

## Draft Teignbridge Design Guide SPD – APPENDIX B - Consultation Responses Schedule

No	Organisation / Individual	Response / Comments
01	Organisation - Abbotskerswell PC	<ul style="list-style-type: none"> <li>- TDC have produced a well-presented and easy to read document in its Urban Design Guide (UDG) (213 pages). However, APC has concern with how it will be utilised by prospective developers and ENFORCED by TDC planners and will it be well met by applicants. (Gen)</li> <li>- As a practical example, the recent application for NA3 Wolborough has singularly failed to promote good design procedures, like those outlined in this Draft Guide and other previous government guides on best practice. Planning performance agreements with TDC were sidestepped, as was any reasonable form of meaningful consultation with local stakeholders, i.e. the community, at an early stage in the application's evolution. <b>The Council is not sure how this document will ensure compliance with the Design Guide, once adopted. (Gen)</b></li> <li>- Each design code's checklist and supporting text is often subjective and in places equivocal or contradictory. <b>It is understood that this guide will mutate into a supplementary planning document after consultation, in which case how will it be engaged and enforced by planners? (Gen)</b></li> <li>- Most of the architectural designs illustrated in many of the pictures show aesthetically pleasing urban design styles, characteristically those applied to urban developments in the early part of the last century, and some well before then. These styles have been lost over the last half-century to the detriment of local communities. <b>APC welcomes the attempt to redress this aesthetic loss, but APC believes it will be at a cost that developers will not absorb for financial reasons. (6 Building Design)</b></li> <li>- Many of the illustrations used belie reality with streets incredibly sparsely populated by cars and people. Comparative photos at peak times would show a different aspect to modern life. <b>When were the photographs taken – perhaps the early hours of Sunday morning? Unless TDC deliver on the aspirations detailed within the Guide, TDC run the risk of being accused of spending public money on producing an impracticable document. (Gen)</b></li> </ul>

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		<p>- The relationships between increased <u>residential densities</u> (Code: DG-LS3 (Density)), <u>employment</u> (Code: DG-LS6 (Land Use: Non-Residential Uses Compatible with Residential Land)) and <u>practical car parking</u> is not sufficiently addressed. <b>TDC needs to openly state its strategy on how to achieve its anticipated car usage per dwelling and per non-residential unit and present a realistic vehicle parking allocation as guidance for all developments. (2 Principal Layout Strategies)</b></p> <p>For example:</p> <p>“Car parking for residential areas should be provided at an average rate of:</p> <ul style="list-style-type: none"> <li>• 1 parking space for 1 bed dwellings,</li> <li>• 2 parking spaces for 2-3 bed dwellings</li> <li>• 3 spaces for 4 bed (or larger) dwellings</li> <li>• 1 visitor space per 10 dwellings”</li> </ul> <p>APC have concern that the use of “average rate” is somewhat meaningless and is incongruous with current modern life and expectations. (4 Streets and Movement, DG-SM8)</p> <p>For example: albeit not a local example but increasingly common, a councillor’s daughter and her partner rent a 2-bedroomed apartment in a 4 storey block of 14 apartments on an estate of similar blocks (mixed open market and social housing), giving a very high dwelling density. The couple are both in work, each unavoidably need a car to travel to work. There is only 1 parking space per apartment in secured parking space, but this invokes frequent disagreements about who parks where. This also necessitates parking outside the secure area and car owners park on any available space, often on pavements straddling double yellow lines. <i>There is nowhere else to park.</i> Such an environment adds stress to their working lives and affects their well-being and also makes the modern estate look more untidy than it should. This issue is common in Teignbridge, too. How will Teignbridge planners ensure misalignment of number of cars against number of dwellings is adequately mitigated in the design guide?</p> <p><b>Car parking for residential areas and non-residential areas must be adequately provisioned.</b></p> <p>- The quality design and build promoted in the UDG is counter to current high-density housing projects, <i>Penns Mount immediately come to mind</i>. APC cannot see how this will change using the UDG. It seems to perpetuate mass housing being built to high density. What will these modern estates look like 25 years after</p>
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		<p>construction is complete? Good design with open green space is costly, which arguably developers find great difficulty accommodating. (6 Building Design)</p> <ul style="list-style-type: none"> <li>- The UDG fails to mention graffiti in its 213 pages (noting that this is rapidly increasing in Newton Abbot). Graffiti is a blight on modern high-density housing estates and urban centres. <b>What will TDC do to ensure developers remain accountable for community space maintenance for a significant period (25 years, perhaps) after developments are finished? (5 Green Structures)</b></li> <li>- Neighbourhoods (DG-LS5) States the majority of homes should have good access to a range of local jobs and facilities within approximately 400m distance or a 5-minute walk. <b>APC Comment: Please state where the jobs are coming from? Perhaps clarifying where these jobs will be for the occupants of at least 1500 dwellings at NA3. (2 Principal Layout Strategies, DG-LS5)</b></li> <li>- The UDG content is highly subjective; it can mean all things to all people and developers will say they are applying all the principles, when they are not. The design principles are statements of intent only, which will fail to be implemented without TDC teeth behind it. (Gen)</li> </ul> <p><b>This document is too late in its production because it should have been available before many of the large, medium and small estates proposed in the Local Plan were allocated, approved and developed. APC will watch this space to see if the Design Codes can be successfully applied in retrospect to these estates. Perhaps newly developed sites should be “OFSTEDed” against the Design Guide.</b></p>
02	Organisation – Bloor – Bovis Homes / Barton Willmore	<p>1 Content</p> <p>This SPD is “design guidance” which is intended “to guide decisions relating to planning applications”. However, the principles and guidance is presented as a series of “codes which imply a status beyond guidance that is inflexible. The terminology should be revised to “principles” rather than “codes”.</p> <p>The document states that “outline applications as a minimum, must set parameters for the design of Reserved Matters”. Parameter Plans are only required for EIA developments. Since 2015 other outline applications only need to state the areas where access points will be situated. The text should be amended to clarify this.</p>

