

East Devon Local Plan – Topic Paper

Chapter 10. Designing Beautiful and Healthy Spaces and Buildings

October 2024 – Version 01



East Devon – an outstanding place

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1. Introduction

1.1 This is one of a series of topic papers that will sit behind and help explain the content of and evolution of the Publication draft of the East Devon Local Plan.

1.2 There may be new versions of this topic paper as plan making progresses to Publication and thereafter into and through plan Examination.

1.3 This topic paper specifically addresses Chapter 10 of the plan – Designing beautiful and healthy spaces and buildings.

2. The Publication Draft of the Local Plan

2.1 At the date that we published this draft topic paper we are moving towards production of the Publication draft of the local plan. There are specific Government regulations¹ that apply to local plan making and these set out actions that need to be undertaken at different regulatory stages (this report specifically relates to Regulations 18, 19 and 20).

2.2 The proposed Publication draft text of the local plan will be an edited and amended draft of the consultation draft plan published in November 2022². The draft plan was consulted on under plan making Regulation 18 and it should be noted that further limited additional consultation under this regulation took place in the late Spring of 2024.

2.3 The Publication plan, under Regulations 19 and 20, will be made available for any interested party to make representations on. The period for making such representations is currently planned to be from December 2024 to January 2025. The Publication plan, representations received and other relevant paperwork will be submitted for Examination, to a target date of May 2025. One or more Planning Inspectors will undertake the plan examination.

2.4 The first drafts of what is proposed to become the Publication plan will be considered by the Strategic Planning Committee of East Devon District Council through 2024. The expectation is that text will then be refined as the year progresses with a view to the Committee being asked to approve the final Publication plan in November 2024.

¹ [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

² [commonplace-reg-18-final-071122.pdf \(eastdevon.gov.uk\)](https://www.eastdevon.gov.uk/commonplace-reg-18-final-071122.pdf)

3. Summary of proposed redrafting of Chapter 10 of the consultation plan

3.1 Chapter 10 of the consultation draft local plan (November 2022) formed a starting point for consultation on policies on the design of spaces and buildings in the local plan. Moving forward towards the Publication Plan the expectation is that there should not be any significant changes to the plan chapter, though there is scope for simplification.

4. Issues and Options consultation

4.1 Prior to production and consultation on the draft local plan the Council consulted on a local plan Issues and Options³ report. This included a series of questions that responses and comments were invited on. A feedback report was published⁴.

4.2 The Issues and Options report explained how attractive places can be planned and sought to find out how important you think it is that this is done. Over three quarters of respondents (77.5%) thought it essential or very important that places be planned to be attractive.

4.3 A lot of respondents made the point that ‘beauty is in the eye of the beholder’ and queried who would be responsible for deciding what was an attractive design. There was support for the use of design codes, particularly if individually tailored to specific sites and with input from local communities, but also significant levels of concern that they may stifle creativity and individuality. Several respondents emphasised the importance of flexibility in design codes, although some thought that developers were likely to ignore them. A significant number of responses favoured more general guidance rather than design codes.

4.4 The importance of green and open spaces that incorporate existing features was raised by many of the respondents, often linked to increasing habitat/biodiversity. Some respondents favoured function, sustainability and affordability ahead of beauty.

4.5 There were several comments that bold new designs should be encouraged and one respondent suggested that ‘architects should be allowed have fun when designing’; another made the point that buildings need to change or we would be living in ‘mud huts’.

4.6 Other points raised included:

- All buildings should be sympathetic to the local environment and not look out of place;
- Buildings should sit well in the landscape;
- Space and well designed buildings improve wellbeing and make the area a desirable place to live;

³ [issuesandoptionsreport-jan2021.pdf \(eastdevon.gov.uk\)](#)

⁴ [2a. Consultation feedback report Ver 03.pdf \(eastdevon.gov.uk\)](#)

- Planning never has created any beauty – just consider council housing design and ugly tower blocks... the only buildings that are beautiful were built before planning was thought of;
- It is essential that design codes are included. If not any “anything goes”;
- General guidance and then make decisions based on individual applications;
- Dull homogenous developments are uninspiring and unstimulating. The number one priority should be to ensure that new buildings produce minimal emissions, are energy self sufficient and are made sustainably, but this can be combined with beauty. A building that is made from sustainable natural materials will look more attractive;
- "Beautiful" is such a subjective term! Impossible to define! However, it is possible to define limits in terms of size and height for a development. These should be generous in existing high density areas, much less so in rural and AONB settings;
- Good design is an investment for the future;
- Beauty is subjective. If you make a plan for that then again you will have planners having personal views on something, where quite frankly they shouldn't, especially as 99% of them have never worked in the private sector and certainly never run a business. The state needs to stop thinking it can control everything and knows better than everyone else;
- Local character and distinctiveness is vital, otherwise everywhere looks the same and bland;
- There are higher priorities, e.g. carbon neutral; and
- Good for well-being and tourism.

