

East Devon Local Plan – 2021 to 2040 - Issues and Options consultation for the attention of the Planning Policy team

We would encourage you to complete the on-line response form – see:

<https://eastdevon.gov.uk/planning/planning-policy/emerging-local-plan/initial-consultations/>

Please only use this paper version of the questionnaire if you lack internet access. Receiving on-line submissions will help us save time and money and will mean we can be more accurate in our work.

Your Title	<input type="text"/>	First name or initial	<input type="text"/>	Surname	<input type="text"/>
Your email address		<input type="text"/>			
Your telephone number		<input type="text"/>			
Your postal address and post code		<input type="text"/>			
Organisation name (if relevant)		<input type="text"/>			
If you are an agent acting for a client please provide the name of your client		<input type="text"/>			

Your Age Range

- 0-18
- 19-25
- 26-40
- 41-55
- 56-70
- 70 plus

In what capacity are you responding to this consultation - what most closely describes you or if you are an agent what best describes, in respect of this consultation, what your client does?

- Private individual
- Environmental body
- Government department or agency
- Local authority
- Parish or town council
- Politician
- Religious body
- Cultural group or body
- Education provider
- Amenity group
- Land owner
- Developer
- Private company
- Emergency service provide
- Utility or transport provider
- Community or resident group
- Representative of commercial organisation or business
- Other – Please specify (in the box below)

Guidance notes

We have produced a local plan issues and options consultation document that we are consulting on from 18 January 2021 to midday on 15 March 2021. In the consultation document we include a series of questions. Please note that this questionnaire should be read alongside the full consultation document.

Please respond to this consultation event, on-line, if possible, see:

<https://eastdevon.gov.uk/planning/planning-policy/emerging-local-plan/initial-consultations/>

Paper copies of this completed of this questionnaire should be posted to:

Planning policy
East Devon District Council
Blackdown House, Border Road
Heathpark Industrial Estate
Honiton
EX14 1EJ

To arrive no later than 12.00 noon on Monday 15 March 2021.

Data Protection

Any personal information which you provide will be held and used by East Devon District Council for the purpose of local plan production. Your information may also be shared within East Devon District Council for the purposes of carrying out our lawful functions. Otherwise your personal information will not be disclosed to anybody outside East Devon District Council without your permission, unless there is a lawful reason to do so, for example disclosure is necessary for crime prevention or detection purposes. Your information will be held securely and will not be retained for any longer than is necessary. There are a number of rights available to you in relation to our use of your personal information, depending on the reason for processing. Further detail about our use of your personal information can be found in the relevant Privacy Notice which can be accessed at: <https://eastdevon.gov.uk/access-to-information/data-protection/privacy-notices>

Please note that responses received will not be treated as confidential and they will be published on our council web site along with your name and if relevant the name of the organisation you represent. If you are an agent your name and organisation will be published as well as those of your client. Postal or email address will not be published unless they are embedded in documentation and cannot be readily blacked out.

Question 1 - Local Plan Objectives

In paragraph 2.1 of the Issues and Options report we set out a series of suggested objectives for the future local plan that cover issues like climate change, meeting housing needs and supporting the economy. Question 1 seeks your views on these objectives.

Do you think these are the right objectives for the new local plan, are there any further objectives that you would wish to see added or amendments made?

- Yes, these are the right objectives
- No, there are further objectives or amendments I would like to add

Please give details

Question 2 – The scope of the local plan

In paragraph 2.2 of the Issues and Options report we propose producing a single plan, but it would be possible to produce a series of plans to cover the different issues. Do you think we should?

Which option do you think we should take?

- Option 1 - Single Plan.** Produce a single local plan covering all policy matters
- Option 2 - Multiple Plans.** Produce a plan that deals with strategic matters (the bigger stuff) first and then subsequent plans that deal with more local concerns and detailed matters later
- Option 3 - Other.** Do an alternative or neither of the above

Please provide any further comments in the box below

Question 3 - Neighbourhood Plans and the new Local Plan

Neighbourhood plans have been agreed for many of our neighbourhoods and more are in preparation. In paragraph 2.11 of the Issues and Options report we explain the role of neighbourhood and their relationship with the local plan.

How do you think we should make best use of existing neighbourhood plans to inform the new local plan that we are producing?

