



# **Mid Devon Design Guide – Supplementary Planning Document Consultation Statement**

**Planning and Compulsory Purchase Act 2004**

**The Town and Country Planning (Local Planning) (England) Regulations 2012  
Regulation 12**

## **Public Consultation (2020)**

The Council carried out a public consultation on a new Design Guide Supplementary Planning Document (SPD). The SPD includes guidance on the design of new buildings in Mid Devon and helps to raise awareness and standards throughout the planning process. The consultation took place from 11 May – 6 July 2020.

The Council wrote to 3,526 people on the Forward Planning Consultation database. These comprised:

- Mid Devon elected members
- Mid Devon parish/town councils
- Adjoining parishes, neighbouring local authorities and statutory groups (including specific and general consultation bodies)
- General consultation bodies and other consultees including database groups defined as individuals, businesses, landowners and voluntary organisations.

In addition the following methods were used to notify consultees:

- Press releases
- Information on the Council's website
- Social media updates

The SPD has been screened for the purpose of Strategic Environmental Assessment and Habitat Regulations Assessment. The Environment Agency, Historic England and Natural England have been consulted on the draft determination that no Strategic Environmental Assessment or Appropriate Assessment is required. Historic England and Natural England confirmed that they concur with the Council's determination. No response was received from the Environment Agency.

The Council invited people to make representations by post or email. A total of 36 valid responses and 1 late representation was received. The following table sets out a summary of the main comments raised during the consultation, along with a response explaining how these have been addressed in the draft Supplementary Planning Document:

Summary of Representation	Response
<b>General Comments</b>	
<p>Historic England supports the intent of this draft Design Guide to secure good design for new development that understands and responds to its landscape, townscape and/or settlement context, reinforces local character and distinctiveness, and contributes to sustainable development. (9 – Historic England)</p>	<p>Support noted.</p>
<p>Support the three step design process outlined in the document. However, there will be many developments of different types and scales taking place in locations that will directly and/or indirectly affect the significance of designated and non-designated heritage assets, including their settings, as well as wider historic landscape and/or townscapes. We are concerned that the inter—relationships between the context and design of new development and the historic environment have not been adequately covered throughout the draft SPD (9 – Historic England).</p>	<p>The Council acknowledges that developments of different types and scales in different locations will directly and/or indirectly affect the significance of designated and non-designated heritage assets. It is considered that the relationship between the context and design of new development is adequately covered throughout the Council’s adopted Local Plan and therefore it is not necessary to repeat this within this SPD.</p>
<p>Green Infrastructure – The SPD could consider making provision for GI within development. (12 – Natural England).</p>	<p>Comments noted and agreed. The Design Guide now includes an additional topic sheet on green infrastructure and biodiversity. Additions have also been incorporated into the ‘site situations’ sheets to reflect that open space and green infrastructure are important elements in addressing the principles of responding to site situations and should be considered alongside built elements’.</p>
<p>Biodiversity enhancement – SPD could consider incorporating features which are beneficial to wildlife within development in line with para 118 of the NPPF – e.g. level of bat roost or bird box provision within the built structure or other measure to enhance biodiversity in the urban environment. (12 – Natural England)</p>	<p>Comments noted and agreed. The Design Guide now includes an additional topic sheet on green infrastructure and biodiversity.</p>
<p>Landscape enhancement - Opportunities to consider how development might make a positive contribution to the character and</p>	<p>Comments noted. Please see green infrastructure and biodiversity topic sheet.</p>

<p>functions of the landscape. E.g. it may be appropriate to seek that, where viable, trees should be of a species capable of growth to exceed building height and managed to do so, and where mature trees are retained on site, provision is made for succession planning. (12 – Natural England)</p>	
<p>Other design considerations – NPPF includes a number of design principles which could be considered including the impacts of lighting on landscape and biodiversity. (12 – Natural England)</p>	<p>Comments noted. Please see green infrastructure and biodiversity topic sheet.</p>
<p>Welcome Mid Devon’s intention to deliver sustainable development across the district by encouraging the development of sustainable transport opportunities both within and between settlements, thereby reducing the reliance on the private car (25 – Highways England)</p>	<p>Support noted.</p>
<p>The County Council is in support of the document, which sets out some practical, general design guidance for future developments within the district. (5 – Devon County Council)</p>	<p>Support noted.</p>
<p>Code currently fails to include anything on the need to embed wildlife design principles into existing and new urban areas (See suggestions in rep for further details). (22 – Devon County Council Ecology)</p>	<p>Comments noted. The Design Guide now includes an additional topic sheet on green infrastructure and biodiversity.</p>
<p>The Design guide would be strengthened by including details of:</p> <ol style="list-style-type: none"> <li>1. How existing green space will be protected and enhanced to facilitate connecting people with nature, as this is proven to benefit all aspects of human health, and the economy as well as providing natural capital.</li> <li>2. How new green spaces will be provided to maximise the health and wellbeing potential of a community, enabling connectivity with nature.</li> <li>3. How Mid Devon will ensure sustainability and conservation of natural resources will</li> </ol>	<p>Comments noted and agreed. The Design Guide now includes an additional topic sheet on green infrastructure and biodiversity. With regards to natural resource conservation, the strategic nature of the guide in tackling the integration of environments both urban and landscape does already address the connectivity of people with the natural environment without overt or explicit instruction to do so. As development across Mid Devon becomes more naturally a reflection of the landscape character (which has affected settlement form), this will be a movement of reconnection and reliance upon the qualities and facility of the landscape and natural resources</p>

<p>facilitate the plans to become net zero such as the collection of rainwater, promotion and creation of infrastructure to promote active travel and installation of air source heat pumps to replace boilers.</p> <p>4. How homes and communities will be constructed to promote healthy eating environments (32 – Devon County Council Public Health).</p>	<p>which are highlighted as important here.</p>
<p>Good and useful document although some of it was written in such a way as to be difficult to read (8 – Willand Parish Council)</p>	<p>Comments noted. It is recognised that there is a significant volume of material. This is necessary to capture the rich and varied nature of the landscapes and settlements across Mid Devon. The procedural guide provides guidance on how to navigate through the guide and officers would be happy to provide further advice on this.</p>
<p>Overall, we think this is a comprehensive guide with a thorough approach that will be helpful to councillors at all levels, and to interested residents as well as assisting prospective developers (14 – Crediton NP Steering Group).</p>	<p>Support noted.</p>
<p>Glad to see the first principle behind the guide is to help achieve the aim that MDDC has set itself: to become carbon neutral by 2030. However, we are not clear as to how far that has affected the detail of the guide in promoting energy efficiency and the use of sustainable materials, locally sourced as far as possible (14 – Crediton NP Steering Group).</p>	<p>Comments noted.</p>
<p>Parish Council supports the aspiration to being carbon neutral. Suggest the wording in the document might need to be updated to bring it line with other policies adopted by the Council. It was suggested that it falls down on CP1 and CP11. (8 – Willand Parish Council)</p>	<p>Comments noted. The guide has been reviewed again and further opportunities to strengthen links and references have been incorporated. Additional policy measures will be taken forward through the next local plan as many interventions require a change to development plan policy.</p>
<p>Very little reference to the recently published 2019 National Design Guide, not even to consider the 10 steps required to meet national planning standards.</p> <p>Very little reference to the NPPF within the</p>	<p>Comments noted. It is considered that the 10 characteristics are reflected throughout the Design Guide as a whole. However, for clarity the 10 characteristics have also been incorporated into Volume 1 (page 4) of the Guide. Similarly, the Design Guide has been prepared having regarding</p>

