation draft Design Guide SPD as a worthwhile document that will give planning guidance.

The general support for the document is welcomed.

18 New Forest
Business
Partnership

1801

Object

We find these proposals to be, in broad terms, subjective, prescriptive, too wide in interpretation and too restrictive in future, potential comprehension.

The Guide intends to seek sustainable solutions that are most appropriate to the locality, local distinctiveness and the National Park. It provides examples but is not intended to be prescriptive or show every solution. The Guide will have linked on-line case studies in the National Park (as noted in Annex 1) which will provide the opportunity for architects, designers and local communities to show good design in context using evolving technologies and sustainable practices.

1802

Whilst certain aspects of the document are capable of endorsement, we find it difficult to understand why such a document is necessary at all bearing in mind the Planning Authority's status as a National Park (with all that that implies) allied to the fact that much of the National Park itself is composed of SSSIs, AONBs, Ramsar sites and a plethora of Conservation Areas where strict (some might say overtly restrictive) planning rules already apply.

The document sets out the reasons for needing a Design Guide on p.1. Many local authorities, including National Parks, prepare design guides, reflecting the importance of new development making a positive contribution to the local area.

1803	<p>In the "Commercial" section greater emphasis needs to be given to the view that the commercial sector may not be able to deliver wholly sustainable and visually attractive buildings. For example, while efforts to comply with BREEAM standards are laudable they will, in the foreseeable future, simply be unobtainable for so long as the present recessionary climate prevails.</p>	<p>Core Strategy Policy DP1 sets the standards for new commercial buildings for the coming years. The Design Guide is set within the context of this policy.</p>
1804	<p>The Authority's duty to seek to foster the economic and social well being of local communities will be progressively unachievable if unaffordable restrictions are placed upon both de novo and existing commercial space occupiers who wish to extend their spatial requirements or create new buildings in acceptable locations.</p>	<p>The Guide intends to seek sustainable solutions that are most appropriate to the locality, local distinctiveness and the National Park, and need not be the most costly. The Core Strategy sets out the planning policies on employment development in the Park.</p>
1805	<p>In the "Conservatories" section, there is no description or justification of the "More eco-friendly materials" nor a factual basis on which such conclusions are reached. The use of materials such as "UPVC", for example, carries with it no indication of how much more economically viable this might be from an ongoing 'costs-in-use' basis from a maintenance perspective.</p>	<p>The Guide does not seek to determine the economic viability of one material over another. It seeks to address the appropriateness of design in the locality and the best solution may not be the most costly. Rural building practices which are given as examples are some of the most sustainable, simple to maintain, and less likely to become obsolete.</p>
1806	<p>Elsewhere in the document there is also a theme of no detailed justification nor acceptance of the financial premium in requiring both domestic occupiers, public sector bodies and commercial operations to comply with such potentially restrictive practices. It is not considered to be the function of the National Park Authority to restrict the activities of its residents, its commercial activities nor, indeed, its public sector partners in a manner that would create an unnecessary and unacceptable financial, social and</p>	<p>The Guide intends to seek sustainable solutions that are most appropriate to the locality, local distinctiveness and the National Park, and need not be the most costly. It is the role of the National Park Authority as the statutory planning authority for the Park to ensure that new development is appropriate to its context.</p>

community related burden on all of those who live and work within the National Park itself.

1807

We would hope that the progress of this document would be curtailed, pro tempore, to enable a more comprehensive and detailed assessment of its merits, rather than be limited to such parties as, for example, the Beaulieu Estate being one of the few bodies to have been consulted prior to this document's publication.

The National Park Authority has met the statutory requirements for the preparation of Supplementary Planning Documents, including a six week public consultation.

19 John Pardey Architects 1901 Object

The current document remains overly prescriptive in its attempt to define appropriate design responses within the confines of the New Forest National Park.

The Guide intends to seek sustainable solutions that are most appropriate to the locality, local distinctiveness and the National Park. It provides examples but is not intended to be prescriptive or show every solution. The Guide will have linked on-line case studies in the National Park (as noted in Annex 1) which will provide the opportunity for architects, designers and local communities to show good design in context using evolving technologies and sustainable practices.