		<p>2 Principal Layout Strategies</p> <p>General – The examples and principles in the draft Design Guide are focused on high density urban typologies and on reflecting historic settlement forms. The Design Guide should also include principles and guidance to allow for the creation of high quality places that are based on the principles of Garden Cities. These principles would require responsiveness to the unique characteristics of the site and its setting whilst also providing for a rational, legible and walkable development structure where distinctive streets and attractive places are created with housing that meets the needs of the occupiers.</p> <p>Page 10 /11. “Prominent side elevations of buildings, particularly those located on street corners are to be architecturally composed to create interest on the street and enhance safety and surveillance, for example through the arrangement of materials and the placement and proportioning of windows” This is an overly onerous requirement to meet the required objective of providing natural surveillance. Suggest it is replaced with “Blank side elevations of buildings, particularly those located on street corners should be avoided where possible.”</p> <p>Page 12-7. “To exclude private drives that reduce public access adjacent to publicly accessible land and reduce the interconnected nature of the network” This should be more positively worded as private drives can make a very positive contribution to a movement network and provide for an appropriate transition and interface with open space. Suggest it is replaced with “Where private drives are proposed they should be designed to ensure that they do not adversely affect public access to areas of public open space.”</p> <p>Page 12-8. “To have cross roads as the default junction type between blocks” This is an overly onerous requirement as crossroads may not be appropriate in all instances or on all sites for reasons of character or legibility. Crossroads do not provide an opportunity to terminate street views which is often a useful technique in the creation of attractive streets and a legible environment. Suggest this is removed</p> <p>Page 14-2. “Density ranges for Major Urban Thoroughfares and avenues/principal streets should be between 40-60dph however densities may be increased up to 80dph in some areas for townscape reasons”. These density ranges would not be appropriate for anything other than very large urban extensions or new settlements (over 1,000 homes) or developments in existing town centres. Suggest the text is reworded as follows: “Density ranges for Major Urban Thoroughfares and avenues/principal streets in major developments of over 1,000 homes or within existing town centres should be between 40-60dph however densities may be increased up to 80dph in some areas for townscape reasons”.</p>
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		<p>Page 14-5. “Density ranges for park edges and other green spaces should be between 40-55dph” This not an appropriate density range for the majority of edges to green spaces at the edges of new settlements or urban extensions where a lower density is usually appropriate to reflect the rural setting. Suggest the text is re-worded as follows: “Density ranges for park edges and other green spaces should be appropriate to the proposed character of that space. In more urban locations a higher density of between 40-55dph might be appropriate to create a strong frontages and sense of enclosure. In more rural locations and at the edge of developments a lower density range of between 25 and 40 is likely to be more appropriate.”</p> <p>Page 14-6. “Density ranges for all other areas should be between 35-50 dph” This needs to be revised to allow for the flexibility of providing lower densities where necessary for the creation of distinctive streets and character areas. Suggest it is re-worded to “Density ranges for all other areas should be between 25-50 dph”</p> <p>Page 14 “Density calculations are to: • Include all private and communal space within the curtilage of an urban block • Include all streets excluding the primary movement network • Include all play areas and small urban parks and spaces situated in the secondary and tertiary street fabric • Exclude land associated with non-residential uses except where that use form part of a mixed-use building that is partially residential” For the avoidance of doubt and any confusion we suggest that this is amended to reflect the way in which density is usually measured in the housebuilding industry: “Density calculations are to: • Include access roads within the site; housing; private gardens; car parking areas; incidental open space and landscaping; and children’s play areas. • Excludes: major distributor roads; open spaces serving a wider area; and significant landscape buffer strips.</p> <p>Page 15 The photographic examples of residential densities show 6 examples ranging from 35-70dph Lower density developments are characteristic of many parts of Teignbridge and lower densities will be appropriate in new developments especially at the edge with rural areas or in ‘rural’ character areas.</p> <p>Page 15 A diagram shows appropriate density distribution within a walkable neighbourhood The diagram excludes reference to rural edge character areas which are an important part of creating distinctiveness in many new developments. Suggest the diagram is amended to show lower density development of 25-35 at the edge of the neighbourhood.</p> <p>Page 16 Sets out principles for the scale of buildings and requires that they are scaled in response to local context, the hierarchy of routes, the orientation to open spaces, the width of spaces to which they relate, topography, proximity to centres, landscape character, the intersections of streets. The table sets out the ranges of permitted storey heights by street type. Given that the vast majority of existing buildings in Teignbridge are 2 storeys and the</p>
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	<p>majority of homes in most new large-scale housing developments are likely to be of 2 storeys it is considered that increased flexibility is required to allow for 2 storey buildings in more locations as below. High streets such as Chudleigh contain 2 storey buildings. The guidance for buildings along High Streets on primary streets should therefore be amended to 2-3.5 storeys The vast majority of buildings fronting rural edges in and areas of open space in Teignbridge are 2 storeys in height. The guidance for buildings adjacent to an all types of open space should be amended to include 2 storeys.</p> <p>Page 17-2. “The majority of homes should have good access to a range of local jobs and facilities within approximately 400m or a 5 minute walk” Agree that this is a good target but Manual for Streets states that “Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes (up to 800m) walking distance of residential areas which residents may access comfortably on foot. However, this is not an upper limit...” Also, unless new jobs and facilities are being provided it is not possible to have control over the proximity of proposed housing to these. Suggest this is re-worded as follows: “Wherever possible, new homes should have good access to a range of local jobs and facilities within approximately 800m or a 10 minute walk”</p> <p>Page 17-4. “Major new proposals are to define neighbourhoods and neighbourhood centre boundaries”. A walkable neighbourhood of 400m would usually contain a minimum of 1,000 homes. Suggest that the wording is revised to make this clearer as follows: “Major new developments of over 1,000 dwellings should defined the location of the proposed neighbourhood centre and the extent of neighbourhood areas”</p> <p>Page 20 1. Typo – “is to be arranged” Should be “are to be arranged”</p> <p>Page 20 1.1 “Are mixed both vertically and horizontally” it is not always possible for commercial reasons for uses to be mixed vertically. Suggest this is re-worded as follows: “Where possible, are mixed both vertically and horizontally”</p> <p>Page 29 Diagram showing strategy for integration of Active Design principles Diagram missing</p> <p>3 Urban Structures</p> <p>Section should be re-ordered so that the starting point is back to back development parcels. To avoid any confusion over the most appropriate type of development block.</p> <p>Page 32: Block design principles The codes for block design principles are focused on blocks with rear parking courts and the dimensions in the table from the Urban Design Compendium would preclude any other form of</p>
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		<p>development block. The vast majority of development blocks in new housing-led developments will be back-to-back blocks with on-plot parking to the front or side of the dwelling. These blocks typically have dimensions of 40m-45m by 50m-80m. This should be amended to reflect this.</p> <p>Page 33: Diagram of “Good Block Design: the essential ingredients” Again, this is based on a rear parking court block which are unlikely to be used in many new housing-led developments. This should be replaced with a more typical back-to-back block featuring car parking close to the front door of each dwelling.</p> <p>Pages 34-43: This section starts with the ‘Parking Court Block’ The ‘Parking Court Block’ has been proved to be an inefficient and ineffective way of delivering housing. Moreover, people prefer to park their car close to the front door of their home. The most common type of development block on the vast majority of new housing-led developments is the ‘back-to-back- type. Parking court blocks are likely to be used only in very specific locations where back-to-back blocks are not possible. For this reason, this section should be revised so that ‘back-to-back’ block is the first block type, followed by mews lane blocks, edge blocks (this should be based on a back-to-back block type), wrap around blocks and finally rear parking blocks.</p> <p>Page 34:2.1.1 “Including automatic gates with a separate pedestrian access accessible to residents/owners and waste collection operatives” This is unlikely to be necessary for courtyards of up to 10 spaces which is what the guidance permits. Suggest reference to electronic gates is removed.</p> <p>Page 36: Typo - meters</p> <p>Page 38: Diagram showing features of a poorly designed back-to-back blocks The text below the diagram “streets dominated by blocks of parking” is misleading because it suggests that the diagram shows this (which it doesn’t)</p> <p>Page 39: Diagram and illustrations These show relatively high density development comprising terraced housing. Whilst this may be appropriate in some urban locations or in central areas of new large-scale developments, it is more likely that edge blocks will feature low density housing comprising detached and semi-detached homes. Suggest diagrams are amended or additional illustrations / photos added.</p> <p>Page 47-54: Front boundary treatments Hedge boundary treatments should be added as these are characteristic of Teignbridge (see page 105) and contribute to attractive street scenes. Formal and informal hedge treatment options should be included.</p>
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	<p>Page 55: Hedge boundary photo This photo is missing. It is suggested that a positive image of a successful hedge boundary is used instead.</p> <p>4 Streets and Movement</p> <p>Pages 66 and 67: Images and plans missing. Would like the opportunity to comment on these once they are available</p> <p>Pages 70 and 71: Images and plans missing. Would like the opportunity to comment on these once they are available</p> <p>Pages 72 and 73: Street alignment Whilst the purpose of this guidance is understood (to slow vehicle speeds and reinforce the street hierarchy), the guidance suggests that streets should be artificially varied in their alignment to reflect historic street types. This could result in streets that are curving and varied in alignment for the sake of it rather than responding to a clear overarching urban design or legibility framework. Text should be added to explain that the overall structure of the development should be based on the creation of a legible network of streets and routes following key desire lines as well as responding positively to the site and features on the site. Within this framework variations in alignment that will assist with reinforcing a street's sense of hierarchy or reinforce legibility and/or slow vehicle speeds will be encouraged.</p> <p>Page 76: Street trees Street trees will not be appropriate or possible on every development or every street. Text should be added to clarify this.</p> <p>Page 77: Images and plans Missing. Would like the opportunity to comment on these once they are available</p> <p>5 Green Structures</p> <p>Page 99 Open Space Standards Required provision of play areas exceeds that required by FiT standard. For example, the provision of a C2 (LEAP) for 100 homes is beyond what is required in FiT (5 minutes' walk or 400m from homes). This should be amended to reflect FiT standard</p> <p>Page 110 Public art The provision of public art may not be viable or appropriate for some major developments and clarification should be added to explain this.</p> <p>6 Building Design</p>
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		<p>Page 113 onwards: Building design This section is overly prescriptive and removes flexibility for approaches other than those specified. There will be developments where a different approach to building design will be justified such as the use of an arts and crafts inspired response to reflect a garden village concept.</p> <p>Page 114 1.5 response to local character Unless the development is within a Conservation Area it will not be viable or necessary to use local building forms or materials. In many cases it will be necessary to use standard house types and this should be clarified in the text. Response to local character can also be achieved through building scale, boundary treatments, the shape and character of green spaces.</p> <p>Pages 118-119 and 126-131: Building materials These requirements are too onerous and restrictive. In developments outside conservation areas natural locally derived materials are unlikely to be viable. Text should be added to explain that as long as the palette of materials is appropriate and would create a distinctive place this is acceptable. A wider range of examples should be shown to include arts and crafts housing, inter-war and other more modern housing in Teignbridge which form part of the context for many new developments.</p> <p>Page 134: Building Types – Detached Houses Reference should be made to detached bungalows as well as 2 and 3 storey dwellings. All photo references refer to Victorian / Edwardian / Georgian /interwar period examples, modern examples should be included to provide a balanced approach. Building Types – Detached Houses - 5. Proportion Change description to “Units should generally be wide fronted though narrow fronted units could be used where increased densities occur. Units should have...”</p> <p>Page 138: Building Types – Semi-detached 4. Footprint Plot dimensions can vary a great deal. Typically, plot widths range from 4.8m-15m. There is no reference to frontage parking for this building type, which should be included as an option. Frontage parking should be broken up every 6 spaces with suitable robust landscape. All photo references refer to Victorian / Edwardian / Georgian /interwar period examples, modern examples should be included to provide a balanced approach.</p> <p>Page 142: Building Types – Semi-detached Footprint There is no reference to frontage parking for this building type (as illustrated in the example photos), which should be included as an option. Frontage parking should be broken up every 6 spaces with suitable robust landscape.</p> <p>Pages 148-155: Building Types – Various All photo references refer to Victorian / Edwardian / Georgian/ interwar period examples, modern examples should be included to provide a balanced approach.</p>
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		<p>Pages 158-159: Building Types – Corner Buildings All photo references refer to Victorian / Edwardian / Georgian/ interwar period examples, modern examples should be included to provide a balanced approach.</p> <p>7 Appendix</p> <p>Street precedents should include more examples from successful suburban areas and more recent housing</p>
03	Organisation – CEG / Turley	<ul style="list-style-type: none"> <li>- This response has been prepared with regard to CEG's land interests at part of the land allocated under Policy NA3 for residential development in the TDC Local Plan at Wolborough, Newton Abbot.</li> <li>- The Role and Scope of the Urban Design Guide</li> <li>- We support the production of the draft Design Guide in principle and acknowledge its role as a Supplementary Planning Document supporting Policy S2 of the Local Plan. It is understood that the Design Guide will form a material consideration to the determination of all applications for which Policy S2 of the Local Plan is of relevance.</li> <li>- The document should be drafted with close regard to the Policy requirements of both Policy S2, but also where relevant, the allocation Policies of the Local Plan such as NA3 and the Development Framework Plans ["DFP"] which are in production for the allocated housing sites. Any conflict between the Policy documents in this regard is likely to lead to the Design Guide being ineffective.</li> <li>- We object to the content and structure of the SPD as it currently stands and would seek, in the first instance for it not to be adopted, on the basis that it would add a confusing and unnecessary layer additional design requirements beyond those set out in the existing Local Plan. In this respect, it is our view that the SPD as it currently stands would be contrary to paragraph 153 of the National Planning Policy Framework which states that "<i>Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development.</i>" At present, the guidance will actually stagnate and stifle development rather than help make successful applications and, through the detailed 'code' that it prescribes, has the potential to add unnecessary additional financial burdens on development. We recommend that the SPD should be significantly amended before it is considered for adoption.</li> </ul>