<p>pages of factual content of all four volumes. (17 – Culmstock Parish Council)</p>	<p>to all provisions of national and local policy. It is not considered necessary to duplicate NPPF policy within the guide itself.</p>
<p>Pictures demonstrated the varied and beautiful vernacular nature of the Mid Devon built-environment, but somehow hesitate to show examples of recent designs which “enhance” the charming character of existing settlements (17 – Culmstock Parish Council).</p>	<p>Not agreed, the guide includes many examples of recent developments which make a positive contribution to the character of existing settlements.</p>
<p>Design Guide is premature if it is to have any significant benefit unless it can include any Climate Emergency polices (17 – Culmstock Parish Council).</p>	<p>Not agreed. As a roadmap to net zero carbon emissions emerges with more concrete strategies for the LPAs approach to addressing this, it is these strategies which can then draw upon the Design Guide as the means by which these policies can be implemented.</p>
<p>Various key principles seem to be missing from the body content of the Design Guide. We suggest that the active parts of the guide should be corrected for the following omissions:</p> <ul style="list-style-type: none"> <li>• Enhancement</li> <li>• Renewables</li> <li>• Insulation</li> <li>• Listed buildings</li> <li>• Nature habitats</li> <li>• Thatch, chert, cobbles and local materials</li> <li>• Neighbouring AONB Design Guide – wrongly listed in “Lower” Culm (d17 – Culmstock Parish Council).</li> </ul>	<p>Comments noted. An additional special topic guide has been added to address GI and biodiversity matters. Additional guidance has also been incorporated with regards to the historic environment. Whilst renewables and insulation are important considered, these would necessitate a change to development plan policy and therefore, these matters will be addressed through the next Local Plan review.</p> <p>With regards to the AONB, amended reference now reads: (See also the Blackdown Hills AONB Management Plan 2019-24 and Design Guide for Houses).</p>
<p>Design Guide should include the following:</p> <ul style="list-style-type: none"> <li>• Include energy saving audits</li> <li>• Greater planning weight should be given to minimise energy</li> <li>• EPC ratings should be scrutinised and tightened</li> <li>• EV charging points should be included on every major development</li> <li>• Attach the forthcoming Future Homes Standard</li> </ul> <p>(17 – Culmstock Parish Council)</p>	<p>Comments noted. It is recognised that these are important considerations. However, it is not possible to include many of these within supplementary guidance. These are matters for development plan policy and will therefore be addressed as the Council commences its next Local Plan Review.</p>
<p>The document is particularly thin and there is no recognition in this document that the fact</p>	<p>Comments noted. It is not agreed that the DG does not recognise that Cullompton is the District focus</p>

<p>that Cullompton has become the District focus for development and that the Garden Village Initiative and the need for a Relief Road are not mentioned at all (Late rep – Cullompton Town Council)</p>	<p>for development and the Garden Village. However, it is difficult to be more comprehensive in relation to the Main Towns and specific proposals such as Culm GV as the DG does not seek to act as a stand-alone masterplanning exercise. Rather, the Guide provides a framework that provides a basis for further attention, in this case, through Cullompton Town Centre Masterplan and Culm GV Masterplan SPD.</p>
<p>Guide provides excellent advice on factors that generate building form and layout. However, there is little guidance on how development should relate to natural features in more detail – such as ancient and veteran trees and hedges. (See rep for guidance on Veteran and Ancient Trees and Hedgerows and field patterns) (5 -Ancient Tree Forum)</p>	<p>Comments noted. An additional topic sheet covering green infrastructure and biodiversity has been incorporated which includes reference to how development should relate to natural features including trees of all ages.</p>
<p>Draft design guide makes a lot of references to active design without making a reference to the publication of Active Design. This final version should make reference to the documents that have influenced this guide. (11 – Sport England)</p>	<p>Comments noted. The Active Design Publication has been included within Volume 4 Designing for Health and Wellbeing (page 6).</p>
<p>The Design Guide is very good and comprehensive document but it's more of a technical reference that is not easy to read to a number of readers. Suggest a reformat i.e. split into sections e.g. a single house builder will want different information to that of a volume house builder/master planner. (11 – Sport England)</p>	<p>Comments noted. It is recognised that there are a number of technical references. Where possible, plain English has been used throughout the document but in certain cases, it is necessary to refer to specific terms that are relevant to urban design and architectural principles. The Council is currently considering ways in which the contents of the DG can be presented online.</p>
<p>Final format could be a web based interactive tool rather than a published document/pdf. We would direct you to the Essex Design Guide for format. (11 – Sport England)</p>	
<p>Would have wished to have seen more on topics such as space standards, and car parking but would like to register our strong approval and support for this very comprehensive, interested and well-illustrated collection of documents (19 – Tiverton Civic Society).</p>	<p>Support noted. It is recognised that these are important considerations. However, it is not possible to include many of these within supplementary guidance. These are matters for development plan policy and will therefore be addressed as the Council commences its next Local Plan Review.</p>

<p>Multiple typographical/spelling errors (see rep for details) (19 – Tiverton Civic Society)</p>	<p>Comments noted. These have been corrected, as detailed below:</p> <p>Completed: in Volume 1, ‘an’rather than ‘and’ in column 1; ed DH (Page 9)</p> <p>No Change (page 5): in Volume 2, ‘human’s activity in column 2 ed reads ‘human activity’</p> <p>Completed: (page 4, not page 5) and ‘repsonse’ in column 3, page 5;</p> <p>Completed (page 11, not page 12) ‘comitment’ in column 2, page 12;</p> <p>Not found ‘constrains’ rather than ‘constraints’ in column 1 (Cullompton).</p> <p>Not found Words missing, for instance, in the coloured parts at the base of both pages 9 and 10 in Volume 1;</p> <p>Completed (actually Vol 2).Page 4, column 1, ‘respond to the climate emergency’</p> <p>There should be capital letters, and in some cases, new sentences in places e.g.</p> <p>Completed (Page 13 not 14) ‘North Devon’ on page 14, column 1, in Volume 2;</p> <p>Completed (Page 10 not 11) ‘However’ on page 11, column 3, Volume 2,</p> <p>Completed (Page 5 not 6) and column 1 of page 6 in Volume 4.</p> <p>Disagree (appropriate terminology to express the ‘exception to’ (outside of) main towns or village boundaries:</p> <p>The words ‘outside of’ appear frequently, and are unnecessary, for instance,</p> <p>in Volume 1, page 6, column 3;</p> <p>in Volume 2, lines 75 and 79;</p>
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	<p>in Volume 3, pages 3 and 17.</p> <p>Enormously lengthy and abstruse sentences, as many as 14 lines long, occur fairly frequently, and, in each case, would read much more clearly if broken down into several separate sections. Examples include examples in</p> <p>Amended: columns 1 and 3 on page 6 of Volume 1,</p> <p>Disagree: and column 2 of page 8 in Volume 4.</p> <p>Amended: The new paragraph on page 27, Volume 2, column 3, should not start with 'For instance' (or should this be part of the previous paragraph?)</p>
<p>Well-presented set of documents and we support much of its contents. However, we would suggest that there should be mention of Mid Devon's rich archaeological heritage, both as a constraint and as an opportunity. The SPD should also refer to the Devon County Historic Environment Record as a key resource. (23 – Devon Archaeological Society)</p>	<p>Comments noted. Reference to the Devon County Historic Environment Record as a key resource has been incorporated.</p>
<p>Reference to Modern Methods of Construction, specifically volumetric modular buildings is currently absent from the document despite the District having a Garden Village.</p> <p>(21 – Latis Group Ltd c/o Montagu Evans LLP).</p>	<p>Comments noted. The Council is currently preparing an additional Supplementary Planning Document in relation to Custom and Self Build. This will also include consideration of Modern Methods of Construction.</p>
<p>The DG gives the impression that it is aimed at very small development parcels, small infills and narrow edge extensions. It is not very clear how the design for bigger sites should be approached (24 – Taylor Wimpey)</p>	<p>This is not a site allocations document and therefore is intended as supplementary to work already in place in those two areas. AS a result it responds to the majority of development and its relative contribution to the settlement. In cases where larger (strategic) development is proposed in policy, policy also requires a more comprehensive masterplanning and design coding in these areas.</p>
<p>Some parts of the guide are incredibly prescriptive (various diagrams for ways to deal with development in different locations) and it often calls for slavish replication of what is</p>	<p>Not agreed. It is not considered that the DG is prescriptive. To the contrary, the Guide is a work of careful interpretation of all baseline, landscape and settlement character, in order to provide a</p>



