

Updated Design Guide for Extensions and Alterations SPD

Brighton and Hove City Council

Consultation Statement, October 2019

PLANNING AND COMPULSORY PURCHASE ACT 2004 TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATIONS 2012, REGULATION 12

This Consultation Statement has been prepared in accordance with Regulation 12(a) and (b) of the Town & Country Planning (Local Planning) (England) Regulations 2012. which states: “Before a local planning authority adopt a supplementary planning document it must – (a) Prepare a statement setting out – (i) the persons the local authority consulted when preparing the supplementary planning document; (ii) a summary of the main issues raised by those persons; and (iii) how those issues have been addressed in the supplementary planning document; and (b) for the purpose of seeking representations under regulation 13, make copies of that statement and the supplementary planning document available in accordance with regulation 35 together with details of – (i) the date by which representations must be made (being not less than 4 weeks from the date the local planning authority complies with this paragraph), and (ii) the address to which they must be sent.”

This statement sets out details of the consultation that has taken place to date which has informed and refined the Supplementary Planning Document (SPD). It sets out the details of how, when and with whom the initial consultation with interested parties and organisations took place and how this had informed the SPD.

Background

The B&H Design Guide for Extensions and Alterations Supplementary Planning Document (SPD 12) was adopted in September 2013. Since the adoption of the SPD, local circumstances, national, regional and local planning policies have all substantially changed. In particular there have been significant amendments to residential permitted development rights. These have allowed more extensive changes to dwelling-houses to happen without the need to obtain planning permission. Many of these changes go beyond limitations and good practice which were considered appropriate when SPD12 was adopted.

It is a good practice for Local Planning Authorities to periodically review development plan policies to ensure that they are up to date. The same is true of associated guidance. This is likely to result in sustaining its status as a material consideration in the determination of planning applications.

The Updated Design Guide for Extensions & Alterations Supplementary Planning Document (SPD 12) seeks to provide guidance that is contemporary. It takes account of current permitted development rights and B&H’s ambition to support the continued regeneration of the City through allowing development that adapts to existing occupiers’ needs. It is part of the suite of documents that seek to continue to raise the quality of the development that will take place in the City. It sets out guidance specific to Brighton and Hove, recognising the different characteristics of areas and the need for a design response tailored to these circumstances.

Area of Coverage

Brighton and Hove City Council with an exception of land that fall within South Downs National Park.

Drafting the SPD

The SPD has been informed by a review led by the Council's planning policy team, with input from urban design, conservation, landscape, development management teams internally and a range of stakeholder externally.

Early consultation was also undertaken with Planning Agents Forum (PAF) to discuss the gaps in the current document and scoping of the new document. The Forum is an umbrella organisation for over 200 town planning and architectural firms based in Brighton making them one of the biggest user groups for the SPD. In summary, there was an overwhelming support for moving away from an approach that relied on detailed prescriptions; shortening the document for user friendliness; making it more Brighton specific along with some comments on specific design details. A meeting was held on 2nd November 2018 and the feedback from this engagement is included in appendix 2. Alongside this feedback the Council reviewed Appeal decisions and conducted internal consultation to inform the new draft of the revised document which was consulted.

Consultation

The SPD has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.

Consultation on the draft SPD is a requirement of Part 5 of the Town and Country Planning (Local Planning) (England) 2012 Regulations and has been undertaken in accordance with those Regulations and the council's Statement of Community Involvement. The Council's Statement of Community Involvement (SCI) sets out policy and standards for engaging residents, local groups, stakeholders and statutory consultees in the preparation of planning-related documents. The public consultation was carried out in accordance with this statement. There was a six week public consultation period which began on the 5th July 2019 and closed on the 16th August 2019. There were bespoke meetings held with PAF at scoping stage (2nd November 2018) and as part of the public consultation (30th August 2019) to collect feedback from the PAF.

