

Householder's Guide: Design of Extensions and Alterations

Supplementary Planning Document



Consultation Statement
February 2024

Householder's Guide: Design of Extensions and Alterations Supplementary Planning Document (SPD)

CONSULTATION STATEMENT

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Householder's Guide: Design of Extensions and Alterations Supplementary Planning Document (SPD)

Consultation Statement

Consultation dates: 23 October 2023 – 12 January 2024

1. Introduction

- 1.1 This report reviews the responses received to the Householder's Guide: Design of Extensions and Alterations Supplementary Planning Document (SPD) consultation.
- 1.2 This SPD consultation resulted from a review and update of the existing SPD originally adopted in 2008. The document provides a clear set of principles for householders submitting planning applications for extensions and alterations to their properties. It has been updated to ensure it aligns with current national and local planning policy and guidance.

2. Householder's Guide SPD proposed updates: Consultation version

2.1 Key proposed updates included in the consultation version of the SPD were:

- Change of SPD title: Householder's Guide: Design of Extensions and Alterations SPD.

Previous title: Householder's guide to extension design

- Additional guidance on design details, materials, the relationship of the development to site boundaries, garden size, access, parking and cycle storage.
- Additional guidance on the design, size and position of side extensions.
- Additional guidance on corner plot development, particularly the need to retain building lines and openness.
- Text relating to loft conversions and associated dormer extensions amended to refer to changes to permitted development rights. This includes the need to use materials that match the existing roofing material.
- Additional design advice on roof lights and solar panels.
- Additional guidance on altering roof shape and size, and roof terraces.
- Additional guidance on the difference between outbuildings or annexes that would be considered ancillary to a house and those that would be considered to form a new dwelling.
- Additional guidance on boundary treatments i.e. fencing around properties, and the need for boundary treatments to reflect local character and the character of the city.
- The requirement that rear extensions should not normally exceed two thirds of the width of the original house has been removed.

3. The consultation

- 3.1 To comply with legislation and to provide an opportunity for the public to provide input into the revision of the SPD, it was necessary to publicly consult on proposals to revise the SPD. The Householder's Guide SPD was available for public comment for just under 12 weeks from 23 October 2023 until 12 January 2024. This consultation period exceeded the statutorily required minimum (4 weeks) and the six weeks required by the Council's Consultation Charter.
- 3.2 The consultation ran alongside public consultations for the outline draft Exeter Plan and the Liveable Water Lane SPD. The consultation complied with the Council's adopted Statement of Community Involvement and Consultation Charter.
- 3.3 Responses to proposed updates to the SPD were invited online through Commonplace, the interactive online engagement platform that has been used by the Council for several other consultations. The option to email or post responses was also available, along with the availability of paper copies of consultation questions on request, plus other versions and support as required.
- 3.4 Consultation questions were structured to enable respondents to provide detailed comments, or to reply quickly and easily if they had less time. The questions focussed on the major proposed SPD updates however general comments on any aspect of the SPD were also invited.
- 3.5 The consultation was promoted through extensive means including:
 - Exeter City Council's weekly e-newsletter (available through 'Stay Connected') which goes to over 4,000 people across the city.
 - Public exhibitions held across the city, running daytime into evening to promote access. Exhibitions included paper copies of the SPD, leaflets summarising the SPD consultation and the opportunity for people to ask questions and discuss the SPD with officers from the City Development team. The events doubled-up as exhibitions for the Exeter Plan and Water Land SPD.
 - Email / post notification for all those included on Exeter City Council's planning policy database.
 - ECC online news article.
 - An article in the November 2023 edition of the Exeter Citizen which goes to each address in Exeter.
 - Promotion on ECC social media platforms.
 - A fully accessible online consultation document was made available while other formats of the document were available on request. An audio version was also available online and in CD format.

4. The survey

- 4.1 The general form of questions used throughout the consultation survey was to initially ask whether people agreed or disagreed with the proposed update, with a follow-up open question asking for more detail as to why they felt that way and to provide any other comments.
- 4.2 Respondents had flexibility in responding and were able to choose which questions they answered. It was not a requirement to provide an answer to all questions. It was possible to answer the initial agree/disagree question without providing further comment or vice versa. Similarly, those who submitted email responses did not necessarily follow the survey format, but these tended to either be general comments. Responses were directed to respond to specific sections of the SPD.

5. Response overview

5.1 24 unique commenters responded to the consultation:

- 18 via Commonplace
- 5 via email
- 1 verbally in response to the audio version of the SPD

5.2 Of these commenters, six identified they were responding on behalf of an organisation with the remaining 18 responding as individuals.

5.3 The six responses that identified they were responding on behalf of an organisation were for:

- Barc Architects
- Devon Wildlife Trust
- Environment Agency
- Historic England
- National Highways
- South West Water

6. Responses

6.1 This section provides an overview of the responses provided to each of the five survey questions, and a summary of the additional comments received. A table detailing all comments received is available in Appendix A.