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		<ul style="list-style-type: none"> <li>- The document runs to a total of 214 pages, setting out a series of “Codes”, suggesting a requirement to comply, for more than 49 separate topics across 5 sections. It is an extensive document that, in practical terms, will be difficult for designers and applicants to review and demonstrate compliance with, and for Officers to implement. (Gen)</li> <li>- The SPD is structured like a Design Code document and includes details and specifications that need to be established at a much later stage in the process. Design Codes can be useful when a specific site, with reference to an approved outline application for very large sites, where they then clearly set out a reasonable process through which reserved matters can be delivered. A Design Code, in that instance, will have site and masterplan specific details and can specify particular design approaches from Primary Street to front gardens.</li> <li>- A Design Code should not preclude innovation or an alternative design approach if it can be demonstrated as being appropriate.</li> <li>- The Codes included within the document are worryingly extensive and run the risk of being unclear, overly prescriptive and contradictory.</li> <li>- It is not appropriate, reasonable nor necessary to dictate the same level of detail of a site/application specific Design Code at this level of policy and guidance.</li> <li>- The SPD lacks clarity and does not expressly state what the primary reason or function of this document is. (Gen)</li> <li>- The document does state, on page 3, that it aims to provide a framework and reference point to achieve high quality development within Teignbridge district by: <ul style="list-style-type: none"> <li>- setting standards and parameters for the design of land;</li> <li>- providing a reference point for character and identity of settlements within the district;</li> <li>- setting expectations for information that influences design quality; and</li> <li>- supporting design related policies of Teignbridge Local Plan</li> </ul> </li> <li>- However, there are other methods through which these aims can, and should be, being achieved.</li> </ul>
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		<ul style="list-style-type: none"> <li>- <i>In respect of the first bullet;</i> standards should be implementable through already existing policy and guidance and the adoption of this SPD would add an unnecessary layer of bureaucracy for applications, particularly if a development site is subject to an SPD prior to a planning application being submitted.</li> <li>- Parameters are generally approved in respect of an outline application to allow for future reserved matters to be implemented within. They would relate specifically to the context of the application. (Section 1 Content /page 3)</li> <li>- Parameters are generated as a consequence of the production of a masterplan design, which is in turn generated on a comprehensive understanding of the site specific constraints and opportunities. It would be difficult and ineffective to generate overarching parameters without this surveyed technical understanding of a site.</li> <li>- <i>In respect of the second bullet;</i> it would be anticipated that as part of the design assessment process a clear understanding of the immediate context character, e.g. of the adjacent buildings, towns and surrounds, would be described with the intention to inform the development proposals. While it may be helpful to identify the macro character of Teignbridge and environs to be included as guidance within the SPD, it would be impossible to pick up each and every context characteristic. By including such a detailed character assessment and indicating it as Code, this runs the risk of preventing alternative and innovative approaches to any design trying to demonstrate compliance with the SPD. (Section 1 Content / page 3)</li> <li>- In simple terms amending the phase Code to “Principle” would offer some flexibility for compliance. This “principle”, ideally a single summary sentence, could then be supported by some supportive guidance notes and illustrations.</li> <li>- <i>In respect of the third bullet;</i> setting expectations for information that influences design quality is notoriously subjective and while it is reasonable to present examples of good and bad design, it is impossible to Code. It should be for the design and planning application to demonstrate a well thought out, responsive design that is fit for purpose and reflective of the local context.</li> <li>- <i>In respect of the fourth bullet;</i> supporting design related policies of Teignbridge Local Plan, it is not considered necessary to implement another layer of information/guidance to sit between Local Plan Policy and Development Frameworks associated with allocated sites.</li> </ul>
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		<ul style="list-style-type: none"> <li>- The SPD should provide guidance and principle only, and remove any reference to detail, allowing this to be picked up through the application process. (Section 1 Content / page 3)</li> <li>- If the Design Guide is progressed in its current form, we are concerned that this will stifle and stagnate development and has the potential to preclude innovative design solutions that are appropriate for some sites taking into account site specific context.</li> </ul> <p>2 Principal Layout Strategies</p> <p>Legibility DG-LS1</p> <ul style="list-style-type: none"> <li>- In detail this topic lacks focus and could be picked up or amalgamated within some of the other topics.</li> <li>- Could a lot of the guidance not refer to the design guidance it reiterates from (By Design, the Urban Design Compendium and Manual for Streets)?</li> <li>- There is a lot of overlap – this risks inconsistent and contradicting guidance.</li> <li>- Specific references to visual links and view corridors are simplistic and could preclude innovative design.</li> <li>- Specifically point 10 refers to ‘Objective’, where no objectives are stated anywhere within the topic or section.</li> <li>- While the diagram and table on page 11 look good, it is not clear what guidance they provide</li> </ul> <p>Movement Networks DG-LS2</p> <ul style="list-style-type: none"> <li>- This is a simpler set of ‘principles’ or guidance, but could benefit from editing.</li> <li>- The hierarchy should be identifiable, but should be relative to the proposed development and site specific masterplan – the primary street for a development of up to 2000 new homes may be very different from the primary street within a development of up to 300 homes.</li> </ul>
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		<ul style="list-style-type: none"> <li>- It is not clear what the diagram on page 13 serves. It replicates the diagram on page 11 – we would recommend that their function should be clarified and amalgamated.</li> </ul> <p>Residential Density DG-LS3</p> <ul style="list-style-type: none"> <li>- The densities referred to need clarification.</li> <li>- In the first instance, it is not clear whether these densities relate to Gross or Net areas - these needs to be defined.</li> <li>- If the SPD is referring to net developable areas for density calculations then the densities applied are extremely high, for example a 1900 terrace is approximately 45 dwellings per hectare and includes approximately 150% parking on street.</li> <li>- Parking should always be a consideration of densities applied.</li> <li>- Generally there doesn't seem to be a very big difference in the density applied to the diagram on page 15 and the assumed densities of the sample photographs should be checked.</li> </ul> <p>Scale of Built Form DG-LS4</p> <ul style="list-style-type: none"> <li>- The principle of applying higher development along primary streets is a reasonable design approach, however, the application of specific ranges in development heights within the table on page 16 is too prescriptive and presents a risk to flexibility in design proposals.</li> <li>- The photos on page 17 demonstrate that there is a difference between building heights and storey heights. This should be expressed more clearly as both images indicate between 2 and 3 storey development, but the outcome is quite different.</li> </ul> <p>Neighbourhoods DG-LS5</p> <ul style="list-style-type: none"> <li>- The principles of setting development around an active, mixed use hub, is a reasonable approach. These hubs could be concentrations of activity, such as a shop, a play space or community facility, but the majority of proposed schemes will necessarily be residential.</li> </ul>
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		<ul style="list-style-type: none"> <li>- Point 2 states that “<i>The majority of homes should have good access to a range of local jobs and facilities within approximately 400m distance or a 5 minute walk</i>”, which is not a sustainable approach. A shop requires a specific population to sustain business and that would need to be served by more than a 400m radius.</li> </ul> <p>The prescription of dimensions is also concerning, in particular the table on page 25</p> <ul style="list-style-type: none"> <li>- e.g. that allotment should be within 200 to 300m of homes is unachievable</li> </ul> <p>Land Use – Non-Residential Uses Compatible with Residential Land DG-LS6</p> <ul style="list-style-type: none"> <li>- The code is repetitious and needs to be reviewed. While the principle of what is included seems reasonable it is difficult to see the focus or function of the Code and whether reference could simply be made to existing guidance such as the Urban Design Compendium or By Design.</li> <li>- We have a concern about the specifics of dimensions mentioned, as this could preclude innovation or alternative designs.</li> </ul> <p>Land Use – Non-Residential Uses Not Compatible with Residential Land DG-LS7</p> <ul style="list-style-type: none"> <li>- Again, while the content is broadly sensible, reference to other design guidance could replace the text.</li> <li>- The reference to Codes on page 22 is singular. This should generally be a point of policy or something that could be covered within planning conditions. In contrast, it is not clear why is this not being applied to other elements, such as layout or design generally.</li> <li>- The diagram on page 22 indicating what to avoid – is it necessary to avoid this?</li> <li>- The diagram on page 23 describes elements but doesn’t seem to have any function.</li> </ul> <p>Land Use – Community Facilities DG-LS8</p>
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		<ul style="list-style-type: none"> <li>- The specific distances to facilities as tabled on page 25 is too prescriptive, with particular concerns on the distances to allotments within 200m.</li> <li>- We see the opportunity for this guidance be included/amalgamated within the 'Neighbourhood' section.</li> </ul> <p>Active Place DG-LS10</p> <ul style="list-style-type: none"> <li>- While the principles set out within this topic seem reasonable, it would be difficult to ensure that every space is 'active'. Overlooked and safe is a reasonable aspiration for the majority of any proposal.</li> </ul> <p>3 Urban Structure</p> <p>Block Structure-General Principles DG-US1</p> <ul style="list-style-type: none"> <li>- This could be set out as a short series of bullets</li> <li>- The table indicating typical block dimensions for different settlement locations – it is a risk being so specific as it should be up to the designer to demonstrate what they are proposing and why. In any case this refers to the Urban Design Compendium, and so this guidance could simply be referenced rather than repeated.</li> </ul> <p>DG-US1.1 to US1.6</p> <ul style="list-style-type: none"> <li>- Concerns about whether some of the specific points within the Code are implementable.</li> <li>- Concerns about the quality of the diagrams of example Blocks – the indicative layout included within the SPD could be read as the required process, some of the diagrams include substandard approaches to layout design and rely on specific architectural decisions to be implementable.</li> <li>- This section of the SPD would benefit from the generation of a one sentence summary objective with supporting text and images.</li> <li>- <i>Edge Blocks</i> – our understanding of an edge block is that it is one plot deep – what is the difference between this and a parking court block, in principle?</li> </ul>
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		<ul style="list-style-type: none"> <li>- <i>Wrap Around Blocks</i> – we have concerns about the approach to these blocks – there is potential that they might constitute a risk in respect of meeting Secured by Design principles. By setting out such a specific response, this may be precluding a better approach to the masterplan</li> <li>- <i>Block Design and Topography</i> – we have no in principle concern about the content of this section, however it is not necessary and could be covered through reference to other guidance. In addition, are the images and diagrams on page 45 necessary?</li> </ul> <p>Private Frontages DG-US2</p> <ul style="list-style-type: none"> <li>- Concern regarding the specific details including in this – this risks limiting design proposals.</li> <li>- <i>Teignbridge Frontage Types</i> – these are extremely specific and detailed. We are concerned that the specific dimensions and details that are included could be taken to constitute a Code to be adhered to - this should be generated on a site specific basis.</li> </ul> <p>Waste and Recycling DG-US3</p> <ul style="list-style-type: none"> <li>- This could simply be covered in a summary principle with supporting text. The details are covered by other local authority policy and guidance</li> </ul> <p>Services and Utilities Networks DG-US4</p> <ul style="list-style-type: none"> <li>- The image is a good guide as to what is not acceptable. The principles could be limited to bulleted principles.</li> </ul> <p>Custom and Self Build DG-US5</p> <ul style="list-style-type: none"> <li>- It is not clear what is different to the guidance set out for CSB as opposed to any other application. This section is too detailed, and could benefit from a series of bulleted principle guidance.</li> </ul> <p>Back to Back Arrangements DG-US6</p> <ul style="list-style-type: none"> <li>- The specific dimensions, while reasonable in principle will limit the potential for development.</li> </ul>
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		<p>Daylighting DG-US7</p> <ul style="list-style-type: none"> <li>- Is this necessary - the requirements set out within this are subject to Building Regulations and other design guidance, as quoted within the document. The requirements seek more detail that would generally be necessary for a planning application, as opposed to Building Regulation Compliance.</li> <li>- Could this not be covered through condition or inclusion within the design material included within application submissions?</li> </ul> <p>4 Streets and Movement</p> <p>Street Character DG-SM1</p> <ul style="list-style-type: none"> <li>- This discusses hierarchy as well as character. We are concerned about the specific reference to local character and the risk that this would preclude alternative design approaches.</li> </ul> <p>Street Design General Parameters DG-SM2</p> <ul style="list-style-type: none"> <li>- Could this and the street character principle cover much of the same information/aspirations There is a concern regarding the specific Coded dimensions included on page 69. This should be generated on a site by site basis and alternative approaches should be allowed, if demonstrated to be appropriate.</li> </ul> <p>Junction Spaces DG-SM3</p> <ul style="list-style-type: none"> <li>- This section is not considered necessary as much of the guidance within the Code is covered by earlier statements</li> </ul> <p>Street Alignments DG-SM4</p> <ul style="list-style-type: none"> <li>- This is unnecessarily detailed and should be dealt with through specific applications.</li> </ul> <p>Ground Surfaces DG-GS5</p>
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		<ul style="list-style-type: none"> <li>- This is unnecessarily detailed, could this not be stated in a single sentence, with supporting guidance and images.</li> <li>- What is the purpose of the detail included in the hierarchy table on page 75</li> </ul> <p>Street Trees DG-GS6</p> <ul style="list-style-type: none"> <li>- This is a reasonable guidance note, but should not need to be a 'Code'. This could be covered through condition. We are concerned about the detail within the table on page 77, this detail should be sought through review of individual planning applications.</li> </ul> <p>Providing for Bicycles DG-SM7</p> <ul style="list-style-type: none"> <li>- Could be summarised into a single principle and supported with text and images</li> <li>- We are concerned as to how the detail of this 'Code' could be implemented, much of this principle should be reviewed and covered through tracking and the detail included in planning applications.</li> <li>- The diagrams and measurement on page 79 are generated from existing guidance, could this not be referred to, in order to edit.</li> </ul> <p>Vehicle Parking DG-SM8</p> <ul style="list-style-type: none"> <li>- These are generally sensible principles, but there should be the removal of the indication of 'Code'. Many of the requirements should be covered by local plan highway policies. We have a specific concern about the statement, "car parking for residential areas should be provided at an average rate of 3 spaces for 4 bed (or larger) dwellings", where it is often appropriate to have only 2 spaces for 4 bed dwellings, if their floor area is less than 1400sqft.</li> <li>- The captions on page 81 refer to 'unallocated' parking, but there is no supporting text for this.</li> </ul> <p>Parking Squares/Apartment parking could be simplified and is overly detailed and should be reviewed through the planning application process.</p> <p>5 Green Structures</p> <p>Landscape Character DG-GS1</p>
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		<ul style="list-style-type: none"> <li>- The principles within this section seem reasonable. While the image on page 87 demonstrates a point, other points aren't made, nor is it clear what its specific function is.</li> </ul> <p>Green Infrastructure DG-GS2</p> <ul style="list-style-type: none"> <li>- We are concerned with the level of detail included and while the principles are generally sound this detail may prevent alternative design approaches.</li> <li>- The list included on page 89 is also very detailed, but does it include everything that could be possible? By attempting to pre-empt and list every possible eventuality this guidance could prevent innovative and site specific solutions.</li> </ul> <p>Urban Parks DG-GS3</p> <ul style="list-style-type: none"> <li>- Many of the points within this guidance have been covered by other parts of the SPD. There is a general risk of inconsistency and not being able to cross reference other topics to ensure that there is no contradiction within the document.</li> </ul> <p>Natural Green Space DG-GS4</p> <ul style="list-style-type: none"> <li>- It may not be possible to include areas of new and enhanced semi-natural habitat into all new development. We are concerned that the generalised guidance will be difficult to implement and to demonstrate compliance with.</li> <li>- This guidance refers to specific documents and as such will the principles not already be implemented through reference to other established policy and guidance?</li> </ul> <p>Green and Blue Corridors DG-GS5</p> <ul style="list-style-type: none"> <li>- The overarching intent of all of these guidance notes so far is for green spaces to be connected. In this respect, this section could be reduced.</li> </ul>
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		<ul style="list-style-type: none"> <li>- We are concerned about the detail of specific guidance regarding lighting to mitigate for bat movement – should this not be done through specific planning applications and is in not covered by other policy or guidance?</li> </ul> <p>Children and Young Peoples Space DG-GS6</p> <ul style="list-style-type: none"> <li>- Is this not already set out in other policy and guidance?</li> </ul> <p>Allotments DG-GS7</p> <ul style="list-style-type: none"> <li>- Is the requirement per population a locally identified need? Would this not need to be updated dependant on requirements and popularity?</li> <li>- We also query the detail included on the diagram on page 101</li> </ul> <p>SuDS DG-GS8</p> <ul style="list-style-type: none"> <li>- This should already be covered by other policy and guidance</li> </ul> <p>Street Planting DG-GS9</p> <ul style="list-style-type: none"> <li>- The principles set out within this topic seem reasonable but we are concerned about any specific dimension or detailed requirement.</li> </ul> <p>Retained Green Features DG-GS10</p> <ul style="list-style-type: none"> <li>- This is overly detailed and it is difficult to understand how this could be implemented other than through the planning application process as this would be subject to either Landscape Management and/or planning condition.</li> </ul> <p>Devon Hedgebanks DG-GS11</p> <ul style="list-style-type: none"> <li>- This topic seems overly prescriptive and is termed as a ‘Code’ as opposed to a principle.</li> </ul>
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		<p>Public Art DG-GS12</p> <ul style="list-style-type: none"> <li>- This is overly detailed and prescriptive and should be reviewed at a more detailed level either through application specific Codes or through planning applications.</li> </ul>
04	Organisation – Dawlish Town Council	<p>Further images required (as noted) Otherwise good (4 Streets and Movement)</p> <p>While section appears rooted in traditional buildings, examples of good modern design can be found across Teignbridge and should also be referenced. (e.g. Oaklands Park, Phase 1, Dawlish). Further indications/examples as to the standard required for good design for one-off plots (e.g. self-build) would also be helpful.</p> <p>A very good 'go-to' section for all those involved in housing development, construction or decision making in the District. (6 Building Design)</p> <p>A much needed SPD, which would provide a valuable reference point for all those seeking guidance on good design. (Gen)</p>
05	Organisation- Design Review Panel	<p>Reference should be made to the Design Review Panel process (as per NPPF). Early engagement with the Panel should be encouraged so that it is used by applicants as part of the design stage and not the decision making stage. (1 Content)</p> <p>Generally the Design Guide should include the option to engage with a The Design Review Panel process as part of the pre application design stage and any other consultations. (Gen)</p>
06	Organisation- Devon County Council (Planning, Transportation & Environment)	<ul style="list-style-type: none"> <li>- The County Council is supportive of the SPD and its intention to promote the key objectives of design which will support the creation of attractive, vibrant places and to clarify the requirements of Policy S2 of the Teignbridge Local Plan to help guide development schemes and decisions.</li> <li>- The County Council is generally supportive of the content of the SPD and the approaches the document adopts with regard to the infrastructure requirements for which Devon County Council has responsibility.</li> </ul>

