

Filtered Data Export

**Full name:** Lisa Turner

**Organisation (where relevant):** Blackdown Hills National Landscape

**Other party name (if relevant):** -

**Proposal:** 10. High Quality Design

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

Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 10.3

**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.:** this paragraph notes that 'The design of development at these allocations is crucial to preserving valuable landscapes, especially in sensitive sites like National Landscapes or heritage assets. Design codes will guide future proposals, ensuring new development is resilient and well-integrated into the environment.' There is nothing to indicate when design codes will be adopted, so there is uncertainty over this. It should make clear that until such time, and alongside, the policies of this section apply.

**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 inclusion of a brief additional statement to clarify and confirm that these policies apply to development on allocated sites would assist with justification and effective implementation and be consistent with national planning policy (NPPF para 182 [Dec 2023])

**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:** Harriet Fuller

**Organisation (where relevant):** Environment Agency

**Other party name (if relevant):** -

**Proposal:** 10. High Quality Design

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

Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 10.4

**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.:** It is disappointing that paragraph 10.4 has had the reference to climate change resilience and green infrastructure removed. These are both important factors which can contribute to high quality design, and benefit residents and users when places are designed with climate change in mind.

**Full name:** Dee Woods

**Organisation (where relevant):** Otter Valley Association

**Other party name (if relevant):** -

**Proposal:** 10. High Quality Design

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

Paragraph

**1(a). Please write down the paragraph, policy or figure number that your representation relates to.:** 10.9

**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 are pleased that a District Design Guide is to be produced to encourage high quality, local distinctiveness and the Devon vernacular. This will augment the existing village design statements and ensure better built environments.

**Full name:** Andrew Ross

**Organisation (where relevant):** Turley

**Other party name (if relevant):** Bloor Homes Exeter

**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.:** Strategic Policy DS01: Design and local distinctiveness [OBJECT]

2.32 Policy DS01 (part D) requires that new development is designed to meet “nationally and locally described space standards”. There is no in principle objection to this requirement for development designed to meet Nationally Described Space Standards [“NDSS”], which is in alignment with the approach to a clear single national standard advocated in government policy/guidance.

2.33 However, it is not clear from the plan what other locally described space standards are intended to apply and if/how these differ from NDSS. The plan policy, supporting text and associated evidence base documents contain no details in respect of what additional locally described standards might apply and what these standards are. There would be no way for an applicant to know what local standards are expected and no opportunity for the Council to test the viability implications of this standard, if it is not clearly defined. On this basis the policy is not justified and not effective (so not sound) and this element should be deleted.

**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.:** To elaborate on issues raised and respond as appropriate during hearings.

**Full name:** Bethan Haigh

**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.:** DS01

**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.:** Vistry recognise and support the requirement within Strategic Policy DS01 for new development to be of a high-quality design and locally distinctive.

Land at Addlepool Farm offers an opportunity to deliver a high quality, self-contained, and sustainable new village, creating homes and a neighbourhood which complements the existing character and needs of the local area.

Addlepool Village is proposed to deliver a range of private and affordable homes supported by a variety of new community, recreational and ecological opportunities to create a self-contained, well-connected, lively and vibrant new neighbourhood. The Site is entirely within the control of Vistry who as promoters of the Site would also ultimately build and sell the new homes, providing greater certainty of delivery in the short to medium term.

We consider that the identification of Land at Addlepool Farm as an allocation, alongside the existing allocation of a new town, would provide the Council with greater assurance that the Plan was capable of delivering its housing requirement, particularly in the event that the new town delivery is delayed.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**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.:** 3.12 It is agreed that new developments should be of high-quality, locally distinctive design, following policies and national guidelines like the National Design Code. It is also agreed that developments must integrate well with the street scene, respecting the areas character, neighbouring properties and local amenities.

3.13 Criterion 13 requires new developments to include measures to secure the management of waste in accordance with the waste hierarchy during the construction and operational phases. It should be noted that, whilst developers can put measures in place to promote

certain waste management strategies, the developer cannot control the behaviour of future homeowners.

**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.:** 3.14 We would suggest that more effective wording of criterion 2 would be to “include measures to promote the management of waste...”. This would ensure that the policy is effective and meets the tests of soundness.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**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?:** 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.:** 2.86 We acknowledge Strategic Policy DS01 and the need for new development to be of high- quality design and locally distinctive.

**Full name:** Elliot Jones

**Organisation (where relevant):** Planning Potential

**Other party name (if relevant):** Bloor Homes

**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

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

**2(a). If yes, and you wish to support the legal compliance of this part of the High Quality Design chapter, please use this box to set out your comments.:** A supporting Statement has been submitted on behalf of Bloor Homes in respect of the Land to the South of Littleham, Exmouth. It has been submitted in respect of Policy SP01 but considers Policy DS01 and others

**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.:** Please see Supporting Statement

**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.:** Please see Supporting Statement

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

**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.:** -

**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.:** Please see Supporting Statement

**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.:** Please see Supporting Statement

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

**4(a). If yes, and you wish to support this part of the High Quality Design chapter's compliance with the duty to co-operate, please use this box to set out your comments.:** -

**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.:**  
Please see Supporting Statement

**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.:** The matters raised in our representations affect matters of strategic importance that run to the heart of the East Devon Local Plan 2020 to 2042. In our capacity as a major housebuilder, we would welcome the opportunity to partake in the hearing session(s).

**Full name:** Frances Lennon

**Organisation (where relevant):** Turley

**Other party name (if relevant):** Bloor Homes Exeter [Land off Ottery Road, Feniton]

**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(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 DS01: Design and local distinctiveness [OBJECT]

2.34

Policy DS01 (part D) requires that new development is designed to meet “nationally and locally described space standards”. There is no in principle objection to this requirement for development designed to meet Nationally Described Space Standards [“NDSS”], which is in alignment with the approach to a clear single national standard advocated in government policy/guidance.

