**SCHEDULE OF COMMENTS RECEIVED DURING PUBLIC CONSULTATION,**

*Proposed response in italics.*

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<th>Name</th>
<th>Comments</th>
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| 1. Denise Pichler (Consultant), Pichler Planning Consultancy | • The document is very prescriptive and makes no reference to permitted development rights. The guide is attempting to impose unnecessarily prescriptive limits regardless of material facts such as the size of house and curtilage and the design and layout at the property. It effectively takes away the accepted premise of assessing each application on its own merits. It also imposes limits that, in many cases, are less than could be implemented as permitted development (PD).

• Clear reference to PD rights was made in the document at section 1.7. Householders or agents are expected to enquire to the planning department to ascertain whether their proposed developments are PD or not. The City Council considers that any further reference to PD rights would make the guide misleading and unnecessarily long. However, it is considered appropriate to place the PD section in a more prominent position. The section is therefore relocated to the Introduction Chapter of the document.

• All the dimensions set out in the document are to avoid extensions which are detrimental to townscape and residential amenity. The dimensions are the starting point for extension design but they are by no means definite limits. In Section 1.2 it is made clear that the City Council recognises that the guide is not exhaustive and values the importance of site appraisal. For any non-compliant proposals the City Council requires an explanation in the design and access statement to show the evidence of thorough site appraisal. On this basis any application will be assessed on its merits.

• In many situations permitted developments can have negative impacts on the townscape and residential amenity (e.g. large box-like flat roof dormers on the rear roof). The guide aims to avoid such detrimental developments which fall under the control of planning. This may result in certain dimensions appearing less than the PD allowance. However, it is the purpose of the document and it is considered appropriate.
• The examples are often contradictory with the document.

• There were examples of non-compliant extensions which are considered acceptable (Figure 1.2 in Section 1.2 Site Appraisal, Figure 1.6 in Section 1.4 Contemporary Design). The purpose of showing them is to emphasise that the document should be read as a ‘guide’ and the principles should be interpreted flexibly according to appropriate site appraisal and analysis. However, the City Council realise that people may mis-understand the purposed of those images and therefore Figure 1.2 and Figure 1.6 has been removed.

• There is no explanation of the reasons for each part of the specific guidance.

• The City Council considers that there is a need to explain the rationale behind the guidance and the guide has therefore been amended.

• Specific observations –
  1. Section 1.2 Site Appraisal - is a logical assessment but is contradicted by all the prescriptive limits.
  2. Section 1.4 Contemporary Design The picture (Figure 1.6) is misleading as it breaks all the rules.
  3. Section 2.5 Checklist - Any new extension must inevitably fail the test 4. It should be stated as ‘must not adversely affect’.
  4. Section 3.1 – Question the logic behind set back. It should not be imposed if alternative solutions are suitable. 1m is an arbitrary figure that does not equate to standard brick courses.
  5. Section 3.3 Roofs – Question the logic behind the drop down of roof line. 200mm does not match brick courses.
  6. Section 3.4 Garage doors – the style of garage door cannot be prescribed other than on a listed building and PD rights overrule this.
  7. Section 4.1 – Dormers on the rear elevation are often PD.
  8. Section 4.4 – a 22m distance can only be achieved where houses were designed with that distance available.
  9. Section 5.2 – the guidance is unenforceable.
  10. Section 5.3 Checklist no.8- Judgement on whether ‘attractive’ or not is a subjective matter.
• Answers to the specific observations-
  1. Explained already.
  2. Explained already.
  3. All checklists have been removed.
  4. The logic behind the ‘set back’ rule has been explained, dimension has been amended to be 900mm to suit brickwork measurements.
  5. The logic behind the ‘two-brick-course’ gap rule has been explained, dimension has been amended to be 150mm to suit brickwork measurements.
  6. The City Council consider that the guidance on the design of garage doors is appropriate and therefore it should remain.
  7. Explained already.
  8. Section 4.4 has been amended.
  9. The City Council does not consider the guidance in this section is unenforceable.
 10. Checklists have been removed.

2. D.J. Wright
   (architect)

• The guide sets out a very prescriptive set of rules and contains no mention of ‘Permitted Development’ rights;
• The guide seeks to apply the same set of rules to every property regardless of the size of the property and specific site circumstances.