6.2 Question 1

- **Do you agree or disagree with the additional advice on gardens? (Paragraphs: 3.12 – 3.13)**
- **Why do you feel this way and do you have any other comments?**

6.3 This new section of the SPD highlighted that gardens are important to protect now and in the future and identifies other relevant policy to refer to.

6.4 Eight people responded directly to this question. Five of these agreed with the additional advice included in the updated SPD and three disagreed. Comments of agreement included the importance of gardens in reducing run off, contributing to biodiversity, mitigating against the effect of climate change and for the wellbeing of all. Also raised was the potential to require planning permission for laying impermeable surfaces and astroturf in gardens.

6.5 Of the three responses that disagreed with the additional advice provided on gardens, one provided no further comment and the other raised the following issues which have limited connection to the particulars of the question, rather, related to the SPD more broadly.

- Suggestion to provide further advice on good design and proportioning.
- Specifics relating to window replacement, glazing bars and saving energy.
- Suggestion that rear extensions should be allowed more flexibility as considered to have less impact on street scene.
- Consideration of shading and overheating with relation to larger glazed rear extensions.
- Suggestion that, where justified, roof ridge step downs should not be required.

6.6 In referencing the SPD General Principles and contemporary design, a respondent raised these should be assessed on a case-by-case basis.

6.7 Question 2

- **Do you agree or disagree with the removal of the advice that rear extensions should not normally exceed two thirds of the width of the original house?**
- **Why do you feel this way and do you have any other comments?**

6.8 Five people responded directly to this question. Four of the five agreed with the removal of this requirement. Comments of agreement included that the requirement was unnecessary and negatively impacted design, that a similar more flexible approach should be taken with regard to the depth of extensions as well and that all extensions should mitigate for the loss of permeable areas.

6.9 One respondent disagreed with the proposed removal of the requirement for extensions to not normally exceed two thirds of the width of the house providing

explanation for their disagreement as being that the removal of the requirement was “too specific”.

6.10 **Question 3**

- **Do you agree or disagree with the additional guidance on the design, size and position of side extensions? (Paragraphs: second half of 5.3; 5.5; 5.7; 5.11; 5.12).**
- **Why do you feel this way and do you have any other comments?**

6.11 This section expanded on guidance for side extensions including further information on terracing and corner plots.

6.12 Three responses were received to this question with one agreeing and two disagreeing.

6.13 The comment in agreement with the advice explained the respondent felt this way because they believe such extensions contribute to urban creep. They also suggested that the planting of trees and/or installing green roofs should be a condition applied to all extensions.

6.14 The two respondents who disagreed did so for different reasons. One respondent suggested that subservience was not a good principle because it too often leads to disjointed buildings and constructional complexity. The other respondent considered that the guidance on side extensions is too restrictive.

6.15 **Question 4**

- **Do you agree or disagree with the additional design advice on roof lights and solar panels? (Paragraphs: 6.8 – 6.15).**
- **Why do you feel this way and do you have any other comments?**

6.16 This question relates to updated guidance on the size, positioning and acceptability of roof lights and solar panels. It is important to note that the majority of solar panel development is allowed through permitted development and in these cases planning permission is not required. Elsewhere in this section, text was updated in relation to permitted development and Exeter City Council's requirements relating to dormer development.

6.17 Three responses were received to this question and all three disagreed with the additional design advice on roof lights and solar panels, however the comments provided by all three respondents related to other matters, namely:

- Specifics relating to the guidance on dormers.
- The presence of restricted covenants in some areas and the reminder of the need for permission to be sought for covenants, in addition to planning permission.
- Confusion over the guidance only relating to works which require planning permission.

6.18 **Question 5**

- **Do you agree or disagree with the additional guidance on roof size and shape, balconies and roof terraces? (Paragraphs: 7.2 – 7.9).**
- **Why do you feel this way and do you have any other comments?**

6.19 This question relates to additional guidance on roof size and shape, balconies and roof terraces, including raising the roof ridge and additional storeys.

6.20 Two responses were provided to this question, one agreeing and one disagreeing. The person who disagreed provided no further comment and the person agreeing expanded on their answer suggesting encouragement for green roofs on flat roof dormers.

6.21 **Other comments:** Other consultation responses provided can be split by those in reference to the SPD's twelve General Principles, and then general comments.