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	Highways & Transport	<p>However, we have a number of comments outlined below which I hope will assist in the further refinements of the document. (Gen)</p> <p><i>Principal Layout Strategies – Legibility</i></p> <p>The County Council is supportive of the outline principles to ensure legibility in new development. However, it is recommended that acknowledgement of the importance of the functionality of primary routes should be included within the code, perhaps in point 12, to ensure that the requirements of these routes are considered as part of scheme design.</p> <p><i>Streets and Movements</i> Street design – General Parameters</p> <p>The Street Design General Parameters section (pages 68 and 69) include detail that is yet to be agreed with Devon County Council. The County Council would welcome discussions with the District Council in order to ensure that the SPD provides the appropriate and accurate information. It is unclear what the table on page 69 is trying to achieve and, in isolation, is not particularly helpful. Again, the County Council is willing to work with the District Council to provide clarity on this matter.</p> <p>Ground Surfaces</p> <p>For roads to be considered for adoption as a highway, they will need to meet the criteria set out within the Devon Design Guide and the Manual for Streets (including the use of appropriate ground surfaces that are approved by Devon County Council as the Highway Authority and which feature within the pallet of approved materials). In considering sites for adoption, each site must be considered on its individual merits and take into account learning and experience from across Devon.</p> <p>Road requirements for bus movements</p> <p>Routes that will be expected to accommodate bus movements should meet the design guidelines outlined in Stagecoach's design manual for new residential developments (<a href="http://www.stagecoach.com/~media/Files/S/Stagecoach-Group/Attachments/pdf/bus-services-and-new-residential-developments.pdf">http://www.stagecoach.com/~media/Files/S/Stagecoach-Group/Attachments/pdf/bus-services-and-new-residential-developments.pdf</a>). This recommends a minimum width of 6.2 metres for bus served roads and ideally 6.5 metres where possible.</p>
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	Education	<p>Schools are included within the ‘civic buildings’ category of the SPD (page 152) which covers a wide range of uses all of which will have different requirements. For example, school sites are required to be secure to meet with safeguarding requirements which may impact upon the layout of a site.</p> <p>The SPD should acknowledge that, in the case of school buildings, some flexibility will be required in the application of the principles to appropriately respond to the requirements of school buildings. This flexibility is also important to ensure that the SPD does not result in unreasonable constraints on school design that would result in increased pressure upon public funding and the need for CIL due to increased costs. (6 Building Design, DG-BD9)</p>
	Waste Planning	<p>The waste and recycling section should signpost to Policy W4 of the Devon Waste Plan and the County Council's Waste Management and Infrastructure SPD, which requires a waste audit statement for major development applications, to include details of segregated storage for recyclable and residual waste. (3 Urban Structure)</p>
	Health and Wellbeing	<p>The SPD appropriately reflects many of the features recommended within Public Health England's Spatial Planning for Health document. Public Health at Devon County Council have the following suggestions to further address health and wellbeing within the SPD:</p> <ul style="list-style-type: none"> <li>- In relation to the height of buildings in certain locations, it is recommended that consideration be given to the impact on air quality and avoidance of a canyon effect. (Gen)</li> <li>- Various sections of the SPD refer to health links and there is opportunity to link some of the features within the Green Structures section to the enhancement of public mental health. (Gen)</li> <li>- Reference to electric cycle provision in garages and guidance on positioning of renewable resources is welcomed. As technology advances, it would be recommended that these provisions become standard design features for new developments. ( 4 Streets and Movement, DG – SM7 )</li> </ul>
	Public Rights of Way	<p>The impact of development upon public rights of way is a material planning consideration. There are no specific references to public rights of way within the document. The NPPF and Planning Practice Guidance states that public rights of way form an important part of sustainable transport links and should be protected and enhanced through design. Additionally, the DEFRA Rights of Way Circular (1/09) gives advice to local authorities on recording, managing and maintaining, protecting and changing public rights of way in association with development.</p> <p>The Circular also covers the statutory procedures for diversion or extinguishment of a public right of way.</p>