• Clear reference to PD rights was made in the document at section 1.7. Householders or agents are expected to enquire to the planning department to ascertain whether their proposed developments are PD or not. The City Council considers that any further reference to PD rights would make the document misleading and unnecessarily long. However, it is considered appropriate to place the PD section in a more prominent position. The section is therefore relocated to the Introduction Chapter of the document.

• All the dimensions set out in the document are to avoid extensions which are detrimental to townscape and residential amenity. The dimensions are the starting point for extension design but they are by no means definite limits. In Section 1.2 it is made clear that the City Council recognises that the guide is not exhaustive and values the importance of site appraisal. For any non-compliant proposals the City Council requires an explanation in the design and access statement to show the evidence of thorough site appraisal. On this basis any application will be
assessed on its merits.

- The guide contains subjective judgements which would be beyond the general scope of the lay person/public and are aspects that should be assessed by the Council at application stage.

- **Checklists have been removed. Applicants/agents will no longer be asked to make subjective judgements.**

- **Specific observations**

  1. **Section 2.1** Question the logic of 3.5m rear depth limit for detached properties. 3.5m depth is not suitable for large detached properties.
  2. **Section 2.5** checklist 4 and 5 need rewording.
  3. **Section 3.1** It is good practice to set the extension back but 1m minimum distance would reduce the viability of some schemes.
  4. **Section 3.3** Roofs – Question the logic behind the drop down of roof line. This requirement would make some schemes unviable or make the roof pitch angle below the recommended angle for slate/tiles.
  5. **Section 3.4** Garage doors – The guidance may only apply to listed buildings or buildings within conservation areas.
  6. **Section 4.1** PD rights may overrule the guidance on dormers.
  7. **Section 4.4** 22m inter-visibility distance can only be achieved on properties that were originally designed with this available distance.
  8. **Section 5.2** Garage doors design is unenforceable.
  9. **Section 5.3** Attractive is a subjective word.
  10. **Appendix - Other Issues** ‘Changing Proposals’ ‘minor amendments’ applications should be mentioned.

- **Answer to specific observations**

  1. **3.5m is the default depth for rear extensions to detached houses.** A significant proportion of detached properties in Exeter, especially recently developed properties, are of modest size and are close to the neighbouring properties. The default rear depth is to ensure extensions are in proportion with the original house and preserve the neighbouring amenity as is explained in the amended SPD. For large properties if a proposed extension exceeding 3.5m is of appropriate scale to the original house and does not affect the neighbours, the proposal would be likely to be
acceptable. But full explanation need to be provided in a design and access statement accompanying the application.

2. Checklists have been removed.

3. 1m set back (now amended to be 900mm) is to ensure the extension will be subservient to the original house and helps to preserve the established street scene. Each application will be treated on its merits.

4. Section 3.3 is considered unnecessary and has been removed.

5. The City Council considers that the guidance on the design of garage doors is appropriate and therefore it should remain.

6. Some dormer extensions may be covered by PD rights but this guide deals with developments which require planning permission. So there is no conflict. The dimensions and guidance are the starting point for dormer design.

7. Section 4.4 has been amended. Reference to 22m distance has been removed.

8. The City Council does not consider the requirement on garage door design is unenforceable.

9. The word ‘attractive’ has been omitted.

10. There is no legal basis for minor amendments. Advice on these is beyond the intended scope of this document.

3. Chris Dent (Architect)

- The guide is too prescriptive and seems to disregard Permitted Development. There are cases where the illustrations are contrary to the principles provided.

- Clear reference to PD rights was made in the document at section 1.7. Householders or agents are expected to enquire to the planning department to ascertain whether their proposed developments are PD or not. The City Council considers that any further reference to PD rights would make the guide misleading and unnecessarily long. However, it is considered appropriate to place the PD section in a more prominent position. The section is therefore relocated to the Introduction Chapter of the document.

- All the dimensions set out in the document are to avoid extensions which are detrimental to townscape and residential amenity. The dimensions are the starting point for extension design but they are by no means definite limits. In Section 1.2 it is made clear that the City Council recognises that the guide is not
exhaustive and values the importance of site appraisal. For any non-compliant proposals the City Council requires an explanation in the design and access statement to show the evidence of thorough site appraisal. On this basis any application will be assessed on its merits.