6.22 **General Principles:** Five respondents made comments on the General Principles and supporting guidance (Chapter 3) that all extensions should follow. Comments included:

- General Principle 6 - Roofs: Suggested rewording to remove the principle that extension roof ridges should be lower than the main roof. Suggested additional text to address surface water.
- General Principle 10 – Integrated design: Suggested additional text to address surface water and include property flood resilience in the list of features to integrate.
- General Principle 11 – Landscape: Suggested inclusion of specifics relating to garden ground levels in flood zones, the need maintain access to Main Rivers, and to strengthen the General Principle's requirement to positively contribute to biodiversity.
- Suggested introduction of a new General Principle on drainage that refers to building regulations requirements.
- Recognition of the importance of asking householders to consider the strategy for rainwater disposal and surface water drainage.
- The potential constraint flood zones have to the conversion of garages to habitable accommodation.
- Suggested inclusion of wording on biodiversity and minimising increases in impermeable surface of gardens.

6.23 **General comments:** The remaining responses provided in the 'any other comment' free text box can be summarised as suggestions to:

- Provide greater detail on flood risk, sustainable drainage, sewer connections, run off associated with extensions, property flood resilience and requirements relating to flood zones and building in proximity to watercourses.
- Provide more support for householders wishing to make improvements that would support sustainable travel rather than support for tarmacking front gardens.
- Prevent alterations that would have negative ecological and surface run off impacts, such as tarmacking driveways or replacing lawns with artificial grass.
- Provide more information on nesting birds and development.

- Strengthen the requirement to positively contribute to biodiversity.
- Provide more support for rewilding.
- Ensure the SPD is clear that planning permission is needed when permitted development rights are not in place.
- Publicise party wall agreements more clearly.

7. Post consultation Householder's Guide SPD amendments

7.1 This section outlines amendments made to the Householder's Guide SPD having considered the consultation responses received. The numbers refer to the paragraph section in the 'proposed adoption version' of the SPD rather than the consultation version. The table in Appendix A responds to all comments received.

7.2 Chapter 1 Introduction

- 1.9 – 1.11: Further detail regarding the information and documents required to be submitted with a planning application.
- 1.17: Paragraph expanded to encompass broader sustainability and environmental performance considerations.
- 1.22 – 1.33: New sections on flood risk and sustainable drainage.
- 1.38 – 11.39: New section on other permissions separate to planning permission, adding party wall agreements and restrictive covenants to the existing mention of building regulations.

7.3 Chapter 2 Policy Context

- Minor wording updates.

7.4 Chapter 3 General Principles

- General Principle 10 – Integrated Design: Wording amended to include reference to integrating flood resilience and sustainable drainage measures.
- 3.3 – 3.5: Site design wording amended, including addition of consideration of water courses, flood risk and aspect.
- 3.6: Amended wording within 'contemporary design' to expand on when this may be acceptable.
- 3.12: Further information about potential constraints associated with converting garages within flood zones.
- 3.14 – 3.15: Further text on gardens including trees, the role of gardens in reducing run off, surface permeability, townscape and biodiversity.
- 3.19: Additional paragraph on considering materials and environmental impact.

7.5 Chapter 4 Rear Extensions

- 4.8: Further information on 'wraparound' extensions and how they will be considered in planning.

7.6 Chapter 5 Side Extensions

- 5.8: Further information on 'wraparound' extensions and how they will be considered in planning.

7.7 Chapter 6 Loft Conversions, Roof Lights and Solar Panels

- Minor wording amendments to emphasise that the SPD refers to building works that fall outside of permitted development rights.

7.8 Chapter 7 Roof Extensions and Alterations

- 7.2: Additional information on hip to gable design considerations

7.9 Chapter 8 Detached Garages, Outbuildings and Boundaries

- 8.6: Additional text on preference for permeable surfaces for driveways and consideration of surface water run off.

7.10 Chapter 9 Other Relevant Information

- 9.9 – 9.10: Additional information provided on bats and nesting birds.
- Flood risk section deleted from here and expanded flood and sustainable drainage information added to chapter 1.
- 9.15 – 9.16: Underground services and sewers section has additional information on sewer connection, surface water disposal hierarchy and building in proximity of sewers and water mains.

8. Strategic Environmental Appraisal (SEA)

- 8.1 In updating and consulting on this SPD, a Strategic Environmental Appraisal Initial Screening Statement was prepared. The Initial Screening Statement concluded that, for the reasons explained in the Statements, the SPD will not have significant environmental effects and therefore does not require a Strategic Environmental Assessment.
- 8.2 The Environment Agency, Historic England and Natural England were consulted on the Initial Screening Statement, in accordance with section 4 of the Environmental Assessment of Plan and Programmes Regulations 2004.
- 8.3 Historic England and Natural England both responded to the SEA consultation. Both bodies agreed with the Council's conclusion that there are unlikely to be significant environmental effects from the proposed Householder's Guide SPD and that it is not necessary to undertake a Strategic Environmental Assessment of this SPD.