<p>there (24 – Taylor Wimpey)</p>	<p>suitable context for unprescribed design. It encourages an imagination of design and solution building in response to all that is highlighted as the Mid Devon canvas.</p>
<p>Principles of Crime Prevention through Environmental Design (CPTED) should be incorporated into the design and layout (See rep for detailed suggestions (29 – Devon and Cornwall Police)</p>	<p>Comments noted. The Following text has been incorporated ‘For safety and security reasons design of all aspects of development should also take account of Principles of Crime Prevention through Environmental Design (CPTED) and engagement with the Police Architectural Liaison Officer is recommended’.</p>
<p>Design should be leveraged entirely as a response to climate change; solar passive design, Brise Soleil, lots of onsite renewables, lots of on-site biodiversity. Materials chosen on the basis of their capital and operational carbon cost, and we should accept that the resulting design (that accommodates these features &amp; materials) as the new norm. (1 - Individual)</p>	<p>Comments noted. It is recognised that these are important considerations. However, it is not possible to include many of these within supplementary guidance. These are matters for development plan policy and will therefore be addressed as the Council commences its next Local Plan Review. However the guide does incorporate the climate emergency as a central theme and provides a basis upon which other strategies can be implemented.</p>
<p>Wherever possible all new buildings should have solar panels built in as part of the original structure to contribute to atmospheric carbon reduction. Rain water collected on roofs etc. should be directed into soakaways rather than the drains to reduce run off causing flooding and maintain the water table. Maximum amount of thermal insulation should be installed to enhance heat retention. (2 - Individual)</p>	<p>Comments noted. Please see above response.</p>
<p>Over development of housing should be allowed to swamp local facilities from roads to hospital schools and shops (2 -Individual).</p>	<p>Comments noted. The quantum and distribution of development, as well as infrastructure provision are matters for local plan policy.</p>
<p>Guide makes reference to policy CP1 “supporting through design the commitment to creating a zero carbon district by 2030”. However the guide contains little information on how this is to be achieved through the planning process. (3 - Individual)</p>	<p>Comments noted. The guide has been reviewed again and further opportunities to strengthen links and references have been incorporated. Additional policy measures will be taken forward through the next local plan as many interventions require a change to development plan policy.</p>

<p>The guide fails to mention the upcoming requirement for the Environment Bill for a net gain of 10% in biodiversity (3 - Individual)</p>	<p>Comments noted. An additional special topic sheet has been incorporated with guidance on biodiversity net gain.</p>
<p>Did not find the document easy to read. Several typos/missed/unnecessary words. (4 - Individual)</p>	<p>Comments noted. A number of typos/missed words etc. have been identified during the course of the consultation. These have been corrected for the adoption version.</p>
<p>Planning has concentrated on the theoretical desire to reduce the use of motor vehicles by limiting the “Off Road” parking opportunities for the new residents. The outcome has been that the new residents have not responded this influence. The result being that “On road” parking, particularly in out of work hours, is reaching hazardous proportions. (7 - Individual)</p>	<p>This is a Local Plan policy matter and does not fall within the scope of the Design Guide. The Council’s Parking Supplementary Planning document provides guidance on the design of residential and commercial parking provision. This will be updated in due course following the adoption of the Local Plan Review.</p>
<p>Large commercial premises and large agricultural buildings are developed without panels. Why is it not a stipulation that, if the commercial building is suitable aligned, it should be fitted with solar panels. (7 - Individual)</p>	<p>Comments noted. A requirement for commercial buildings to be fitted with solar panels is a development plan policy matter and therefore, will be considered as part for the next Local Plan Review.</p>
<p>Important to ensure the highest design standards in any new developments e.g. installation of renewables, high spec insulation. It is also important to enable electric cars, public transport, cycling and walking (16 – Individual).</p>	<p>Agreed, comments noted.</p>
<p>Photograph 9 on page 23 is wrongly captioned. This is the public highway. (26 – Individual).</p>	<p>Comments noted. This has been corrected.</p>
<p>Comments regarding the development of Silverhaye Farm. Opportunity for a sensitive and attractive new holding. The opportunity was missed (27- Individual).</p>	<p>This is a planning application matter. No change required.</p>
<p>All housing developments should include the provision of adequate public open space(not just small play parks), including playing fields (28 – Cllr Wilce)</p>	<p>Comments noted. An additional topic guide has been incorporated to provide guidance on green infrastructure. Quantitative standards for public open space are set out in Policy S5 of the adopted Local Plan.</p>
<p>DG does not address the visual impact of solar</p>	<p>Comments noted. The installation of solar panels</p>

<p>panels on our roofs, insulation or wind power (30 – Individual)</p>	<p>and equipment on residential buildings and land is generally permitted development (subject to certain limits and conditions) with no need to apply to the Local Planning Authority for planning permission.</p>
<p>Social engineering involved in limiting of individual parking has backfired and a better solution may be for developers to provide additional off road parking, either per household or on separate land within the proposed development (34 – Individual)</p>	<p>Comments noted. The Council’s policies on parking are set out within Policy DM5 of the Local Plan Review as well as the adopted Parking SPD.</p>
<p>Why is it not a stipulation that, if the commercial building is suitably aligned, it should be fitted with Solar Panels? (34 – Individual)</p>	<p>Comments noted. A requirement for commercial buildings to be fitted with solar panels is a development plan policy matter and therefore, will be considered as part for the next Local Plan Review.</p>
<p>Landscape eroded by numerous planning consents (35 – Individual)</p>	<p>Comments noted.</p>
<p>More emphasis required on maintaining the patchwork of villages, which is such an attractive feature of the Mid Devon countryside. As new estates (both residential and industrial) proliferate, I see a real danger of village boundaries extending to the point where there will be clear separation between the villages. For a county whose, countryside is one of its main attractions, this would be a tragedy.</p>	<p>Comments noted. It is considered that successful application of the Design Guide will achieve these aspirations. The DG seeks to highlight the various successful conditions throughout the district which can be drawn upon in the variety of different locations (site situations). The DG actively avoids prejudicing particular typologies however where these demonstrate how they achieve various design principles then the use of different typologies is acceptable.</p>
<p><b>Volume 1: Procedural Guidance</b></p>	
<p>CP3: principle should be amended (or a new core principle introduced) to include reference to the conservation and enhancement of the historic environment, heritage assets, their settings and wider historic landscapes and/or townscapes (9 – Historic England)</p>	<p>Comments noted. An amendment to CP2 has been incorporated to read ‘Identifying and facilitating local distinctiveness, including conservation and enhancement of the historic environment, heritage assets, their settings and wider historic landscapes and/or townscapes as part of an integrated approach to design’.</p>
<p>Background Page 6 – Should include an explanation of landscape, settlement form, character and distinctiveness in relation to the historic environment, heritage assets, their settings and wider historic landscapes and/or</p>	<p>Comments noted. Additional text has been incorporated as follows ‘At the same time design can contribute to the conservation, enhancement and enjoyment of historic environments,</p>