During the consultation period:

- the SPD was made available on a dedicated website through Citizen Portal. Hard copies were made available in Council Offices and 15 libraries across the city (Hangleton Library, Hove Library, Hollingbury Library, Mile Oak Library, Moulsecoomb Library, Patcham Library, Portslade Library, Rottingdean Library, Saltdean Library, Westdene Library, Whitehawk Library, Woodingdean Library)
- interested groups on the Local Plan consultation database were emailed and invited to comment
- a press release was issued
- the consultation was publicised via social media

Consultation comments have been taken into consideration in the preparation of the revised document and responses are identified within Appendix 2. Consultation comments received related to 10 questions.

The consultation generated 10 responses (six returned via online tool; three via email and one via bespoke meeting). The online survey respondents included two representatives of organisations and six individual citizens. Responses have been largely positive to the approach, structure and details provided in the updated SPD. Responses that were returned

via feedback email included Highways England, RSPB, Brighton Society and an individual citizen. A summary of consultation feedback and responses is given in Appendix 1.

Bespoke consultation event with PAF

Given the early contribution of PAF at the scoping stage, the Council invited PAF for a further bespoke meeting with the intention to gather their views on the consultation draft SPD. The meeting was held on 30 August 2019. The notes from the meeting are incorporated in the Table in Appendix 1.

These comments together with recommended changes to the Draft Residential Extensions & Alterations Supplementary Planning Document will be presented to the council's Tourism, Equalities, Communities and Culture Committee on 21 November 2019 for its consideration and adoption. Once adopted, SPD 12 will be revoked.

Appendix 1 Schedule of comments and officer's responses

Representor	ID	Summary of responses	Officer's response
[REDACTED]	SPD001	<p>The SPD is overly prescriptive in terms of design "instruction". The preservation of footprint of buildings for extensions when not seen from the street, even in conservation areas, ought not to be a restriction, but a general high quality design standard should be sufficient.</p> <p>The concept that an extension needs to be subservient to the host building is not necessarily correct. This seems to predicate against wholesale remodelling of houses where some are considerably improved because of this.</p> <p>Agree with SPD imparts positive guidance to applicants Disagree SPD is set at appropriate level</p>	<p>The SPD has significantly moved away from using design 'instruction' that formed bulk of guidance in the existing document. Disagree with the comment on the footprint of the building in conservation areas, which does need to be retained to ensure the original integrity remains.</p> <p>Disagree, as the SPD's emphasis on 'subservience' does not act against wholesale remodelling. Remodelling is outside the scope of this document</p> <p>Support noted Disagree as the SPD significantly revised to set at appropriate level that would benefit both property owners and professional agents.</p>
[REDACTED]	SPD002	<p>Hip to gable changes on semi detached properties. That it must stay the same as the adjoining property. This used to be included but I can't see it in there anymore.</p>	<p>Included in the updated document</p>
[REDACTED]	SPD003	<p>Need to help encourage sustainable forms of transport. Brighton housing stock is biased towards terrace housing. This causes issues for cyclists, parents of young children, and people with mobility issues. All such people would greatly benefit from the ability to provide secure sheds in front gardens.</p> <p>As above. Support from bike sheds etc</p>	<p>The predominance of terraced housing in Brighton and Hove is a wider issue which will be addressed through the City Plan. The idea of a bike shed in the front gardens is likely to benefit many, however, the benefit has to be weighed against whether it has adverse impact on the streetscene. The guidance does not intend to be too prescriptive by including every proposals</p>
[REDACTED]	SPD004	<p>I think it's brilliant in concept but lets itself down by lack of Plain English in several parts. It's written as if for other experts and it needs to be written for the layman. I know this is difficult - experts forget that what they know is not common knowledge. But if you don't make it easy for ordinary householders to read then they won't bother and the good thinking behind the document</p>	<p>Comment noted. Issue of plain English, jargons and longer sentences have been addressed in the revision</p>