9. Conclusion

- 9.1 While this SPD consultation received a relatively small response, constructive comments were provided. Many of these comments have been incorporated in further SPD updates made post-consultation. If comments have not resulted in changes this often reflects the limitations of the document whereby it cannot account for every scenario that may arise in terms of householder developments and that an SPD cannot introduce new policy requirements that do not reflect or supplement national or local plan policy requirements. The table in Appendix A includes responses to all consultation comments received.
- 9.2 The importance of providing greater information on flood risk, drainage and support for the preservation of gardens, permeable surfaces and biodiversity were the strongest response themes.
- 9.3 In some cases it is difficult to draw further firm conclusions of support or lack of support for the proposed SPD changes. This is in part due to the response size, but also because the explanation provided for agreeing or disagreeing with a proposed amendment often did not relate to the amendment in question, or comments related to very specific issues, or opinions on design.
- 9.4 Where reference to requesting more flexibility was made, particularly in terms of design, it is important to remember that while the content of this SPD is a material consideration when determining householder planning applications, each planning proposal is also considered on its own merits in line with policy when deciding whether to grant planning permission.

APPENDIX A – Table of all consultation comments received and Exeter City Council's responses

OVERVIEW

Individual / Organisation	Agree / Disagree	Response	Comment
1 Environment Agency		<p>Householder extensions and alterations which will increase occupancy have the potential to increase pressure on combined sewer systems. Such proposals present an opportunity to look to mitigate water quality impacts by removing surface water from the combined sewer system where possible, for example by taking roof and surface water to an onsite soakaway or sustainable drainage system (SuDS) where possible, and where ground conditions do not allow this, attenuate surface water before discharging to the combined sewer. Similarly, proposals should minimise any increase in impermeable surfacing and roof cover due to impact on surface water runoff.</p> <p>In addition, householders could look to include devices such as water butts on new extensions and downpipes, grey water reuse, etc, solutions should be proportional to the alterations/extensions being proposed.</p>	Paragraph 1.16 in the sustainability section has been expanded to encompass broader sustainability and environmental performance considerations.
2 South West Water		SWW wish to highlight the need for extensions and conversions to abide by the surface water disposal hierarchy, as described within Building Regulations Part H (Requirement H3) (and successor documents), where development is implemented through the use of Permitted Development rights or a granted planning permission. If a householder's property has an existing connection for their domestic surface water into a public sewer, this does not	Underground services and sewers section has additional information on sewer connection, surface water disposal hierarchy, and building in proximity of sewers and water mains.

Individual / Organisation	Agree / Disagree	Response	Comment
		<p>provide an automatic right to connect into the same sewer with subsequent development.</p> <p>SWW wish to direct potential householders of the following guidance to be aware of SWWs policy in relation to works in proximity to statutory assets, and potential build-overs: Building near a public sewer Building & Development South West Water and Building near water mains Building & Development South West Water. [links provided in original response]</p>	

CHAPTER 2. POLICY CONTEXT

Individual / Organisation	Agree / Disagree	Response	Comment
1 Environment Agency		<p>Para 2.3 We recommend that paragraph 2.3 is altered to say 'living conditions for neighbours and occupiers'.</p> <p>After paragraph 2.5 We suggest a point is added around design in terms of its sustainability and future resilience opportunities as well as the other more aesthetic based design aspects. Design aspects which lessen the property's contribution to climate change effects, flooding and water quality whilst also increasing property resilience to the impacts of these.</p>	<p>Sentence amended to end after 'living conditions'</p> <p>The sustainability section in chapter 1 has been expanded to encompass broader sustainability and environmental performance considerations.</p>

CHAPTER 3. GENERAL PRINCIPLES

Individual / Organisation	Agree / Disagree	Response	Comment
3 Individual		<p>General Principles - section 6, Roofs. I feel that this should read "Roofs should match the main roof in terms of shape, pitch and materials. The ridges or the highest rooflines and the eaves-line should be no higher than that of the main roof."</p> <p>I feel that forcing extensions to have a lower ridgeline introduces construction complexity which is likely to lead to long term maintenance problems.</p> <p>Visually it often gives a disjointed and unpleasant appearance to the property.</p>	<p>Comment noted. The General Principle has remained unchanged as the Council sees value in retaining this as a general principle of extension design. Each planning proposal is assessed on its own merits in line with policy.</p>
1 Environment Agency		<p>We recommend that either point 6 (roofs) or point 10 (integrated design) should include a comment on the need to better address surface water where roof space or overall impermeable surfacing is being increased such as SUDS, water butts, attenuation rather than direct to combined sewer. This is particularly pertinent where a proposal includes additional bedrooms.</p> <p>Point 10 should include property flood resilience (PFR) in the list of items to integrate where applicable.</p> <p>Point 11 (landscape) could highlight that garden ground levels should not be raised where they lie in flood zones 2 or 3 and boundaries and garden structures should not be placed in the flood zone or prevent access to Main Rivers.</p>	<p>General Principle 10 wording amended to include reference to integrating flood resistance and sustainable drainage measures into design.</p> <p>General Principle 10 wording amended to include reference to integrating flood resistance and sustainable drainage measures into design.</p> <p>This detail has been included in the new flood risk section in chapter 1.</p>

