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Second Regulation 19 Consultation – East Devon Local Plan – Responses by Chapter

Filtered Data Export

DS01

Full name: Iwan Easton

Organisation (where relevant): Boyer Planning

Other party name (if relevant): 3West Developments Ltd

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS01

1(b). Does your comment relate to one of the changes listed above?: No

1(c). If the comment is related to a site, please state the site reference here.:
Exmo_20

3. Do you consider that this part of the High Quality Design chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the High Quality Design chapter, please use this box to set out your comments.:

2.58 3West Developments support the requirements of the policy which ensure proposals respond to local policy and guidance, and to be of high quality and locally distinctive.

2.59 Land at St Johns, north-west of Exmouth, presents an opportunity to deliver up to 700 highquality homes. The development would respond positively to its surroundings, meeting local housing needs through a mix of private and affordable homes, alongside new social and community facilities.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Our attendance is necessary to effectively discuss the points raised in these representations.

Full name: Nick Matthews

Organisation (where relevant): Savills

Other party name (if relevant): Mac Mic Strategic Land

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS01

1(b). Does your comment relate to one of the changes listed above?: No

3. Do you consider that this part of the High Quality Design chapter is sound?: No

3(b). If no, please give details of why you consider this part of the High Quality Design chapter is not sound. Please be as precise as possible.: Savills on behalf of Mac Mic Strategic Land

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."

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."

3(c). Please set out the modification(s) you consider necessary to make this part of the High Quality Design chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the High Quality Design chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: 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.

Full name: Community Campaigner David Barton

Organisation (where relevant): Community Campaigner David Barton

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS01

1(b). Does your comment relate to one of the changes listed above?: No

3(b). If no, please give details of why you consider this part of the High Quality Design chapter is not sound. Please be as precise as possible.: This consultation feedback submission has been produced by , also known as Community *** Personal details have been removed *** Campaigner *** Personal details have been removed *** who is promoting both the existing Built Historic Environment and Traditional Vernacular Architecture (TVA)/ Traditional Architecture (TA) as a key feature across UK and Ireland-wide Local Authorities and associated Planning Departments at all tiers of Local, Regional and Central Government.

This universal consultation therefore acts as an official Representation at all and any stage of official area UK Planning Consultations- Preliminary Scoping Documents, Named Stages of the Local Plan, Conservation Area Appraisals and Supplementary Planning Documents (SPDs), primarily regarding Design Codes.

Representations are being made by *** Personal details have been removed *** as part of his ongoing work to champion the key stakeholders at various key areas old and new with a view to supporting their economic growth through the merits of High-Quality style Conservation with the hope of encouraging wider constructive and restorative support through positive and constructive working.

It is submitted that TVA should play a key part in any and all policy moving forwards on the grounds of conferring practical benefits be these periodic maintenance, their perceived support from the public, their invaluable contribution to achieving Climate Crisis Targets set local, nationally and internationally alongside their overall cost-effectiveness to key stakeholders alike in terms of Planning and sourcing of raw materials.

*One primary document that should be considered with significance especially alongside my own representation is a written academic account of the actual practicalities associated with Traditional Architecture from a leading expert in their field.i.) Not only does this in-depth analysis provide an in-depth take on the widely assorted merits of this type of Architecture but it fully corroborates my case made across all sections typically found in one of the consultations highlighted above.

Furthermore, my representations to date and contained herein this document are duly supported by the Founder and Director of The Institute for Traditional Architectureii.) who has identified and recognised my own contribution(s) to communities up and down the Sefton Borough. This is an internationally acclaimed organisation which periodically works with other leading agencies and organisations to bring about effective positive change.

Outlined throughout Submission are responses to existing Consultations which set out why I consider amendments to existing Planning Policy documents are necessary to ensure the best possible outcomes.

References to supporting documents are contained in the indented blue numbering.