		<p>will have no impact. Either avoid or explain jargon such as 'curtilage' or include it in the glossary. There is a typo in the first par under Listed Buildings – 1948 Formal - that makes it hard to comprehend. It would be worth repeating the advice to discuss plans with neighbours at an early stage in the second section, on Neighbourly Development.</p>	<p>The Town and Country Planning Act (2012) Regulations sets out how neighbour consultation should take place. It is not considered necessary to repeat that information on the SPD.</p>
	SPD005	<p>Make consulting neighbours compulsory, especially showing them the plans. It is not only useful to discuss initial ideas with neighbours, it is vital!</p>	<p>See above comment</p>
	SPD006	<p>With the advent of E-cars and cycles it would assist if consent could be given to erection of small secure units at front of houses.</p> <p>The provision of small secure structures at front of houses for E-charging and storage (small 2 metre x 2 metre x 3metre secure structure to secure charging point and storage)</p> <p>SPD needs to consider future development of greener (electric) vehicle charging for all new developments and grant consent for existing premises</p>	<p>The document does not preclude against any proposal to have a small secure structure at front of houses as long as they do not detract from the quality of the streetscene.</p> <p>This issue is being addressed through other council policy and initiatives.</p>
	SPD007	<p>Supportive of the inclusion of the paragraph found under General Principles/ Delivering Sustainability. However, "You may wish to consider" is too weak and should be strengthened. Also consider including :</p> <p>"It is paramount to examine any building before the extension work commences to establish if there are any active swift nests within the building.</p>	<p>The SPD is guidance and it is not considered appropriate to make alterations that will seem like giving 'instruction' or policy.</p> <p>New text suggesting the need for a survey prior to construction to examine if there are any active swift nests has been added.</p>
The Brighton Society	SPD008	<p>In general terms we support the draft update. It is less prescriptive than the previous SPD, in line with our comments on that SPD we submitted on 19 April 2013. We are pleased to see that many of our comments appear to have been taken account of in the current draft.</p> <p>However some of the points we made in that document are still relevant to the current draft SPD, and there are some</p>	<p>Support noted.</p> <p>Guidance similar to what has been suggested is at the start of the detailed section.</p>