Individual / Organisation	Agree / Disagree	Response	Comment
		<p>Para 3.9 Pleased to note that paragraph 3.9 asks householders to consider the strategy for rainwater disposal/surface water drainage. This is important so that drainage is not an afterthought.</p> <p>Para 3.11 On access, parking and servicing, paragraph 3.11 should note flood zones as a potential constraint to conversion of garages to habitable accommodation.</p> <p>Para 3.12 We recommend that paragraph 3.12 in respect of gardens is amended to include 2 more bullets; one regarding no net loss of biodiversity and one around the need to minimise any increases in impermeable surfacing of gardens.</p> <p>The latter is an important point relating to householder development. The gradual urban creep of the city through additional hard surfaces for patios and parking combined with extensions and increased roof areas will further increase unattenuated surface water going into the combined sewers and increase the risk of CSOs directly to watercourse or indirectly via surface water sewers. Heavy rainfall events are likely to increase in frequency due to climate change which will increase pressure on the sewerage network with associated risks to water quality.</p>	<p>Comment noted.</p> <p>This has been included in what is now paragraph 3.12, in addition to text referring to where there is the loss of a potential parking space requiring the local highways authority to be consulted.</p> <p>The value of front gardens to townscape, biodiversity and run off / permeability has been added to the gardens section (paragraphs 3.13 – 3.15), which also references protected tree works.</p> <p>The SPD is unable to require no net loss of biodiversity or prevent impermeable surfacing of rear gardens as this would be considered a new policy rather than supplementary to an existing. The SPD does suggest these issues be considered in the design process. Much of the work that can be done relating to surfacing or rear gardens can be done without planning permission therefore there is currently no control of this through planning.</p>

Individual / Organisation	Agree / Disagree	Response	Comment
			A new policy will be included in the new Exeter Plan which requires improvements to biodiversity.
2 South West Water		<p>For the avoidance of doubt, SWW would suggest the inclusion of 'Drainage' as an additional 'General Principle' within the SPD. Potential wording of which is drafted below for consideration:</p> <p>'Drainage: Any additional surface water drainage as a result of development should be disposed of in line with Building Regulations Requirement H3. The use of rainwater harvesting and storage is encouraged.'</p>	<p>The decision was taken not to add a new General Principle as the SPD references to the need to adhere to building regulations, and a new section on flood risk and drainage, has been added.</p> <p>Additional text has been included in chapter 9 within 'underground services and sewers', relating to sewer connections, the surface water disposal hierarchy and building in proximity of sewers and water mains.</p>
5 Devon Wildlife Trust		<p>Point 11 states 'Landscape Extensions should be designed to minimise the impact upon existing soft and hard landscape features that positively contribute to local character, biodiversity...'. Whilst it is important to ensure that the design of proposed development minimises impacts on existing biodiversity, in line with current government policy we would urge the LPA to adopt higher aspirations than to merely 'minimise'. A sentence is needed here which states that 'opportunities to improve biodiversity in and around extensions must be integrated as part of their design'. This is to ensure compliance with NPPF para. 180.</p>	<p>This is an important point however NPPF paragraph 180 does not allow for such a requirement to be added to this document. However, the importance of protecting and enhancing biodiversity has been strengthened throughout the document, notably in the following sections: gardens, ecology, sustainability and drainage.</p>

QUESTION 1 REGARDING ADDITIONAL GUIDANCE ON GARDENS

Individual / Organisation	Agree / Disagree	Response	Comment
8 Individual	Agree	Gardens should be protected as they are essential for reducing run off which contributes to flooding. Impermeable patios, decking and fake grass should be discouraged. Permeable materials should be promoted.	Much of this work can be done without planning permission. The SPD suggests consideration of these matters, and this has been strengthened in chapter 3.
13 Individual	Agree	I agree about the importance of gardens and biodiversity and for this reason I feel that planning permission must be sought to lay astro-turf in gardens or to reduce a garden's greenspace more than 50%. I do not agree that extensions cannot be separate properties as long as these properties pay council tax and are included in the 5YLS.	This proposes changes to national policy and permitted development rights, which is not within the scope of this SPD. The SPD has sought to raise the profile of consideration of permeable surfaces. The acceptability of outbuildings as new dwellings will fall to individual assessment of the proposal and the site and whether a new dwelling to meets set requirements.
14 Individual	Agree	Acknowledgement of the benefit of gardens and green space to individuals, families and communities; the importance of maintaining and getting local biodiversity; and the role of green spaces in missing against the effects of climate change (e.g. cooling urban areas, improving drainage, growing food).	The SPD suggests consideration of these matters and this has been strengthened in chapter 3.
15 Individual	Agree	I agree that urban gardens are essential to the survival of biodiversity in the UK so should be safeguarded through planning requirements.	Comment noted. Local policy seeks to provide and retain external amenity spaces and gardens where possible.
16 Individual	Agree		N/A