Question 4 - Planning for health and wellbeing

In Chapter 3 of the Issues and Options report we set out the health and wellbeing benefits of active lifestyles and the ways in which planning can promote this.

How important do you think it is that we should actively promote health and wellbeing throughout our new local plan?

- Absolutely essential
- Very important
- Quite important
- Of limited importance
- Not important at all

Please provide comments below on any health and planning matters you consider to be particularly important

Question 5 - Energy efficiency of new buildings

In paragraph 4.4 of the Issues and Options report we identify ways of reducing carbon emissions from new developments, including setting higher energy efficiency standards for new buildings. Do you think we should?

Do you think we should

- Option 1 - Plan for net-zero carbon from plan adoption.** This would require all new development to be net-zero carbon upon adoption of the plan. However, it would be at a cost and as a consequence we may see less affordable housing built and maybe fewer other social and community benefits from development
- Option 2 - Plan for net-zero carbon from a future date.** This would require all new development to achieve net zero carbon from a future date in the plan process. It could allow time for the development industry to adjust to the higher standards and may mean we can secure more affordable housing and community benefits from development
- Option 3 - Do neither of the above and not have a policy.** Under this option we could just wait for and apply any Government policy

Please provide any further comments

Question 6 - Provision of solar arrays/farms and windfarms

Paragraphs 4.5 to 4.7 of the Issues and Options report deals with maximising energy from renewable sources. Question 6 seeks your views on what level of support we should give.

Which option do you think we should take?

- Option 1 - Identify suitable areas for renewable energy developments
- Option 2 - Not identify areas but offer general support
- Option 3 - Take a restrictive approach to renewables
- Option 4 - None of these options

Please provide any further comments on wind farms and solar arrays/panels

Question 7 - Carbon saving measures

Paragraph 4.8 of the Issues and Options report sets out seven policy objectives for helping to achieve carbon neutrality including using 'waste heat', and promoting community led renewable energy schemes.

Do you think we have identified the appropriate carbon saving and related policy matters to be addressed in a new local plan and are there any other policy areas that you think we should be considering?

- Yes, the appropriate carbon saving policy matters have been addressed
- No, there are other policy areas that should be considered

Please give details

Question 8 - How many new homes should we plan for each year?

In Chapter 5 of the Issues and Options report we set out the current Government requirement for us to build at least 928 new homes a year (although this figure can change). Paragraph 5.4 explains that we would need to almost double the number of affordable homes (to 461 every year for the next 20 years) to meet current and future needs. Do you think we should?

Which option do you think we should take?

- Option 1 - Plan for an average of at least 928 new homes being built each year** – This would accommodate levels of house building that accord with current Government requirements. It may mean, however, that we fall a long way short of meeting all affordable housing needs.
- Option 2 - Plan for a greater number of homes, for example 1,200** – this may meet more of the affordable housing need but not all of it.
- Option 3 - Plan to build considerably more homes each year** - A figure of 1,614 homes would align with Governments previous thinking and would potentially result in all affordable housing needs being met.
- Option 4** - Select option 4 if you think none of the above are appropriate

Please provide any further comments and justification in the box below, especially if you think a different number of new homes being built each year is appropriate.

Question 9 - Sites for small scale housing developments

Paragraphs 5.5 to 5.7 of the Issues and Options report sets out Government policy that at least 10% of new homes should be built on smaller sites (below 1 hectare). This provides more opportunities for smaller, local businesses and is more likely to reflect local character than mass produced homes. Do you think we should?

Which option do you think we should take?

- Option 1 - Allocate or identify land for around 10% of homes to be on small sites** - this approach would meet minimum government standards.
- Option 2 - Allocate or identify land for around 11% to 25% of homes to be on small sites** - this approach would be higher than Government minimum standards.
- Option 3 - Allocate or identify land for 26% to 50% of homes to be on small sites** - this approach would be substantially higher than Government minimum standards.
- Option 4** - Allocate or identify land for 51% or more of homes to be on small sites - with such a high figure this approach could fundamentally change the nature of house building in East Devon.
- Option 5 - None of the above or an alternative**

Please provide any further comments in the box below

Question 10 - Planning for housing for people at all stages of their life

Paragraphs 5.8 and 5.9 of the Issues and Options report sets out the reasons for building a range of homes that can accommodate different circumstances. What approach should we take to encourage this, or is it not something the local plan should deal with?

Which option do you think we should take?