2.35

However, it is not clear from the plan what other locally described space standards are intended to apply and if/how these differ from NDSS. The plan policy, supporting text and associated evidence base documents contain no details in respect of what additional locally described standards might apply and what these standards are. There would be no way for an applicant to know what local standards are expected and no opportunity for the Council to test the viability implications of this standard, if it is not clearly defined. On this basis the policy is not justified and not effective (so not sound) and this element should be deleted.

**Full name:** Jess Perminter

**Organisation (where relevant):** Carney Sweeney

**Other party name (if relevant):** CR Down Farming Ltd and Stuart Partners 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

**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.:** In the 1st paragraph, the requirement to be in accordance with "...any other local guidance." is too vague.

The policy contains a long list of prescriptive requirements in the 2nd paragraph and under part E, which duplicate the National Design Guide and other policies in the draft LP, for example those in the Meeting Climate Change and Meeting Housing Needs chapters.

The Devon Waste Plan contains relevant policies for inert waste and the principles do not need to be duplicated in the draft LP.

**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.:** Policy should be simplified.

**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

**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.:** Introduction

1. This representation is submitted by Savills on behalf of Mac Mic Strategic Land (from hereon referred to as 'Mac Mic'). Mac Mic is a strategic land promoter with a strong reputation for delivering planning permissions that lead to high-quality development.

2. Mac Mic has instructed Savills on their behalf to submit a series of representations to the relevant policies of the Regulation 19 Local Plan, including this policy.

Policy AR01

3. Strategic Policy DS01 contains an extensive list of criteria with which development proposals are required to comply. Criterion D on this list is an obligation to "meet nationally and locally describes space standards".

4. The Nationally Described Space Standard (NDSS) is one of three optional standards that could be incorporated into Local Plan policies where evidence demonstrates a need exists. The Planning Practice Guidance states at Paragraph: 020 Reference ID: 56-020-20150327 that:

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

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

5. We are aware of no evidence supporting the Local Plan which justifies the requirement for 100% of new homes to meet the NDSS. And whilst we do not doubt that the vast majority of households would wish to live in large homes if all other considerations were equal, that does

not reflect the reality of the housing market. Larger homes are more expensive to construct than smaller properties and consequently have a higher sales value. Requiring all homes therefore to comply with NDSS will inevitably mean that some prospective house purchases are simply unable to afford a new home. In this respect, the policy conflicts with Strategic Policy HN01 (housing to address needs) which seeks to:

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

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

**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.

**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)

**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

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

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

**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.:** -

**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.:** -

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

**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.:** -

**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 attached.

**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 attached.

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

**4(a). If yes, and you wish to support this part of the High Quality Design chapter's compliance with the duty to co-operate, please use this box to set out your comments.:** -

**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.:** -

**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.:** See attached.

**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

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

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

**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.:** -

**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.:** -

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

**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.:** -

**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 attached.

**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 attached.

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

**4(a). If yes, and you wish to support this part of the High Quality Design chapter's compliance with the duty to co-operate, please use this box to set out your comments.:** -

**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.:** -

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

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: See attached.**

**Full name:** Simon Coles

**Organisation (where relevant):** Carney Sweeney

**Other party name (if relevant):** C R Down Farming Ltd and Stuart Partners 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

**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.:** CarneySweeney acts for CR Down Farming Ltd and Stuart Partners Ltd in connection with land south of A3052 and east of A376, Clyst St Mary, East Devon.

In the 1st paragraph, the requirement to be in accordance with "...any other local guidance." is too vague.

The policy contains a long list of prescriptive requirements in the 2nd paragraph and under part E, which duplicate the National Design Guide and other policies in the draft LP, for example those in the Meeting Climate Change and Meeting Housing Needs chapters.

The Devon Waste Plan contains relevant policies for inert waste and the principles do not need to be duplicated in the draft LP.

**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.:** Policy should be simplified.

**Full name:** Harriet Fuller

**Organisation (where relevant):** Environment Agency

**Other party name (if relevant):** -

**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(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.:** Point C of this policy could refer to the natural environment (pollution, flood risks, biodiversity) as one of the factors which should not be adversely affected.

**Full name:** Rachel Danemann

**Organisation (where relevant):** Home Builders Federation (HBF)

**Other party name (if relevant):** -

**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 con-sistent with national policy

98. In this policy wording the Council 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.

**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.:** 99. 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.

100. 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

**Other party name (if relevant):** -

**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.:** Historic England broadly supports Policy DS01 insofar as it relates to our remit.

However, part 11 promotes a 'fabric first approach' which will not always be appropriate to apply to historic buildings. An adjustment to the text is therefore requested.

**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.:** Suggested adjustment to policy text:

"Measures that minimise risks associated with climate change, including a fabric first approach (or an alternative approach for historic buildings under policy CC02), the use of appropriate materials, techniques, and technologies to reduce carbon emissions over the lifetime of the development;"

**Full name:** Lisa Turner

**Organisation (where relevant):** Blackdown Hills National Landscape

**Other party name (if relevant):** -

**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 reference here to the Blackdown Hills design guide for houses is welcome, however it is anticipated that this will be reviewed and updated within the plan period, and so this should be clarified accordingly to remain valid.

Criteria E .4 and .8 refer to 'appropriate lighting' – there should be some reference to light pollution and dark skies.

**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 effectiveness of the plan will be improved by amending the wording to recognise that future updated versions of the Blackdown Hills design guide for houses should also be referenced.

'Appropriate' lighting would be more effective and appropriate for application in more rural, intrinsically darker areas of the district if there were cross reference to limiting the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation (NPPF Dec 2023 paragraph 191).

**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:** Devon Wildlife Trust (planning)

**Organisation (where relevant):** Devon Wildlife Trust

**Other party name (if relevant):** -

**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(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.:** An additional statement is required within this policy relating to lighting.

