

**Date:** 6 July 2020

Forward Planning  
Mid Devon District Council  
Phoenix House  
Phoenix Lane  
Tiverton  
EX16 6PP

Dear Sir / Madam,

**CONSULTATION ON MID DEVON DESIGN GUIDE SPD**

We write on behalf of our client Redrow Homes (Redrow) in response to the consultation on the draft Mid Devon Design Guide SPD.

Redrow is an award-winning housebuilder that prides itself on offering high quality homes in desirable places with placemaking being as important as home building. This placemaking philosophy is driven by the Redrow 8 – eight key principles that underpin 'The Redrow Difference'. These cover everything from individual streets to the wider context of the site in its local area, as well as the interconnections between the two. The Redrow 8 promotes diversity, sustainability, social interaction, environmental awareness and more, to deliver a connected, cohesive quality of life that sets their developments apart.

Redrow are currently in discussions with the landowner, the Chettiscombe Estate, to deliver the first phases of the Tiverton Eastern Urban Extension, a new garden neighborhood allocated to meet Tiverton's development needs. The Tiverton Eastern Urban Extension was first allocated in the Mid Devon Allocations and Infrastructure DPD and is being carried forward in the emerging Mid Devon Local Plan Review. In accordance with site specific policy, extensive Design Guide and Masterplanning exercises have been carried out, resulting in adopted Design Guide and Masterplan SPD's. The principles within these documents are being taken forward through a recently submitted detailed Design Guide required by condition attached to the outline planning permission for the first half of the development.

Redrow supports the Council's intent to promote good design and placemaking through a Mid Devon Design Guide SPD. However, as noted in Volume 2 of the Draft Design Guide, the "*main design consideration and reference*" in respect of Tiverton Eastern Urban Extension is the site-specific adopted

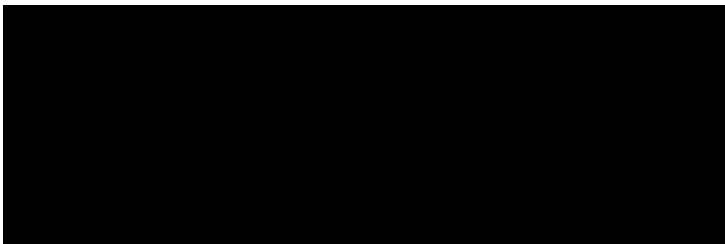


Design Guide and Masterplan. This site-specific Design Guide and Masterplan sets out a clear vision and design framework for delivery of a 'Garden Neighbourhood'. For this reason and to avoid confusion it should be made clear that the Tiverton Eastern Urban Extension is exempt from the Mid Devon Design Guide SPD.

We have provided further detailed commentary and suggestions on the Draft Design Guide in Table I, appended to this letter.

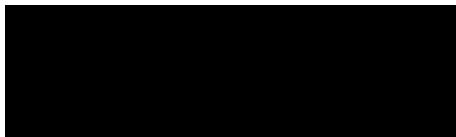
We would be grateful if these comments are taken into account in the preparation of the Mid Devon Design Guide SPD.

Yours sincerely,



**Russell Smith MRTPI**  
**Principal Consultant**

**Email:**  
**Mobile:**  
**Tel:**



**Table 1 – Comments on Mid Devon Design Guide SPD**

Page / ref	Text or illustration	Comment / representation
<b>Volume 1 – Procedural Guidance</b>		
<b>Page 7 Grey text boxes</b>	<p>A number of the publications referred to as references have been archived by central government and are therefore no longer relevant. References to the following archived sources is likely to cause confusion and should therefore be deleted:</p> <p><b>“By Design – towards better practice”</b> – Withdrawn by central government on 7 March 2014 (replaced by the new planning practice guidance)</p> <p><b>Building for Life 12 (2012)</b>. This has been superseded by the 2018 edition.</p>	<p>Reference to By Design should be deleted or clarification added that this is an archived source that has been replaced by the Planning Practice Guidance and National Design Guide.</p> <p>The BfL12 reference should be corrected to the latest version.</p>
<b>Page 7 – yellow text boxes</b>	<p>The approach for <b>all</b> new development to be shaped by historic settlement patterns is not realistic or appropriate for the delivery of balanced, modern, viable communities.</p>	<p>Whilst local heritage and local character is one of the potential influences on design approach set out in the National Design Guide (NDG) it is not the only one. The NDG also refers to existing built development in the vicinity of the site (the layout, form, scale and appearance, details and materials of this may be relevant to informing the design of the new place) as well as access and movement considerations, views, demographics and economic factors. The NDG states that well designed development should also be based on an understanding of “the architecture prevalent in the area”.</p> <p>In areas where there is no evidence of locally distinctive vernacular design in the immediate vicinity of the site it is reasonable and appropriate to draw on local examples of good and popular examples of housing design and layout. For example. If the context of the site includes typologies such as 1930s detached and semi-detached homes, these would be an appropriate cue to draw on for the design response in terms of layout, form, scale and appearance as well as detailing and materials.</p>

The aspirations and requirements of the residents of the new community are also valid and important considerations in the design of the new place. The internal design of the home and the outside spaces and layout should be responsive to the requirements of residents both now and in the future. For example this should include sufficient space for parking conveniently located close to the front door of the home and in a location that allows for the charging of electric vehicles.