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	Flood Risk	<p>In particular, the Circular encourages any potential revisions to alignment that are necessary to accommodate planned development should avoid the use of estate roads wherever possible and preference should be given to the use of made up estate paths through the landscaped or open space areas away from vehicular traffic. (Gen)</p> <p>Devon County Council also encourages Local Planning Authorities to take into account the provisions of the Rights of Way Improvement Plan (<a href="https://new.devon.gov.uk/prow/rights-of-way-improvement-plan/">https://new.devon.gov.uk/prow/rights-of-way-improvement-plan/</a>) in the development of planning policies. In addition, it is recommended that reference is made to reference to the disability access position statement recently finalised by the Devon Countryside Access Forum (<a href="https://new.devon.gov.uk/prow/devon-countryside-access-forum/">https://new.devon.gov.uk/prow/devon-countryside-access-forum/</a>).</p> <p>Devon County Council has published guidance on the design and function of Sustainable Drainage Systems. Reference should be made within the SPD to the guidance provided in this document. (Gen) (<a href="https://new.devon.gov.uk/floodriskmanagement/sustainable-drainage/">https://new.devon.gov.uk/floodriskmanagement/sustainable-drainage/</a>).</p> <p>A minor correction is required to the title on page 102. This should read ‘SuDS – Sustainable Drainage Systems’ – the word ‘urban’ is not needed. (5 Green Structures)</p>
07	Organisation - Devonshire Homes / Roach Planning	<ul style="list-style-type: none"> <li>- Devonshire Homes is supportive of the principles of good design. Some of its new homes reflect and celebrate the characteristics and style of their surroundings, whereas others are contemporary. The unifying factor is that all of Devonshire Homes’ sites are individually designed by them and their architects to create bespoke new neighbourhoods which are sympathetic to their locality. The local authority, consultees and members of the public have the opportunity to comment on, and to a degree influence, the design, through consultation, which is often pre-application as well as once a planning application is made.</li> <li>- Each planning application is made with an accompanying Design and Access Statement explaining the design rationale, which amongst other matters includes a review of the local area’s structure and buildings, an examination of the site’s constraints and opportunities, local policies, technical design standards for highways and drainage, the developer’s proposed house types (fine-tuned accordingly) and open market mix, affordable housing mix and open space requirements, etc. Then of course it is the local authority which determines the planning application.</li> <li>- It is this developer-led approach, with appropriate input from the local authority, consultees and the public, which Devonshire Homes and other housebuilders strongly favour, rather than design being local authority-led, which the draft Urban Design Guide appears to intend. (Gen)</li> </ul>

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		<ul style="list-style-type: none"> <li>- Devonshire Homes is also supportive of the principle of design guidance being published by local authorities, as long as that guidance is limited, is user-friendly and pragmatic, and is permissive of contemporary design as well as traditional / vernacular design. However we consider that Teignbridge's draft Urban Design Guide is none of these things.</li> <li>- The draft Urban Design Guide places too much emphasis on mimicking traditional / vernacular design and is not permissive of contemporary design or innovation. The guide does not promote a diverse mix of architecture for the district and it should. There are several instances of recent contemporary design in Teignbridge for example The Pavilions in Teignmouth and the South Devon University Technical College in Newton Abbot, which the Urban Design Guide does not appear to acknowledge. (Gen)</li> <li>- Attention is drawn to paragraphs 59 and 60 of the National Planning Policy Framework (NPPF) to support these arguments.</li> <li>- Similarly, the following excerpt from the draft revised NPPF published on 5 March 2018 is instructive:</li> <li>- <i>"125. To provide maximum clarity about design expectations, plans or supplementary planning documents should use visual tools such as design guides and codes. These provide a framework for creating distinctive places with a consistent and high quality standard of design. However their level of detail and degree of prescription should be tailored to the circumstances in each place, and should not inhibit a suitable degree of variety where this would be unjustified (such as where the existing urban form is already diverse)."</i></li> <li>- The Urban Design Guide needs to make much clearer what specifically is policy to which weight is to be attached in decision-making, and what is just guidance or example.</li> <li>- Further involvement of Devon County Council (DCC) as Local Highways Authority in the production of the Urban Design Guide is strongly urged. In particular it is important that the range of street types presented on page 68 and the sketches on page 71 are agreed with DCC. Devonshire Homes would not wish to be in a position where planning permission is granted based on a highway alignment and / or materials that cannot subsequently be adopted by DCC. (4 Streets and Movement)</li> </ul>
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		<ul style="list-style-type: none"> <li>- At 159 pages plus appendices the draft Urban Design Guide is too long, is over-prescriptive, and is not user-friendly. It is suggested that the document needs to be substantially shorter in length. At times it reads as if it were an academic design textbook rather than a guidance document. Many of the tables presented, most notably that on page 69, are very difficult to understand. Navigating the document can at times be difficult, for example the different sections on 'Urban Structure' and 'Streets and Movement' are arguably a false dichotomy so consideration should be given to amalgamating them. (Gen)</li> <li>- It may be useful for the eventual (shortened) guide to include a checklist in an appendix, so that developers can easily see the design requirements, respond to them, and demonstrate their response to them in their Design and Access Statements. (Gen)</li> <li>- Object to the requirement on page 126 for natural slate roof covering. There are many slate-effect roof tiles available on the market that are authentic-looking and significantly more cost-effective and sustainable. The option of other types of tile should also be considered, particularly in towns rather than villages. (6 Building Design)</li> <li>- Object to the use of a photograph of Devonshire Homes' Kilnwood development in Kingsteignton on page 74 of the draft Urban Design Guide which is cited as a "<i>poorly designed paving area</i>", which we feel it is not, particularly when looked at in its entire design rather than a small area. This development was of course subject to detailed scrutiny by Teignbridge District Council through the planning process and was granted planning permission. (4 Streets and Movement)</li> </ul>
08	Organisation – Natural England	<ul style="list-style-type: none"> <li>- Natural England (NE) welcome the Teignbridge Design Supplementary Planning Document and its references to incorporating green infrastructure ('green structures') into the design and layout of development. (5 Green Structures)</li> <li>- NE recommend that you include connectivity for wildlife as a general design principle under principal layout strategies. This could for instance be incorporated under 'movement networks'. Green infrastructure connectivity is especially important in the Teignbridge area which contains a large part of the South Hams SAC and where a 'Connectivity Zone' for greater horseshoe bats is being proposed as part of the emerging South Hams SPD. The design SPD can provide real support for the South Hams SPD and we recommend clear links between the two. (2 Principal Layout Strategies)</li> </ul>

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		<ul style="list-style-type: none"> <li>- NE recommend that you reconsider the terminology and the subdivision of 'green structures' into green infrastructure, natural green space and green and blue corridors, as this may be confusing to the reader. Would-be readers may moreover not look at all sections and may therefore miss important information. (5 Green Structures)</li> </ul>
09	Organisation – Ogwell PC	<ul style="list-style-type: none"> <li>- The overriding view was that the intention to issue this supplemental guidance in support of the Teignbridge Local Plan is a most positive step if it helps improve the quality of future property developments. (Gen)</li> <li>- The Contents document is headlined "Urban Guide" whereas neither the District nor the Design Guide (DG) content are exclusively urban. (Gen)</li> <li>- Hopefully the finished DG will be a single document rather than the discreet sections in the draft. Without the opening section the key guidance on the aims, usage and the planning process generally can easily be overlooked if just exploring the main sections. ( 1 Content)</li> <li>- For the non-professional the guide is so comprehensive as to be a fairly daunting and not hugely accessible document. It is the hope therefore that individual property owners can be encouraged to refer to the necessary guidance specific to their circumstances rather than feel they have to digest the entire contents. (Gen)</li> <li>- The tabulated DG-Codes are good summaries of the detailed guidance and could usefully be brought together in one place, possibly at the beginning of the whole guide with hyperlinks to the relevant detailed sections. (Gen)</li> <li>- The inclusion of examples of poor design practice to reinforce guidance of what is good is seen as worthwhile. (Gen)</li> <li>- Some use of technical terms is to be expected but it seems unnecessary to ascribe new meanings to words that already mean something different! Examples - p10 "legibility" (harmonious?): p12 "permeable" (navigable?): p19 "orientating" (locating?). ( 2 Principal Layout Strategies)</li> </ul>

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		<ul style="list-style-type: none"> <li>- Whilst the sort of planning issues that we see on a regular basis mostly involve alterations to and construction of single residential properties, there was a consensus view (for what it is worth) that the quality of larger residential developments would benefit from greater emphasis being given to: <ul style="list-style-type: none"> <li>• Incorporation of more trees and shrubs (existing and/or new plantings) inside the actual developments to soften the hard landscapes.</li> <li>• Transport linking to existing networks of travel routes, especially for pedestrians and cyclists.</li> <li>• More parking than existing guidance specifies. (Gen)</li> </ul> </li> </ul>
10	Organisation – Park Green (SW) Ltd	<p>I think the principle of a design guide an excellent one, and most of what is suggested makes good sense. I would however, urge the planning department not to be too prescriptive in terms of being bound by the past, particularly outside of conservation areas.</p> <p>Local character must be respected, but it is important that innovation is allowed, not just in terms of modern design, but also in terms of traditional design which may not be much in evidence in a particular locality. Provided these are handled sensitively, and add visual interest to the street scene, then they can enhance an area. It is important that there is some flexibility built into the design guide and that areas are allowed to evolve, without destroying the essential elements of the local character that are of real value.</p> <p>On slate hanging, nail hanging for roof tiles is specified, but this is rather too prescriptive for every location. Slate hooks are a better way of securing tiles, particularly in exposed locations, and each site must be assessed on its own merits. Whilst a preference for nail hung slate tiles makes sense, it should not be so prescriptive as to exclude other options where it is appropriate to do so. (6 Building Design)</p>
11	Organisation - RSPB	<ul style="list-style-type: none"> <li>- The RSPB welcomes the Urban Design Guide but recommend it makes more reference to integrating provision for wildlife (via retention and creation of new opportunities) in all aspects of urban design. This is part of sustainable development and will be in the best interests of wildlife and of people – contact with and access to nature and wildlife rich green space as part of people’s daily lives has proven benefits for physical and mental health. (Gen)</li> <li>- One measure we particularly recommend is provision for cavity nesting birds such as swifts, house sparrows and starlings via integral nest sites that are incorporated into the design and construction of new dwellings</li> </ul>