**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.:** Lighting should be minimised, designed to be sensitive to wildlife and to provide dark areas/corridors for nocturnal wildlife. Permanent physical barriers should be utilised as robust, enforceable and effective barriers to lighting, e.g. using walls, hedges and shrubs/trees to create dark areas/corridors - rather than relying mainly on lighting strategies which are difficult to enforce post development and are of limited effectiveness. Reference should be made to DCC guidance note 'Maintaining dark corridors through the landscape for bats'.

**Full name:** Devon Wildlife Trust (planning)

**Organisation (where relevant):** Devon Wildlife Trust

**Other party name (if relevant):** -

**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(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.:** 'Appropriate soft landscape (greening) measures and open space provision to enhance amenity and biodiversity value'. This statement is a missed opportunity for a much greater benefit to wildlife.

**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 text should be replaced with wording which states that the landscaping must be designed to form ecological networks throughout the built environment, which are of benefit to both nature and the establishing community of residents. Native species should be utilised and the text should state that 'development must deliver a minimum 20% biodiversity net gain'.

**Full name:** Devon Wildlife Trust (planning)

**Organisation (where relevant):** Devon Wildlife Trust

**Other party name (if relevant):** -

**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(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.:** Reference to protection of biodiversity is required as a point under 'Proposals will only be permitted where they: C. Do not adversely affect.'

**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 point should read 'the existing ecological value of the site'. All development must follow the mitigation hierarchy of avoid, minimise, mitigate. It is critical to be clear at all points that the first and preferable option is to avoid damage. Only where this cannot be wholly achieved should minimising, mitigating and replacing the damage be considered. The mitigation hierarchy should be referred to within this policy.

**Full name:** David Morgan

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**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(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.:** Comment: Strategic Policy DS01: Design and local distinctiveness (pages 174-176). While this policy is comprehensive, historically, policies relating to high quality design and maintaining local distinctiveness have not been rigidly applied (and enforced) during the determination of planning applications. Or post-application changes to approved designs by property owners without consent have not reinforced the Local Planning Authority's commitment to maintaining design standards, before, during and after developments have been proposed.

Poor design standards where new builds or alternations to existing buildings do not sit well in their context, does nothing to support good relations between neighbours or the wellbeing of those in adjacent properties who have been affected by a lax attitude to design and local distinctiveness by planning officers, enforcement officers and councillors.

Design and local distinctiveness also need to be applied to all types of new build projects, including affordable housing whereby it can sit well in its context and integrate alongside market-value based dwellings. Affordable housing does not need to look "cheap and bland" compared to market-value led dwellings, as this creates a discordant social "us" and "them" attitude in some communities. Therefore, Strategy Policy DS01 needs to be recognising the need to raise the design standards and local distinctiveness of all housing.

**Full name:** Peter Strouts

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**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

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

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

**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.:** The houses on the front page are hideous. They will age extremely badly and stand out in a village that prides itself in aesthetically attractive old buildings. The windows are not like any window in the entire village, it stands out badly. Why would you advertise these house, that are actually next to an ancient stone finely crafted church?! Planners should focus on using local sustainable materials such as wood, lime mortar instead of cement is better for net zero.

**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.:** Planners should focus on using local sustainable materials such as wood, local stone. Lime mortar instead of cement is better for net zero.

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

**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.:** -

**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.:** -

**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.:** -

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

**4(a). If yes, and you wish to support this part of the High Quality Design chapter's compliance with the duty to co-operate, please use this box to set out your comments.:** -

**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.: -**

**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)

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: -**

**Full name:** Kerry Kennell

**Organisation (where relevant):** Ottery St Mary Town Council

**Other party name (if relevant):** -

**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

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

**2(a). If yes, and you wish to support the legal compliance of this part of the High Quality Design chapter, please use this box to set out your comments.:** High Quality Design – The Council support the high quality design but feel that it is essential that it needs to be the right development for the site.

**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.:** -

**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.:** -

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

**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.:** -

**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.:** -

**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.:** -

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

**4(a). If yes, and you wish to support this part of the High Quality Design chapter's compliance with the duty to co-operate, please use this box to set out your comments.:** -

**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.:** -

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

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: -**

**Full name:** Oliver Keates

**Organisation (where relevant):** OBK Land and Planning Ltd

**Other party name (if relevant):** -

**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

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

**2(a). If yes, and you wish to support the legal compliance of this part of the High Quality Design chapter, please use this box to set out your comments.:** Good and appropriate design should be encouraged such as respecting local characteristics and special qualities. This policy is supported, a policy which is consistent and in line with the NPPF. I have no specific comments to make as regards this policy.

**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.:** -

**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.:** -

**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.:** -

**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.:** -

**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.:** -

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

**4(a). If yes, and you wish to support this part of the High Quality Design chapter's compliance with the duty to co-operate, please use this box to set out your comments.:** -

**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.:** -

**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.:** -

**Full name:** Sylvia Meller

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**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

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

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

**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.:** -

**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.:** -

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

**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.:** -

**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.:** Important details are missing

**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.:** All new buildings should be fitted with solar panels, heat pumps, up-to-date insulation, bird boxes, swift and bat friendly roofs, bug bricks.

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

**4(a). If yes, and you wish to support this part of the High Quality Design chapter's compliance with the duty to co-operate, please use this box to set out your comments.:** -

**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.:** All new buildings should be fitted with solar panels, heat pumps, up-to-date insulation, bird boxes, swift and bat friendly roofs, bug bricks.

**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)

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.:** -

**Full name:** Dee Woods

**Organisation (where relevant):** Otter Valley Association

**Other party name (if relevant):** -

**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?:** 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 SD01 seems to be fairly comprehensive

**Full name:** Richard John Eley

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**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

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

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

**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.:** There is some evidence that design quality has marginally improve in East Devon in recent years, but it is still very poor. We see a great deal of mass development to standard designs, almost always by Big Six developers. This will be perpetuated by the current preference for New Towns within the district. There is very little opportunity for the building of individually designed homes of obvious quality. This problem is compounded by the Council's longstanding preference for new homes with tiny rooms and tiny windows providing the minimum of natural light. I was pleased, however, to see this issue briefly highlighted in this Chapter, at long last.