This Submission has been prepared for UK and Ireland-wide Local Authorities in the hope that it may serve as an umbrella representation by Mr. Barton. This does not prejudice his ability to also comment on live stages of any one Consultation, merely providing the ability to be put in touch directly with any one Local Authority in receipt of this Representation with the prospect of also taking part in any version(s) of Consultations begin ran by said Local Authorities. If there are future consultations, especially regarding Design Codes and SPDs relating to this across both designated and non-designated heritage assets then it is hoped that these are duly provided to Community Campaigner David Barton.

Mr. Barton has cited material references and sources from his previous Representation to the Bootle Area Action Plan Consultation (2021-2026) that align with his existing and ongoing points which he would like to raise in parallel with other Local Authorities. Where a more detailed discussion with leading sources, such as Architects and Academics may prove conducive with these Councils then Mr. Barton would be delighted to discuss this further.

Community Campaigner David Barton:

Community Campaigner David Barton is a Heritage Campaigner of over 11 years' experience who has championed and led a number of successful campaigns to promote TVA in modern-day life. His dual mandate is to provide effective (alternative) use of historical buildings encompassing a full restoration alongside achieving the mainstream construction of new classical architecture on numerous economic, environmental and ecological grounds that align with existing policy set out by Central Government covering the UK and increasingly elsewhere across the world.

Having worked with a wide array of residents, businesses and organisations in that time, which has included the full restoration of the Victorian Verandahs on Lord Street, Southport in tandem with the respective key stakeholders and other property owners to

prevent demolition of Old Builds across Sefton, Mr. Barton is now hoping to make the process of utilising the built environment to its fullest potential a far simpler one that will enable Bootle to fully reach its maximum potential as a historic town.

3(c). Please set out the modification(s) you consider necessary to make this part of the High Quality Design chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the High Quality Design chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.:

1. Design Codes based on TVA should be utilised in preference to Design Guides

2. LAs should establish recurring partnerships with key Consultation Bodies, such as

Create Streets and The King’s Foundation, etc who specialise in getting through to a huge swathe of grassroots members of the public with tried and tested previous experience in Local Plans, such as Lichfield, etc.

3. Non-demolition of historic buildings prior to the 1950s must be made policy or adhered to as part of LCC’s commitment to combatting the Climate Crisis through sequestering carbon in its Old Builds.

4. LAs should adopt a Local List of Valued Buildings (Non-designated Heritage Assets), which have been a Government requirement since the policy introduction through the NPPF in 2012. Historic England produced a guide to help Councils in May 2012. Bristol produced an exemplar list in 2015, which is well worth reviewing.

5. Existing Action Plan if present for Designated and Non-designated Heritage Assets needs identifying and/ or establishing (I may support this if invited).

6. Option for people to provide feedback even if out of time for additional documents, such as SPDs or at the discretion of Councils where feedback may be particularly assistive or lead to additional academic and architect guidance. Option for public publishing of feedback should be encouraged with the consultee's consent to encourage wider consultation uptake moving forwards.

7. Era-style Buildings, especially rows of Georgian, Victorian and Edwardian architecture must be faithfully restored, retained and recreated to complement surrounding historic streets that may or may not be classed in official Conservation Areas preventing harsh contrast with newer built housing estates from the 1950s onwards.

8. Where demolition is proposed for 1950s style housing onwards- any new construction must be in the historic building style and local materials to ensure high carbon capacity, quality aesthetic and true blending of the interconnected conurbations of any one area, place or location.

9. Concerted efforts to identify and locate core suppliers for raw materials and specific heritage skills should encourage new uptake of these limited artisan craft skills by new contractors locally based to support the local economy, provide employment, and reduce the cost of product and service in the long-term.

10. Volunteer labouring assemblies should be fully encouraged and supported identifying key individual and group skillsets that can be utilised to protect historic buildings or areas at risk with a view to supporting the construction of new authentic style housing (as and where appropriate) and the reconstruction of demolished prized old buildings beloved by the community, such as community pubs, libraries and community centres.

11. Simplified streamlined Planning Process for key stakeholders either working to authentically restore buildings and/ or build new ones, such as observed with many civic buildings in Budapest Hungary and the Federal University Buildings in the US.