<p>townscapes and how the Design Guide will contribute to their conservation, enhancement and enjoyment. (9 – Historic England)</p>	<p>landscapes and heritage assets’.</p>
<p>References Page 7 – Should reference the conservation area character appraisals and management plans with links to them on the Council’s website. Links can also be provided to key Historic England advice e.g. Managing Changes to Heritage Assets (2016) and The Setting of Heritage Assets (2017). (9 – Historic England)</p>	<p>Comments noted. The DG now includes references to the Conservation Area appraisals and management plans under evidence base. A reference to the suite of guidance documents has been incorporated under ‘Other Publications’.</p>
<p>Site and Context Appraisal (Page 9) – The reference to the potential need for conservation area assessment and heritage appraisals in historic environments should be clarified to provide a better indication of when these might be required for designated heritage assets, e.g. assets on the local heritage assets register and archaeological sites.</p> <p>The Council’s local validation check list refers to ‘heritage statements’ as opposed to conservation area assessment and heritage appraisals and it would be helpful if the language matched.</p> <p>There should also be an explanation of the relationship between heritage statements/desk based assessment, and design and access statements. (9 – Historic England)</p>	<p>Comments noted. Several references to the historic environment have been incorporated throughout the guide. However, it is not considered necessary to explain the relationship between different studies. The requirements referred to within the representation will apply irrespective of whether the Design Guide references them and therefore it is unnecessary to duplicate policy and guidance from elsewhere.</p>
<p>Review of planning policy (page 9 – This should also refer to conservation area character appraisals and management plans with links to them on the Council’s website. What is the relationship with other guides e.g. windows and doors, and roofs and chimneys? (9 – Historic England)</p>	<p>Completed with following text: ‘Refer also to Conservation Area Appraisals and Management Plans where they are in place (these have also contributed to the formation of this guide and other Local Plan policy.’</p>
<p>The SPD section on design process should refer to making use of the Devon Historic Environment Record (HER) (18 – DCC Historic Environment).</p>	<p>Completed: included as above.</p>

<p>Page 7 – Under “Other publications” we suggest referencing something that specifically advises about environment/creating biodiversity and preserving existing trees of value and hedgerows (14 – Crediton NP Steering Group).</p>	<p>Completed: included MDDC Green Infrastructure Assessment (2013) in Evidence Base list and added policy ref to Topic Paper (Vol4) to DM26: ‘Mid Devon has prepared a Green Infrastructure Assessment (2013) in support of the Local Plan Review process which identifies green infrastructure as a key part of all development policy areas with the addition of policy DM26 which outlines the types of contributing elements to a green infrastructure strategy and the wide benefits these can bring.’</p>
<p>Design guidance would benefit from citing ‘good practice’ precedents of how contemporary and traditional schemes may have successfully interpreted the local character. This would be of greater relevance to our client (13 – Barratt Homes c/o Origin 3).</p>	<p>Not agreed, the guide includes many examples of recent developments which make a positive contribution to the character of existing settlements. The guide provides the framework by which applicants are able to demonstrate how their proposals can make positive contributions to the character of existing settlements. Providing more specific examples would reduce the innovation and individual interpretation for each applicant and the guide is not intended to stifle design imagination in this way.</p>
<p>To future proof the DG and give it longevity, design principles for new settlements, as potentially could be delivered at J27 could be included. (13 – Barratt Homes c/o Origin 3).</p>	<p>Comments noted. DG does enable consideration of new settlements but also recognising that developments of this scale will be subject to a detailed 2 stage masterplanning process and a separate design guide.</p>
<p>Early engagement is welcomed. We encourage the DG to go further and look to influence sites, such as J27 as the promotional stage, before even getting to pre-application (13 – Barratt Homes c/o Origin 3).</p>	<p>Comments noted. This is beyond the scope of the Design Guide and is a matter for local plan policy.</p>
<p>Commitment to zero carbon by 2030 needs to appreciate viability considerations to ensure deliverability in regards to other planning gain (13 – Barratt Homes c/o Origin 3).</p>	<p>Comments noted. Policy requirements in relation to net zero carbon as well as viability evidence will be considered as part of the next local plan review.</p>
<p>DG appears to miss that larger scale developments (new settlements) provide the opportunity to address site wide considerations for sustainable development (13 – Barratt Homes c/o Origin 3).</p>	<p>Not agreed. It is not for the SPD to make strategic suggestions on the strategy for addressing sustainability of settlements, or the developments strategy for the district.</p>

<p>Number of references have been archived by Government including “By Design – towards better practice” and “Building for Life 12 (2012)”</p> <p>Reference should be replaced with National Design Guide and the latest version of BfL.</p> <p>(20 – Redrow Homes c/o Walsingham Planning)</p>	<p>Completed: deleted By Design; updated BfL to read ‘5th Edition (2018)’. National Design Guide already included.</p>
<p>Approach for all new development to be shaped by historic settlement patterns is not realistic or appropriate for the delivery of balanced, modern, viable communities.</p> <p>(20 – Redrow Homes c/o Walsingham Planning)</p>	<p>Not agreed. The Design Guide demonstrates how the historic environment, landscape and the influences it has, and continues to exert on settlement form across the district can be used as the basis of the design of new development.</p>
<p>Foreword – Design Guide does not mention the NPPF and the brownfield first planning/building objective (31 – CPRE Devon).</p>	<p>Comments noted. The DG has been prepared with strong regard to national and local planning policy. It is not considered necessary to duplicate these provisions within the guide itself.</p>
<p>Background – Suggest addition to Paragraph 4”It should allow for the adaptability of physical space <i>as designated in the Local Plan 2013-2033</i> and as far as possible not prohibit the adoption of future technologies (31 – CPRE Devon).</p>	<p>Not agreed. The suggested reference is unnecessary.</p>
<p>Understanding the district – Suggest adding “Mid Devon has a diverse landscape ranging from high plateau, <i>wide spread farmland</i>, to steep valley incisions.” (31 – CPRE Devon).</p>	<p>Comments noted. This suggestion has been incorporated.</p>
<p>The Design Process – Suggest to add “Conservation Area assessments and Heritage appraisals <i>will</i> be required in <i>many</i> historic environments”</p>	<p>Comments noted. The suggestion has been incorporated.</p>