4.7 The Issues and Options report identified two areas with the potential for additional policy work. These were encouraging innovative designs and incorporating wildlife friendly elements into developments. We sought views on whether these were appropriate.

4.8 Although most respondents ticked the yes box (71%) a number did suggest other objectives as did people ticking the no box. There was a lot of support for wildlife friendly design and many respondents thought this scope should be widened to include a range of sustainable features, such as sustainable urban drainage systems.

4.9 Encouraging innovative design was quite divisive, with some support, but many respondents saying that buildings should blend with their surroundings and others saying that innovative design can cause eyesores.

4.10 Other objectives put forward included:

- Safe buildings;
- Building for life;
- Design refuse bins into all new builds;

- Joined up rights of way/exercise routes;
- Climate and biodiversity;
- Green infrastructure;
- Secure cycle storage;
- Protect from light pollution; and
- Allotments.

5. Draft Plan consultation

5.1 In the draft plan consultation Chapter 14 formed one of the plan chapters that was consulted on. A full feedback on the consultation can be viewed at: [accessible-reg-18-consultation-feedback-report-spring-2023.pdf \(eastdevon.gov.uk\)](https://www.eastdevon.gov.uk/accessible-reg-18-consultation-feedback-report-spring-2023.pdf)

5.2 General matters raised in respect of this chapter included:

- The Environment Agency support the link between climate change resilience and green infrastructure with good design.
- A respondent commented: “I would prefer all new housing estates to enhance the environment by incorporating new hedgerows, tree planting, houses to all have swift bricks and solar panels, electric charging points, walking and cycling routes, environmentally diverse green spaces, good links to public transport.”
- Design guidelines need to include measures to retain or provide new hedgerows and trees as well as to enhance these with planting of new appropriate species.
- View expressed: The majority of new build often fails communities because the house are too small, small to non-existent gardens, too many houses on the site, grossly inadequate parking leaving residents frustrated and others annoyed because people encroach elsewhere. New sites need less houses to give people more space and more car parking, at least two spaces for every new house.
- A high number of additional comments flagged that recent developments have failed to deliver well designed buildings and places.
- New homes should make use of off-site volume modular building techniques.
- Developers and house builders must be far more rigorously monitored to ensure that they build well in the multiple unit market as well as in the elite up market sites.

- Green infrastructure and biodiversity enhancements, sustainable travel, modern heating, insulation, solar [power generation] should become the norm in all new developments.
- Developers must be held to account with building poor quality housing. Too many issues with new builds that cause more problems than they are worth. They must be built with character in keeping with the area such as farm style housing.
- Buildings with historical value must be renovated and not demolished because a developer would rather pull it down and build 5 houses on its footprint. Those that own vacant houses and leave them to rot must be penalised. Former Rolle College site and Goodmores farm are a prime example. Any buildings destroyed by fire, water etc that had an architectural or historical value must be rebuilt in a similar style.
- Otter Valley Association would like to see more emphasis on the value and benefits of good design, especially the growing evidence on the influence of design in the built environment on physical and mental health and well-being. Paragraphs 126 to 134 in the NPPF could be used to strengthen the design policies in the Plan. The OVA would like to see a more proactive and collaborative approach, which will engage with local communities effectively.
- If any new housing is to be built it must be high quality and in keeping with existing architecture (ideally using local materials and craftspeople), but modest in size in order to be genuinely affordable for working people who have grown up in the area and provide vital skills (nurses, teachers, tradespeople etc).
- It is imperative that it is environmentally friendly and developments are required to make use of ground source heat pumps, air source heat pumps, solar panels, water recycling, sustainable materials, natural planting and drainage solutions to protect the local environment. It is inexcusable in this day and age that developers can build new housing that avoids these measures and hastens global warming.

6. Further Regulation 18 consultation – Spring 2024

6.1 In the late Spring of 2024 there was further Regulation 18 consultation on selected topic matters. The design of spaces and buildings were not matters that were explicitly consulted on.

7. Sustainability Appraisal feedback

7.1 The draft local plan was supported by a Sustainability Appraisal⁵ (SA). This SA will be updated and refined as plan making progresses and it will be one of the documents that is submitted as part of the submission for Examination.

7.2 The SA report of the draft plan was largely supportive of the policy approach being taken forward for designing buildings and spaces: “The proposed policies are consistent national policy on achieving well-designed places, along with objectives contained in the Council Plan, and the Local Plan itself. Reasonable alternatives to these policies have been identified where differing approaches could be acceptable in this wider policy context”.