		<p>additional ones which apply to the current draft.</p> <p>A - Achieving high quality design</p> <p>1.1 We think it would be helpful if there was a general statement included in this section to the effect that design proposals for dealing with situations which are different from those described in the guidance would be considered on their merits, within the general parameters of the guidance.</p> <p>1.2 Because the draft is not prescriptive, we think it is important that some of the key design principles which should be applied to the design of Extensions be more fully described and discussed.</p> <p>For example para 7 on p.6 could be amplified to include topics such as the context of the street or neighbourhood, and emphasise the importance of creating a polite relationship to that context, in terms of form, detail, materials as well as appropriate and sympathetic architectural language and vocabulary, (in addition to matters such as scale, mass... etc., which are already mentioned in that paragraph).</p> <p>1.3 It would be helpful if this section could include a few well-chosen example images of what is considered a good design solution in a particular context and what is not considered to be acceptable.</p> <p>C – Delivering Sustainability</p> <p>1.4 Solar panels There is no mention of solar panels. We think solar panels should not be allowed at all on street frontages in Conservation Areas, unless they are treated as part of the roof finish – for instance there are panels which blend into a slate roof visually. These should be encouraged in areas where a slate finish could be acceptable. A consistent approach is required to this.</p> <p>2 Section 4 – Detailed Guidance</p>	<p>The text of Section 3 was reviewed and guidance has been added to suggesting consideration of building line, pattern, roof lines, pitch and shapes of roofs, views and orientation in Section 3 A Achieving High Quality Design.</p> <p>Relevant images will be added</p> <p>Comment noted. Including specific guidance on solar panels will be too prescriptive. Each application will be assessed on its individual merit and impact on the character of the neighbourhood and streetscene.</p> <p>Inconsistency removed in the revised document</p> <p>This inconsistency has been removed</p> <p>The SPD does not rule out</p>
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		<p>2.1 Rear Extensions – guidance notes Paras 5 and 7 both mention two storey extensions – but the guidance is different in each. Para 5 states the ridge should be 0.5m lower, para 7 says it should “normally be set lower...”</p> <p>2.2 Single storey side extensions There could be situations where a side extension can be better integrated with an existing house by bringing the extension forward and continuing the lower part of the roof in front of the existing house to form a porch or bay window. The possibility of such perfectly satisfactory visual solutions should be permitted.</p> <p>2.3 Corner plots We are glad to see our previous comment on this has been taken account of. Corner sites can be handled in a variety of ways in which a corner extension could form the dominant element of a row of terrace houses - for instance by acting as a positive visual stop at the end of a row. This is definitely one situation where proposals should be considered on their merits.</p> <p>2.4 Roof extensions and alterations is too prescriptive. There are several examples in Brighton and Hove where one side of a semi-detached property has had a roof conversion and the other hasn't. It isn't a big problem visually and the clause prevents both owners of unconverted roofs converting their attics, as each side is prevented by the other one, thus precluding any roof alterations on both sides. It seems most inequitable.</p> <p>Extensions which are out of scale and character such as box dormers which occupy almost the full width of a house are far worse. The paragraph dealing with the latter type of roof extension probably needs to be tightened up.</p> <p>2.5 p.13 – principle is spelt wrongly – should be principal.</p>	<p>possibility of innovative solutions, however each of the proposals will be subject to individual assessment.</p> <p>SPD could not provide guidance on specific proposals.</p> <p>Support on the guidance on corner plot is welcomed.</p> <p>This is a tricky issue requiring careful assessment of the need for balance. The guidance intends to avoid imbalance in semi-detached pairs</p> <p>Disagree. Box dormers that are not seen from the streets are potentially acceptable.</p> <p>Amendment made.</p>
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		<p>2.6 Dormers with balconies - add “...and amenity and privacy...”</p> <p>3. Section 5 – Conservation Areas</p> <p>3.1 First para – <i>Some areas of the city...</i> There are 34 Conservation Areas. Why not say so? You mention the number of Listed Buildings.</p> <p>3.2 Locally listed buildings should also be mentioned in this paragraph as well.</p> <p>3.3 Conservation Areas, Buildings of Local Interest Existing pattern and grain of development is also an important consideration which should be added to the list.</p> <p>3.4 Side, Rear and front Extensions in CAs (p.16) There are several references to “historic” buildings in this section. It is not clear whether this term refers to listed or locally listed buildings or to all buildings in Conservation Areas. Clarification is required.</p> <p>3.5 New and replacement windows Some further explanation is required here. Traditional single glazed windows are generally much more finely detailed than their double-glazed equivalents. It is possible to achieve an acceptable level of fine detail, but this needs to be highlighted, as by no means all window manufacturers will provide windows which are acceptable in visual terms.</p> <p>4. Appendices</p> <p>4.1 It should be emphasised that the documentation for applications in Conservation Areas require more detail, and should specifically include information relating to the local context and relevant Heritage considerations.</p> <p>As a member of the Conservation Advisory Group we see far too many low quality applications which do not include this information.</p>	<p>Amendment made</p> <p>Amendment made</p> <p>Amendment made</p> <p>Amendment made</p> <p>‘Historic’ refers to both nationally and locally listed buildings in Conservation Areas.</p> <p>Amendment made in response to the comment</p> <p>Comment noted. This will be dealt with as part of wider review of Development Management Services.</p>
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Highway England	SPD009	No comments	
PAF	SPD0010	<p>General – The document appears much improved, more user friendly and is considered to address many of the issues by not being too prescriptive. Welcomed the proposed approach but question how this will be interpreted by officers and inspectors.</p> <p>Neighbourhood typologies – Question the need for the inclusion of this table. Useful for interest only but does not tie into the document overall.</p> <p>General Principles – The inclusion of a paragraph discussing and acknowledging the overall context and setting of the site would be beneficial. Agreed that pursuing this approach was beneficial.</p> <p>General Principles –Retention of the visual symmetry of semi-detached pairs is not necessary.</p> <p>Neighbourly Development – Inclusion of a paragraph relating to roof terraces and balconies would be useful.</p> <p>Delivering Sustainability – Agreed to include source of documents in reference web-links to assist off-line research.</p> <p>Detailed Guidance - 45 degree rule should be flexibly applied as cases do exist where the rule isn't complied with but no harm to amenity results. Suggested softening of the wording to; "all rear extensions ideally should comply with the 45 degrees rule".</p> <p>Detailed Guidance – Question what is meant by "rear extensions unacceptably extending beyond side walls" and if it is necessary</p> <p>Detailed Guidance – Remove the guidance suggesting a two storey pitched roof extension should have a ridge set lower than principal ridge of the dwelling.</p> <p>Detailed Guidance – Revise guidance on</p>	<p>Support noted. The document remains "guidance" and not policy</p> <p>Neighbourhood typologies figure removed</p> <p>Support noted</p> <p>Disagree. It is considered that semi-detached pairs in vast majority cases do benefit from the guidance.</p> <p>New guidance added in response</p> <p>Support noted and sources of documents added</p> <p>Suggested amendment made</p> <p>The sentence is caveated by "in the majority of cases" and considered useful to be retained.</p> <p>Disagree. It is considered that in majority cases this guidance is helpful to achieve the subservience principle.</p> <p>Text revised to suggest "should integrate well with the</p>