<p>Early engagement – Suggest to add “Check other local advisory groups, such as Design Review panels, <i>Wildlife trusts</i>, Heritage, Community, <i>Civic Societies</i>, and local interest groups who usually welcome early engagement and can be a valuable source of assistance and information” (31 – CPRE Devon).</p>	<p>Comments noted. Amendment has been incorporated.</p>
<p>Refining the design and submitting a planning application. Paragraph 2 – Suggest “Liaise with the Local Authority to ensure all requirements have been met, including conformity to the Local Plan 2013 – 2033, to register a Planning Application” (31 – CPRE Devon).</p>	<p>Comments noted. However it is considered that the suggested reference is unnecessary.</p>
<p>The photo on page 3 and photo number 5 in Volume 1 is not Yeoford but Woodland Head which is about one and a half miles away. (33 – Individual)</p>	<p>Completed.</p>
<p><b>Volume 2: Designing for Landscape and Settlement Form</b></p>	
<p>Pages 4 – 8 - Other than reference to the Dartmoor Fringes the text in relation to landscape and settlement character does not prompt consideration of landscape or area-based heritage assets (9 – Historic England).</p>	<p>Completed: text added to Vol2, page 7: ‘Additional area characterisation work such as more localised landscape or area-based heritage assessments for registered parks, gardens or conservation areas are encouraged as part of design development where they complement parish and district scale studies.’</p>
<p>Main Towns (Pages 10 – 24) – Text does not acknowledge that there are conservation areas in Cullompton, Tiverton and Crediton (9 – Historic England).</p>	<p>Completed: text added to Vol2, page 11: ‘The Conservation Area Appraisals for each of the 3 settlements have also contributed to understanding the full character of each of the settlements. Cullompton also has a Conservation Area Management Plan which identifies where changes and improvements would be welcome and could take place. This provides further context for design and the application of the Design Guide.’</p>
<p>In relation to Cullompton, the text should note at appropriate points that there is an Article 4(2) Direction in force and that the town has a High Street Heritage Action Zone.</p>	<p>Completed: Text added to Vol2 page 17: An Article 4(2) Direction is currently in force and the town has a High Street Heritage Action Zone and there are a series of several historical foci – the Roman fort (potential for public open space), the early medieval church and later medieval market areas. Coordination between High Street initiatives, other town centre design and heritage assets will be</p>

	important in affecting sustainable change.
Villages (pages 26-72 and Countryside (pages 74-80) - The text does not identify that many of the villages/settlements are conservation areas, some of which have appraisals and management plans (9 – Historic England).	Completed: Text added Vol2 page 26: ‘Mid Devon District Council have completed Conservation Area Appraisals for many villages and Management Plans for some. These identify where changes and improvements would be welcome and could take place. These provide further context for design and the application of the Design Guide. Details of these studies can be found on the MDDC website.’
The Cullompton section could usefully refer to its several historical foci – the Roman fort (potential for public open space), the early medieval church and later medieval market areas (18 – DCC Historic Environment).	Completed: Text added to Vol2 page 17: ‘An Article 4(2) Direction is currently in force and the town has a High Street Heritage Action Zone and there are a series of several historical foci – the Roman fort (potential for public open space), the early medieval church and later medieval market areas. Coordination between High Street initiatives, other town centre design and heritage assets will be important in affecting sustainable change.’
Congratulates Mid Devon District Council on this excellent document but request that you remove the broken green lines with the words ‘Creedy Park Setting, Shobrooke Park Setting and Downes Park Setting’ from the illustration on page 24 of Volume 2. The inclusion of this notation on the plan is inaccurate and misleading (See rep for further detail) (10 – Gardens Trust)	Completed: Green lines removed and text added to key Vol2 Page23: ‘The associations between nested and overlapping settings of surrounding historic parks contribute to the setting and outlook of the town and are sensitive to any changes at the edge of the settlement as well as offering opportunity to shape the landscape identity of the town’s eastern edge.’
Agree with the recommendation that the landscape be taken into consideration when a settlement is developed but suggested that with regard to the Mid Devon Landscape the motorway and major roads should be noted as being just as significant as hills and rivers. This affects Willand in particular as when the M5 is closed the B3181 becomes a diversion route. (8 – Willand Parish Council)	Disagree that these elements have shaped the form of settlements over the same time period that the landscape and geology have. We have however taken into account where there has been some influence in the form of the settlement typologies if for instance a river, railway or road divides a settlement, or influences its linear or cross roads form. The majority of these settlement forms derive from streets which are of a scale to include pedestrian occupation and links and relationships across and along the routes are conceivable (in fact have driven trade and social function over time). The same cannot be said for motorways or railways and so they cannot be



	drawn upon to deliver the same facility to the place into the future.
Willand has been identified as being a Patchwork Settlement typology, the only village in Mid Devon to be identified as this type along with one town, Tiverton. The Parish questioned whether the recommendation that this type of settlement should avoid creating a distinctive centre was something that was true or should be desired. (8 – Willand Parish Council)	Comments noted. It is important that the Design Guide recognises the existing settlement typologies irrespective of whether some parts of the settlement form have arisen by means which are regrettable. The guidance then provides advice on solutions which seek to unify the character and settlement typology.
Some of the weaknesses identified in Tiverton, especially on connectivity and road design, apply equally to Crediton. There are: <ul style="list-style-type: none"> <li>• Pedestrian connections among new estates are an after thought</li> <li>• Excessively large junctions to small, infill, cul de sac developments in outlying areas</li> <li>• Pedestrian and cycle links around the town not integrated well with neighbouring area</li> <li>• Oversize highways through neighbourhoods result in poor public realm and car dominance.</li> </ul> (15 – Crediton Town Council)	Comments noted. It is difficult to be comprehensive in each Main Town case -these chapters are not intended as standalone masterplan exercises. Avoided adding more ‘weaknesses’ etc but have instead amended intro text to Main Town section (Vol2 page 10) to include: [... strengths and weaknesses.]... ‘(Many more exist in each case and this chapter is intended to provide a basis for the further attention which may be given to each settlement – i.e. through town centre masterplans)’.
Page 21 – Setting – Developers proposing plans that will impact on the setting could be more clearly direct to consider more significant green spaces and planting of more mature trees to create new green corridors and contribute to those already existing (14 – Crediton NP Steering Group).	Comments noted. An additional special topic guide has been incorporated which provides guidance in relation to green infrastructure and biodiversity.
Page 4 – While the introductory pages have obviously been updated to refer to the 2019 climate emergency, over a year later the factual definitive pages don’t seem to have been significantly updated from 3 year old documents (17 – Culmstock Parish Council).	Comments noted. The guide has been reviewed again and further opportunities to strengthen links and references have been incorporated. Additional policy measures will be taken forward through the next local plan as many interventions require a change to development plan policy.
Connectivity, climate change and sustainability – Issue not just the provision of connective footpaths and cycle routes themselves but the	Comments noted. The guide has been reviewed again and further opportunities to strengthen links and references have been incorporated.