12. Where there have been evolving building styles over years, eg. Combination of one or more: Georgian, Edwardian and Victorian, the style that best promotes the area, ie. One that has the majority era structures left or capacity size requirements as examples should be utilised by house builders, especially where a streetscape may have been annihilated during the World Wars.

Full name: Margaret Leppard

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS01

1(b). Does your comment relate to one of the changes listed above?: Yes

3. Do you consider that this part of the High Quality Design chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the High Quality Design chapter, please use this box to set out your comments.: I Appreciate lighting that maximises dark sky amenity

Full name: Robin James Meadwell

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS01

1(b). Does your comment relate to one of the changes listed above?: No

2. Do you consider that this part of the High Quality Design chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the High Quality Design chapter is not legally compliant. Please be as precise as possible.: It is for EDDC to ascertain and establish whether this chapter is legally compliant.

3. Do you consider that this part of the High Quality Design chapter is sound?: No

3(b). If no, please give details of why you consider this part of the High Quality Design chapter is not sound. Please be as precise as possible.: A number of Developers operate nationally and have multiple trading names which are used across the regions. It is common practice among Developers that they pre-existing designs for house types. The result is that there a multiple new housing developments across the regions of the UK where the housing provided comprises of the same styles of house being built and numerous areas now appearing uniform externally and internally and with no distinct variation. Small, local Developers are often more capable of providing housing which is sympathetic to the surrounding area and landscape.

4. Do you consider that this part of the High Quality Design chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the High Quality Design chapter fails to comply with the duty to co-operate. Please be as precise as possible.: It is for EDDC to establish whether this chapter is compliant with the Duty to co-operate.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: MR D. MORGAN

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS01

1(b). Does your comment relate to one of the changes listed above?: Yes

2. Do you consider that this part of the High Quality Design chapter is legally compliant?: Yes

3. Do you consider that this part of the High Quality Design chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the High Quality Design chapter, please use this box to set out your comments.: Strategy Policy DS01: 'Design and Local Distinctiveness'.

(Pages 200-201). Quote: "Appropriate lighting (limiting the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation) to oversee public spaces and reduce crime opportunities;"

I support the addition of reference to "appropriate lighting" and its definition, as many areas included within or near to the East Devon National Landscape have outstanding or sensitive landscape features and topography (i.e. towards the top of a valley). Or these areas are within the vicinity of the activities of the Beer Quarry and Caves SAC and bat activities which would be adversely affected by light pollution from inappropriate lighting initiatives. Such a policy should also be considered in the context of wider new developments within or near the East Devon National Landscape so as to avoid creating inappropriate lighting in areas which have distinctive topography and/or landscape feature and wildlife activities.

4. Do you consider that this part of the High Quality Design chapter complies with the duty to cooperate?: Yes

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Lisa Turner

Organisation (where relevant): Blackdown Hills National Landscape

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS01

1(b). Does your comment relate to one of the changes listed above?: Yes

3. Do you consider that this part of the High Quality Design chapter is sound?: No

3(b). If no, please give details of why you consider this part of the High Quality Design chapter is not sound. Please be as precise as possible.: For the most part.

We support this policy as being strong and clear on high quality design and distinctiveness, and welcome the amendment to criteria E.4.

We noted previously that the Blackdown Hills Design Guide for Houses which was specifically referenced is due to be reviewed and revised, however we did not contemplate the reference being deleted. We consider the guidance helpful in seeking to conserve and enhance the designated AONB and as such relevant to this policy.

3(c). Please set out the modification(s) you consider necessary to make this part of the High Quality Design chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the High Quality Design chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Reinstate some reference to guidance specific to National Landscapes, for example the end of the second sentence could be amended thus, ‘...whether adopted as Supplementary Planning Documents or promoted through other means, including the National Landscapes.’

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Rachel Danemann

Organisation (where relevant): Home Builders Federation

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS01

3. Do you consider that this part of the High Quality Design chapter is sound?: No

3(b). If no, please give details of why you consider this part of the High Quality Design chapter is not sound. Please be as precise as possible.: The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy.

