

Eden District Council EIP Issues and Questions Response on behalf of Story Homes 1 23995/A3/DM

Statement J

Policy Dev5 Statement J Policy Dev5 – Design for new Development is this Policy consistent with National Policy and Guidance?

- 1.0 Are the references to the “Building for Life Guidelines” consistent with National Guidance?
- 1.1 No. The Council appears to be introducing an arbitrary “Red, Amber, Green scoring” system against Building for Life which is only best practice guidance. The NPPF seeks to ensure the design policies avoid unnecessary prescription and detail and should provide guidance on the overall scale, density and massing in relation to the local character of the area. Policy DEV5 should be revised to ensure that it is consistent with paragraph 58 of the NPPF.
- 1.2 It is also unclear as to how DEV5 will be used in practice. The Policy as drafted appears to suggest that the Council will be introducing other measures such as having a clear understanding of the form and character in their assessment of Green, Amber and Red. It is not clear how, for example, you could achieve a ‘Green’ score rating in these assessments. Therefore this Policy is unclear.
- 2.0 Does the Policy adequately reflect the need to conserve and enhance the historic environment, heritage assets and their setting?
- 2.1 No – the policy at this time does not reflect this and should be incorporated into the policy.

Summary

Is this Policy consistent with National Policy and Guidance?

The Policy is not consistent with national policy as it includes the Building for Life Guidelines, which are not a statutory requirement and including this is contrary to the NPPF, as it creates unnecessary design prescription.

To be found sound, the reference to Building for Life Guidelines should be removed.