<p>design of them, which should be to the highest standards of usability with attention to surfacing and lighting, landscaping and attractiveness. These aspects should have more prominence in the guide (14 – Crediton NP Steering Group).</p>	<p>Additional policy measures will be taken forward through the next local plan as many interventions require a change to development plan policy.</p>
<p>Page 22 – Development at Gateway locations – We are unlikely to gain new landmark buildings at these locations but we could gain a more attractive, practical, pedestrian friendly road design with an emphasis on impressive environmental landmarks as gateways to our town (14 – Crediton NP Steering Group).</p>	<p>Comments noted.</p>
<p>Page 24 – Strongly agree with the mention of additional permeability to improve connectivity between surrounding neighbourhoods and the High Street. Developers should be more clearly encouraged to think of all the potential connections they can create rather than links they have to provide (14 – Crediton NP Steering Group).</p>	<p>Comments noted and agreed. However, it is suggested that this is the premise of the Design Guide already without any additions needed. Connections are highlighted as necessary in the context of the form of the settlement and this is how they will be encouraged to respond</p>
<p>Cullompton Tiverton and Crediton are the focus for development in the district. The design of a new settlement can also have its own identity based in part on the site’s landscape and waterscape characteristics and through good masterplanning (13 – Barratt Homes c/o Origin 3).</p>	<p>Comments noted. The distribution of development is a matter for local plan policy.</p>
<p>Finding less constrained sites in the region are required going forward – housing demand can therefore be met in part by a new settlement and the Design Guide should recognise this (13 – Barratt Homes c/o Origin 3).</p>	<p>Comments noted. The site allocation process is a matter for local plan policy.</p>
<p>Welcome the objective of delivering streets to encourage walking and cycling and reduce the relation on the car, however, we recommend the Design Guide acknowledges reference to Manual for Streets.</p> <p>Parking – Include acknowledgement to the County Council’s current parking standards.</p> <p>Waste Management – Reference should be</p>	<p>Completed: Text added to Vol 3 (Compendium of District Design), page 2 (Introduction): ‘MDDC recommends Manual for Streets as a resource in the context of some design matters as well as other policy documents such as the MDDC Parking SPD and Waste Storage SPD.’ Suggest reference to these documents offering more detailed technical information is more appropriate in Vol3, than Vol2 as rep suggests.</p>

<p>made to how storage facilities could integrate well with their surrounding environment (13 – Barratt Homes c/o Origin 3).</p>	
<p>Increased densities should be focused around key public transport intersections, along strategic routes, overlooking public spaces and within neighbourhood, local and village centres. Can be applied to larger strategic developments/urban extensions and new settlements (13 – Barratt Homes c/o Origin 3).</p>	<p>Comments noted. This is a matter for local plan policy.</p>
<p>Linear form is one of the most common settlement forms across Mid Devon. Continuity does not necessarily mean terracing. There are a number of examples in towns and villages within Mid Devon that achieve continuity with detached and semi-detached dwellings, and this should be reflected in the Design Guide (13 – Barratt Homes c/o Origin 3).</p>	<p>Comments noted. Agree with this comment, but the DG doesn't mention terraces, or any other specific typology in reference to the Linear form, or the 'Site on a Thoroughfare' site situation -the most likely to be relevant to a linear village centre. It already includes reference to side and rear boundaries to properties (inferring detached or semi-detached) being used successfully in various situations around Mid Devon. Given, as this comment indicates, there are a variety of ways to successfully maintain the continuity of the Linear form it would seem inappropriate to draw attention to any individual typology as the 'right' way to do this.</p>
<p>Design Guide should highlight the importance of an environmentally led Masterplan and providing exemplar Green and Blue Infrastructure.</p> <p>SUDS: Surface water features can make a significant contribution to the landscape character, biodiversity and sustainable performance of development.</p> <p>Landscape: The way in which landscape and open spaces are organised can make a significant contribution to the character and success of a development. It is critical that this is a consideration at an early stage in the design process.</p> <p>Biodiversity: The 10% net gain in biodiversity required on all developments once the Environment Bill is enacted should be referred to as the use of the DEFRA metric will be</p>	<p>Comments noted. These comments have been incorporated in to a new special topic guide which addresses GI and biodiversity.</p>

<p>required (13 – Barratt Homes c/o Origin 3).</p>	
<p>New developments should be designed to meet the lifestyles of the people likely to live there. DG should draw lessons from contemporary precedents and provide a framework for the delivery of house types designed for modern living and streets and places designed around modern lifestyles (such as convenient and practical parking and the ability to charge an electric vehicle easily) (13 – Barratt Homes c/o Origin 3).</p>	<p>Comments noted. A number of contemporary precedents are considered and the DG reflects on these. Parking provision and electric vehicle charging infrastructure are matters for local plan policy and the Council’s Parking SPD.</p>
<p>The only typologies shown, predominately comprise terraces with minimal car parking. No provision is made for detached homes or any lower density form of housing. Detached homes are an important part of the character of Mid Devon and they remain very popular house types that provide for modern lifestyles (13 – Barratt Homes c/o Origin 3).</p>	<p>Disagree with observation. Please see responses above regarding agnosticism with regard to typologies. An additional review of the Design Guide was requested by MDDC to ensure the Design Guide was Net Zero Carbon target compatible since the declaration of climate emergency was announced part way through the preparation of the guide. Some building typologies will perform better as tools in achieving these targets than others. Nevertheless, the Design Guide does still not express a preference for one typology over another, only that where a typology is selected that it can be demonstrated its use in its context is contributing to the settlement form in the way the Guide outlines.</p>
<p>Design Guide should refer to detached homes and how they should form part of the creation of mixed and balanced communities as well as high quality streets and spaces. Detached homes can be used to create strong corners, focal points, key groupings, addressing gradients and provide skyline interest (13 – Barratt Homes c/o Origin 3).</p>	<p>DG is agnostic to house type and form in order to focus more attention on the principles of place making and local distinctiveness. It does not prohibit the forms mentioned and would allow, where these functions of buildings mentioned can be demonstrated, the use of these in the way described. Many approaches to achieving particular design principles are displayed throughout the district and it would be inappropriate to single out one typology as the ‘right’ way of approaching certain design principles.</p>
<p>Page 14 – all of the ‘good’ examples are from the town centre and all of the negative ones are taken from suburban locations. This presents and unbalanced and incorrect view that all suburban typologies are poor design</p>	<p>The intentions of the DG are misread here. The intention is not to reference ‘suburban’ or ‘urban’ typologies specifically, rather to highlight the various successful conditions throughout the district which can be drawn upon in the variety of</p>

<p>references (rep provides other positive examples) (20 – Redrow Homes c/o Walsingham Planning).</p>	<p>different locations (site situations). The DG actively avoids prejudicing particular typologies as the ‘right’ or ‘wrong’ approach. Where these can demonstrate how they achieve various design principles then the use of different typologies is acceptable.</p>
<p>Pages 15 and 16 – This section sets out a series of considerations and references for the key strategic spatial design ‘components’. To avoid confusion it should be made clear that the text that the TEUE is exempt from the following guidance in the new district-wide design guide (20 – Redrow Homes c/o Walsingham Planning).</p>	<p>Not agreed, no development will be exempt. Rather the guide will be a material consideration in the determination of planning applications. However, it is recognised that in the case of Tiverton EUE, more comprehensive masterplanning and design coding has been undertaken.</p>
<p>Page 6- Good info on landscape areas. Not sure thumbnail photos are easy to understand; sometimes even mixed and confused. the block colour often obscures the point in question (24 – Taylor Wimpey)</p>	<p>Comment unclear. No thumbnail photos are included at page 6, or in the entire Landscape character chapter.</p>
<p>Page 28 – Good dissemination of local settlement typologies. Could they be the ones to form the basis for larger schemes (Not all, but some of them – e.g. central square) (24 – Taylor Wimpey)</p>	<p>Noted. Agree that the design guide approach to landscape and settlement form may play a role in identification of sites and future plan making</p>
<p>Page 32 <i>‘Avoid inadvertently creating a substitute for the central space by the provision of similar open space, or location of non-residential uses elsewhere. ‘</i></p> <p>That does not make sense as it surely depends on the volume, critical mass of the new development (24 – Taylor Wimpey)</p>	<p>Comments noted. Scale of development appropriate to settlement function and form is a policy issue. DG is concerned with maintaining character and integrity of the landscape and built distinctiveness and the central space in settlements which historically have functioned around this form is and should remain a single focus. This is not to say other policy compliance in areas of open space provision need to also be fulfilled according to the scale of development, but this should be carried out, located and designed in a way which respects a settlement hierarchy to the public realm.</p>
<p>p.36 Linear forms should be expanding on all sides, otherwise one increases the distances (bad for walking and cycling) (24 – Taylor Wimpey).</p>	<p>Comments noted. DG cannot specify ‘where’ development can and cannot happen around these settlement types. This is a matter for local plan policy. However the approach to landscape and settlement form may play a role in future plan</p>