	<p>integration of flat roofs into pitched roofs</p> <p>Detailed Guidance – Agreed the requirement that a pitched roof (single storey extension) should generally be set lower than the cil of the first floor windows.</p> <p>Side Extensions – Questioned the sentence in paragraph 4 stating; “parapet walls are preferred.”</p> <p>Side Extensions – The requirement to maintain an “appropriate set-in” between the extension and side boundary is more relevant to detached and semi-detached dwelling.</p> <p>Side Extensions – Reintroduce paragraph 1 from SPD 12 with regards to infill extensions. Requested the removal of the requirement to be “as close to 2m as reasonably possible” in consideration of what can be done with permitted development.</p> <p>Side Extensions – Requested the removal of the requirement to maintain the boundary wall and fence as this can cause problems for overall maintenance and can be detrimental overall. Potential for benefit to all parties through Party Wall agreements.</p> <p>Front Extensions – No overall comments</p> <p>Roof Alterations – Request the removal of paragraph relating to roof alterations unbalancing the semi-detached pair.</p> <p>Dormer Windows and Rooflights – Agreed in general that the section is a great improvement on previous.</p> <p>Question if it is necessary to always insist that dormer windows line-up with windows on storeys below. If it is to be retained wording should be caveated as “normally” to allow for exceptions.</p> <p>Dormer Windows and Rooflights – Agreed that entertaining the possibility of front dormers is a positive inclusion in the document.</p> <p>Balconies and Roof Terraces – Requested a revising of the wording to paragraph 3.</p>	<p>existing eaves”. Support noted</p> <p>Removed from the document</p> <p>Agreed that this is more relevant for detached and semi-detached properties. Minor changes made for clarity.</p> <p>Changes made</p> <p>Changes made</p> <p>In vast majority cases this guidance has been judged to be beneficial.</p> <p>Support noted</p> <p>Change made</p> <p>Support noted</p> <p>The guidance is considered useful in cases where the inclusion of such features introduces new/or exacerbates further overlooking then refusal</p>
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		<p>Outbuildings –and Requested clarification as to how “purposes incidental” is interpreted by officers. All agreed that wording “...do not include primary accommodation” but requested the removal of the requirement to never include bathrooms/shower rooms, toilets or kitchens” as this should be assessed on a case by case basis.</p> <p>Conservation Areas Clarification needed to distinguish the type of building within the CA. Example referred to of 60’s blocks being within CA’s but being required to have Conservation rooflights and whether this was always necessary.</p> <p>Conservation Areas – Roof Extensions and Alterations - Discussion around whether sentence advising “...historically rooflights were small and confined to rear roof slopes or hidden valleys” was accurate.</p> <p>Conservation Areas – This section should include guidance as to how double glazed units could be considered appropriate even in historic buildings. Questioned whether an insistence upon single glazing was always necessary and whether this needs addressing given the drive towards sustainable architecture and development. Further discussion also around whether UPVC could be appropriate subject to detailing.</p> <p>General – Discussion generally held around submission of materials and the preference that this is agreed within the scope of the application and through the submission of photographs of samples rather than insistence of physical samples.</p>	<p>is likely. No change made.</p> <p>Agreed and changes made</p> <p>Text of SPD amended to clarify that the policy guidance relates only to historic buildings and does not apply to modern buildings that do not contribute positively to a conservation area.</p> <p>We confirm that we consider this sentence to be accurate.</p> <p>The text of the SPD has been amended to clarify that in many cases timber windows can acceptably incorporate double glazing. Further guidance – and justification for the approach relating to UPVC windows – can be found in SPD09 and does not need to be repeated here.</p> <p>This is outside the scope of the SPD but the principle of the comment is accepted.</p>
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Appendix 2 Notes of the meeting with PAF on 2nd November 2018