There is very little chance that we will see anything different when it comes to the delivery of the new town, and Cranbrook's expansion will again see repetitive estates of monotonous design.

A possible cause of this deterioration in design standards my reflect the haste and lack of care shown with site selection in the new Local Plan, and the last one, for that matter. It is just easier to plonk a New Town in the countryside, or to allocate a big field for a couple of hundred properties. than it is to deliver a nuanced and sensitive expansion to a quiet village, or a clever enhancement of a town centre site.

We do see some interesting and thoughtful individual developments in East Devon's more protected locations, but in the West End, sadly, we are destined to see more of the same Big Six sprawl. There is clearly no commitment within the Council to do anything else.

**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 above.

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

**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.:** -

**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.:** There is simply no provision for improving design, or countering the current predisposition for large scale estate development.

**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.:** There needs to be more care taken over site selection, more input from elected councillors, and the views of local residents taken into account. I feel that some more development could be accommodated in the National Landscapes if sensitively located. In this way, we could abandon the New Town or at least make it smaller, and we could reduce the desecration of the West End. I still believe that our housing allocation could be challenged, and I hope that a new unitary authority may give us more room for manoeuvre, But I accept that as a nation we clearly need more housing.

Another possibility is for thoughtful redevelopment within our towns. We also must make our new homes bigger and room sizes increased. We should be building more three storey houses, and using more roof space.

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

**4(a). If yes, and you wish to support this part of the High Quality Design chapter's compliance with the duty to co-operate, please use this box to set out your comments.:** -

**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.:** Specifically, we have not addressed the issue of the Great Exeter Sprawl with Exeter City Council.

**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.:** Housing Design and the allocation process has been very badly handled and is a major issue.

**Full name:** Martin Shaw

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**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

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

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

**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.:** -

**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.:** -

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

**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.:** -

**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.:** Picture shows two buildings, each of which is reasonably well designed, but which do well together. So instead of illustrating good overall design, this image highlights problem of failing to make neighbouring buildings compatible, which is an all too common problem with planning in the district.

**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.:** -

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

**4(a). If yes, and you wish to support this part of the High Quality Design chapter's compliance with the duty to co-operate, please use this box to set out your comments.:** -

**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.:** -

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

**6. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary.: -**

**Full name:** Alex Munday

**Organisation (where relevant):** Kitchener Land and Planning

**Other party name (if relevant):** Mr Lillie and Ms Blundell

**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.:** Alexander Munday of Kitchener Land and Planning (KLP) on behalf of Mr Lillie and Mrs Blundell

Whilst we are generally supportive of draft Policy DS02, we are concerned about the proposal to require all major developments to be supported by a design code agreed with or produced by the council.

For many smaller development proposals, whilst classified as major development if over 10 dwellings, design principles can be agreed and captured through the development of site specific masterplans and Design and Access Statements. We therefore question the justification for seeking to impose specific design codes on 'all' major development proposals under this draft 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.:** We recommend that the Council either seek to justify this requirement or amend the policy to remove the current blanket approach.

**Full name:** Andrew Ross

**Organisation (where relevant):** Turley

**Other party name (if relevant):** Bloor Homes Exeter

**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.:** Policy DS02: Housing density and efficient use of land [OBJECT]

2.34 As drafted Policy DS02 is not justified and will not be effective. Not all major development schemes would require the production of a design code, as is stated by the policy. The plan does not, either via the policy or the supporting text, provide justification for the requirements that are contained within the policy.

2.35 Major developments are (as is referenced elsewhere in the plan) those which (in respect of residential development) propose 10 or more dwellings or are on a site of greater than 0.5ha. There are many instances where developments of this scale would not require a design code to have been produced in order to be granted planning permission (such schemes may be proposed via full planning application which enable the Council to fully assess the detailed design of the development). Additionally, there are instances where larger scale development may come forward as part of a large major development, but where a design code is not necessary, such as the delivery of infrastructure or larger scale employment development which might be part of a mixed use development allocation.

2.36 Whilst the intent of Policy DS02 around density and the efficient use of land is supported, the detailed around design codes is poorly constructed and won't be effective.

Alternative policy provision should be made around the use of Design Codes if this is necessary to support the implementation of the plan as a whole, where there should be greater clarity about how design codes are to be used and the types and scales of development that are relevant. The plan should also clarify the Council's intentions in respect of District wide design codes that it will produce in order to support the policies

in the plan (there is no clarity on this point currently within the text that supports Policy DS02, although there are references to the intention for a District Design Guide linked to Policy DS01).

**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.:** To elaborate on issues raised and respond as appropriate during hearings.

**Full name:** Bethan Haigh

**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

**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.:** Vistry support Policy DS02 and agree with the need for proposals for residential development to optimise the density of the Site in a manner that conserves or enhances the character of the area and makes efficient use of land.

It is also noted that proposals for major residential development in heritage sensitive locations will be required to be supported by a design code agreed with or produced by the council as planning authority.

It is acknowledged that Clyst St George Church (Grade II) is located to the north west of the Site and there are locations within the Site which have some visibility of the church tower.

The proposed masterplan demonstrates how the new village can be delivered sensitively in the context of these views. 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:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**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.:** 3.15 It is agreed that residential development should optimise site density while preserving the area's character and efficiently using land and that major developments must be supported by a design code supported by the Council.

3.16 It is considered that a design code for all major residential developments is excessive and that this should only be required for larger schemes. It is also noted that there is no guidance on what a design code should include, which raises the concern that officers could request an unreasonable level of detailed as part of the design code.

**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

**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.:** Whilst we are generally supportive of draft Policy DS02, but we are concerned about the proposal to require all major developments to be supported by a design code agreed with or produced by the council.

For many smaller development proposals, whilst classified as major development if over 10 dwellings, design principles can be agreed and captured through the development of site specific masterplans and Design and Access Statements. We therefore question the justification for seeking to impose specific design codes on 'all' major development proposals under this draft policy.