	making.
p.42 - Sustainability issues. Should 'dispersed' be replicated? It is not a very sustainable form of development (24 – Taylor Wimpey)	Comments noted. DG cannot specify 'where' development can and cannot happen around these settlement types. This is a matter for local plan policy. However the approach to landscape and settlement form may play a role in future plan making.
p.45 Site Situations – The key is on one page but serves several diagrams on different other pages. Not easy to use (24 – Taylor Wimpey)	Disagree. It would confuse reading and make this a much more cumbersome section if the Key were repeated on every page. At the draft stage we also had comments to the contrary that a common key at the beginning of the chapter would aid the readability and hence the document revision register reflects this change to include the key in one place at the beginning of the chapter.
p.48 onwards - Interesting descriptions of site locations, but almost all sites mentioned are sort of infills or tiny extensions to the settlements (24 – Taylor Wimpey)	Please see above responses. This is not a site allocations document and therefore is intended as supplementary to work already in place in those two areas. AS a result it responds to the majority of development and its relative contribution to the settlement. In cases where larger (strategic) development is proposed in policy, policy also requires a more comprehensive masterplanning and design coding in these areas. Added following text on page 46 for clarity: 'Local Plan site allocations determine development distribution but the Design Guide approach to landscape and settlement form may play a role in future plan making.'
P.58 – Edge on a limb? Difficult to understand what this diagram is trying to say. Query whether illustration is correct. (24 – Taylor Wimpey)	Introduction to the settlement form chapter is careful to highlight that the summaries of settlement typologies may not comprehensively reflect the wide array of individual settlement forms across the district but in summarising, the resource of observed features from across the district is made available for interpretation. If the comment references a particular settlement not conforming wholly with one of the 7 settlement typology summaries, it may be that drawing upon features of two or more others is a more helpful way of the applicant identifying a suitable design approach in the context of their site. The Design Guide is intended to be used flexibly in this way.

	<p>Added following on page 46 vol2 for clarity of use of Site Situations: ‘Sites may display characteristics of multiple situations and appropriate responses be interpreted accordingly.’ Also amended final paragraph on page 27 vol2: ‘It may be that some of the features of two or a number of the settlement typologies seem to match the development location. The guide should be used flexibly to form a judgement as to which elements of the Design Guide are applicable to creating a development which contributes in the best way possible to the settlement form of the given location.’</p>
<p>p.60 Edge to Satellite – Query whether illustration is correct. Too many back walls exposed – should never be the case (24 – Taylor Wimpey)</p>	<p>Rear boundaries to the open countryside is a real condition prevalent throughout a wider variety of settlements across the district. Their treatment is the means by which development of this form is acceptably accommodated within the landscape and the DG makes references to various treatments which could be employed to achieve this. Where there are exceptions to this eg. a road around the edge of a settlement which only has development on one side the DG also drawn attention to this through the various site situations and the possible responses to them.</p>
<p>p.76 – Countryside – Fit for one house but what is the guidance for development. There need to be more on how to structure new developments; this does not say much (24 – Taylor Wimpey)</p>	<p>Policy leads on development locations. Light touch advice included in DG to assist situations where design guidance is useful to PD. Regardless of planning policy position on the countryside even small development interventions can contribute to the distinctiveness of the landscape.</p>
<p>Cullompton town component list ignores the proposed town centre bypass which is currently planned to traverse the CCA fields in total rejection of both item 4 (retain the open aspect) and item 6 (detrimental consequences) (3 - Individual)</p>	<p>Comments noted. Amended text to Item 6, Page 20, Vol2 to read: ‘While infrastructure capacity and accessibility is key to the town’s growth and sustainability, design response to negative aspects such as noise or visual intrusion should take care to avoid equally detrimental consequences such as impact on views, east-west movement, green space, conservation of heritage assets or the emergence of a highways dominated environment, particularly in the case of the provision of a town centre relief road (Policy CU19, Local Plan Review).’</p>
<p>Page 19 and elsewhere the word “legibility” is used. This may have some hidden meaning to</p>	<p>Comments noted. We have been careful to use plain English throughout the documents but where</p>

the authors but in the context it is nonsensical for the rest of us. There are other jargon issues in the guidance (for example the use of words such as fenestration) which makes it difficult for the layman to understand. (3 - Individual)	certain words are more relevant to the Urban Design or Architectural principles it is important these principles are well communicated in the ways that professionals understand them.
<b>Volume 3: Compendium of District Design</b>	
Provides a useful reference guide to district-wide built environment features. It does not explain that public realm works and other forms of development that affect the historic environment should always be informed by a staged approach (9 – Historic England).	Comments noted. However it is not considered necessary or proportionate to include this within the Design Guide given that this is a requirement of national policy in any case.
Should include reference to relevant Historic England advice on these matters (9 – Historic England).	Completed: See amendments included under other responses
Page 24 – Parking and Transport – Guide states that integrated parking is important but we wonder if this could be more clearly expressed with some further guidance (14 – Crediton NP Steering Group).	Comments noted. Further guidance on this matter will be provided as part of the Council’s Parking SPD review.
Secure cycle storage can be a challenge where sites are tight. We would be interested to know what would be considered adequate (14 – Crediton NP Steering Group).	Comments noted. Cycle parking standards are provided in Policy DM5 of the Local Plan 2013 – 2033. Added text to Vol 3 page 24: ‘(see Policy DM5 for minimum car & cycle parking standards)’.
Page 26 – Agricultural and commercial buildings – Do not agree that the siting of commercial buildings in existing industrial settings makes the design less important (14 – Crediton NP Steering Group).	Completed: amended to read: ‘Many new commercial buildings will be sited within existing industrial settings (C) and replicate existing buildings and functions.’
Page 2 – Agreed that considered in isolation a single design feature may be justified in many ways, however it is through the necessary balancing of technical and aesthetic priorities that a broader design rationale can be made which respects context, is innovative and contributes to the commitment to a zero carbon district by 2030 (13 – Barratt Homes c/o Origin 3).	Comments noted.
Page 2 – Importance of public realm is supported. However images are devoid of cars	Not agreed. All 12 images except 2 (which are of public green space) include cars. Cars and space for