8. Habitats Regulations Assessment

8.1 The local plan will need to be assessed under the Habitat Regulations. A preliminary assessment of policies in the draft plan has been produced: [east-devon-local-plan-hra-110723-2013-doc-from-footprint.pdf \(eastdevon.gov.uk\)](https://www.eastdevon.gov.uk/media/110723-2013-doc-from-footprint.pdf)

9. Assessment of policies in Chapter 10

9.1 Chapter 10 of the draft plan set out a series of policies that are reviewed below.

⁵ [sa-of-pos-consultation-draft-lp_2022.pdf \(eastdevon.gov.uk\)](https://www.eastdevon.gov.uk/media/110723-2013-doc-from-footprint.pdf)

General issues raised on Chapter 10

Through consultation and evidence gathering work, policies in the draft local plan on designing healthy spaces and buildings were generally supported and seen as appropriate. The Designing Beautiful and Healthy Spaces and Buildings chapter highlights how the appropriate design of spaces and buildings has a direct impact on peoples' health, safety, security, inclusion, travel choices, the cost of living and general quality of life

Key technical evidence sources

The current local plan has a policy on Design and Local Distinctiveness (Policy D1) and two policies which cover the Display of Advertisements – Applications for Display of Advertisements (D4) and Conservation Areas (EN10).

Key documents

National Planning Policy Framework (NPPF):

https://assets.publishing.service.gov.uk/media/669a25e9a3c2a28abb50d2b4/NPPF_December_2023.pdf

National Design Guide:

https://assets.publishing.service.gov.uk/media/602cef1d8fa8f5038595091b/National_design_guide.pdf

National Model Design Code:

https://assets.publishing.service.gov.uk/media/60140c1d8fa8f53fc52c5c31/National_Model_Design_Code.pdf

Guidance Notes for Design Codes:

https://assets.publishing.service.gov.uk/media/60140c438fa8f53fba2e4a50/Guidance_notes_for_Design_Codes.pdf

Technical Housing Standards – Nationally described space standard (NDSS):

https://assets.publishing.service.gov.uk/media/6123c60e8fa8f53dd1f9b04d/160519_Nationally_Described_Space_Standard.pdf

Blackdown Hills AONB Design Guide for Houses:

https://blackdownhillsaonb.org.uk/wp-content/uploads/2018/05/bhaonb-housing-design-guide_publishedmarch2012.pdf

East Devon AONB Planning Guidance:

<https://www.eastdevonaonb.org.uk/wp-content/uploads/2021/01/AONB-Planning-Guidance-Document-LOWRES.pdf>

Issues and options consultation

Over three quarters of respondents (77.5%) thought it essential or very important that places be planned to be attractive.

A lot of respondents made the point that ‘beauty is in the eye of the beholder’ and queried who would be responsible for deciding what was an attractive design. There was support for the use of design codes, particularly if individually tailored to specific sites and with input from local communities, but also significant levels of concern that they may stifle creativity and individuality. Several respondents emphasised the importance of flexibility in design codes, although some thought that developers were likely to ignore them. A significant number of responses favoured more general guidance rather than design codes.

The importance of green and open spaces that incorporate existing features was raised by many of the respondents, often linked to increasing habitat/biodiversity. Some respondents favoured function, sustainability and affordability ahead of beauty.

There were several comments that bold new designs should be encouraged and one respondent suggested that ‘architects

Officer commentary in response:

It is noted and welcomed that significant support through this early engagement was attached to the importance of designing beautiful and healthy spaces and buildings.

It is recognised that differing people will interpret design in differing ways, though policy does seek to set a framework for high standards.

Green open spaces are seen as a critical component of quality of design.

should be allowed have fun when designing'; another made the point that buildings need to change or we would be living in 'mud huts'. The following bullet points give a 'flavour' of the comments received to illustrate some of the matters raised:

- All buildings should be sympathetic to the local environment and not look out of place;
- Buildings should sit well in the landscape;
- Space and well designed buildings improve wellbeing and make the area a desirable place to live;
- Planning never has created any beauty. Just consider council housing design and ugly tower blocks. The only buildings that are beautiful were built before planning was thought of;
- It is essential that design codes are included. If not any "anything goes";
- General guidance and then make decisions based on individual applications;
- Dull homogenous developments are uninspiring and unstimulating. The number one priority should be to ensure that new buildings produce minimal emissions, are energy self sufficient and are made sustainably, but this can be combined with beauty. A building that is made from sustainable natural materials will look more attractive;
- "Beautiful" is such a subjective term! Impossible to define! However, it is possible to define limits in terms of size and height for a development. These should be generous in existing high density areas, much less so in rural and AONB settings;
- Good design is an investment for the future;