The design approach set out in volume 1 should be revised to refer to the design requirements and aspirations of residents of the new places as well as clarifying that new development should reflect the positive attributes of existing examples of local housing in areas remote from conservation areas or other concentrations of locally distinctive buildings.

This would ensure that new developments meet the needs and aspirations of the new residents who will make up the new community as well as ensuring that it is well integrated with its surroundings.

**Volume 2 – Designing for Landscape and Settlement Form**

**Page 14**

In the montage of good and bad examples all of the 'good' examples are from the town centre and all of the negative ones are taken from suburban locations. This presents an unbalanced and incorrect view that all suburban typologies are poor design references. In fact, Tiverton contains many suburban areas which are very popular places to live, from which strong positive design cues can be taken to inform future developments in Tiverton.

The 'Strengths and weaknesses' section for Tiverton should be revised to include the following and other positive examples from suburban locations within the settlement.



*Landscape-led approach in Park Road, Tiverton, provides for convenient on-plot car parking that is well screened within the streetscene*




*Street vista terminated and a sense of enclosure created at Middlemead Road, Tiverton.*



*Tree-lined arcadian character created in Blundell's Avenue, Tiverton*



*Lower density, attractive homes at the edge of Tiverton (Post Hill)*

		 <p><i>Lower density, attractive homes at the edge of Tiverton (Post Hill)</i></p>
<p><b>Pages 15 and 16 – ‘A Framework for Design Guidance in Tiverton’</b></p>	<p>This section sets out a series of considerations and references for the key strategic spatial design ‘components’. For the Eastern Urban Expansion Area, the key references are the Eastern Expansion Area Masterplan and Design Guide.</p>	<p>As noted in Volume 2 of the Draft Design Guide, the “main design consideration and reference” in respect of Tiverton Eastern Urban Extension is the site specific adopted Design Guide and Masterplan. The site-specific Design Guide sets out a clear vision and design framework for a delivery of a ‘Garden Neighbourhood’. For this reason and to avoid confusion it should be made clear in the text that the TEUE is exempt from following the guidance in the new district-wide Design Guide. A note should be added to the table on pages 15/16 to this effect.</p>
<p><b><i>Volume 3 – Compendium of District Design</i></b></p>		
	<p>General</p>	<p>As noted in Volume 2 of the Draft Design Guide, the “<i>main design consideration and reference</i>” in respect of Tiverton Eastern Urban Extension is the site specific adopted Design Guide and Masterplan. This site-specific Design Guide sets out a clear vision and design framework for a delivery of a ‘Garden Neighbourhood’. For this reason and to avoid confusion it should be made clear in the introductory text that the TEUE site is exempt from following the guidance in the new district-wide Design Guide. A note should be added to the table on pages 15/16 to this effect.</p>

<p><b>Page 6 – Proportion and Scale</b></p>	<p>When describing the transition from denser central areas with a more vertical emphasis to edge locations with a more horizontal emphasis, the caption under one of the illustrations on page 6 states, ‘It is important in these scenarios to find a balance between the desirable sense of openness and an appropriate lower density whilst avoiding the potential suburban feel of low density, low rise development’.</p>	<p>This dismissal of the suburban typology of housing is unhelpful. Most of the settlements in Mid Devon include areas of suburban housing that not only contribute to the character of those places (and provide for that contrast with the higher density core) but are also very popular places to live.</p> <p>This section of the guide should be revised to clearly explain which aspects of suburban design are to be avoided and it should be explained how compact, walkable, landscape-led places using a suburban typology comprising detached homes can be delivered successfully. This is important to provide for the creation of balanced and diverse communities and to deliver the range of home types that people aspire to.</p>
<p><b>Page 7 and 8 – Frontages and Elevations</b></p>	<p>The majority of the examples (8 of the 9) are of terraced properties. The one photograph example of semi-detached homes from Park Road in Tiverton showing repetition is taken from a considerable distance from the frontage.</p>	<p>This section should be revised to include a representative mix of house typologies found across the district including detached homes and semi-detached homes, both of which form part of the character and identity of most settlements in Mid Devon and continue to be very popular types of homes which provide for modern lifestyles. Detached and semi-detached homes are also effective at providing convenient parking close to the front door that is well screened within the street scene by landscaped boundaries.</p> <p>Without this revision the guide is likely to cause confusion and could frustrate the delivery of homes that people aspire to live in.</p>
<p><b>Pages 11-22 – Doors, Porches and Windows, Roofs and Dormers, Chimneys</b></p>	<p>No examples shown of detached or semi-detached homes, which remain very popular types of homes.</p>	<p>The guide should be revised to include examples of detached and semi-detached homes to avoid confusion. For example, the use of slate coloured tiles on these detached homes in Tiverton reflect the locally distinctive palette of materials.</p>





**23-24 –  
Parking  
and  
Transport**

No examples are shown of on-plot parking in driveways which is the most convenient and desirable arrangement from the perspective of the occupier of the home. By providing parking close to the front door real transport choice is provided especially for the elderly and people with disabilities. This also provides for convenient charging of electric vehicles.

As drafted the guidance is unrealistic and is likely to cause confusion and frustration in the delivery of homes that people want.

This section should be revised to focus on how parking that is conveniently located for the resident of the home (i.e. in front of or close to the front door of the homes) can be designed so that the street scene is not adversely affected. This can be achieved though landscaped boundaries and other planting within the street scene.