1902

The document fails in its aim to provide inspiration and lacks clarity. At in excess of seventy pages, the guide would benefit from being more concise.

The Guide expands upon a wide range of Core Strategy policies and is written to engage with a wide range of applicants.

20 Perring Architecture and Design 2001 Object / Comment

We understand the need for directives and encourage an understanding of local distinctiveness and site specific design solutions – the aims of the guide are laudable.

Support for the need for, and the aims of, the Guide are welcomed.

2002	We are disappointed by the prescriptive nature of the 'acceptable' design strategies and approaches, as illustrated throughout the document.	The Guide intends to seek sustainable solutions that are most appropriate to the locality, local distinctiveness and the National Park. It provides examples but is not intended to be prescriptive or show every solution. The Guide will have linked on-line case studies in the National Park (as noted in Annex 1) which will provide the opportunity for architects, designers and local communities to show good design in context using evolving technologies and sustainable practices.
2003	The document contains factual errors regarding building materials (cedar) and environmental strategies.	Reference on p.50 to cedar relates only to shingles.
2004	The Design Guide appears to contradict the aims of PPS7 which encourages planning authorities to take a 'positive approach to innovative, high quality contemporary designs that are sensitive both to their immediate setting and the defining characteristics of the wider local areas.'	The Aims of the Guide on p.4 clarify that the Guide does not seek to encourage one style over any other, and that the focus is not solely on existing traditional buildings. It clearly states that when set in context contemporary design can also complement existing character and location. The Guide will have linked on-line case studies in the National Park (as noted in Annex 1) which will provide the opportunity for architects, designers and local communities to show good design in context using evolving technologies and sustainable practices.
2005	Appropriate and sympathetic design solutions can only be arrived at through examination of a building on an individual basis, usually involving a trained design professional, and cannot be reduced to a set of diagrams illustrating what the approach should be. Furthermore, from an environmental perspective, the approaches illustrated could be wholly inappropriate and even damaging; if site specific environmental	General guidance is provided on understanding site characteristics. It is not intended to replace the client's brief and the design professional's assessment.

influences are not properly considered.

2006

A group of local architectural practices including Perring Architecture & Design have offered to set up and run a local Design Review Panel in the past, and this offer still stands. This has not been acknowledged, nor has this group been approached by the NFNPA for design advice relating to the Design Guide. A review panel and serious consultation with trained design professionals is essential if the NFNPA is serious about ensuring that appropriate and good quality design solutions are adopted within the New Forest.

In 2007 the National Park Authority's Planning Development Control Committee considered a report on design review panels and resolved to use the Hampshire County Design Review Panel when required. This will be kept under review. The Case Studies will be an opportunity to share examples of good design.

21	Natural England	2101	Support / Comment	Natural England welcomes the SPD. Well designed buildings can enhance landscape character and contribute to a sense of place and local identity; provide habitats to enhance biodiversity; contribute to health, well being and contact with nature; and help deliver sustainable communities.	The general support for the document is welcomed.
		2102		We welcome the consideration given to land form, settlement patterns and architecture, within the document. Encouraging reference to the Landscape Character Assessment and Village Design Statements is also welcomed.	Support for these elements of the Guide is welcomed.

2103

The design of development should protect and enhance natural resources, support natural ecosystems and incorporate beneficial biodiversity features. In this regard the Site Assessment section of the document could be further developed to ensure that functioning and dynamic ecosystems are retained and enhanced where possible, with integration of green infrastructure. By detailing the following examples, it would ensure that developers are aware of the extent of the requirements and have given them consideration prior to referring to professional advice and survey, by starting at Site Assessment stage it will ensure that the environment is considered from the start :

- o Incorporation of green spaces and wooded areas (to provide shade and wind attenuation)
- o Promotion of a healthy, well functioning and dynamic ecosystem which returns surface water to the soil, recycles wastes, avoids pollutants, retains and enhances features such as hedges, trees, green spaces and ponds and other natural features.
- o Integration of waterways, ponds and green spaces to provide wetland habitats and other design features such as sustainable drainage and flood attenuation. Features such as reed beds and permeable paving that allows sustainable drainage can also be included as part of development, with the added benefit of protecting soils from erosion and maintaining soil function.