In this policy wording the Council is seeking to give Local Plan status to the existing SPD which is not appropriate. Planning policy must be made through the Local Plan process. This is subject to mandatory requirements for public consultation and independent scrutiny through the Examination process.

If the Council wish to provide additional advice on the interpretation of this policy, this should be done through a Supplementary Planning Document, which is prepared and consulted on after the Local Plan policy has been adopted. It cannot be done through trying to give Local Plan policies status to an existing SPD, especially as the existing SPD hangs from the adopted policies in the Local Plan, which will be replaced when this new Local Plan is adopted.

3(c). Please set out the modification(s) you consider necessary to make this part of the High Quality Design chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the High Quality Design chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: The reference to the SPD should therefore be removed from the policy. If the Council wish to prepare an SPD on this subject, this could be referenced in the supporting text.

Full name: Kim Miller

Organisation (where relevant): Historic England

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS01

1(b). Does your comment relate to one of the changes listed above?: Yes

3. Do you consider that this part of the High Quality Design chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the High Quality Design chapter, please use this box to set out your comments.: We welcome the additional text in clause 11 to highlight that alternative approaches to ‘fabric first’ are often desirable when dealing with historic buildings. This addressed the issue raised in our response to the Regulation 19 Local Plan.

Full name: Gary Parsons

Organisation (where relevant): Sport England

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS01

1(b). Does your comment relate to one of the changes listed above?: Yes

3. Do you consider that this part of the High Quality Design chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the High Quality Design chapter, please use this box to set out your comments.: Sport England supports high quality design that encourages active lifestyles as highlighted in Active Design (<https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-designand>) reference in the current MHCLG consultation draft Design and Placemaking Planning Practice Guidance (2026).

3(c). Please set out the modification(s) you consider necessary to make this part of the High Quality Design chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the High Quality Design chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Sport England would encourage development in East Devon and specifically in Marcombe be designed in line with the Active Design principles to secure sustainable design. This could be evidenced by use of the Active Design checklist.

DS02

Full name: Iwan Easton

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Taylor Wimpey UK Ltd

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS02

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here.:
GH/ED/39a, GH/ED/39b

3. Do you consider that this part of the High Quality Design chapter is sound?: No

3(b). If no, please give details of why you consider this part of the High Quality Design chapter is not sound. Please be as precise as possible.: The policy has been amended to include that developments of 50 or more dwellings, especially in or adjacent to a National Landscape, will be required to supported by a design code agreed with, or produced, by the Council as planning authority. It is considered that requiring a design code for all major residential developments is disproportionate, and that such a requirement should be limited to larger schemes of at least 500 dwellings plus. It is also noted that there is no guidance on the expected content of a design code, which gives rise to concern that officers may seek an unreasonable level of detail as part of any such submission.

3(c). Please set out the modification(s) you consider necessary to make this part of the High Quality Design chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the High Quality Design chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: [see 3(b)] It is considered that requiring a design code for all major residential developments is disproportionate, and that such a requirement should be limited to larger schemes of at least 500 dwellings plus. It is also noted that there is no guidance on the expected content of a design code

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Our attendance is necessary to effectively discuss the points raised in these representations.

Full name: Iwan Easton

Organisation (where relevant): Boyer Planning

Other party name (if relevant): 3West Developments Ltd

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS02

1(b). Does your comment relate to one of the changes listed above?: No

1(c). If the comment is related to a site, please state the site reference here.:
Exmo_20

2. Do you consider that this part of the High Quality Design chapter is legally compliant?: No

3. Do you consider that this part of the High Quality Design chapter is sound?: No

3(b). If no, please give details of why you consider this part of the High Quality Design chapter is not sound. Please be as precise as possible.:

2.60 3West support the principle of Policy DS02 and agree that residential development should optimise density in a manner that conserves or enhances the character of the area and makes efficient use of the land.