- Option 1 - We should explicitly require housing provision for people at all stages of life.** This approach could place demanding standards on developers to provide housing for all stages of people lives. It could though reduce monies available to pay for other wider community benefits from development.
- Option 2 - We should encourage but not require housing provision for people at all stages of life.** Under this approach we could encourage and support such housing but be less demanding on specific standards to be met.
- Option 3 - Not set standards for differing types of housing provision.** This approach would leave developers to determining the types of houses that should be built rather than policy seeking to require specific outcomes
- Option 4 - None of the above or an alternative**

Please provide any further comments in the box below on how we may best plan for housing for all.

Question 11 - Additional housing policy objectives

Paragraph 5.10 of the Issues and Options report identifies nine additional housing policy objectives, including encouraging more self-build homes, allocating sites for retirement housing and setting minimum space standards for new homes.

Do you think these are appropriate housing policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

- Yes, these are appropriate housing policy areas to be addressed
- No, there are other major policy areas that should be addressed

Please give details

Question 12 - Preference for location for future job provision

Paragraphs 6.4 to 6.7 of the Issues and Options report explains why much recent employment development has occurred near to Exeter and where future job growth would best be located. We set out below a number of differing potential areas in East Devon that could accommodate future job growth and development. Please indicate your in principle levels of support for each option

12a - Continued focus on big employment sites in the West End of the District	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
12b - Encouraging greater business development in other areas close to Exeter (for example expanding Greendale and Hill Barton Business Parks)	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
12c - Encouraging greater business development at and within the main towns of East Devon	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
12d - Encouraging business expansion and development in the villages and across the countryside of East Devon	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
12e - Encourage and enable more home working	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
If you have any comments on the above or alternative options please set these out below.	

Question 13 - Differing jobs sectors in East Devon

Paragraphs 6.8 to 6.10 of the Issues and Options report discuss what sort of jobs the local plan should encourage, including the opportunities to attract new and emerging sectors with highly skilled jobs. To what degree do you support, or not, the following approaches to future jobs or differing types of jobs?

13a - More jobs overall – with an emphasis on attracting new/larger employers and inward investment in any or all sectors	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
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13b - More high technology jobs - focussing on high technology and high skilled jobs (including in the transformational sectors).	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
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13c - Local Entrepreneurs – promoting opportunities for more home/locally based/small businesses.	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
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13d - Traditional Sectors - Focus on growth, resilience and diversification in our traditional sectors - such as agriculture, tourism and care	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
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If you have any comments on the above or alternative options please set these out below.

Question 14 - Additional economic policy objectives

Paragraph 6.11 of the Issues and Options report identifies six areas where policies could be developed to help support the economy. These include promoting jobs close to where people live, encouraging people to patronise local businesses, supporting shared workspaces, allocating additional employment sites and links between economic development and developing a greener economy.

Do you think these are appropriate economic policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

- Yes, these are the appropriate economic policy areas
- No, I think there are other policy areas that should be addressed

Please give details

Question 15 - Town centre uses

Chapter 7 of the Issues and Options report considers options for the roles of our town centres. Question 15 seeks your views on these options. We set out below a number of differing potential uses and approaches to promoting town centre vitality and activity. Please indicate your in principle levels of support for each potential option or approach.

15a - Retail to dominate – support retail uses in town centres and if possible resist other uses.	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
15b - Promote mixed commercial uses - support retail as well as other commercial uses such as café's and offices	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
15c - Redefine town centres to smaller core areas – concentration on retail and commercial uses in the core and allowing much greater flexibility for other uses in peripheral areas	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
15d - Support change of use to housing – allow for any shops or commercial premises to be converted to housing	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
15e - Support community uses - promote more community spaces in town centres	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
15f - Leisure uses – promote new gyms and sports facilities in town centres.	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose

If you have any comments on the above or other distribution matters please set these out below

Question 16 - Additional town centre policy objectives

Paragraph 7.6 of the Issues and Options report identifies three additional area where policies may be appropriate including the use of vacant stories over shops, resisting 'out of town' uses to support town centres and producing town centre masterplans to identify key areas for improvement.

Do you think these are appropriate retail and town centre policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

- Yes, these are appropriate policy areas
- No, there are other major policy areas that should be addressed

Please give details

Question 17 - Designing beautiful spaces and buildings

Chapter 8 of the Issues and Options report explains how attractive places can be planned and Question 17 seeks to find out how important you think it is that this is done.