- In many situations permitted developments can have negative impacts on the townscape and residential amenity (e.g. large box-like flat roof dormers on the rear roof). The guide aims to avoid such detrimental developments which fall under the control of planning. This may result in certain dimensions appearing less than the PD allowance. However, it is the purpose of the document and it is considered appropriate.

- Suggest clarification on:
  1. Principle 10—Whether the 55sqm include paths.
  2. How does the 3m rule apply to properties with original rear lean-to’s.
  3. Is the 200mm gap from top of tile or from the flashing course?

- Response to the suggested clarifications:
  1. 55sqm includes paths. There is no need to clarify this in the document.
  2. Applicants/agents are expected to enquire the planning department when they are in doubt about how to measure.
  3. The 150mm gap should be measured from the top of tiles to the bottom of cills.

- Suggest amendments on:
  1. Principle 11 Landscape. Add ‘where practical’ because all extensions remove something.
  2. Section 2.5 Checklist No.4 Add ‘reasonable’ light and outlook of neighbours. Virtually all extensions alter outlook in some minor way.
  3. The 1000mm set back is both too large for small dwellings and not a standard brick course. Suggest either 450mm, 675mm or 900mm would be sufficient to distinguish the original from the extension.
  4. Suggest add ‘generally’ should remain parallel to the house.
  5. Fig 3.3, suggest add ‘…not exceed half the width of the main house if 2 storey’.
  6. 3.5 Checklist No.2. Add ‘reasonable’ light and outlook of neighbours.
  7. 5.3 Checklist No.2 Add ‘reasonable’ daylight and
sunlight.
8. 5.3 Checklist No.3 Add ‘existing’ privacy.
9. 5.3 Checklist No.4 Add ‘general or reasonable’ outlook.
10. 5.3 Delete Checklist No.7 as PD rights override.

- Response to suggested amendments:
  1. Principle 11 Landscape has been rewritten.
  2. Checklists have been removed.
  3. The dimension has been amended to be 900mm. The objective is to ensure the extension will be subservient to the original house and helps to preserve the established street scene. In terms of viability for small properties each application will be treated on its merits.
  4. The paragraph has been rewritten but it is considered unnecessary to add ‘generally’.
  5. The City Council considers the ‘half-width’ guidance should apply to both single and multi-storey side extensions.
  6. Checklists have been removed.
  7. Checklists have been removed.
  8. Checklists have been removed.
  9. Checklists have been removed.
  10. Checklists have been removed.

- Other suggestions/questions:
  1. ‘Forward’ should be ‘Foreword’
  2. Is the 1m from boundary really necessary if there is an alternative route to back garden?
  3. The symmetry of dormers is considered too prescriptive.
  4. 4.5 Alteration to the roof shape is often PD.
  5. 4.6 Checklist. Should read ‘existing privacy’ of the neighbours?
  6. 5.1 Why should all outbuildings be 1m off boundary?
  7. 5.2 The design of garage doors is a PD right.
  8. 5.3 Checklist No.8 is questionable as PD. ‘Attractive’ is too subjective.
  9. What about flat roofed extensions? Are they acceptable?
  10. What about design of fences visible in the public domain?

- Response to other suggestions/questions
  1. The spelling has been corrected.
  2. The requirement for 1m set in for side extensions has been removed.
  3. The requirement for 1m set below the ridge has been amended to be 0.5m. No change to other dimensions.
4. Change of roof shape may sometimes be PD but it is generally unacceptable when planning permission is required.

5. Checklists have been removed.

6. The requirement for 1m off boundary has been removed.

7. The change of garage doors may be PD. But it is a planning matter when it forms part of a scheme that requires permission and therefore is enforceable.

8. Checklists have been removed.

9. Flat roof extensions are acceptable if the original house is of a flat-roofed design. It is covered in Principle 6 Roofs in the amended SPD.

10. The document does not provide detailed advice on the design of fences. Applicants/agents are expected to enquire the Planning Department with regard to a range of external works such as decking and boundary walls/fences, etc. Reference is made in Section 1.5 External Works.

4. Robin Jones (architect), Robin Jones Architect Ltd

- The document should merely be design advice and not a supplementary planning document.

- The City Council considers that the status of the Supplementary Planning Document does not conflict with the nature of document as a design guide.