2.61 However, the policy as drafted lacks certainty and risks unnecessary duplication. In particular, the relationship between the requirement for design codes under Policy DS02 and the requirement for a comprehensive masterplan for St John's under Strategic Policy SD01 must be clearly defined. Both matters address overlapping issues.

2.62 To ensure the policy is effective and consistent with the tests of soundness, Policy DS02 should be amended to explicitly confirm that the comprehensive masterplan required under Strategic Policy SD01 will satisfy any design code expectations for the site, and that additional design code requirements will not be imposed where these matters have already been addressed. This certainty is essential to support deliverability and avoid delay.

4. Do you consider that this part of the High Quality Design chapter complies with the duty to cooperate?: No

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: Our attendance is necessary to effectively discuss the points raised in these representations.

Full name: Iwan Easton

Organisation (where relevant): Boyer Planning

Other party name (if relevant): Vistry Group

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS02

1(b). Does your comment relate to one of the changes listed above?: Yes

3. Do you consider that this part of the High Quality Design chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the High Quality Design chapter, please use this box to set out your comments.: Policy DS02:
Housing Density and Efficient Use of Land

2.53 Vistry support Policy DS02 and the requirement for residential development to maximise the number of new homes and density of the development in a manner that is compatible with the site setting and characteristics.

2.54 It is also noted that development will need to conserve and enhance the character of the area, especially in a National Landscape.

2.55 Policy DS02 has also been amended to confirm that proposal for developments of 50 or more dwellings and those in environmentally or heritage sensitive locations, especially adjacent to a National Landscape, will be required to be supported by a design code agreed with or produced by the council as planning authority. Land at Addlepool Farm is not located within any statutory or non-statutory landscape character or quality designations. In addition, the 2022 EDDC Housing and Economic Land Availability Assessment concluded that the site would have no impact on the East Devon National Landscape.

2.56 The proposed masterplan for land at Addlepool Farm as considered how the village can be delivered sensitively in the context of views to the Clyst St George Church (Grade II) located to the northwest of the site, as there are locations within the site boundary that have some visibility of the church tower. Key view corridors have been retained and are proposed as green space to ensure that the intervisibility of the church tower can be preserved

Full name: Laura Grimason

Organisation (where relevant): Pegasus Group

Other party name (if relevant): Taylor Wimpey Strategic Land

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS02

1(b). Does your comment relate to one of the changes listed above?: Yes

3(b). If no, please give details of why you consider this part of the High Quality Design chapter is not sound. Please be as precise as possible.: This policy has been amended to specify that a design code is required for developments of more than 50 dwellings. This is a change from the first Regulation 19 consultation which simply referred to this as a requirement for major development. We object to the requirement for a design code for all developments of over 50 dwellings as this is considered to be excessive and request that the threshold is upped to at least 500 dwellings. Such a low threshold of 50 would place an unnecessary burden on developers. Good design is not dependent on a design code and whilst a design code would be appropriate for the largest of schemes (500+), it is an unnecessary burden for anything under this threshold. This additional burden is at odds with the current NPPF consultation document which seeks to deliver a more proportionate and streamlined planning system to help bring competition and diversity to the market, and support faster build out.

Full name: Emma Morrison

Organisation (where relevant): Pegasus Group

Other party name (if relevant): The Co-op Group Food Ltd.

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS02

1(b). Does your comment relate to one of the changes listed above?: Yes

3. Do you consider that this part of the High Quality Design chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the High Quality Design chapter, please use this box to set out your comments.: Co-op generally support the requirement to make the best use of land by maximising the number of homes and density of development. This is best achieved in highly sustainable locations, such as town centres.