<ul style="list-style-type: none"> • Beauty is subjective. If you make a plan for that then again you will have planners having personal views on something, where quite frankly they shouldn't, especially as 99% of them have never worked in the private sector and certainly never run a business. The state needs to stop thinking it can control everything and knows better than everyone else; • Local character and distinctiveness is vital, otherwise everywhere looks the same and bland; • There are higher priorities, e.g. carbon neutral and • Good for well-being and tourism. 	
<p>Draft Plan consultation</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • The Environment Agency support the link between climate change resilience and green infrastructure with good design. • A respondent commented - "I would prefer all new housing estates to enhance the environment by incorporating new hedgerows, tree planting, houses to all have swift bricks and solar panels, electric charging points, walking and cycling routes, environmentally diverse green spaces, good links to public transport" • Design guidelines need to include measures to retain or provide new hedgerows and trees as well as to enhance these with planting of new appropriate species. 	<p>Officer commentary in response:</p> <p>This is covered by Policy PB08.</p> <p>This is covered by Policy PB08.</p>

- View expressed - The majority of new build often fails communities because the house are too small, small to non-existent gardens, too many houses on the site, grossly inadequate parking leaving residents frustrated and others annoyed because people encroach elsewhere. New sites need less houses to give people more space and more car parking, at least two spaces for every new house.
- A high number of additional comments flagging that recent developments have failed to deliver well designed buildings and places.
- New homes should make use of off-site volume modular building techniques.
- Developers and house builders must be far more rigorously monitored to ensure that they build well in the multiple unit market as well as in the elite up market sites.
- Green infrastructure and biodiversity enhancements, sustainable travel, modern heating, insulation, solar [power generation] should become the norm in all new developments.
- Developers must be held to account with building poor quality housing. Too many issues with new builds that cause more problems than they are worth. They must be built with character in keeping with the area such as farm style housing.
- Buildings with historical value must be renovated and not demolished because a developer would rather pull it down and build 5 houses on its footprint. Those that own vacant houses and leave them to rot must be penalised. Former Rolle College site and Goodmores farm are a prime

Policy TR04 specifies car parking should be provided at an average of 1.7 spaces per dwelling.

Policy DS01 has been written to tackle this.

<p>example. Any buildings destroyed by fire, water etc that had an architectural or historical value must be rebuilt in a similar style.</p> <ul style="list-style-type: none"> • Otter Valley Association would like to see more emphasis on the value and benefits of good design, especially the growing evidence on the influence of design in the built environment on physical and mental health and well-being. Paragraphs 126 to 134 in the NPPF could be used to strengthen the design policies in the Plan. The OVA would like to see a more proactive and collaborative approach, which will engage with local communities effectively. • If any new housing is to be built it must be high quality and in keeping with existing architecture (ideally using local materials and craftspeople), but modest in size in order to be genuinely affordable for working people who have grown up in the area and provide vital skills (nurses, teachers, tradespeople etc). • It is imperative that it is environmentally friendly and developments are required to make use of ground source heat pumps, air source heat pumps, solar panels, water recycling, sustainable materials, natural planting and drainage solutions to protect the local environment. It is inexcusable in this day and age that developers can build new housing that avoids these measures and hastens global warming. 	
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<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<ul style="list-style-type: none"> • No specific issues are identified in feedback received. 	

Sustainability Appraisal	
See Sustainability Appraisal table below.	
Habitat Regulations Assessment	
<ul style="list-style-type: none"> Policy could not have any conceivable effect on a site. No likely significant effect. 	
Commentary on policy redrafting for the Publication Plan	
No significant changes are made to overarching introductory references to the chapter.	

Strategic Policy 62 – Design and Local Distinctiveness	
This policy seeks to set out an overarching position that the design of buildings (both newly developed and resand open spaces should be of the highest quality and reflect local distinctiveness. It outlines criteria for using appropriate materials and methods which will reduce carbon emissions over time and mitigate for any adverse impacts of the proposed development.	
Key technical evidence sources	
See evidence sources above.	
Issues and options consultation	
See general issues above.	
Draft Plan consultation	
Key issues raised in consultation:	Officer commentary in response:

- The Environment Agency note the reference to the waste hierarchy as a positive but consider the plan could go further and embrace the circular economy. The circular economy may be a better way of committing to ways of reducing waste and reusing materials. In planning terms this can be particularly important when considering refurbishing or repurposing buildings rather than building new.
- Newton Poppleford and Harpford Parish Council are concerned that the policy uses terms that are subjective and not measurable. They also consider that: ‘space’ should include private rear gardens; developments of more than five homes should have variation in design detail, light pollution should be mitigated.
- Devon County Council support point 2 on the implementation of the waste hierarchy and recommend this is expanded to include the design phase.
- Devon and Cornwall Police suggest permitting proposals where they “have considered designing out crime principles and imbedded them into the design in order to reduce the opportunity for crime and anti-social behaviour”.
- Much more could be said in the explanation on the importance of:
 - The influence of design on physical and mental health and well-being
 - Effective engagement throughout the design process and tools to achieve this (detailed in the NPPF and NPPG)

‘Recycling and waste storage facilities should be in locations well related to collection points’ added to policy text.

