
East Devon Local Plan Regulation 19 (Phase 1)

**Strategic Policy DS01: Design and Local
Distinctiveness**

Representation by Savills on behalf of Mac Mic Strategic
Land

March 2025

Introduction

1. This representation is submitted by Savills on behalf of Mac Mic Strategic Land (from hereon referred to as 'Mac Mic'). Mac Mic is a strategic land promoter with a strong reputation for delivering planning permissions that lead to high-quality development.
2. Mac Mic has instructed Savills on their behalf to submit a series of representations to the relevant policies of the Regulation 19 Local Plan, including this policy.

Policy AR01

3. Strategic Policy DS01 contains an extensive list of criteria with which development proposals are required to comply. Criterion D on this list is an obligation to *"meet nationally and locally describes space standards"*.
4. The Nationally Described Space Standard (NDSS) is one of three optional standards that could be incorporated into Local Plan policies where evidence demonstrates a need exists. The Planning Practice Guidance states at Paragraph: 020 Reference ID: 56-020-20150327 that:

"Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:

- *need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*
- *viability – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
- *timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions."*

5. We are aware of no evidence supporting the Local Plan which justifies the requirement for 100% of new homes to meet the NDSS. And whilst we do not doubt that the vast majority of households would wish to live in large homes if all other considerations were equal, that does not reflect the reality of the housing market. Larger homes are more expensive to construct than smaller properties and consequently have a higher sales value. Requiring all homes therefore to comply with NDSS will inevitably mean that some prospective house purchases are simply unable to afford a new home. In this respect, the policy conflicts with Strategic Policy HN01 (housing to address needs) which seeks to:

"support development of dwellings most suited to younger people noting the importance of housing to support and nurture a younger workforce."

6. We strongly recommend that EDDC revisit Strategic Policy DS01 and establish a requirement which reflects the identified need rather than applying a blanket approach to NDSS.