Full name: Dan Yeates

Organisation (where relevant): Savills

Other party name (if relevant): Sidbury LVA LLP

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS02

1(b). Does your comment relate to one of the changes listed above?: Yes

2. Do you consider that this part of the High Quality Design chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the High Quality Design chapter is not legally compliant. Please be as precise as possible.: See enclosed representations

2(c). Please set out the modification(s) you consider necessary to make this part of the High Quality Design chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the High Quality Design chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See enclosed representations

3. Do you consider that this part of the High Quality Design chapter is sound?: No

3(b). If no, please give details of why you consider this part of the High Quality Design chapter is not sound. Please be as precise as possible.: See enclosed representations We acknowledge that the Council has responded to an extent with some changes proposed to draft Policy DS02 in this further Regulation 19 consultation. In our previous response we highlighted our concerns over the blanket approach taken in requiring all major developments to be supported by a design code. However, we remain concerned that the draft policy not only requires a design code for developments of over 50 homes but also those sites within or adjacent to a National Landscape. Whilst we acknowledge that National Landscapes have a higher sensitivity, our view is that the policy should be consistent in terms of the site size threshold and should not seek to introduce an additional threshold within the policy for all sites within National Landscapes. This for example could result in the need for small sites within the National Landscape to require a design code which is likely to be disproportionate given the size and nature of those sites. There is also no reflection within the draft policy over whether some of those sites could come forward as outline planning applications rather

than detailed planning applications. Design codes are clearly much more relevant to the latter than the former.

3(c). Please set out the modification(s) you consider necessary to make this part of the High Quality Design chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the High Quality Design chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: See enclosed representations In our view, the draft policy should be updated to include the 50 dwelling threshold now introduced, but remove the additional reference to the requirement for design codes in National Landscapes.

4. Do you consider that this part of the High Quality Design chapter complies with the duty to cooperate?: No

4(b). If no, please give details of why you consider this part of the High Quality Design chapter fails to comply with the duty to co-operate. Please be as precise as possible.: See enclosed representations

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: Yes, I wish to participate in hearing session(s)

6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: In order to represent the interests of Sidbury LVA LLP in relation to their interests in the Land south of Furzehill, Sidbury (SIDM_34), and other draft policies in the plan.

Full name: Chrissie Hunn

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS02

1(b). Does your comment relate to one of the changes listed above?: Yes

1(c). If the comment is related to a site, please state the site reference here.:
EXMO_17

2. Do you consider that this part of the High Quality Design chapter is legally compliant?: No

2(b). If no, please give details of why you consider this part of the High Quality Design chapter is not legally compliant. Please be as precise as possible.: National Landscapes are protected pieces of land, due to their beauty and location. They are protected by Law, which has not been mentioned and should not be developed on, unless exceptional circumstances, which has sites like Exmo_17 are not. The local plan is coming across, that it is ok to develop in National Landscapes, when in fact it is not. Brownfield sites, should be developed first and the right housing be built, such as for low social rent and first time buyers, that can then only sell onto other first time buyers. Too much housing is bought by people moving to the area, which pushes prices up. No matter how many houses built, the cost will never decrease, unless you stop second homes and cap private rental prices.

2(c). Please set out the modification(s) you consider necessary to make this part of the High Quality Design chapter legally compliant, in respect of any matters you have identified above. You will need to say why each modification will make this part of the High Quality Design chapter legally compliant. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Housing should not be built in the National Landscape. It is protected by law, which the plan goes against. Only affordable housing to local needs and families should be built on brownfield sites.

3. Do you consider that this part of the High Quality Design chapter is sound?: No

3(b). If no, please give details of why you consider this part of the High Quality Design chapter is not sound. Please be as precise as possible.: National Landscapes are protected landscapes for many reasons, which had various laws regarding this as well as at Government level, where there is a push to conserve and

enhance our current National Landscapes and to further enhance them, not through housing developments, but through improving wildlife habitats and planting of trees.

3(c). Please set out the modification(s) you consider necessary to make this part of the High Quality Design chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the High Quality Design chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Build only housing that meets local need, such as low cost social housing, first time starter homes, that can only be sold to other first time buyers and homes for families that are affordable. This housing to be built on brownfield sites, preventing the destruction of National Landscapes. There is no need to build expensive housing. Those who can afford these, can afford the open market stock of housing. It only profits the developer and adds further constraints on the current infrastructure such as sewage network, roads and health care. Support the idea of a cap on private rental so that those who cannot get into social housing, are not paying a fortune on private rent. Have restrictions on second homes, many homes are second homes, which impacts on the housing market.