‘The use of close-board or similar timber fencing abutting public or communal areas will not be permitted’ replaced with ‘Particular care will need to be given to boundary treatments that abut public or communal areas in order to avoid adverse impacts’.

- Distinctive design, providing a strong sense of place, and which is sympathetic to local character and history
- Mixed use, legibility (encouraging ease of movement), public space and realm, inclusive and accessible neighbourhood.
- The desirability of flexible / adaptable homes
- Home Builders Federation considers the policy wording should not be interpreted by decision makers as conveying the weight of a Development Plan Document onto the document types listed in the policy. The documents have not been subject to examination and do not form part of the Local plan. Requirements should be set out in sufficient detail to determine a planning application without relying on other criteria or guidelines set out in separate guidance.
- Home Builders Federation states that the NDSS are optional, and only to be introduced where there is clear evidence of need. EDDC will need robust justifiable evidence
- Housing Association planning consortium is concerned that there is no reference to the evidence base study that supports and justified the 'need' to implement NDSS as per PPG. Application of NDSS can undermine viability of affordable housing developments. Essential that NDSS are robustly viability tested.
- EDDC does not have robust ways to evaluate "high quality design". Guidance should be developed to assist developers and individual applicants in producing Design and Access statements that should be clear and simple.

- Devon Wildlife Trust would encourage EDDC to strive for more than ‘to reduce carbon emissions over the lifetime of the development’. We recommend the inclusion of the requirement for the provision of net-zero homes within this policy and would like to see EDDC strive for carbon positive homes. The trust provides more detail on specific wording amendments they would wish to see made.
- Policy should make it clear that poorly designed developments will be refused.
- Development should allow for modern and innovative designs, so long as it is truly "high quality". Developers' standard portfolio of 4 or 5 designs carpeted across a large development should be resisted.
- Provision for low/no carbon energy as source of heating and lighting with appropriate external/internal storage to be built in at design stage. Solar generation or heat pumps should be integrated at build stage.
- Energy efficiency should be prioritised.
- Support for measures to reduce carbon emissions.
- Spaces between buildings can be as important as the design of the buildings themselves and provide coherent linkages across a wider area.
- Policy should ensure adequate gardens / outdoor space is provided.
- Support for measures to enhance biodiversity.
- Who decides what trees and hedges are worthy of retention? All trees and hedgerows are worthy of retention (unless diseased).

- Biophilia measures to be integrated as part of the design to be evaluated.
- There is evidence that living close to nature makes housing very popular and more valuable. Consider cavity bricks for nesting birds, trees, ponds, long grass and wildflowers, hedgehog highways, green spaces, etc, e.g. <https://www.barratthomes.co.uk/new-homes/dev001701-canal-quarter-at-kingsbrook> where Barratts have worked with RSPB
- Support for minimum space standards.
- Well thought through, and so good to see design being taken so seriously. Good design means fit for purpose!
- Please ensure that EDDC is equipped to implement all the good intentions included in these policies and will follow through.
- Good design may mean NO street lighting in a rural setting. Light pollution should be kept to a minimum particularly where development is adjacent to dark areas, e.g. of farmland or AONB.
- We support the intention to focus design attention on the most sensitive sites including allocations within AONBs or affecting a heritage asset and to address this by producing design codes for certain allocated sites and specific areas. The AONBs will be happy to work with the council on this. We welcome the retention/update of the existing local plan design policy (D1) (Blackdown Hills AONB Partnership).
- Sustainable transport should be integrated into new housing areas from the start.

- Exmouth Town Council Members commented that “high quality design” is very subjective and open to interpretation / in the eye of the beholder. Also, that Design and Access statements vary in quality but are often treated as a tick box exercise as part of the planning application process. Members support introduction of space standards but raised concerns about achieving this in the context of viability challenges by developers and increasing costs of building materials. Also risk that the same houses are built all over the country to the point where every new community is starting to look the same. As a result, the distinctiveness of places gets forgotten and communities lose their identity. Will design codes be produced by EDDC and will they have any legal status? Concerns were also raised about broader enforcement operations relating to the mitigation of noise, smell dust etc.
- Any new houses/developments should be built to passivehaus certification standard.
- EDDC should promote the construction of residential accommodation above commercial premises in or near Town/Village Centre. This would mean Town Centres not being 'dead' after 5pm.
- Housing development should be varied in size and tenure with affordable housing distributed over the site rather than clustered in one area.
- Suggestion that the policy wording is woolly, including terms such as worthy of retention, safe environment, necessary and appropriate street lighting, good levels of daylight.