Furthermore, given the comments we have already made in relation to draft Policy SP02 and the proposed housing requirement and potential growth issues, we see this as an unnecessary additional layer of information which will likely only constrain and further slow down delivery.

**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 recommend that the Council either seek to justify this requirement or amend the policy to remove the current blanket approach.

**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.:** It is important that Sidbury LVA LLP is present to participate in the hearing

session for Policy DS02 owing to their interest in Land South of Furzehill (Sidm\_34). It is important that they are given the opportunity to make their case in relation to this policy.

**Full name:** Dan Yeates

**Organisation (where relevant):** Savills

**Other party name (if relevant):** 3West 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

**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.:** Whilst we are generally supportive of draft Policy DS02, we are concerned about the proposal to require all major developments to be supported by a design code agreed with or produced by the council.

For many smaller development proposals, whilst classified as major development if over 10 dwellings, design principles can be agreed and captured through the development of site specific masterplans and Design and Access Statements. We therefore question the justification for seeking to impose specific design codes on 'all' major development proposals under this draft 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.:** We recommend that the Council either seek to justify this requirement or amend the policy to remove the current blanket approach.

**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.:** It is important that 3West Group is present to participate in the hearing session for Policy DS02 owing to their interest in the Land north and east of Exton Farm (Wood\_28). It is important that they are given the opportunity to make their case in relation to this policy.

**Full name:** Elliot Jones

**Organisation (where relevant):** Planning Potential

**Other party name (if relevant):** Bloor Homes

**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.:** 4.106. Density of new development is addressed in Policy DS02. It seeks to optimise the density of the site in a manner that conserves or enhances the character of the area and makes efficient use of land. Proposals for major development schemes and those in environmentally or heritage sensitive locations will be required to be supported by a design code agreed with or produced by the council as planning authority.

4.107. The supporting text notes that this policy reflects the guidance in the NPPF.

4.108. The policy requires all major development proposals and developments in environmentally or heritage sensitive locations to be supported by a Design Code. This element of the policy should be reconsidered.

4.109. As currently worded, the policy does not define what is considered to be a major development and what quantum and form of development would trigger the requirement for a design code, or likewise, what location would be considered to be sensitive. Significant time and resources are required in preparing and agreeing design codes, adding a financial burden and potential delays to development. It is an unreasonable policy burden, particularly, when major development such as Land to the South of Littleham are subject to a requirement to prepare an agreed masterplan.

**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.:** 4.110.

There should be no requirement to prepare a masterplan and a Design Code, and this should be made clear in the drafting of the policy. Bloor Homes support the direction of the policy and the need to optimise densities but consider that the requirement for a design code should be removed, or, at least, clarified.

4.111. Bloor Homes objects to this policy in its current form.

**Full name:** Elliot Jones

**Organisation (where relevant):** Planning Potential

**Other party name (if relevant):** Bloor Homes

**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

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

**2(a). If yes, and you wish to support the legal compliance of this part of the High Quality Design chapter, please use this box to set out your comments.:** A supporting Statement has been submitted on behalf of Bloor Homes in respect of the Land to the South of Littleham, Exmouth. It has been submitted in respect of Policy SP01 but considers Policy DS02 and others

**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.:** Please see Supporting Statement

**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.:** Please see Supporting Statement

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

**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.:** -

**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.:** Please see Supporting Statement

**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.:** Please see Supporting Statement

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

**4(a). If yes, and you wish to support this part of the High Quality Design chapter's compliance with the duty to co-operate, please use this box to set out your comments.:** -

**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.:**  
Please see Supporting Statement

**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.:** The matters raised in our representations affect matters of strategic importance that run to the heart of the East Devon Local Plan 2020 to 2042. In our capacity as a major housebuilder, we would welcome the opportunity to partake in the hearing session(s).

**Full name:** Frances Lennon

**Organisation (where relevant):** Turley

**Other party name (if relevant):** Bloor Homes Exeter [Land off Ottery Road, Feniton]

**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(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.:** Policy DS02: Housing density and efficient use of land [OBJECT]

2.36

As drafted Policy DS02 is not justified and will not be effective. Not all major development schemes would require the production of a design code, as is stated by the policy. The plan does not, either via the policy or the supporting text, provide justification for the requirements that are contained within the policy.

2.37

Major developments are (as is referenced elsewhere in the plan) those which (in respect of residential development) propose 10 or more dwellings or are on a site of greater than 0.5ha. There are many instances where developments of this scale would not require a design code to have been produced in order to be granted planning permission (such schemes may be proposed via full planning application which enable the Council to fully assess the detailed design of the development). Additionally, there are instances where larger scale development may come forward as part of a large major development, but where a design code is not necessary, such as the delivery of infrastructure or larger scale employment development which might be part of a mixed use development allocation.

2.38

Whilst the intent of Policy DS02 around density and the efficient use of land is supported, the detailed around design codes is poorly constructed and won't be effective. Alternative policy provision should be made around the use of Design Codes if this is necessary to support the implementation of the plan as a whole, where there should be greater clarity about how design codes are to be used and the types and scales of development that are relevant. The plan should also clarify the Council's intentions in respect of District wide design codes that it will produce in order to support the policies in the plan (there is no clarity on this point currently within the text that supports Policy DS02, although there are references to the intention for a District Design Guide linked to Policy DS01).

**Full name:** Jess Perminter

**Organisation (where relevant):** Carney Sweeney

**Other party name (if relevant):** CR Down Farming Ltd and Stuart Partners 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

**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 1st paragraph of Policy DS02 is supported.

However the 2nd paragraph is unrelated to housing density or making efficient use of land. In any event,

“...environmentally or heritage sensitive locations...” is not defined and too vague.

Furthermore, design codes should only be used on large strategic sites where delivery will be phased and the site is in multiple ownership, with development being undertaken by more than one developer.