Full name: Margaret Leppard

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS02

1(b). Does your comment relate to one of the changes listed above?: Yes

3(c). Please set out the modification(s) you consider necessary to make this part of the High Quality Design chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the High Quality Design chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: include locations that promote ‘nature based tourism’

Full name: MR D. MORGAN

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS02

1(b). Does your comment relate to one of the changes listed above?: Yes

3. Do you consider that this part of the High Quality Design chapter is sound?: No

3(b). If no, please give details of why you consider this part of the High Quality Design chapter is not sound. Please be as precise as possible.: ‘Strategy Policy DS02: ‘Housing density and efficient use of land’.

(Page 203). Quote: “Proposals for residential development should seek to maximise the number of new homes and density of development of any site but to do so in a manner that is compatible with site setting and characteristics and which conserves or enhances the character of the area especially in a National Landscape and makes efficient use of land. Proposals for developments of 50 or more dwellings and those in environmentally or heritage sensitive locations especially in or adjacent to a National Landscape will be required to be supported by a design code agreed with or produced by the council as planning authority. Codes, amongst other matters, may specify density recommendations for key allocations.”

I do not support the proposed amendment that new development should seek to maximise rather than optimise the number of new homes and the density of any sites. This approach will not actively look to maintain or conserve the density characteristics of existing adjacent developed sites, such as for parking, landscaping, private garden space and/or boundary designs. Moreover, the minimum quoted figure of 50 dwellings for a major development scheme where a design code will need to be proposed and agreed with by the local planning authority, is too high, as it will increase the likelihood of more generic housing estate schemes being designed by developers. This minimum figure needs to be set much lower at 35 dwellings to ensure that even smaller developments will actively look to deliver a design code which ensures that appropriate density requirements and less generic looking housing estates are delivered in environmentally or heritage sensitive locations.

3(c). Please set out the modification(s) you consider necessary to make this part of the High Quality Design chapter sound, in respect of any matters you have

identified above. You will need to say why each modification will make this part of the High Quality Design chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: This statement on page 203 should be re-written to read as: "Proposals for residential development should seek to optimise the number of new homes and density of development of any site in a manner that is compatible with site setting and characteristics and which conserves or enhances the character of the area, especially in a National Landscape or sensitive location and makes efficient use of land. Proposals for developments of 35 or more dwellings and those in environmentally or heritage sensitive locations, especially in or adjacent to a National Landscape, will be required to be supported by a design code agreed with or produced by the council as planning authority. Codes, amongst other matters, may specify density recommendations for key allocations."

The revised wording will ensure sites are not simply crammed with as many new homes as possible which might not be suitable for their context or the surrounding environment. Setting a lower threshold figure of 35 dwellings also promotes the need to deliver high quality design, including for smaller developments in villages and towns, through a design code that is agreed by the Local Planning Authority.

5. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?: No, I do not wish to participate in hearing session(s)

Full name: Lisa Turner

Organisation (where relevant): Blackdown Hills National Landscape

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS02

1(b). Does your comment relate to one of the changes listed above?: Yes

3. Do you consider that this part of the High Quality Design chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the High Quality Design chapter, please use this box to set out your comments.: Yes, we support the amendments to this policy. While it is right to use land efficiently by maximising numbers and density, it is important to recognise that other factors, such as landscape character and heritage may determine a different approach particularly in the National Landscapes.

Full name: Rachel Danemann

Organisation (where relevant): Home Builders Federation

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS02

3. Do you consider that this part of the High Quality Design chapter is sound?: No

3(b). If no, please give details of why you consider this part of the High Quality Design chapter is not sound. Please be as precise as possible.: The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy.

It is not appropriate for the Local Plan to include a policy requiring compliance with an as yet unwritten policy or design Code that the Council may decide to produce at some point in the future. The Plan must provide certainty. As such any reference to Guidance should be in supporting text. As the supporting justification explains, the NPPF already includes national policies on design. We therefore question the appropriateness of this policy, which seems to add nothing and is not clear on how a developer would comply with it.