- Most of the design guidance is reasonable and acceptable but there is insufficient flexibility within the guide for unusual circumstances with particular regard to:
  1. General Principle 6 Scale,
  2. Depth of Rear Extensions in Chapter 2,
  3. Width of side extensions, and
  4. Side extension beyond the rear main wall.

- All reference to dimensions should be removed. There should be additional clauses allowing for unique and exceptional circumstances and allowing for unique and unusual solutions.

- All the dimensions set out in the document are to avoid extensions which are detrimental to townscape and residential amenity. The dimensions are the starting point for extension design but they are by no means definite limits. In Section 1.2 it is made clear that the City Council recognises that the guide is not exhaustive and values the importance of site appraisal. For any non-compliant proposals the City Council requires an explanation in the design and
access statement to show the evidence of thorough site appraisal. On this basis any application will be assessed on its merits. However, amendments have been made across the guide to enhance flexibility. For example, 1m set in rule for side extensions has been removed, and side extension beyond the rear main wall is now acceptable in principle.

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<th>5. Anonymous architect</th>
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<tr>
<td>• Broadly welcome the document.</td>
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<td>• Question whether the SPD is overly and unnecessarily prescriptive.</td>
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<td>• There are special circumstances where the general principle of subservience and 3.5m depth limit for rear extensions to detached houses may not apply.</td>
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<td>• All the dimensions set out in the document are to avoid extensions which are detrimental to townscape and residential amenity. The dimensions are the starting point for extension design but they are by no means definite limits. In Section 1.2 it is made clear that the City Council recognises that the guide is not exhaustive and values the importance of site appraisal. For any non-compliant proposals the City Council requires an explanation in the design and access statement to show the evidence of thorough site appraisal. On this basis any application will be assessed on its merits. However, amendments have been made across the guide to enhance flexibility. For example, 1m set in rule for side extensions has been removed, and side extension beyond the rear main wall is now acceptable in principle.</td>
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<td>• Question ‘presumption that extensions should harmonise with the character of the existing building’ where the original house is of insufficient quality.</td>
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<tr>
<td>• The statement has been amended to ‘presumption that extensions should harmonise with or where possible enhance the character of the original house.</td>
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<th>6. D.S.Brewer (agent)</th>
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<td>• The Principle that requires matching roofs may in practice reduce the size of possible extensions.</td>
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<td>• Matching roofs are the starting point for any extension. Where a non-matching roof is proposed, the applicant is expected to state the reason why this particular approach is taken (e.g. viability or to meet the requirement for a 150mm gap).</td>
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<tr>
<td>• Question the logic of the depth limits for rear extensions.</td>
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| 7. David Burley (architect) | - The rationale for the rear depth limits has been explained in the amended SPD.
- Where does the 22m back to back distance derive from?
- Reference has now been made to the Exeter Local Plan with regard to 22m back to back distance.
- 200mm is not a standard 2 brick courses gap.
- The required gap between the roof of single-storey rear extensions and first floor cills has been amended to be 150mm, which is about 2 standard brick courses.
- Section 4.6 Checklist 5 Privacy – It would be useful to know what positions would or would not be acceptable for dormers.
- Checklists have been removed. Dormer windows should not increase the potential for overlooking.

| 8. M.J.U.Lyons (architect), Prewett | - The guide is overly prescriptive and in some cases (eg. P5 fig 2.2 Extension to detached buildings) has no logical basis/proven necessity. The guide is a cover-all/pattern book solution to be applied to all locations irrespective of context, orientation, proximity or local conditions.
- All the dimensions set out in the document are to avoid extensions which are detrimental to townscape and residential amenity. The dimensions are the starting point for extension design but they are by no means definite limits. In Section 1.2 it is made clear that the City Council recognises that the guide is not exhaustive and values the importance of site appraisal. For any non-compliant proposals the City Council requires an explanation in the design and access statement to show the evidence of thorough site appraisal. On this basis any application will be assessed on its merits.
- The logic of the depth limits for rear extensions has been explained in the amended SPD.
- The guide should be clearly cast as advisory only.
- The City Council does not consider it appropriate that the document is advisory.