**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 is considered that the 2nd paragraph should be deleted.

**Full name:** Nick Guildford

**Organisation (where relevant):** C G Fry & Son

**Other party name (if relevant):** Mr & Mrs Cowling

**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 1st paragraph of Policy DS02 is supported.

However the 2nd paragraph is unrelated to housing density or making efficient use of land. In any event, "...environmentally or heritage sensitive locations..." is not defined and too vague.

Furthermore, design codes should only be required on larger strategic sites where delivery will be phased and the site is in multiple ownership, with development being undertaken by more than one developer. To require them for all major development schemes as proposed adds an additional layer of approval process that would delay housing delivery unnecessarily.

**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 2nd paragraph of policy DS02 should be deleted.

**Full name:** Samantha Thomas

**Organisation (where relevant):** CarneySweeney

**Other party name (if relevant):** Cavanna Homes (Cavanna)

**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(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.:** -

**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 1st paragraph of Policy DS02 is supported.

However the 2nd paragraph is unrelated to housing density or making efficient use of land. In any event, "...environmentally or heritage sensitive locations..." is not defined and too vague.

Furthermore, design codes should only be used on large strategic sites where delivery will be phased and the site is in multiple ownership, with development being undertaken by more than one developer.

**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 is considered that the 2nd paragraph should be deleted.

**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)

**Full name:** Samantha Thomas

**Organisation (where relevant):** CarneySweeney

**Other party name (if relevant):** Taylor Wimpey Exeter

**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(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.:** The 1st paragraph of Policy DS02 is supported.

However the 2nd paragraph is unrelated to housing density or making efficient use of land. In any event, "...environmentally or heritage sensitive locations..." is not defined and too vague.

A requirement for design codes on all major schemes (so 11+ homes) is considered excessive and unreasonable. Design Codes should only be used on large strategic sites where delivery will be phased and the site is in multiple ownership, with development being undertaken by more than one developer.

**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.:** It is considered that the 2nd paragraph should be deleted.

**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)

**Full name:** Simon Coles

**Organisation (where relevant):** Carney Sweeney

**Other party name (if relevant):** C R Down Farming Ltd and Stuart Partners 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

**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.:** CarneySweeney acts for CR Down Farming Ltd and Stuart Partners Ltd in connection with land south of A3052 and east of A376, Clyst St Mary, East Devon.

The 1st paragraph of Policy DS02 is supported.

However the 2nd paragraph is unrelated to housing density or making efficient use of land. In any event, "...environmentally or heritage sensitive locations..." is not defined and too vague.

Furthermore, design codes should only be used on large strategic sites where delivery will be phased and the site is in multiple ownership, with development being undertaken by more than one developer.

**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 is considered that the 2nd paragraph should be deleted.

**Full name:** Simon Coles

**Organisation (where relevant):** Carney Sweeney

**Other party name (if relevant):** C G Fry & Son 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

**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.:** The 1st paragraph of Policy DS02 is supported.

**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.:** However the 2nd paragraph is unrelated to housing density or making efficient use of land. In any event, "...environmentally or heritage sensitive locations..." is not defined and too vague.

Furthermore, design codes should only be required on larger strategic sites where delivery will be phased and the site is in multiple ownership, with development being undertaken by more than one developer. To require them for all major development schemes as proposed adds an additional layer of approval process that would delay housing delivery unnecessarily.

**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 is considered that the 2nd paragraph should be deleted.

**Full name:** Simon Collier

**Organisation (where relevant):** Collier Planning

**Other party name (if relevant):** Eagle One MMLIII 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

**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 write on behalf of Eagle Investments (SW) Ltd to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which it owns to the west of Hulham Road, Exmouth.

This draft policy requires that proposals for major development schemes and those in environmentally or heritage sensitive locations will be required to be supported by a design code agreed with or produced by the Council specifying density recommendations for key allocations. This is an excessive obligation for a site of this scale, particularly where a full planning application is forthcoming. Clarification is required in respect of which allocated sites this is intended to apply to and what process it is anticipated would be required to be followed. It is recommended that this approach is only applied to very large sites.

**Full name:** Simon Collier

**Organisation (where relevant):** Collier Planning

**Other party name (if relevant):** Eagle One MMLIII 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

**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 write on behalf of Eagle Investments (SW) Ltd to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which it owns at St Johns, Exmouth, which is included as part of the draft allocation Exmo\_20.

This draft policy requires that proposals for major development schemes and those in environmentally or heritage sensitive locations will be required to be supported by a design code agreed with or produced by the Council specifying density recommendations for key allocations.

**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.:** In order to avoid unnecessary repetition, clarification is required in respect of how this requirement relates to the Strategic Policy SD01 for Exmo\_20 and its requirement for a comprehensive masterplan to be agreed with the Council.

**Full name:** Simon Collier

**Organisation (where relevant):** Collier Planning

**Other party name (if relevant):** Eagle One MMLIII 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

**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 write on behalf of Eagle Investments (SW) Ltd to make representations on the Local Plan Regulation 19 Publication Draft consultation with reference to land which it owns to the south of Hulham Road, Exmouth.

This draft policy requires that proposals for major development schemes and those in environmentally or heritage sensitive locations will be required to be supported by a design code agreed with or produced by the Council specifying density recommendations for key allocations. Clarification is required in respect of which allocated sites this is intended to apply to and what process it is anticipated would be required to be followed.

**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 is recommended that this approach is only applied to very large sites.

**Full name:** Stuart Houlet

**Organisation (where relevant):** PCL Planning Ltd

**Other party name (if relevant):** Waddeton Park Limited (Honiton)

**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 goes beyond the requirements of national policy in requiring a design code for all major development proposals. Whilst it is recognised this might be appropriate in sensitive locations it is unreasonable to require a design code to be agreed for all major applications. It will simply add delay and costs to planning application submissions without adding any greater benefit to existing requirements such as Design and Access Statements etc. It is also very doubtful whether the Council would be able to sufficiently resource this.

**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.:** Policy DS02 should be amended to reflect circumstances where a design code maybe appropriate rather than a blanket requirement for all major applications.