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		<p>and other buildings. We recommend Teignbridge District Council amends this Guide to recommend a minimum provision of one 'swift brick' per dwelling. Suitable sites are 5 metres above ground and they should be c1 metre apart. Large buildings such as apartment blocks can have multiple integral nest sites. Suitable sites are high under the eaves, and ideally they should not be sited where exposed to prevailing weather or full sun. There are a range of designs available (6 attachments relating to integral nest sites) and many can now be made so, externally, they match the surrounding material of the building. They require no maintenance once installed and are fully contained within the wall, with the only opening being flush with the external wall. (Gen)</p> <ul style="list-style-type: none"> <li>- There is more information in the Exeter City Council Residential Design Guide SPD (biodiversity extract attached). This SPD has been accepted as good practice by the T&amp;CPA, RTPI, RIBA, ALGE, Natural England and the CIEEM. Since adoption in 2010 Exeter City Council planners have regularly made installing swift boxes a condition in various types of development, including single units and comparatively modest developments, and increasingly developers are willing to include these measures. (Gen)</li> <li>- The link below shows one design of integral nestbox installed in a new housing development by Duchy of Cornwall, following advice from RSPB in 2016, and such installation is now standard for other Duchy developments.</li> </ul> <p><a href="http://nansledan.com/sustainability/nesting-birds/">http://nansledan.com/sustainability/nesting-birds/</a></p> <ul style="list-style-type: none"> <li>- Also attached are RSPB requirements for a major new urban development at Aylesbury and we recommend that these measures are fully incorporated into the Urban Design Guide.</li> </ul> <p><a href="https://www.rspb.org.uk/our-work/conservation/projects/kingsbrook-housing/">https://www.rspb.org.uk/our-work/conservation/projects/kingsbrook-housing/</a></p> <p>Cover</p> <ul style="list-style-type: none"> <li>- Recommend addition of "nature" (or wildlife or biodiversity) to the list on the front cover as that would clearly signal the role that urban design has in retaining and providing new opportunities for nature.</li> </ul> <p>1 Content</p>
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		<p>Clearly embedding safeguarding and provision for nature throughout this SPD will ensure biodiversity is given appropriate attention in urban design. Such an approach will meet the National Planning Policy Framework, demonstrating sustainable development and ensuring that conserving and enhancing the natural environment is considered in urban design (e.g., paras 109, 118, 119 and 125).</p> <p>2 Principal Layout Strategies</p> <ul style="list-style-type: none"> <li>- Legibility DG-LS1 – recommend addition of “wildlife” to point 2, and “nature (habitats and species)” to point 3, so that the role of development to provide for biodiversity is clearly embedded in this new guidance.</li> <li>- Neighbourhoods - Code: DG-LS5 - recommend addition of mention of green infrastructure is specifically included here.</li> <li>- Land Use - Community Facilities - Code: DG-LS8 - recommend specific inclusion of green infrastructure/nature-rich environments as being an important ‘community facility’ - linked to improving people’s mental and physical wellbeing. Land use- Green and Blue space - as mentioned above, recommend a specific mention of the important connection between access to green space and nature-rich environments and people’s health. Provision for nature is important in its own right and for people’s wellbeing.</li> <li>- Land use – Green and Blue Space DG-LS9 – recommend there is a specific reference to “nature” in this and a statement recognising the proven benefits of contact with nature-rich green space to people’s physical and mental health.</li> <li>- Active place – DG-LS10 – recommend there is mention of the contribution that nature-rich green corridors and spaces make towards enhancing the value of these measures. Include specific mention of importance of connected green spaces, wildlife habitats (green infrastructure, corridors and networks, and incorporated within buildings, e.g., new point 11 “Nature-rich urban environments. Ensuring that nature is included in urban design will mean that people will benefit from wildlife-rich environments in which to live and work and travel between. Ensuring biodiversity is ‘built into’ all aspects of urban designs wherever possible (e.g., integral nest sites for swifts in individual houses, soft landscaping that provides food, shelter and breeding</li> </ul>
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		<p>sites for wildlife) will contribute to an attractive environment for people. Contact with nature has proven benefits for people's mental and physical wellbeing".</p> <p>3 Urban Structure</p> <ul style="list-style-type: none"> <li>- Additional statement is recommended to encourage opportunities to incorporate nature in all types of structure, from design to build.</li> <li>- Page 31 - recommend inclusion of particular reference that opportunities for biodiversity (retention of habitats, creation of new sites) should be considered and incorporated wherever possible, so that connections to nature are constant in people's lives</li> <li>- Block Design – we recommend an additional point <i>Integration of nature – retaining and providing new opportunities for habitats and species from private spaces (e.g., integral nest sites in individual dwellings and wildlife friendly gardens) to the public realm (connected green corridors and green spaces, and soft landscaping maximising opportunities for wildlife including invertebrates such as butterflies, bumblebees and hoverflies, amphibians such as common toads and frogs, reptiles such as slowworms, small mammals such as hedgehogs, and birds, particularly those species that can thrive in urban areas, given appropriate shelter, food and breeding sites).</i></li> <li>- Block Design Principles – DG-US1 – we recommend inclusion of reference to importance of making hard surfaces such as car parking permeable and including options such as green roofs and living walls.</li> <li>- Block Design - Code DG-US1 - recommend inclusion of reference to maximizing use of nature-friendly 'soft landscaping', maximizing use of permeable 'hard surfacing' (e.g., parking areas) and ensuring that boundaries (e.g., walls, fences) are sufficiently permeable to allow for movement of species such as hedgehogs (individual 'sealed' gardens, even if planted to provide some suitable foraging etc. habitat, hedgehogs (and other species) need to travel over a wider distance to find enough food, shelter and a mate), so a simple gap in the base of boundary walls will help.</li> <li>- Block Design – Edge Blocks – in the first sentence we recommend amendment to “drainage and wildlife” as the two are not incompatible in the context of SuDS.</li> </ul>
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		<ul style="list-style-type: none"> <li>- Page 45, we recommend including (including via the illustration) of the importance of ensuring that solid boundaries such as walls and fences do incorporate small gaps at the base to allow for the movement of wildlife such as hedgehogs, as these need to travel over 1 mile each night to forage etc. so, whilst individual garden habitats can be suitable, they need to be able to move between gardens and from gardens to green spaces etc.</li> <li>- Waste and Recycling - Code DG-US3 - recommend that there is provision of suitable sites and containers in gardens of new houses to encourage home composting as a means of reducing amount of compostable vegetation sent for Council recycling.</li> <li>- Page 60, Custom and self-build. It is important that measures for wildlife are integrated into this type of development too.</li> </ul> <p>4 Streets and Movement</p> <ul style="list-style-type: none"> <li>- Street Character – DG-SM1 – the RSPB supports the hierarchy of users as this will help contribution to a reduction in emissions that contribute to damaging climate change, help improve air quality, and benefit people's health and enable more connection with local green space and nature.</li> <li>- Ground Surfaces DG-GS5 – we recommend addition of the value of designing permeable surfaces and, in some locations such as parking areas, including suitable low-growing plants. Specific mention of importance of incorporating relevant SuDS measures as part of 'hard surfaces', including permeable surfaces and use of planted areas should be made.</li> </ul> <p>5 Green Structures</p> <ul style="list-style-type: none"> <li>- Page 85 - recommend specific mention of how buildings themselves (individual houses and others) can make provision for nature, including via incorporation of integral nest sites for swifts and bat roost boxes within their construction. Landscape Character - Code: DG-GS1 - point 4 - recommend amendment to "and other habitats including grasslands".</li> </ul>
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		<ul style="list-style-type: none"> <li>- Page 87 - please amend the caption to the illustration to "New trees and hedgebanks using native, locally occurring species help . . ." as species choice is important in determining the value for nature that landscaping has.</li> <li>- Page 89 - recommend inclusion of mention of SuDS, and importance of 'permeable' boundaries in walls, fences, etc. to allow for movement of hedgehogs, amphibians and reptiles into and between gardens and GI. Include reference to grassland, scrub, hedges and wetlands (including SuDS).</li> <li>- Page 92 - Poorly designed Natural Green Spaces - these are important points. The success of natural green space for wildlife depends on the species of wildlife and habitat types being retained or provided, the size of the area and its connections to other similar habitats. However, it cannot be assumed that wildlife charities have the resources to be able to commit to managing what are frequently small and isolated areas of green space</li> <li>- Natural Green Space – DG-GS4 – we support the mitigation hierarchy. In reference to Poorly designed Natural Green Spaces, we recommend amending the first bullet to include recognition that urban environments can provide suitable conditions for some species. In the second bullet point, we consider that it is not reasonable to suggest that wildlife areas prone to mismanagement are passed to wildlife charities to manage. There are important questions of resources and matters of scale to consider and it cannot be assumed that such an option is appropriate or feasible.</li> <li>- It is of primary importance that wildlife areas are located, designed, resourced and managed so as to be effective, and developers and local authorities have an important role here.</li> <li>- P94, illustration - please add "permeable boundaries" to "Front gardens". Support Codes DG-GS5 Green and Blue Corridors and the statements for Design for connectivity and Avoid severance from light sources.</li> <li>- Children's and Young People's Space - Code: DG-DS6 - recommend mention of importance of providing contact with nature (e.g., soft landscaping that is suitable to attract wildlife) in design and provision as this can enrich their experience of outdoor environments and provide an important means of re-connecting children with nature.</li> </ul>
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		<ul style="list-style-type: none"> <li>- Allotments Code: DG-DS7 - in relation to point 5.2, we recommend that there is some permeability at ground level as this will enable species such as hedgehogs and slowworms to access the allotment areas.</li> <li>- SuDS DG-GS8 – we recommend inclusion of reference to <i>Sustainable drainage systems – maximising the potential for people and wildlife – a guide for local authorities and developers</i> (RSPB/WWT): <a href="https://www.rspb.org.uk/globalassets/downloads/documents/positions/planning/sustainable-drainage-systems.pdf">https://www.rspb.org.uk/globalassets/downloads/documents/positions/planning/sustainable-drainage-systems.pdf</a></li> <li>- Page 107 – there is no illustration for how existing hedgebanks can be incorporated into new developments. Whilst it is evitable that some wildlife value will be lost due to the change of context, it should be possible to incorporate some hedges, e.g., as boundary elements to a green space or public space or other public realm area.</li> <li>- Devon Hedgebanks - Code DG-DG11 - suggest the final para is amended to include recommendation for compensatory planting where there is some loss of hedgerow. For example, a new entrance could be bounded by new or translocated hedges, at a sufficient distance from junctions etc. to allow for visibility.</li> <li>- Public Art DG-GS12 – we recommend that illumination is avoided if public art is sited where light may impact on vegetation that is used by commuting or foraging bats or in natural green spaces.</li> </ul> <p>6 Building Design</p> <ul style="list-style-type: none"> <li>- Good Building Design – DG-BD1 – we recommend including that good building design includes provision for nature, for example, in incorporation of integral nest sites in new dwellings and other buildings and specific reference is made to the contribution to biodiversity enhancement that new buildings can provide if integral nest sites for swifts are incorporated into their design and build, and we recommend other measures such as living walls and green roofs are also included as these contribute to sustainable development.</li> <li>- In the various illustrations of different building styles, we recommend amendments to show where integral nest sites for swifts can be incorporated. For example, on p120, a couple of entrance holes could be shown under the eaves of the gable end and annotated “internal nest site for swifts, with small entrance hole flush</li> </ul>
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		<p>with wall”. I have sent more detail on this separately. In our view, including this on illustrations highlights better how building design can include opportunities for nature.</p> <ul style="list-style-type: none"> <li>- Page 127 – Materials and Details Standing Advice - we recommend this addition in Eaves: “Integral nest sites for swifts and other species should be incorporated into the design and construction of new dwellings (and other buildings) at an overall ratio of 1 per dwelling. Suitable sites are approximately 5 metres above ground level, they should be c1 metre apart from each other and in locations away from prevailing weather conditions and direct sunlight” Blocks of flats and other high rise buildings could have multiple cavities installed – swifts are colonial species.</li> </ul> <p>Appendix</p> <p>B Implementing Policy S2. (page 166)</p> <p>In k) we recommend specific inclusion of the need for new building to provide opportunities for biodiversity, including by ensuring that integral nest sites for cavity nesting birds such as swifts, starlings and house sparrows are included in the design and construction of new dwellings at an overall ratio of 1 per dwellings.</p> <p>Please amend third bullet point so it makes specific reference to the opportunities for nature that new building can provide, from integral nest sites for cavity nesting species such as swifts, house sparrows and starlings, to soft landscaping in gardens and public realm landscaping that provides shelter, food and breeding sites - and enables movement of - a range of invertebrates (including butterflies and bumblebees), amphibians, reptiles and small mammals such as hedgehogs.</p> <p>Other points</p> <p>RSPB recommend:</p> <ul style="list-style-type: none"> <li>- a baseline standard of ratio of 1 integral nest site for swifts per dwelling.</li> <li>- specific mention of importance of species choice in soft landscaping planting schemes to provide nectar and pollen for insects including butterflies, bumblebees and hoverflies, as well as shelter, food and breeding sites for other wildlife that could exist in urban environments given appropriate habitat provision.</li> </ul>
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		<ul style="list-style-type: none"> <li>- mention of green roofs and living walls. In buildings adjacent to existing or new 'green spaces' or water bodies.</li> <li>- provision of nest cups for swallows in open sided buildings, and under the eaves for house martins - these should not be sited above windows or doors where fouling from droppings may be an issue.</li> <li>- mention of need to consider existing biodiversity (e.g., nesting birds and roosting bats) in urban re-development, requiring appropriate survey, timing and mitigation measures during re-development and ensuring that replacement and enhanced provision is made in new development.</li> <li>- adoption of measures for GI, connectivity, protection of existing important ecological features, planting of new trees and shrubs, grassland and wildlife seed plots, SuDS, new gardens, individual buildings, community greenspaces as recommended in RSPB requirements for a new development in Aylesbury (see attachment sent separately).</li> <li>- ensuring that all measures in Exeter City Council's Residential Design Guide re biodiversity (see separate attachment) are included in this Urban Design Guide.</li> </ul>
12	Organisation - South West Water	<ul style="list-style-type: none"> <li>- Thanks for this content noted.</li> </ul>
13	Organisation – Teignmouth Neighbourhood PC	<ul style="list-style-type: none"> <li>- This design guide should prove to be a welcome addition to the planning policies toolkit available within Teignbridge.</li> <li>- Much of the guidance issued in the draft Urban Design Guide appears to make good sense. Good design adds to both the visual appeal and practical living and working elements of a community. (Gen)</li> </ul>