SPD 12 Design Guide for Extensions and Alterations

Professional Agents' Forum
Hove Town Hall, G87
02 November 2018, 0900-1130

Notes from the meeting

Attendees:

BHCC: Liz Hobden, Paul Vidler, Tim Jefferies, Sujeet Sharma

PAF: [REDACTED], [REDACTED], [REDACTED], [REDACTED]

The meeting started with a presentation from BHCC giving an introduction and overview of work undertaken so far and an outline of the methodology suggested for updating/review of SPD12 which includes:

- input made by this meeting by PAF
- appeal decision analysis (ongoing)
- internal review within the Council involving officers and Members (ongoing)

Draft contents, timescales for SPD preparation and suggestions for a broader approach were presented as agenda items for discussion. PAF members were invited to make general comments as well as detailed observations on seven key elements in the SPD.

Moving forward, these points will be further considered in updating the SPD in combination with comments collected through other sources and review outcomes undertaken by the Council. Timetable shared with PAF.

General Comments from PAF representatives:

- Correct interpretation of the guidance by Case Officers is key to effective implementation of the SPD. Less experienced planners have difficulty in interpreting the guidance which lacks clarity in places
- Inconsistency in guidance and illustrations (example illustration does not follow 45 degrees rule)
- There needs to be a distinction in the guidance between public and private views of extensions (front and rear) and between areas of the city – conservation areas and other areas of the city
- Householders have difficulties deciding whether to invest in something like daylight assessment due to inconsistencies in the decision making
- Sometime rigid compliance to the SPD has been seen to have poor quality outcomes. SPD should ultimately seek to achieve good design
- Over-controlling and prescriptive on certain elements
- Recognised that heritage sensitive areas can have highest bar, but there are areas where SPD application can afford to be more relaxed. Variation of architectural styles and street scene in different areas require different approaches

- SPD needs to catch up with expanding PD rights
- Given the variety of applications there has to be some rules, however it is all about implementation. Principles in the SPD follow established design criteria applicable to all typology of schemes but the emphasis should vary
- Overall the guidance/illustration do not take account of the topography in Brighton and Hove
- A checklist approach might help in bringing this clarity for both applicants/agents and Case Officers. A simplified SPD would obviate the need for extensive guidance
- Guidance could have 10 or 20 examples demonstrating why they are positives and covering range of cases
- Keep SPD simple if not, explain different terminologies used
- More common sense should be applied on objections and lack of objections
- Compliance with SPD 12 could be linked to validation requirements