**Full name:** Stuart Houlet

**Organisation (where relevant):** PCL Planning Ltd

**Other party name (if relevant):** Waddeton Park Limited (Honiton)

**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 goes beyond the requirements of national policy in requiring a design code for all major development proposals. Whilst it is recognised this might be appropriate in sensitive locations it is unreasonable to require a design code to be agreed for all major applications. It will simply add delay and costs to planning application submissions without adding any greater benefit to existing requirements such as Design and Access Statements etc. It is also very doubtful whether the Council would be able to sufficiently resource this.

**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.:** Policy DS02 should be amended to reflect circumstances where a design code maybe appropriate rather than a blanket requirement for all major applications.

**Full name:** Stuart Houlet

**Organisation (where relevant):** PCL Planning Ltd

**Other party name (if relevant):** Waddeton Park Limited (Honiton)

**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.:** [Submitted on behalf of Waddeton Park Limited (Honiton)]

The policy goes beyond the requirements of national policy in requiring a design code for all major development proposals. Whilst it is recognised this might be appropriate in sensitive locations it is unreasonable to require a design code to be agreed for all major applications. It will simply add delay and costs to planning application submissions without adding any greater benefit to existing requirements such as Design and Access Statements etc. It is also very doubtful whether the Council would be able to sufficiently resource this.

**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.:** Policy DS02 should be amended to reflect circumstances where a design code maybe appropriate rather than a blanket requirement for all major applications.

**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.:** To elaborate on these and previous representations made on the Plan

**Full name:** Stuart Houlet

**Organisation (where relevant):** PCL Planning Ltd

**Other party name (if relevant):** Waddeton Park Limited (Honiton)

**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.:** (PCL Planning on behalf of Waddeton Park Limited (Honiton)):

The policy goes beyond the requirements of national policy in requiring a design code for all major development proposals. Whilst it is recognised this might be appropriate in sensitive locations it is unreasonable to require a design code to be agreed for all major applications. It will simply add delay and costs to planning application submissions without adding any greater benefit to existing requirements such as Design and Access Statements etc. It is also very doubtful whether the Council would be able to sufficiently resource this.

**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.:** Policy DS02 should be amended to reflect circumstances where a design code maybe appropriate rather than a blanket requirement for all major applications.

**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 provide greater elaboration of the detail of these representations

**Full name:** Stuart Houlet

**Organisation (where relevant):** PCL Planning Ltd

**Other party name (if relevant):** Waddeton Park Limited (Honiton)

**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.:** Chapter 10 - High Quality Design

Policy DS02: Housing density and efficient use of land.

The policy goes beyond the requirements of national policy in requiring a design code for all major development proposals. Whilst it is recognised this might be appropriate in sensitive locations it is unreasonable to require a design code to be agreed for all major applications. It will simply add delay and costs to planning application submissions without adding any greater benefit to existing requirements such as Design and Access Statements etc. It is also very doubtful whether the Council would be able to sufficiently resource this.

**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.:** Modification required

Policy DS02 should be amended to reflect circumstances where a design code maybe appropriate rather than a blanket requirement for all major applications.

**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.:** To elaborate on these and previous representations made on the Plan

**Full name:** Will Ridalls

**Organisation (where relevant):** PCL PLANNING LTD

**Other party name (if relevant):** Simon Stokes

**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 goes beyond the requirements of national policy in requiring a design code for all major development proposals. Whilst it is recognised this might be appropriate in sensitive locations it is unreasonable to require a design code to be agreed for all major applications. It will simply add delay and costs to planning application submissions without adding any greater benefit to existing requirements such as Design and Access Statements etc. It is also very doubtful whether the Council would be able to sufficiently resource this.

**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.:** Policy DS02 should be amended to reflect circumstances where a design code maybe appropriate rather than a blanket requirement for all major applications.

**Full name:** Rachel Danemann

**Organisation (where relevant):** Home Builders Federation (HBF)

**Other party name (if relevant):** -

**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

101. 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.

**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.:** 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

**Other party name (if relevant):** -

**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?:** 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 support the requirement in Policy DS02 to optimise residential density while conserving and enhancing the character of the area.

**Full name:** Lisa Turner

**Organisation (where relevant):** Blackdown Hills National Landscape

**Other party name (if relevant):** -

**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 notes that proposals should optimise the density of the site in a manner that conserves or enhances the character of the area. In National Landscapes proposals should conserve and enhance.

The second part of this policy refers to 'those in environmentally or heritage sensitive locations' without expressing what 'those' are or defining an environmentally or heritage sensitive location.

**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.:** Amend the policy wording to include a clear reference to 'conserving and enhancing' character specifically in National Landscapes.

Seek to clarify 'those' and specify if required (should be) in or adjacent 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:** -

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**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.:** Pegasus Group, on behalf of Taylor Wimpey Strategic Land

The requirement for a design code for all major residential developments is excessive.

**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.:** “Major” should be specifically defined in this context as generally it refers to residential schemes of over 10 dwellings.

Supporting paragraph 10.11 refers to NPPF paragraphs 123 to 130. This should be amended to 124 to 130.

The policy should also refer to a source of guidance on the expected scope and content of Design Codes, for clarity.

**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)

**Full name:** Devon Wildlife Trust (planning)

**Organisation (where relevant):** Devon Wildlife Trust

**Other party name (if relevant):** -

**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(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.:** Reference is required to ensuring that the existing biodiversity value of the site is retained and enhanced.

**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.:** Reference is required to ensuring that the existing biodiversity value of the site is retained and enhanced.

**Full name:** Oliver Keates

**Organisation (where relevant):** OBK Land and Planning Ltd

**Other party name (if relevant):** -

**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

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

**2(a). If yes, and you wish to support the legal compliance of this part of the High Quality Design chapter, please use this box to set out your comments.:** I support this policy which seeks to optimise the density of a site and makes efficient use of land.