- The dimensions and the use of materials are very
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<th>&amp; Lyons</th>
<th>subjective.</th>
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<td>• In certain situations the use of double ‘up and over’ garage door is the only solution to a design problem.</td>
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<td>• Each case will be assessed on its merits.</td>
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<tr>
<td>• The dimensions proposed for the positioning of dormers will conflict with Building Regulations.</td>
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<tr>
<td>• The required 1m set below the ridge has been amended to 0.5m. This would provide more scope for dormer extensions that meet both planning requirements and Building Regulations.</td>
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<td>• Building to the boundary (side extensions and detached outbuildings, etc) should be acceptable.</td>
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<tr>
<td>• The requirement of 1m set in from the boundary for side extensions and detached outbuildings has now been deleted.</td>
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<th>9. Tim Williamson (architect), Heighway Field Associates</th>
<th>The guide should result in an improvement in the quality of the built environment.</th>
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<tr>
<td>• One of the images on the front cover is an inappropriate example.</td>
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<td>• The front cover images have been removed.</td>
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<tr>
<th>10. C.D. Poole (agent/builder), Attic Designs Ltd</th>
<th>Commented on Chapter 4 Roof Extensions and Alterations.</th>
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<td>• Front dormers should not be ruled out.</td>
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<td>• In the amended SPD the restriction on dormers at the front has been removed.</td>
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<td>• The vast majority of housing stock will not allow a dormer to be set 1m below the ridgeline.</td>
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<td>• The required 1m set below the ridge has been amended to 0.5m.</td>
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| 11. M.C. Williams (Householder) | Properties with mixed window sizes/positions may not allow the dormer sitting on the elevation symmetrically.  
**In the amended SPD the dormer windows are now required to be either located symmetrically or aligned with the windows below.**  
Need to provide guidance on dormer extensions to properties which already overlook neighbouring properties.  
Section 4.4 has been rewritten to cover the situation where overlooking already occurs.  
Recogisne the value of the guidance and strongly support many of the principles included in the document.  
Prohibiting wrap-around extension could result in poorly integrated design.  
The restriction on wrap-around extensions has been deleted.  
There is a need to provide better guidance on roofs of single storey extensions, for example lean-to roofs are sometimes more appropriate for extensions to houses with a gabled roof.  
*In the amended Section 3.3 it is stated that with regard to garages and carports ‘a lean-to will often be the best solution...’:*  
The guidance on garage door design is undesirable and does not contribute to security (Principle 12).  
The City Council considers that garage doors can have a significant impact on the townscape quality and therefore the advice on garages doors should remain. The City Council does not consider vertical timber garage doors are insecure as they are widely used and have stood the test of time. |
| 12. Omar Salam (householder) | Object with particular regard to flat roof dormer windows. The guide will inhibit many properties from using their roof space to fulfil the properties’ maximum potential in terms of usable living space.  
The City Council considers that dormers of flat-roofed design may be acceptable if the positions and proportions are right. The restriction on flat roof dormers has been removed. |
| 13. Mr. Mrs. J. Hambly (Householders) | • Object General Principle 1  
With regard to ‘Granny Annex’ extensions the guide has a negative impact on independence by prohibiting separate staircases and kitchens. The family members have no choice but to eat at the same table and access through the same entrance. The principle is questionable in terms of Human Rights. It would also become a ‘fire hazard’ if there were no separate entrance to the extension.  

• The purpose of Principle 1 is to ensure that separate dwellings, offices or workshops are not created under the guise of an application to extend a house.  
• The City Council’s solicitor has considered the text of Principle 1 and has confirmed that there is no legal objection to it as a statement of policy.  
• In relation to the objection on fire safety ground, Principle 1 does not prevent an extension from having an external door. The requirement is simply that there should be an internal connection in all cases. |
|---|---|
| 14. Terry Webster (Householder) | • The draft guide does not take account of special situations, agreements between neighbours, etc.  
• Special situations may be a material planning consideration that need to be taken into account. But there are other material issues such as townscape quality and residential amenity need to be considered and they are likely to carry more weight in the decision making process. The guide does make reference to special site conditions/situations in the Section 1.2 Site Appraisal. The City Council considers the statement is sufficient for any special circumstances. |
| 15. Devon County Council | • No formal comments. |
| 16. Alison Bailey, South West Water | • Suggest the inclusion of a paragraph about development close to public sewers and water mains.  
• A paragraph on Underground Services has been inserted in the Appendix- Other Issues. |
| 17. David Wood, Topsham Society | • Welcome the guide as it contains lots of sound common sense and ‘good neighbourly’ guidelines.  
• *Noted*. |