- Request for the addition of a requirement for off-road parking spaces, with carports preferred to garages.
- Policy should include a requirement for integrated rain-water storage / retention.
- Concern expressed over combined sewer systems not being fit for the future – request to separate the processing.
- The East Devon AONB team supports the intention in paragraph 10.3 for the Council to provide design codes for sites allocated that lie within the AONB and other sensitive locations and the advice provided in Policy 62.
- National Grid request the inclusion of an additional criteria to ensure design policy is consistent with national policy, stating “x. Taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites”.
- Agents for Bourne Leisure set out that in line with legislation a Design and Access Statement should only be required for applications for major development and request policy amendment. They consider that the design criteria listed within the policy should not apply to all developments, as they cannot be met by all development types. For example, as caravans are not classified as buildings/development, it is not possible to meet the full requirements of this draft policy for this type of proposal. They also seek further refinement to plan policy in respect to matters relating to impacts from development.
- A developer recommends amendments to criterion 2 as it is not possible for developers to ensure future occupiers

<p>adopt sustainable waste disposal methods, so amend to state that development should include measures to promote the management of waste.</p> <ul style="list-style-type: none"> • A developer is unclear what is meant by ‘identify opportunities for design that minimises risk associated with climate change’. • Clause 6 – no evidence has been provided to justify the requirement for these optional standards. So the policy is currently unjustified. 	
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<ul style="list-style-type: none"> • No specific additional matters were identified in feedback that relate directly to this policy. 	
<p>Sustainability Appraisal</p>	
<ul style="list-style-type: none"> • The draft local plan SA report advised policy is preferred over alternatives identified because of major positive effects arising from high quality design, carbon emissions and health and well-being. A range of minor positive effects were noted in relation to biodiversity, landscape, land resources, housing and access to services. The option of not having a design policy was rejected as this would rely on national policy and guidance; this alternative would result in greater uncertainty on promoting high quality design, and would not provide a bespoke policy to prioritise locally important design issues. 	<ul style="list-style-type: none"> • Endorsement through the SA work of the broad policy approach is noted and welcomed.
<p>Habitat Regulations Assessment</p>	

<ul style="list-style-type: none"> Policy could not have any conceivable effect on a site. No likely significant effect. Criteria for resource use, urban landscape and design with no adverse effects to the character of the town and surrounding environment. 	
Commentary on policy redrafting for the Publication Plan	
<ul style="list-style-type: none"> Redrafted policy title: Policy DS01 – Design and Local Distinctiveness 	
No significant changes are made to overarching introductory references to the chapter.	

Strategic Policy 63 – Housing Density and Efficient Use of Land

This policy seeks to set out an overarching position that developments will be in keeping with character of the neighbourhood, whilst making most efficient use of space and density.

Key technical evidence sources

See evidence sources above.

Issues and options consultation

See general issues above.

Draft Plan consultation

<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> Devon County Council query whether efficient use of land also refers to renewable energy proposals of farmland, where there could be an option to utilise unused space on buildings. 	<p>Officer commentary in response:</p> <p>Reference to specific minimum density standards to support the efficient use of land has been removed.</p>
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- Comments calling for appropriate development density to safeguard gardens, outdoor space, and distance between gardens.
- Maximising site densities, which is an implication here, may create more units but unenviable living environments. People need space and privacy as well as good housing.
- Concern that increased density forces cars to park on the roadside.
- Comments suggesting that increased housing density to maximise use of land is not always a good idea as it can increase impact on the natural world, interfering with connectivity of animal movements.
- Sympathetic development in line with the existing build is what is needed.
- Design guides may be required to support design quality for higher density developments.
- I hope we will consider flats and apartments as part of this. As long as acoustic insulation is properly attended to, flats are a very pleasant option. They can provide bigger rooms, better layout and more pleasant living than a house on a tiny footprint.
- The Codes identified in section 63 assume that facilities such as bus/train services remain static (or improve) through time. Higher densities mean lesser provision of off-street parking and garaging. In the last year Stagecoach have reduced service provision to towns such as Ottery/Honiton/Axminster and reliance on using the car for journeys has been adversely affected.