How important do you think it is that we should actively plan to create beautiful spaces and buildings?

- Absolutely essential
- Very important
- Quite important
- Of limited importance
- Not important at all

Please provide comments below on design matters you consider to be particularly important. We would be especially interested in your views on whether we should include design codes in our future local plan for each allocated development site or whether we should make it simpler and just have general guidance.

Question 18 - Additional design policy objectives

Paragraph 8.8 of the Issues and Options report identifies two areas with the potential for additional policy work. These are encouraging innovative designs and incorporating wildlife friendly elements into developments.

Do you think these are appropriate design policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

- Yes, these are appropriate housing policy areas
- No, there are other major policy areas that should be addressed

Please give details

Question 19 - The importance of conserving and enhancing heritage assets

Chapter 9 of the Issues and Options describes our heritage assets and sets out the positive impacts they can have on our quality of life and local economies.

Through a new local plan (and in the work of the council more generally) how important do you think it is that we should conserve and enhance our heritage assets?

- Absolutely essential
- Very important
- Quite important
- Not really of any importance

Please provide any further comments on heritage asset conservation and enhancement below including on any specific matters you think a new local plan should address.

Question 20 - Development in protected landscapes

Paragraphs 10.3 & 10.4 of the Issues and Options report sets out the importance of protecting our protected landscapes and the potential limitations this may place on how much and where development should be placed. Question 20 seeks views on the levels of restriction you favour.

In considering whether we should allow for development in protected landscapes do you think

- Option 1 - Place significant restrictions on development.** This approach would apply very tight constraints on development. However, it could mean more development pressure elsewhere in East Devon.
- Option 2 - Allow for development to meet local needs.** This would allow for limited development, specifically where it will meet smaller scale local social, housing or economic needs, it could still mean more development pressure elsewhere in East Devon.
- Option 3 - Allow for greater levels of development.** This approach would allow for much more development in protected landscapes, in so doing it could however reduce the need to build elsewhere.
- Option 4 - None of the above or an alternative**

Please provide any further comments in the box below

Question 21 - Net gains in biodiversity

Paragraphs 10.5 to 10.7 of the Issues and Options report explains the new approach of quantifying the potential impact of development on biodiversity to inform planning decisions and ensure that there is a 'net gain'. Question 21 seeks views on the approach you would favour to gain biodiversity improvements.

In order to gain biodiversity improvements which option would you prefer?

- Option 1 - On-site provision**
- Option 2 - Secure the habitats locally**
- Option 3 - Pay a cash tariff towards a strategic delivery scheme**
- Option 4 - A combination of the above**
- Option 5 - None of the above or an alternative**

Please provide any further comments in the box below

Question 22 - Additional natural environment policy objectives

Paragraph 10.8 of the Issues and Options report identifies 10 additional themes for the natural environment that may benefit from policies in the local plan.

Do you think these are appropriate natural environment policy issues to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

- Yes, these are the appropriate natural environment policy issues
- No, there are other major policy areas that should be addressed

Please give details

Question 23 - Promoting accessibility by walking and cycling

Chapter 11 of the Issues and Options report sets out the issues for promoting sustainable transport. Question 23 seeks your views on how important you think it is that new development is sited so that it is within walking distance of services and facilities.

In order to promote walking and cycling and ensure that facilities are accessible we could adopt the possible approaches detailed below, which one would you favour?

- Option 1 - Focus new development as small clusters of growth in locations within easy walking or cycling distance of existing services and facilities** - This will limit the potential location of new development and will require existing facilities and services to have the capacity to cope with extra customers/users
- Option 2 - Focus new development on a small number of growth areas where the large scale of development will support the delivery of new accessible services and facilities** - This may require very high levels of development to support facilities, which may overwhelm a small settlement.
- Option 3 - A combination of options 1 and 2** – This will enable some growth where existing facilities and services are accessible and have capacity with the remainder focused on growth areas to be developed with new services and facilities.
- Option 4 - Do not require facilities and services to be within walking or cycling distance of new development but require them to be available within the settlement** - This option would not require access by foot or cycle to facilities and services but would require them to be available locally. It may however encourage car use.
- Option 5 - None of the above** - Perhaps you think that accessibility by walking or cycling is not a relevant concern?