**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.:** -

**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.:** -

**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.:** -

**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.:** -

**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.:** -

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

**4(a). If yes, and you wish to support this part of the High Quality Design chapter's compliance with the duty to co-operate, please use this box to set out your comments.:** -

**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.:** -

**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.:** -

**Full name:** Angie Hurren

**Organisation (where relevant):** Broadclyst Parish Council

**Other party name (if relevant):** -

**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(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.:** Housing Density and Design Quality (Strategic Policy DS02 & Broadclyst D1)

- 

The Local Plan requires compact, energy-efficient housing layouts to reduce land take.

7

- 

Broadclyst NP's Policy D1 ensures that housing integrates heritage character, biodiversity-friendly landscaping, and high thermal performance (Passivhaus standards where possible).

**Full name:** Devon Wildlife Trust (planning)

**Organisation (where relevant):** Devon Wildlife Trust

**Other party name (if relevant):** -

**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(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.:** 'Designed with consideration of the existing biodiversity value of the site' should be included as an additional point.

**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.:** 'Designed with consideration of the existing biodiversity value of the site' should be included as an additional point.

**Full name:** Bethan Haigh

**Organisation (where relevant):** Boyer Planning

**Other party name (if relevant):** Taylor Wimpey UK Ltd. C/O Boyer

**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.:** 3.18 It is agreed that new developments in East Devon should deliver high quality multi-functional Green and Blue infrastructure in accordance with Natural England's Green Infrastructure Framework. However, the 5 principles referred to by Natural England are to be met at a wider local authority level, and not for individual sites.

**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.:** 3.19

Testing planning applications against these specific principles is, therefore, unjustified. To ensure the policy is sound, we propose removing this requirement.

**Full name:** Jess Perminter

**Organisation (where relevant):** Carney Sweeney

**Other party name (if relevant):** CR Down Farming Ltd and Stuart Partners 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.:** 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.:** G: Upon the submission of an outline planning application, it is premature to define the management and maintenance of GI.

**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 is considered that part A can be retained. The requirement to submit a green and blue infrastructure plan can be addressed through validation requirements. The remainder of the policy duplicates the Natural England guidance and is unnecessary such that it should be deleted.

**Full name:** Simon Coles

**Organisation (where relevant):** Carney Sweeney

**Other party name (if relevant):** C R Down Farming Ltd and Stuart Partners 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.:** DS04

**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.:** CarneySweeney acts for CR Down Farming Ltd and Stuart Partners Ltd in connection with land south of A3052 and east of A376, Clyst St Mary, East Devon.

G: Upon the submission of an outline planning application, it is premature to define the management and maintenance of GI.

**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 is considered that part A can be retained. The requirement to submit a green and blue infrastructure plan can be addressed through validation requirements. The remainder of the policy duplicates the Natural England guidance and is unnecessary such that it should be deleted.

**Full name:** Harriet Fuller

**Organisation (where relevant):** Environment Agency

**Other party name (if relevant):** -

**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(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 are supportive of this standalone policy on both green and blue infrastructure and that it sets out the multifunctional benefits of good blue and green infrastructure, including climate adaptation and resilience.

**Full name:** Rachel Danemann

**Organisation (where relevant):** Home Builders Federation (HBF)

**Other party name (if relevant):** -

**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.:** 102. To be effective this policy needs to be clearer on how it relates to mandatory BNG, particularly in relation to stacking.

**Full name:** -

**Organisation (where relevant):** -

**Other party name (if relevant):** -

**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.:** Green Infrastructure provision is an important consideration for new housing developments. However, it is understood that Natural England's 5 Green Infrastructure Principles are meant for a strategic level and not individual sites. The link in Footnote 63 takes you the Natural England document which confirms this. Guidance which is relevant to green and blue infrastructure provision and design at development site level is required.

**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)

**Full name:** Helene Jessop

**Organisation (where relevant):** RSPB

**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(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.:** The RSPB supports the policy but recommends that it includes a specific reference to the emerging Devon Local Nature Recovery Strategy. There are opportunities for the Green and blue infrastructure that will be delivered in the lifetime of the new Local Plan to contribute towards recovery of nature in Devon.

**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.:** It omits reference to the emerging Devon Local Nature Recovery Strategy and so blue and green infrastructure located, designed and implemented without being informed by the Devon LNRS may not maximise opportunities to conserve, enhance or provide opportunities for biodiversity.

**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.:** Whilst supporting the policy overall, the RSPB recommends that specific reference is included to the emerging Devon Local Nature Recovery Strategy and highlights the benefits of synergy whereby green and blue GI can be designed and implemented to maximise biodiversity benefits if informed by information within the Devon LNRS (eg, target areas for habitat restoration).

**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)

**Full name:** Neil Butler

**Organisation (where relevant):** Natural England

**Other party name (if relevant):** -

**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?:** 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 DS04: Green and blue Infrastructure

Natural England welcomes the embedding of the Natural England Green Infrastructure Framework and Principles within the policy. This gives a good sense of clarity to developers around the design and integration of Green Infrastructure into their projects.

**Full name:** Oliver Keates

**Organisation (where relevant):** OBK Land and Planning Ltd

**Other party name (if relevant):** -

**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

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

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

**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.:** -

**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.:** To say that “Development in East Devon will deliver high quality multi-functional Green and Blue infrastructure in accordance with Natural England’s Green Infrastructure Framework” should be an aim only to be achieved “where possible”. This is a very prescriptive approach and could, realistically, be difficult to achieve on a lot of housing sites where the aim is to optimise density and design schemes which are compatible with the local character. This policy could prove too onerous and good/ appropriate landscaping for the location is the key.

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

**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.:** -

**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.:** -

**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.:** -

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

**4(a). If yes, and you wish to support this part of the High Quality Design chapter's compliance with the duty to co-operate, please use this box to set out your comments.:** -

**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.: -**

**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.: -**

**Full name:** Dee Woods

**Organisation (where relevant):** Otter Valley Association

**Other party name (if relevant):** -

**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?:** 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 SD04 concerning green and blue infrastructure is very good, but it is essential that the infrastructure is properly maintained, so provision needs to be made for this.