Individual / Organisation	Agree / Disagree	Response	Comment
20 Individual	Disagree	<p>Further advice is needed about good design and proportioning. Replicating the original does not necessary lead to good design.</p> <p>Sometimes it is not possible to replicate the existing very thin glazing bars if a window is being replaced with high performing double or triple glazing. Saving energy is not mentioned.</p> <p>Extensions at the rear of buildings should be allowed more flexibility in design than those at the front or side, where the street scene is more important.</p> <p>Generally people like open and connect with their gardens at the rear, and this would mean larger glazed areas. Shading and overheating should be a consideration, with an allowance for shading features at the rear in particular.</p>	<p>Each planning application is assessed against planning policy on its own merits.</p> <p>Each planning application is assessed against planning policy on its own merits. Environmental performance is a key consideration and is raised in the introduction as being given merit, but it does not automatically supersede all other considerations.</p> <p>Each planning application is assessed against planning policy on its own merits.</p> <p>Each planning application is assessed against planning policy on its own merits.</p>
4 Individual	Disagree	<p>6 - In some scenarios having no ridge step down benefits the building, structure and performance. With correct justification, this should be allowable in certain scenarios/building types.</p> <p>General principles 7 & 8 and contemporary design 3.5 & 3.6 - Some visually contrasting or contemporary designs can harmonise with a host building, without matching architectural details, materials or features. In this case, with justification and design rationale, a judgement should be made on a case by case basis. The wording of the general principle clauses referred back to in clause 3.6 is quite limiting in this regard.</p>	<p>Each planning application is assessed against planning policy on its own merits, and appropriate justification.</p> <p>Extensions are expected to follow the general principles, and where they do not, the proposal should be explained and justified. The SPD wording has been updated to make this clearer.</p>

Individual / Organisation	Agree / Disagree	Response	Comment
		Eg Stepping outside of the design guide should be possible with the right quality design.	
24 Individual	Disagree		N/A

CHAPTER 4. REAR EXTENSIONS

Individual / Organisation	Agree / Disagree	Response	Comment
1 Environment Agency		4 Rear extensions: Suggest that an additional point is inserted which highlights if the property in question is adjacent to a watercourse, a structure-free buffer may be required. Where a watercourse is designated as a Main River, works may also require a Flood Risk Activity Permit under the Environmental Permitting Regulations.	This information has been included in the new flood risk section in chapter 1.

QUESTION 2 REGARDING REMOVAL OF THE ADVICE THAT REAR EXTENSIONS SHOULD NOT NORMALLY EXCEED TWO THIRDS OF THE WIDTH OF THE ORIGINAL HOUSE

Individual / Organisation	Agree / Disagree	Response	Comment
6 Barc Architects	Agree	I also think that the limit on the depth of extensions should be increased or at least an exception made for well designed and considered extensions that serve to improve the local built environment.	Each planning application is assessed against planning policy on its own merits.
3 Individual	Agree	Unnecessary and leads to disjointed designs	Comment noted.
7 Individual	Disagree	Too specific	Comment noted.
8 Individual	Agree	All extensions should include mitigation for the loss of permeable areas. Roof gardens or planting trees should be encouraged.	The SPD has sought to raise the profile of consideration of permeable surfaces and this has been strengthened in chapter 3.
9 Individual	Agree		N/A

CHAPTER 5. SIDE EXTENSIONS

QUESTION 3 REGARDING THE ADDITIONAL GUIDANCE ON THE DESIGN, SIZE AND POSITION OF SIDE EXTENSIONS?

Individual / Organisation	Agree / Disagree	Response	Comment
3 Individual	Disagree	I do not agree that "subservience" is a good principle (fig 5.1 and 5.2). It leads to constructional complexity and weaknesses. It may be appropriate in some cases to avoid terracing (fig 5.5), but too often it leads to a disjointed buildings and not a better streetscape.	Comment noted. The Council sees value in retaining subservience as a general principle of extension design.
8 Individual	Agree	Urban creep, through extensions and concreting areas, significantly contributes to localised flooding. Planting trees and/or installing green roofs should be a condition to allow any extension.	The SPD is not able to mandate such matters, but it does encourage consideration of these matters, and environmental performance, reduced run off, flood risk, drainage, and the importance of gardens and trees. All of these themes have been strengthened in the SPD update.
23 Individual	Disagree	This is very restrictive policy that favours some and not others	Comment noted.