<p>and 21<sup>st</sup> Century need for car parking, shopping, internet deliveries etc. cannot be ignored (13 – Barratt Homes c/o Origin 3).</p>	<p>delivery vehicles and/or commercial and agricultural vehicles have been included as observed through extensive field survey of Mid Devon. All drawings are based on real settlements or the hybridisation of a variety of similar type settlements and present car parking and other vehicle requirements and capacity in ways which are true to the mixed life across the district. It is within this context that the DG addresses how to make appropriate design responses.</p>
<p>Page 10 – Consideration of “boundaries and thresholds” focusses on the historic village character, which is relevant in part, but the DG should acknowledge the technical balance of delivery, building reg compliant homes, adoptable roads service provision etc. It currently does not (13 – Barratt Homes c/o Origin 3).</p>	<p>Comments noted. Disagree that the DG does not acknowledge the technical balance of delivery, building reg compliant homes, adoptable roads service provision etc given that no part of the guide is prescriptive. To the contrary, the Guide is a work of careful interpretation of all baseline, landscape and settlement character, in order to provide a suitable context for unprescribed design.</p>
<p>Page 11-12 – DG would benefit from citing examples of how local distinctiveness can be reinterpreted in a contemporary way fit for 21 century developments (13 – Barratt Homes c/o Origin 3).</p>	<p>The Intro to the Guide in Vol1, makes clear that the provision of the Guide is not intended to deny the opportunity for designers to engage in a design process. It is provided in order to equip and facilitate a richer process of designing according to the context and interpreting the local character for 21st century purposes. The important principles of the Mid Devon character, in how settlements have formed within the landscape and the role sites have in contributing to this settlement form are the central tenets of the design guide. The interpretation of how building typologies and design detail can achieve these principles is the responsibility of the continuing design process and the parties involved in this.</p>
<p>Page 23-24 – Recommended that acknowledgement is made of the County Council’s current parking standards and suggested that a compliant scheme is cited, supported with a set of car parking principles to improve the quality of car parking provision (13 – Barratt Homes c/o Origin 3).</p>	<p>Comments noted. The Council’s parking policies are set out in Policy DM5 of the Local Plan and the Parking SPD. It is therefore not necessary to repeat this guidance within the DG.</p>
<p>Page 24 – Agreed that new development should make reasonable provision for alternative means of transport. J27, Tiverton</p>	<p>This is a matter for development plan policy and falls outside of the scope of this SPD.</p>

<p>Parkway is uniquely places to support growth in Mid Devon and the wider Exeter area (13 – Barratt Homes c/o Origin 3).</p>	
<p>Page 6, 7, 9, 11 – 22 - The dismissal of the suburban typology of housing is unhelpful. This section should be revised to clearly explain which aspects of suburban design are to be avoided and it should be explained how compact, walkable, landscape-led places using a suburban typology comprising detached homes can be delivered successfully (20 – Redrow Homes c/o Walsingham Planning).</p>	<p>The Design Guide does not dismiss or promote any individual typology on its own merits. Rather the Design Guide structures a process of the justification of the use of various typologies, urban design practice and detailing of buildings according to their appropriateness to the context, either relating to landscape and settlement type, or according to site situation within the settlement. In relation to suburban typologies, designers would be encouraged to demonstrate how they represent an appropriate response to the context if they believe this to be so.</p>
<p>Pages 23-24 – No examples are shown of on-plot parking in driveways which is the most convenient and desirable arrangement from the perspective of the occupier of the homes. As drafted the guidance is unrealistic and is likely to cause confusion and frustration in the delivery of the homes that people want (20 – Redrow Homes c/o Walsingham Planning).</p>	<p>The process of developing the design guide has not included any district wide surveying of preferences for car parking among home owners. However sales of a variety of houses types, those including and those not including the parking described have occurred throughout the district during the time over which the Design Guide has been prepared. Evidencing ‘what people want’ would be a complex and possibly unachievable aim. The Design Guide has therefore concentrated on the observable and evidence able character of the district in so far as how settlements have formed within the landscape and the role sites have in contributing to this settlement form. In doing so it provides the basis upon which other market demand intelligence can be applied. The Design Guide makes no prejudice as to the appropriate parking solution in different circumstances. It also avoids favouring any particular product or house type on offer from a particular developer or house builder. The Design Guide provides the basis upon which designs which demonstrate the application of a variety of typologies and approaches are able to contribute to settlement form are welcome.</p>
<p>It would be good to have something broader with regards to place making components: from movement to Block structure to street typologies. there are some good images and suggestions on details, but no strategy in</p>	<p>This contradicts a previous comment regarding the ‘prescriptiveness’ of the Guide. The Design Guide aims not to be prescriptive of a particular block or building typology. Rather it provides the basis upon which block layout and building typologies of a</p>

general (24 – Taylor Wimpey)	variety of types, where demonstrated to contribute to the settlement form in the way the Guide outlines, can be beneficial.
Diagrams – it is hard to read the text and understand what it relates to, Using the same 3d images over and over is good but would be good to vary illustrations (24 – Taylor Wimpey)	Noted.
<b>Volume 4: Special Topic Guides</b>	
Topic Sheets – It might be helpful to number these (14 – Crediton NP Steering Group).	Completed.
Page 4 – Designing for Community – Strongly endorse the guidance. We would particularly like to see a very strong steer towards designing a greater amount of open amenity space in new developments (14 – Crediton NP Steering Group).	Support noted. An additional topic guide has been incorporated which includes guidance on green infrastructure and biodiversity.
Disappointing that the guide does not follow on from its consideration of the Council’s climate emergency declaration and consider the opportunities to design new communities around existing public transport infrastructure and the overall benefits to the environment, economy and health and wellbeing of such development. J27, Tiverton Parkway is uniquely placed to support growth in Mid Devon and the wider Exeter area (13 – Barratt Homes c/o Origin 3).	Not agreed. Climate change is a core principle and central tenet running through the guide which seeks to support through design the Council’s commitment to ambitious targets for carbon reduction.
The connection between good placemaking and financial value and deliverability of new development is recognised but the reference to slower build out rates on larger sites being as a result of the homogeneity of house types limiting market absorption rates is disputed. Larger sites often have complex infrastructure issues which delay commencement (13 – Barratt Homes c/o Origin 3).	Comments noted. It is recognised that larger sites often have complex infrastructure issues which delay commencement. These are principally matters for local plan policy. However, the purpose of this topic guide is to communicate that there is a strong connection between good place making and financial value and deliverability of new development in order to incentivise such approaches and facilitate usability of the guidance.
The Design Guide should set out how New Settlement Design could incorporate a range of facilities within a neighbourhood via mixed use centres or neighbourhood hubs (13 –	Comments noted. The Design Guide is not intended as standalone masterplan exercise, but provides a basis for the further attention which may be given to each settlement. These matters would be considered as part of a site-specific

Barratt Homes c/o Origin 3).	masterplanning process.
Themes of Sustainability and Biodiversity should have been included (24 – Taylor Wimpey)	Comments noted. An additional special topic guide has been incorporated in relation to green infrastructure and biodiversity.

<b>SEA and HRA Screening Report Comments</b>	
On the basis that the SPD is not a plan that is required by legislative, regulatory or administrative provisions; that it will provide additional guidance on existing policies contained within an adopted Development Plan Document that has already been subject to a Sustainability Appraisal/SEA; and that it is not likely to result in significant effects upon the historic environment, Historic England would concur with your assessment that SEA is not required.	Comments noted.
On the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan. (12 – Natural England)	Comments noted.