- Some recent housing developments assume that residents will walk or cycle. With a higher than average proportion of elderly this assumption is erroneous.
- This policy is meaningless since conserving/ enhancing the character of the area and efficient use of land may be in tension as recognised in para 10.9; surely for each site both minimum and maximum densities are needed.
- Exmouth Town Council Members are broadly in favour of a minimum density standard but feel that a tiered system may be needed to reflect optimum densities in built up versus rural areas. Also, that the efficient use of land is potentially in opposition with environmental sensitivity.
- It was noted that there are unforeseen consequences with optimising housing density. i.e. extra pressure on already-stretched primary healthcare services! The impact of development needs to be borne in mind - not just how efficiently the land is used.
- Suggested need for a further consultation once the policy is further advanced.
- Minimum density standards for towns should consider the facilities and services of the town, not just the location with regard to transport. For example, Axminster has a limited number of services, shops and facilities, and those that there are, are severely underfunded or run purely on charity (e.g., the swimming pool). If a minimum density is set, then more funding and investment should be put into the town's facilities and services to meet the needs of the current residents as well as to facilitate further numbers.

- We have seen increased density as land prices have increased to ensure the development is financially viable, even though a developer does not need to build 'affordable housing' if the developer can prove to the District Valuer it is financially unviable.
- Play/community/allotment areas have been severely reduced over the last few years in size and increased density to meet the profit margin of c20%?? We do not wish to see high tower blocks, as per our British cities, which would not fit in with the East Devon landscape.
- All design codes should incorporate the policy guidance in the NPPF around irreplaceable habitats and urban tree cover.
- As a rule, the more 'rural' the environs, the less dense should be the development. All other things being equal, we want to see high levels of density, and this can be achieved with clever design, but lines of boxy housing closely cramped together in semi-rural, village edge locations, is not acceptable. Smaller sites with individual house design and reasonably sized private gardens can make development much more acceptable, and nice homes to occupy.
- Hawkchurch Parish Council - We note the wording of this policy has not been finalised but there is no reference to differential housing densities dependent on the location of the development. For example, distinguishing between town, suburban or more rural settings. This would be in line with national guidance and reflect what other areas do to

address the acceptability of different densities and intensity of housing in different areas.

- Exceptions to minimum density standards should be allowed based on local characteristics.
- I fully support this policy and hope that it will be strictly adhered to. Too many sites in Lympstone simply have had one or two large houses built on them when they are capable of accommodating far many more much needed smaller dwellings.
- Home Builders Federation recommends that the policy provides appropriate flexibility to allow developers to take account of the evidence in relation to site specific conditions, market aspirations, deliverability, viability and accessibility.
- And need to consider policy in the context of other policies eg open space, biodiversity net gain, cycle and bin storage, housing mix, residential space standards, accessible and adaptable dwellings, energy efficiency, and parking,
- Often density standards impede good design. Density should be the outcome of detailed design process, not the starting point
- Implications of a Design Code requirement should be included in the viability assessment
- Design codes are resource intensive and add financial burden and potential delay to development as well as a burden on local authority resource. Wording requiring design codes for developments of ten dwellings or less in sensitive locations should therefore be reconsidered.

<ul style="list-style-type: none"> Agents for FW Clarke - PPS3 had minimum density requirements. The NPPF does not. We object to the proposed setting of minimum densities. Not every single aspect of professional planning judgement needs to be set out in black and white. 	
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<ul style="list-style-type: none"> No specific additional matters were identified in feedback that relate directly to this policy. 	
<p>Sustainability Appraisal</p>	
<ul style="list-style-type: none"> The draft local plan SA report advised policy is preferred over alternatives identified because of major positive effects arising from high quality design, carbon emissions and health and well-being. A range of minor positive effects were noted in relation to biodiversity, landscape, land resources, housing and access to services. The option of not setting minimum density standards would make less efficient use of land, particularly given the environmental constraints in the district; therefore, this alternative is rejected. 	<ul style="list-style-type: none"> Endorsement through the SA work of the broad policy approach is noted and welcomed.
<p>Habitat Regulations Assessment</p>	
<ul style="list-style-type: none"> Policy could not have any conceivable effect on a site. No likely significant effect. Minimum density standards yet to be determined. 	
<p>Commentary on policy redrafting for the Publication Plan</p>	

<ul style="list-style-type: none"> • Redrafted policy title: Policy DS 02 – Housing Density and Efficient Use of Land
No significant changes are made to overarching introductory references to the chapter.

Strategic Policy 64 – Display of Advertisements	
This policy seeks to set out criteria for advertisements.	
Key technical evidence sources	
See evidence sources above.	
Issues and options consultation	
See general issues above.	
Draft Plan Consultation	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • The policy is fine. It is all about enforcement, and strict adherence to protecting the look of the countryside, closely controlling illegal advertising, and being very conscious of distracting drivers. • Needs to be in keeping with the area. • Advertising needs to be controlled. Some town centres are devalued by gawdy and scruffy signage and there should be stronger measures to stop it. • Again, please promote good design and creativity to commerce, with possible guides to avoid environmental degradation. 	<p>Officer commentary in response:</p> <p>No amendments required.</p>