CHAPTER 6. LOFT CONVERSIONS, ROOF LIGHTS, SOLAR PANELS

QUESTION 4 REGARDING THE ADDITIONAL DESIGN ADVICE ON ROOF LIGHTS AND SOLAR PANELS

Individual / Organisation	Agree / Disagree	Response	Comment
10 Individual	Disagree	To maximize the liveable space/use of a property if a family need to increase the amount of rooms, a much more efficient use would be being able to have a dormer up to the existing height of the roof, and not half a meter below it. Also to say if dormers are not already in a road you cannot get permission to put them is ridiculous, and will exclude many roads from being able to have them if needed for no reason at all. Also the stipulation of mostly having them on the rear elevation is odd and may not make sense to anyone in that area. A better stipulation would be where the front or back of a house does not overlook neighbours then that should be encouraged.	The SPD is relevant to proposals that fall outside of permitted development. Each planning application is assessed against planning policy on its own merits to consider acceptability. Some of the detail within this comment relates to permitted development requirements which are set nationally.
11 Individual	Disagree	In addition to conservation areas some developments may have restrictive covenants not to alter appearances (eg Gras Lawn). These should also be referenced as although they may not be a planning matter it is something householders should make themselves aware of and seek the relevant permission.	A section on 'other permissions separate to planning permission' has been added to chapter 1 of the SPD and refers to the need to check for restrictive covenants. It includes a reminder that these lie entirely separate to planning permission. A section within chapter 2 refers to well-designed distinctive areas, including mention of Gras Lawn, and the need to protect the unique characteristics of such areas.
4 Individual	Disagree	Rooflights and solar panels are allowable under Permitted Development within Conservation Areas and the additional design advice is confusing in this regard. This design guide	This section, and other areas within the SPD, outline that it refers only to solar panels and other work that requires

Individual / Organisation	Agree / Disagree	Response	Comment
		should be limited to works falling outside of Permitted Development rights.	planning permission i.e. falling outside of works allowed under permitted development. This has now been reiterated to try to make it clearer.

CHAPTER 7: ROOF EXTENSIONS AND ALTERATIONS

Individual / Organisation	Agree / Disagree	Response	Comment
1 Environment Agency		It is worth noting that although such additions do not increase overall roof area and thus do not increase surface water runoff, such use for the roof void often increases bed numbers and thus pressure on the foul sewer network. We would advise that the opportunity should be taken to put down pipes to water butts, and change any surface water going to a combined system to SuDS where possible or, if not, attenuate surface water on site to offset the increase in sewer use and not worsen water quality issues.	This has been included in the new flood risk and drainage section in chapter 1.

QUESTION 5 REGARDING THE ADDITIONAL GUIDANCE ON ROOF SIZE AND SHAPE, BALCONIES AND ROOF TERRACES

Individual / Organisation	Agree / Disagree	Response	Comment
8 Individual	Agree	Green roofs should be encouraged on flat roof dormer extensions	Environmental performance and reduced run off included in the expanded sustainability section in chapter 1. The benefits of green roofs have also been added to ecology section in chapter 9.
12 Individual	Disagree		N/A

CHAPTER 8: DETACHED GARAGES, OUTBUILDINGS AND BOUNDARIES

Individual / Organisation	Agree / Disagree	Response	Comment
1 Environment Agency		<p>With all structures covered by chapter 8 it is worth noting that where gardens adjoin a watercourse, a buffer with no structures may be required to allow access to the watercourse. For a fluvial main river this distance is 8m but for a tidal main river the distance is 16m.</p> <p>Para 8.3 We recommend that an additional point is added to paragraph 8.3 highlighting that ancillary out-buildings should be located outside the flood zone wherever possible and any that need to be located within the flood zone should not include ground floor sleeping accommodation.</p>	<p>This detail has been included in the new flood risk section in chapter 1.</p> <p>Para 8.3 Referred to in new flood risk section in chapter 1, which includes the link to standing advice.</p>

Individual / Organisation	Agree / Disagree	Response	Comment
		<p>Para 8.5 We recommend that additional design details text is included after paragraph 8.5 regarding making them flood resilient and ensuring that the surface water from new building roofs goes to water butts and soakaways rather than into the combined sewer system.</p> <p>Para 8.6 We advise that paragraph 8.6 include that new driveways should be permeable wherever possible and any that have to be impermeable should drain to soakaways not the combined sewer.</p> <p>Boundary treatments (paragraphs 8.10-8.12) it should be noted that these are an opportunity to incorporate PFR through flood proof gates, etc.</p>	<p>Para 8.5 Referred to in new flood risk section in chapter 1.</p> <p>Para 8.6 This has been added.</p> <p>Boundary treatments Reference to property flood resilience has been included in the new flood risk section in chapter 1, and General Principle 10 – integrated design.</p>