2104

We welcome the inclusion of green roofs under Considering an eco-effective scheme and the inclusion of nest/roost areas under Supporting and Enhancing Biodiversity, along with the retention of wildlife corridors

The suggested amendments have been incorporated on p.22.

Text added and changed:

Ecology

~~Development should maintain and enhance biodiversity. Successful schemes need to identify habitats and protected species constraints at an early stage through "~~***The design of new development should protect and enhance natural resources, support natural ecosystems and incorporate beneficial biodiversity features. Successful schemes need to:***

- o identify habitats and protected species constraints*
- o incorporate green spaces and treed areas (to provide shade and wind attenuation.)***
- o promote surface water drainage to soil, recycle waste, avoid pollutants, and enhance natural features.***
- o Integrate waterways and ponds to provide wetland habitats and design features such as sustainable drainage."***

Support for biodiversity elements welcomed.

2105	It would also be a positive addition if reference to www.natureonthemap.org.uk is provided and consideration given to the means of access to a development at the design stage. This is because it has been noted that a number of developments come forward with access across verges which are part of designated Sites of Special Scientific Interest, with little consideration to alternative routes of access or minimising the extent of any such impact.	Link to a map of nature conservation designations included on p.19, and specific reference made to verges being potentially a SSSI designation. Text added: "Surrounding designations eg. Sites of Special Scientific Interest (SSSI), Sites of Importance for Nature Conservation (SINC), County Wildlife Sites etc and general impacts on nature (eg verges may have SSSI designation)." A link to a website that shows the natural conservation designations has been added.
2106	The design and setting of development should promote access and enjoyment of the natural environment, as well as including measures to mitigate and adapt to climate change and encourage efficient use of energy and resources. We welcome the recommendation in the Sustainability section to use flexible design to ensure that buildings can be adapted for re-use and inclusion of the Renewable Energy section. However, further attention may be drawn to active travel patterns and access to communal spaces within the Surroundings and Settings section.	Supportive comments about the Sustainability and Renewable Energy sections are welcomed. New wording has been included on p.63 about green infrastructure, cycle-ways and bridleways. Text added: "Integrating green infrastructure, footpaths, cycleways and bridleways."
2107	We hope that these comments will allow the document to develop a stronger focus on the natural environment and assist in delivering well designed developments.	A number of amendments have been made throughout the document.

22	National Park Authority Access Officer	2201	Comment	p.67 / p.65	Would like to see some mention of the requirement to keep public highways, including footpaths and bridleways, free from overhanging vegetation. Specifically this relates to: - the recommendations on Page 65 to re-establish front gardens with natural hedged boundaries, and to	Reference to considering public access as part of development proposals has been added to p.21 Text added: " Public access: No development should have an adverse affect on the extent or quality of public access."
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replace urban boundaries with fences where planting can poke through.

- p.67, where it would be helpful if it could be recommended that the hedge plants should be planted sufficiently far back from the lane so that when the hedge plants grow, the side branches will not overhang the lane.

- p.67, where it would be helpful to include the information that fences adjacent to highways, including minor highway such as footpaths and bridleways, should be no more than 1m high.

Reference also added to description establishing a hedge on p.67.

Text added: "*leaving ample space to grow adjacent to the lane.*"

2202

p.66

Page 66 includes a photographic illustration of a highway authority fingerpost. I think this is misleading because highway signage is permitted development, and the highway authority will have its own design criteria.

Photograph omitted and text changed: "...using dragon's teeth ~~and traditional finger post signs.~~"

2203

Access issues should have greater emphasis. A paragraph about public access on page 22 would be welcomed. E.g. development should maintain and enhance public access and amenity. Existing public access should be incorporated into design at an early stage. No development should have an adverse effect on the extent or quality of public access.

Reference to considering public access as part of development proposals has been added to p.21

Text added: "*Public access: no development should have an adverse affect on the extent or quality of public access.*"

New wording has been included on p.63 about green infrastructure, cycle-ways and bridleways.

Text added: "*Integrating green infrastructure, footpaths, cycleways and bridleways.*"