Single storey rear extensions

- Emphasis on visual impact at the rear unduly cumbersome and needs a rethink
- Extension should be seen on its own merits and should be judged in its own right. Some schemes do not have front, back or side. Corner buildings fall within that aspect. SPD however aiming at the common situations
- Clarity in criteria needed. Criterion 5 is overarching and should be the first one to be assessed. It should then obviate the need for applying other more prescriptive criteria
- Overlooking receiving unduly emphasis for single storey rear extensions and need rationalising especially for city centre areas
- More clarity over the meaning of overbearing needed
- Overlooking in city centre is different. Application of overbearing criterion for a single storey rear extension not appropriate

Two storey rear extension

- In areas with less sensitivity – SPD should be more relaxed
- Where schemes do not complying with overbearing or 45 degrees rules SPD should be clear about how to mitigate against those. Rules are important to distinguish poor quality schemes from good quality schemes. SPD should have hooks that would enable Officers to suggest solutions. The order of how that is processed is important
- If all other conditions are fulfilled new roof below the ridge appears rather too prescriptive
- Flat roof issue and sensitivity of rear building needs to be looked at - especially the positives. Flat roofs often give more light to neighbours; solar panels
- The guidance provides some flexibility with the inclusion of 'generally' and 'normally', which is often not exercised by less experienced Officers

Infill extension

- Wrong illustrations in the document
- Causes practical problems with what is being prescribed and an area to review
- Rear of the building - wrap around should be made clear. Diagram showing wrap around as acceptable does not make sense
- Wrap around in Conservation Areas can be less restrictive as long as it follows original forms of the building. Listed buildings is a different matter

Side extensions

- Setback is generally not a bad rule but blanket application may not be appropriate. How much to set back – is an issue. There can be no rule of thumbs on street scene impact which requires design justification exercise
- 'Balance' is a criterion to be reviewed. Common in semi-detached extensions, its application on detached houses not appropriate
- Need to think out of the box for some cases - Corner sites/contemporary design solutions are often positively received by Inspectors

Dormers

- Key issue is that the guidance doesn't seem to distinguish between front and rear and in and outside conservation areas. This needs to be addressed.
- Too much emphasis on aligning windows. Everything does not need to be symmetrical. Prescribing style is inappropriate and can be very subjective.
- Dormer policy needs reviewing - is often described as impacting on the host building which is not necessarily correct
- Page 17 restrictive on box dormers. This needs to be relaxed for areas with less sensitivity.
- What is wrong with rear box dormers (set in from sides and down from ridge, up from rear wall) outside conservation areas. Dormers window should be as small as possible' needs reviewing. Sense of proportion is what matters
- Guidance on matching materials too prescriptive. It should starting point. The latitude given is hidden

Roof alterations

- Illustration in the document incorrect
- Roof alteration sensitivity differs and needs to be rationalised according to location
- Roof alteration and dormers should be separated. There should be no dormer policy just the roof alteration
- Roof lights as few as possible small as possible contradicting
- Cabrio style roof light visually inappropriate needs reviewing
 - Text suggesting distinction on the front and rear especially with dormers should be included

Balconies

- Balconies and roof terraces guidance are restrictive and discourage exploiting sea views/garden views. Front balconies have positives and negatives. Visual harm by having a balcony in non- conservation area needs to be reviewed
- Too prescriptive. Balconies should be encouraged as they provide amenity space

Finally,

The panel agreed that it is a good way forward for the BHCC to set a higher bar for design quality. SPD update should be priming people for positive intervention. It is recognised that SPD cannot cover everything but efforts should be directed to the SPD that is less rigid and more proportionate in its advice. Going forward, engagement with PAF will continue.

It was agreed that comments would be shared with the PAF and would inform the revisions to the SPD along with the views of other consultees (including officers and councillors)

Sujeet Sharma

BHCC