Full name: Kim Miller

Organisation (where relevant): Historic England

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS02

1(b). Does your comment relate to one of the changes listed above?: Yes

3. Do you consider that this part of the High Quality Design chapter is sound?: No

3(b). If no, please give details of why you consider this part of the High Quality Design chapter is not sound. Please be as precise as possible.: We object to the replacement of a reference to ‘optimising density’ with a reference to ‘maximising the number of new homes and density’. This is inconsistent with both the NPPF 2024 and new draft NPPF 2025, and indeed internally inconsistent with the statement that development should be ‘compatible with the site setting and characteristics’ (a statement which we support).

3(c). Please set out the modification(s) you consider necessary to make this part of the High Quality Design chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the High Quality Design chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: Remove the word maximise and refer to ‘optimising’ density, consistent with the NPPF.

DS03

Full name: Margaret Leppard

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS03

3. Do you consider that this part of the High Quality Design chapter is sound?: Yes

3(a). If yes, and you wish to support the soundness of this part of the High Quality Design chapter, please use this box to set out your comments.: Great! There are several adverts in Seaton that stick out like a sore thumb!!

DS04

Full name: Rachel Danemann

Organisation (where relevant): Home Builders Federation

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS04

3. Do you consider that this part of the High Quality Design chapter is sound?: No

3(b). If no, please give details of why you consider this part of the High Quality Design chapter is not sound. Please be as precise as possible.: The policy is not considered to be sound as it is not positively prepared, effective, justified or consistent with national policy.

3(c). Please set out the modification(s) you consider necessary to make this part of the High Quality Design chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the High Quality Design chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: To be effective this policy needs to be clearer on how it relates to mandatory BNG, particularly in relation to stacking.

Full name: Neil Butler

Organisation (where relevant): Natural England

Proposal: 10. High Quality Design

1. To which part of the High Quality Design chapter does your representation relate?: Policy

1(a). Please write down the paragraph, policy or figure number that your representation relates to.: DS04

3. Do you consider that this part of the High Quality Design chapter is sound?: No

3(b). If no, please give details of why you consider this part of the High Quality Design chapter is not sound. Please be as precise as possible.: Strategic Policy DS04: Green and Blue Infrastructure & Natural England Green Infrastructure Standards:

Natural England welcomes the commitment that development should accord with the Natural England Green Infrastructure (GI) Framework. The GI Framework comprises several key components, including the Design Guide, GI Principles, and a suite of dedicated GI Standards. The standards include the Green Infrastructure Strategy, Accessible Greenspace Standards, Urban Nature Recovery Standard, Urban Greening Factor, and the Urban Canopy Cover Standard.

Requiring development to align with the Framework implies that all these standards within it should also be applied. However, these standards are not explicitly recognised within Policy DS04, nor are they clearly signposted elsewhere in the plan.

The Standards are intended to be used flexibly by councils and to adapt to local circumstances. They can be adapted to mirror or improve on the existing approach within East Devon.

3(c). Please set out the modification(s) you consider necessary to make this part of the High Quality Design chapter sound, in respect of any matters you have identified above. You will need to say why each modification will make this part of the High Quality Design chapter sound. It will be helpful if you are able to put forward your suggested revised wording for the relevant policy or paragraph. Please be as precise as possible.: It would therefore be helpful for the local plan to confirm how the [Natural England Green Infrastructure] Standards will apply in East Devon. For example, does the council intend to use the recommended Urban Greening Factor of 0.5 for greenfield development? Or will it provide its own figure? Please note that

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Natural England has published guidance for Local Planning Authorities on preparing an area wide Green Infrastructure Strategy:

<https://designatedsites.naturalengland.org.uk/GreenInfrastructure/downloads/Green%20Infrastructure%20Framework%20Process%20Guide%20for%20Local%20Planning%20Authorities.pdf>

It is also noted that Policy DS04 also references 5 NE GI Framework Principles. It is noted that the GI Framework has 15 principles.