CHAPTER 9: OTHER RELEVANT INFORMATION

Individual / Organisation	Agree / Disagree	Response	Comment
1 Environment Agency		It is good to see that with regard to ecology paragraph 9.9 encourages the incorporation of small-scale opportunities for biodiversity enhancements, including the use of SuDS. As noted elsewhere, there are benefits to the water environment of redirecting surface water from the sewer network to onsite SuDS.	Comment noted. Biodiversity references have been strengthened throughout the SPD.
		<p>We are pleased to see that paragraph 9.12 refers householders to our Flood Risk Standing Advice. However, additional text could be included here highlighting that any new roof area or hard surface should avoid being drained to the combined sewer. Instead, these areas should be drained sustainably to a soakaway and/or use devices such as water butts wherever possible to help both water efficiency and water quality.</p> <p>It should also include that extensions and alterations are an opportunity to consider and include PFR measures for those properties already in the flood zone. There should be guidance on this within the SPD especially for those properties in conservation areas and what types of PFR design and materials will be acceptable.</p>	<p>This has been expanded on in the new flood risk and drainage section in chapter 1.</p> <p>Property flood resilience has been included in the new flood risk section in chapter 1, however the SPD cannot go into detail, particularly regarding heritage assets, as what may be acceptable will be specific to each proposal.</p>
5 Devon Wildlife Trust		<p>Ecology</p> <p>Paragraph 9.8 states that a bat survey will be required in certain circumstances. No account is taken of the potential for the presence of nesting birds within the structure. A sentence is required which states that assessment of the building for nesting birds is required prior to commencing works or that works are undertaken outside of the main bird breeding season of March to August (inclusive). This is to ensure</p>	Additional text added on nesting birds in the ecology section in chapter 9.

Individual / Organisation	Agree / Disagree	Response	Comment
		compliance with the Wildlife and Countryside Act 1981 (as amended).	
		<p>Paragraph 9.9 states that 'Exeter City Council encourages householders to incorporate small scale opportunities for biodiversity enhancement in their proposals.' We would urge the LPA to adopt higher aspirations than to merely 'encourage' opportunities for biodiversity enhancement.</p> <p>This is to ensure compliance with NPPF para. 180. The inclusion of swift bricks and bat boxes within all extensions should be mandatory. The provision of safe routes for hedgehogs between different habitat areas should be mandatory.</p>	The SPD is unable to require biodiversity enhancement as this would be considered a new policy rather than supplementary to an existing policy, including the requirements of NPPF para 180 in relation to householder applications. The SPD does suggest these issues should be considered in the design process and this has been strengthened in the update.

ADDITIONAL COMMENTS

Individual / Organisation	Agree / Disagree	Response	Comment
17 Individual		The SPD must be clear that planning permission is needed when an extension does not have permitted development rights.	This is included in sections 1.4 and 1.5 in the introduction which also briefly explains permitted development rights. It is also reiterated at various points throughout the document that the SPD refers to proposals falling outside of permitted development.
18 Individual		We are currently involved in building an extension and we needed a Party Wall Agreement with our neighbour. Our neighbour is a council tenant and therefore the agreement is with East Devon County Council. However, the process for this was unclear and we ended up having to pay double the cost because we had to have our own party wall surveyor and	A section on 'other permissions separate to planning permission' has been added to chapter 1 of the SPD and refers to the need to consider party wall agreements. It

Individual / Organisation	Agree / Disagree	Response	Comment
		also pay the EDCC Surveyor. Later we learned that if the process had been done differently we would have only needed to pay for one party wall surveyor. This seems patently unfair and information about this should be publicised clearly.	includes a reminder that these lie entirely separate to planning permission.
19 Individual		<p>More support for householders wishing to make improvements that would support sustainable travel, such as cycle parking storage options. Current planning guidance makes it easier to tarmac a garden to park vehicles than installing a cycle shelter for bikes.</p> <p>Restrictions for alterations that would have a negative ecological impact, such as tarmac driveways or replacing lawns with artificial grass, which results in both habitat loss and a reduction in permeable surfaces, which increases surface run off and risks of flash flooding.</p> <p>More support for rewilding efforts.</p>	<p>This comment largely relates to nationally set permitted development rights. The SPD and the Council's Residential Design Guide detail when cycle storage provision will be supported.</p> <p>The value of front gardens to townscape, biodiversity and run off / permeability has been added to the gardens section (paragraphs 3.13-3.15), as well as raised in the new flood risk and drainage section in chapter 1.</p> <p>The SPD has expanded text and strengthened support for biodiversity, environmental performance, and ecology throughout the document during this update.</p>
21 National Highways		No comment	N/A
22 Historic England		No comment as not LBC specific	N/A