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		<p>The visual appeal of the Teignmouth and Shaldon area is a key factor in the success of the local visitor industry, for both staying and day-trip visitors. Visitor spend in Teignbridge (of which the majority takes place in Teignmouth, Shaldon and Dawlish Warren) was worth £264m in 2016 (Value of Tourism report). Local distinctiveness and the quality of the local natural environment, along with the built environment forms a key driver of the local visitor industry. The Design Council has also highlighted the multimillion pound benefits to local and regional economies which come from well-designed buildings and the correlation between</p> <ul style="list-style-type: none"> <li>- generally well-designed communities and the performance of their economies - we wish to encourage this, as just one element to help lift the currently poorly performing economy of the whole of Teignbridge. (Gen)</li> <li>- Two very different examples of good design in the built environment which we would like to highlight as examples of excellence and worth emulating in any future development are: <ul style="list-style-type: none"> <li>• The award winning Shoreside development in Shaldon - developed in collaboration with the community</li> <li>• The award winning Teign Heritage Centre in Teignmouth - which also preserves items of local history as parts of its more modern design</li> </ul> </li> <li>- Both of these developments complement the surrounding natural, built and historic environment in terms of scale, height, shape, aspect, materials and palettes used and sit well within the landscape and these design principles should be applied more widely and consistently. Some developments undertaken previously and sometimes more recently in the local area detract from local character and appear to be more 'identikit' designs which do not add to, or complement local distinctiveness, whereas we would, as a subjective view say that the two highlighted examples add to local area. (Gen)</li> <li>- Within the draft design guide there appeared to be little firm guidance on tree planting and green space. We expect that this issue may surface within our Neighbourhood Planning process and are keen to ensure, where possible, any local development, or regeneration incorporates elements of green space and tree planting, including potentially street trees. Again we expect that species chosen would be locally appropriate native species, or where possible those which complement the coastal location i.e. coastal pine species. (5 Green Structures)</li> </ul>
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		<p>We are also very keen to ensure that attractive locally distinctive features in areas to be developed, or regenerated are preserved, restored and sympathetically incorporated into development, including those of historical/cultural significance and local Devon hedgerows. This also includes keeping open significant views</p> <ul style="list-style-type: none"> <li>- of the coast, or prominent landscape features and screening through planting of features which are less complementary. (5 Green Structures)</li> <li>- In our previous emerging Neighbourhood Plan we expressed a desire to ensure that solar panels/tiles on domestic and commercial buildings are allowed, provided that they use the most unobtrusive type of panel/tile available and are appropriate to the local area - special exemptions may for instance be required in conservation areas. Domestic and small-scale solar energy on buildings is something that can yield positive environmental and economic benefits for local residents and householders when it is developed sympathetically. We expect to potentially test this idea again during the Neighbourhood Plan consultation period. (Gen)</li> <li>- Lastly we note that if adopted the draft Urban Design Guidance would become a material consideration in planning decisions across Teignbridge, which we would welcome. We would wish to see the guidance applied in a strong and consistent manner, in collaboration with local communities. It should be used not to stop all development, but to bring about much more appropriate development (in line with allocated development sites) that complements both the urban and surrounding rural and coastal landscapes. Self build and additional speculative planning proposals should also be subject to this same guidance, as long as they pass all other planning tests. (Gen)</li> </ul>
14	Organisation - Woodland Trust	<p>The Woodland Trust strongly welcomes the approach to protecting existing tree and hedgerow features and designing in street trees planting and tree and hedgerow planting features at this early planning stage. Street trees provide a range of social, economic and environmental benefits and it is essential that every opportunity is taken to maximise canopy cover in our towns and cities in a way which is well designed at the outset to achieve sustainability in the longer term. ( 5 Green Structures)</p>
15	Individual – Mr G	<p>No detail yet (1 Content)</p> <p>Just question no detail (7 Appendices)</p>