<ul style="list-style-type: none"> • General support for policy expressed by multiple representations. • Exmouth Town Council Members are supportive of this policy but commented that there is no reference to the need for advertisements to be environmentally friendly - e.g. type of illumination. • All [advertisements] should require planning permission. • The policy should make it clear that advertising in rural areas and the AONB will not normally be acceptable. • Lighting at night should be discouraged as it is a waste of energy, affects wildlife and spoils the night sky. The national adverts like McDonalds signs should also be controlled as they destroy the local character. • Devon Wildlife Trust advise where illuminated, the type and level of illumination should reflect the general level of lighting in the area.' 'and must consider potential impacts on biodiversity' should be added to this statement. 	
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<ul style="list-style-type: none"> • No specific additional matters were identified in feedback that relate directly to this policy. 	
<p>Sustainability Appraisal</p>	
<ul style="list-style-type: none"> • The draft local plan SA report advised policy is preferred over alternatives identified because of major positive effects arising from high quality design, carbon emissions and health and well-being. A range of minor positive effects were noted in relation to biodiversity, landscape, land resources, housing 	<ul style="list-style-type: none"> • Endorsement through the SA work of the broad policy approach is noted and welcomed.

<p>and access to services. The option of not having a policy relating to the display of advertisements was rejected as it would lack clarity on what is likely to be acceptable for designing adverts and decision-making on planning applications.</p>	
<p>Habitat Regulations Assessment</p>	
<ul style="list-style-type: none"> • Policy could not have any conceivable effect on a site. No likely significant effect. 	
<p>Commentary on policy redrafting for the Publication Plan</p>	
<ul style="list-style-type: none"> • Redrafted policy title: Policy DS03 – Display of Advertisements 	
<p>No significant changes are made to overarching introductory references to the chapter.</p>	

Policy omissions from Chapter 10	
There have been no identified policy omissions from this chapter and no new policies are proposed for adding in.	
Key technical evidence sources	
See evidence sources above.	
Issues and options consultation	
<p>Paragraph 8.8 of the Issues and Options report identifies two areas with the potential for additional policy work. These are encouraging innovative designs and incorporating wildlife friendly elements into developments. We sought views on whether these were appropriate.</p> <p>Although most respondents ticked the yes box (71%) a number did suggest other objectives as did people ticking the no box. There was a lot of support for wildlife friendly design and many respondents thought this scope should be widened to include a range of sustainable features, such as sustainable urban drainage systems.</p> <p>Encouraging innovative design was quite divisive, with some support, but many respondents saying that buildings should blend with their surroundings and others saying that innovative design can cause eyesores.</p>	
Draft Plan consultation	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> • None Identified 	

Supplementary Regulation 18 consultation Spring 2024	
<ul style="list-style-type: none"> No specific additional matters were identified in feedback that relate directly to this policy. 	
Sustainability Appraisal	
No specific matters noted to report on.	
Habitat Regulations Assessment	
No specific matters noted to report on.	
Commentary on policy redrafting for the Publication Plan	
No new policies are added/changes noted.	

Sustainability Appraisal	
Policy number/title: <ul style="list-style-type: none"> 62. Policy – Design and local distinctiveness 63. Policy – Housing density and efficient use of land 64. Policy – Display of advertisements 	
Outcome of sustainability appraisal: Preferred alternative: Policies 62, 63 and 64. Reasons for alternatives being preferred or rejected:	Support in SA is noted.

- The preferred policies 62, 63 and 64 are likely to have major positive effects arising from high quality design, carbon emissions and health and well-being. A range of minor positive effects are noted in relation to biodiversity, landscape, land resources, housing and access to services.
- 62A. Do not include a design policy – this would rely on national policy and guidance, which has recently been updated with a stronger approach on achieving well-designed places. However, this alternative would result in greater uncertainty on promoting high quality design (objective 3), and would not provide a bespoke policy to prioritise locally important design issues, so has been rejected
- 63A. Do not set minimum density standards – this would make less efficient use of land, with negative effects on objective 6, particularly given the environmental constraints in the district. Therefore, this alternative is rejected.
- 64A. Do not have a policy relating to the display of advertisements – this alternative is rejected as it would lack clarity on what is likely to be acceptable for designing adverts and decision-making on planning applications, with negative effects on design (objective 3).

10. Conclusions

- 10.1 This paper provides an assessment of policy matters that have informed redrafting of the local plan in respect of design policies. At this stage of plan making, recommendations on a first redraft of plan policy for Strategic Planning Committee for October 2024 meetings, no significant or substantive policy changes are recommended.
- 10.2 The redrafted policies have, however, been adjusted to seek to provide greater clarity in respect of application.
- 10.3 This chapter 16 of the plan will be subject to refinement through the committee process, and any possible subsequent redrafting, and will be considered again at Committee later this year.