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16	Individual – Mr M	<ul style="list-style-type: none"> <li>- The tone and content is over-prescriptive. I appreciate that you have to set out your stall but there is a danger in what is written being blindly interpreted for all sites without consideration of truly local (site specific) qualities and without innovation in style or technology. For example, the advice on materials, storey heights, window details, comes across as either being correct (approvable) or incorrect (should be refused).</li> </ul> <p>I fear this might be used by officers (or more likely by local objectors) to frustrate applications which (for possibly very good reasons) venture outside of the over-prescriptive set of tolerances quoted. If the intention is to remove all design from the process of creating buildings, then I would suggest the document is a triumph. However, developments produced solely relying on this guide are likely to be bland and unimaginative as is often the case when professional judgements are reduced to a tick-box exercise.</p> <p>I would welcome an acknowledgement that professional designers need flexibility to interpret the character and morphology of an area and actually design something that evokes 21<sup>st</sup> century lifestyles and tastes. (Gen)</p> <ul style="list-style-type: none"> <li>- Confused about the analogy to district wide character (evoked throughout the 'Building Design' section). No district has a single character and the desire to whittle centuries of architecture in a variety of distinct communities into a single 'character' worries me. Design advice is one thing, but character is subtle and depends on many factors that need to be interpreted on site, based upon first principles with good recording of the environs.</li> </ul> <p>The application of common building types is unhelpful. It risks producing ubiquitous estates and pollutes older buildings nearby with what may well end up being poor quality pastiches. The townscapes we have today are a product of contemporary design at each age through history, and to look backwards risks diminishing the value of our old buildings by adding mere interpretations of previous style. I yearn for more within the guide about modern design, based upon first principles. This completely missing from the 'Building Design' section of the document, which effectively amounts to a historical guide to period buildings. (Gen / 6 Building Design)</p> <ul style="list-style-type: none"> <li>- I am concerned by the term 'most/least embellished'. It implies that façade treatments of buildings are designed like adding baubles to a Christmas tree. Real architects do not design in this applique manner. This will undoubtedly lead to poor quality pastiche detailing on the 'grand' and prominent streets to contrast</li> </ul>
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		<p>with an absence of such on lower order streets. I would suggest removing the term embellishment and replacing it with ‘complexity’, ‘intricacy’, or ‘grandeur’ which will allow this hierarchy to be expressed in a variety of styles (pastiche or modern). Otherwise, I strongly support the council’s aspirations to raise the game in hierarchical planning of streets and the reduction in blank facades to perimeter boundaries of development blocks. ( Section 2 Principal Layout Strategies / page 11 )</p> <ul style="list-style-type: none"> <li>- <b>Movement networks</b> – statement 3 in regard to edge treatments could say more about safe, defensible space to border the road or street. This can be a useful device in some circumstances and should not be ruled out as an effective frontage treatment. ( Section 2 Principal Layout Strategies / page 12 )</li> <li>- <b>Movement networks</b> – more could be made of allowing desire lines (last words on page 12). Desire lines are paramount to connecting the positive landmarks mentioned on page 12 and are at the heart of successful relationships between spaces. On difficult sites there is often a temptation to focus on a highway-led street solution which can work effectively as long as short cut pedestrian routes follow desire lines.</li> </ul> <p>For example, the recent Bovis Estate in Chudleigh where there are no pedestrian cut throughs meaning one has to drive 1,000m rather than walk 200m to get from the bottom of the site to the top! This should be avoided and I welcome more being said on permeability of layouts and streets. ( Section 2 Principal Layout Strategies / page 12)</p> <ul style="list-style-type: none"> <li>- <b>Movement networks</b> – possibly mention the desire to reduce active means of speed control (signage, humps, narrowings) and adopted a more modern approach to speed reduction (shared surfaces, subtle road treatments, absence of signage clutter) so as to empower the pedestrian. Much has been written on this matter and yet still visually offensive road signing is the default option for developers and their highways engineers. (Section 2 Principal Layout Strategies / page 12)</li> <li>- The building storey height guide makes no allowance for changing topography and variety. I feel it should be stated that this is a very loose guide (or removed altogether). Too much depends upon local conditions for a blanket district wide min/max storey height to be defined as part of policy. Also, the example photograph of Chudleigh contradicts the 2.5-3.5 height on main roads as many of the buildings are only 2 storeys in the town centre! (Section 2 Principal Layout Strategies / page 16)</li> </ul>
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		<ul style="list-style-type: none"> <li>- <b>Urban Structure.</b> Most of this section is convincing! Fantastic to see aspirations which I am sure will vastly improve development quality in TDC. (Section 3 Urban Structure)</li> <li>- <b>Waste</b> – This provides excellent information on waste design. (Section 3 Urban Structure)</li> <li>- <b>Daylighting</b> - What about suggesting trying to make plots and roofs oriented to allow future installation of solar energy generation (thermal or PV)? Could be a simple note to encourage consideration of this. (Section 3 Urban Structure / page 63)</li> <li>- I am disappointed by the lack of any real consideration that modern building styles can benefit the character of an area. All the windows on every single sample building shown on this page are the typical golden section type used circa 1700-1900. This section of the guide is disturbing and appears to rule out modernity in favour of something that approximates to a C18 cottage type (informal) or a late Georgian villa (formal).  Guidance about Teignbridge's past building traditions needs to be conveyed as such, and new styles should be welcomed on the proviso that explanations of the principle design methods used are explained within the planning application. Otherwise you risk thousands of poorly detailed, fake cottages and townhouses appearing on new sites where there are no real reasons for blindly reproducing bygone forms. Let's have some encouragement of good modern design! (Section 4 Streets and Movement / page 115)</li> <li>- <b>Material approaches.</b> This matrix is total nonsense. The 'unacceptable approaches' creates a series of double negatives that are hard to drill into. It's just jargon and all the responses are negative....so why not remove that entire lower section of the table and simply say:- <i>'Do not use – (i) materials applied in ways that undermine local identity without innovation, (ii) materials that reflect those found locally but used in ways that undermine local identity and without innovation, (iii) and/or materials that are not a good reflection of those found locally used in ways that undermine local identity or without innovation'</i>. You don't need to make a table for a series of answers that are all 'no'! It's a poor way to express policy.</li> <li>- The whole page is devoid of any understanding of the historic environment. I strongly contest the section stating <i>'Materials that are not a good reflection of those found locally'</i> cannot be used anywhere in Teignbridge's historic environment. Not even on extensions to existing buildings. Why not? Some of the most celebrated extensions to historic buildings are those that purposefully use contemporary materials and design techniques to reinforce the distinction between old and new. For example, the use of metal framed, glazed extensions to old cottages, the installation of wide format glazing in former barn openings, the use of</li> </ul>
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		<p>different walling materials to create a legible intervention, a landscape led building design in the grounds of a larger more formal listed building. This strategy is strongly supported by ICOMOS and UNESCO guidelines, as well as Historic England literature.</p> <p>Effectively banning modern materials will stifle known techniques for extending historic buildings or designing within their grounds, and that's a great shame. Yes, I agree that modern materials should not be used for repair, but you cannot design a building using a table! I suggest this is omitted in favour of a general statement about the use of materials being either (i) faithful to the host material for repairs to listed buildings, (ii) traditional to reflect the vernacular style of an area or (ii) high quality modern materials used in sensitive, innovative ways to enhance historic understanding and express site evolution.</p> <ul style="list-style-type: none"> <li>- Teignbridge have once again cited innovation as a footnote in this section. Surely innovation should be at the core of everything we do and should be positively encouraged. Why not try to celebrate innovation rather than effectively stating it's acceptable as long as there isn't a ubiquitous, fake, pastiche approach that would suit? (Section 6 Building Design / page 118)</li> <li>- <b>Materials.</b> I suggest you remove the reference to 'combed wheat straw'. Most thatch is now water reed and this is largely accepted on all but key protected buildings. Also, ridges are not necessarily flush. Some are blocked but most in Devon have simple traditional ridge peaks (not sculpted with pheasants or elaborate dressings). Eyebrow dormers are indeed prevalent but there are also a number of Cottage Orne buildings that have full dormers in thatch. I fear this advice goes too far to be useful. Perhaps a simple statement about thatch in a vernacular style would suffice?</li> </ul> <p>The 'Slate' section goes too far. The statement '<i>traditional slating practices include the use of random width and diminishing</i>'. Very few buildings (generally much older cottages and barns) have random or diminishing slate courses. Most buildings from 1800 onward in the region have even slate courses laid in what might be regarded as the modern, regular manner. Scantles are also far less prevalent in the region than the statement would make out. (Section 6 Building Design / page 119)</p> <ul style="list-style-type: none"> <li>- <b>Common Building Styles of Teignbridge.</b> I am naturally concerned about this section because I see variations between villages and towns and feel that the district cannot be boiled down to a few selected types. Each site ought to be assessed on its merits and its own character determined from that.... or indeed a new and modern character created through 21<sup>st</sup> century design.</li> </ul>
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		<ul style="list-style-type: none"> <li>- The most prevalent building type in the district is either the 1960's bungalow or the static caravan, and yet these types are curiously not reflected? To say these are ubiquitous across the UK and therefore irrelevant in a local design code is not true. The same might be said for the 'Rendered Townhouse' and the 'Town Stone' or 'Victorian' and 'Regency' types. All of these appear as dateable examples across many parts of the UK as fashions in architecture changed and patterns books on style became widely available. Many of these types (Regency and Victorian) can plainly be seen in neighbouring authorities (Torrey particularly) and elsewhere in Bristol and throughout the south of the UK. My point is that these generalisations of common buildings are unhelpful to real designers when creating good new architecture.</li> </ul> <p>If this is a proper assessment of common architectural styles in Teignbridge then you must also include the <b>'mid-century rendered bungalow'</b>. If this is (as I suspect) an exercise in stating what you <i>like</i> about buildings in Teignbridge and ignoring everything else, then leave this section as it is. However, if the latter is true, I suggest that Teignbridge don't dress this section up as analytical review of common styles when more modern (equally valid) common building types have been ignored. A better title for the section as written would be <i>'common building types in Teignbridge that planning officers feel comfortable with'</i>. (Section 6 Building Design)</p> <ul style="list-style-type: none"> <li>- <b>Roof Coverings.</b> I am pleased to see that the council will favour natural slate for all development. However, this will come as a massive shock to most developers who use cheaper alternatives (mini stonewold, concrete tiles, profiled roof tiles, etc.). Also, why not suggest what new materials might be used, i.e. the assertive use of zinc roofing, copper roofing, sedum and meadow grass.</li> </ul> <p>Architects will be left feeling that modern materials quoted above are not welcome in Teignbridge, and nor are quality modern detailing techniques. Why not at least recognise there's a place for modern materials; for example landscape-led design using green roofs, etc. in my opinion, you have to say something more than the perpetual footnote of ... we might allow some 'innovation'.</p> <p>(Section 6 Building Design / page 126)</p>
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		<ul style="list-style-type: none"> <li>- <b>Roof ventilation</b> Slates vents are a perfectly acceptable means to vent soil pipes and extracts on front or rear elevations. I agree that cowl ventilators or upstands are ugly but ventilation in this manner is a pre-requisite of building design and should not be limited in this manner. (Section 6 Building Design / page 126)</li> <li>- <b>Renewables</b> This is over prescriptive. The statement ‘best mounted on the rear slopes only’ would seem to reduce effective site-wide solar collection which seems contrary to efforts to reduce carbon emissions from dwellings. I fail to see why solar PV should not be an integral, acceptable part of modern roofscapes on developments. Particularly on unprotected or undesignated sites, remote from an important historic context. (Section 6 Building Design / page 126)</li> <li>- <b>Rooflights.</b> <i>The statement reads ‘....should use dark coloured frames or match roof colour (i.e. <u>RAL 2015</u>).’</i> I am not aware that ‘2015’ is a RAL colour. In any case why not just say ‘to be dark grey’ and leave it to the supplier? Are planners really going to know or worry about the precise RAL shade? (Section 6 Building Design / page 126)</li> <li>- <b>‘Casement windows should be flush fitting....’</b> I commend this but most UPVC and alu. windows are storm casements as standard. Many off the shelf timber windows are also. Flush casements are generally a special option. You will need to be sure you wish to impose this on developers who would normally default to storm windows for new developments. If a few estates are approved without flush casements, I fear that might diminish the potency of your guide and people will start ignoring it. (Section 6 Building Design / page 130)</li> <li>- <b>Modern materials (general).</b> The materials section fails to recognise that even small developments can have a distinctive characteristic of their own. Individual buildings of strong architectural merit should be recognised. Nothing is said of this. Overall, there is no consideration that a quality modern design with modern materials used in a sensitive way can enhance Teignbridge.</li> <li>- What you will end up with (unless this portions of the guide become more flexible) is a series of bad pastiches of buildings from a relatively narrow period in history (C18-C19) created without innovation. I strongly feel that an admission that modern materials and design techniques could (if used with skill and confidence) create buildings of real merit that respond to the 21<sup>st</sup> century need. Even DNPA with their very</li> </ul>
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## Draft Teignbridge Design Guide SPD – APPENDIX B - Consultation Responses Schedule

		<p>traditional approach to everything design related, consider modern detailing and materials as an integral part of their Design Guide. (Section 6 Building Design)</p> <ul style="list-style-type: none"> <li>- In summary, I welcome a design guide in some form and the sections on urban planning, green space, etc. will be useful for inspiring developers for whom design is often an afterthought in the process of selling as many houses as possible. However, I think the building design section is useless for good architects who design from proper principles and are used to analysing character. For building professionals, this section is over-prescriptive, removes the right of designers to innovate, and attempts to reduce the subtleties of design &amp; character to a tick box exercise. This limits the freedom of architects and officers to design something extraordinary, revolutionary, or of its time.</li> <li>- I take particular issue with the assessment of common building types. Those quoted are (i) mostly not native to Teignbridge and are in fact ubiquitous styles across large parts of the UK. Also, those quoted are historically selective; ignoring mid-later 20th century types which are far more prevalent than the types mentioned. Whilst I feel that the materials advice is valid, this will vastly increase the cost of all developments. If TDC adopt this and one application is allowed to use a lower class of material, it renders the guide pointless. Therefore, I would urge consideration of how prescriptive you wish to be in that regard.</li> </ul>
17	Individual – Mr S	<ul style="list-style-type: none"> <li>- The guide acts to hinder and stifle true innovative and good design. Unless there is say a Georgian Terrace, that would usually benefit from either conservation or listed protection status, (if of merit) , making the design guide effectively invalid, as any qualified or experience design professional would work , within such frameworks, for protection to the character of the area/ design. (Gen)</li> <li>- Have residents actually been consulted? (Gen)</li> <li>- Have the consequences of such guides been properly evaluated – i.e. it will make TDC areas stagnant in design and material choices, creating bland streetscapes or forms and effectively removing innovative design. (Gen)</li> <li>- The guide also goes against NPPF guidance, as it is so onerous that it may actually restrict home owners from even contemplating simple extensions, as one example and is very dictated by the local authority (Gen)</li> </ul>

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18	Individual – Ms W	<ul style="list-style-type: none"> <li>- I would like to see greater protection of our Heritage. (Gen)</li> <li>- Buildings like Prospect Chapel, the GWR/ SDR Carriage and Wagon Works, Seymour Horwells, John Vicary &amp; Sons Woollen Mills, the Meter Testing Building have either been demolished or have no protection and so vulnerable to the 'clean sheet' approach of 'regeneration'.</li> <li>- I would like to see an insistence on re-purposing buildings, not allowing them to decline until the only solution is demolition, assisting developers to find a design that doesn't dwarf the existing building like the Wolborough Street design dwarfs St Leonard's Tower. (Gen)</li> <li>- I would like to walk around Newton Abbot and find an historic settlement with burgage plots still visible in the building matrix, with limestone facings, with pitched roofs, 4 over 4 or 6 over 6 windows, and small buildings for a small town, enabling small businesses to move in and flourish, not be presented later with an oversized construction no-one else can take on. (Gen)</li> </ul>
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