Please provide any further comments in the box below

Question 24 - Additional sustainable transport policy objectives

Paragraph 11.7 of the Issues and Options report identifies 13 key issues that may need to be considered around the theme of sustainable transport.

Do you think these are appropriate sustainable transport policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

Yes, these are appropriate sustainable transport policy areas

No, there are other major policy areas that should be addressed

Please give details

Question 25 - Facilities and services that are important

Chapter 12 of the Issues and Options report deals with infrastructure requirements and asks what facilities are important to people to help us prioritise what may be needed and where. Please score the services and facilities listed below in accordance with their importance to where you live or would want to live

Please score the services and facilities listed below in accordance with their Importance to where you live or would want to live?	Please tick one box only for each item			
	Essential	Very Important	Quite Important	Of little Importance
Convenience store/Post Office	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Supermarket	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Childcare and nursery school provision	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Primary school	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Secondary school	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Children’s play area	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sports & leisure facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Health care facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Open spaces	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Easy access to a range of jobs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Regular bus service (5 plus per day)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Train station	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Paths for walking and cycling	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Access to full fibre broadband	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public house	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Place of worship (e.g. a church)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
High quality road links	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Emergency services (police, fire, ambulance)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Community hall	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Youth facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you have any other comments or would identify other facilities please set these out below.

Question 26 - Additional infrastructure and service provision policy objectives

Paragraph 12.9 of the Issues and Options report identifies five other infrastructure and service policy objectives.

Do you think these are appropriate infrastructure and service provision policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

- Yes, these are appropriate policy areas to be addressed
- No, there are other major policy areas that should be addressed

Please give details

Question 27 - Retaining and refining the existing settlement hierarchy

Chapter 13 of the Issues and Options report considers strategic options for the distribution of new development expressed in terms of a settlement hierarchy. Question 27 seeks your views on what your preferred pattern of development would be.

Which of the following options do you prefer for a potential settlement hierarchy?

- Option 1** - Same hierarchy as current local plan: 7 Towns plus Cranbrook and the 15 Villages
- Option 2** - A hierarchy that retains the towns and Cranbrook but has a lower number of villages that may accommodate development
- Option 3** - A hierarchy that retains towns and Cranbrook but has a higher number of villages that may accommodate development
- Option 4** - Do something different in terms of a hierarchy or not have one

Please provide any comments below on the potential hierarchy, especially if you do not support the listed options.

Question 28 - Broad distribution of housing development

Paragraphs 13.12 to 13.14 of the Issues and Options report considers the strategic spatial options for accommodating housing growth. Question 28 asks which broad approach to the distribution of housing development you favour.

Which broad approach to the distribution of housing development would you favour in a new local plan?

- Option 1 - As existing.** Continue with a distribution pattern of planned new development that is in line with the current local plan – for 60% of new homes at the West End, 30% in Towns and 10% in Villages and rural areas
- Option 2 - More West End focused.** This approach would focus more of the future new house building close to Exeter, perhaps as much as 75%, with the remaining 25% being in town and villages (for example 20% in towns and 5% in villages).
- Option 3 - A less West End focused pattern.** This approach would seek to accommodate far less development close to Exeter, maybe as little as 20% of future new homes, with the bulk of new housing, 80% of provision, being dispersed across towns and villages (for example 50% in towns and 30% in villages and rural areas).
- Option 4 - An alternative to the above.** You may consider that there are different ways or approaches to look at development distribution (if so we would welcome your thoughts and comments)

Please provide any comments on the above in the space below

Question 29 - Future options for the type and location of development

Paragraphs 13.15 & 13.16 of the Issues and Options report sets out a range of option for accommodating development. Which do you prefer?

How do you feel about the development types and locations listed below	For each option please tick one box only					
	Strongly support	Support	Neither oppose or support	Oppose	Strongly oppose	None of the options
Infilling in towns and at larger villages	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Building one or more additional new towns	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Planning for new villages	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
large scale (over 50 home)urban expansions to existing towns	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
small scale (under 50 home) urban expansions to towns	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Building houses on the edges of East Devon villages	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Do you have any further observations on the alternative development options and approaches? Please provide comments below						

Question 30 - Establishment of a Development Corporation

Paragraphs 13.17 to 13.19 of the Issues and Options report explain the role that a development corporation could plan in delivering very large scale developments. Question 30 asks for view on how important you consider this would be.

If one or more big strategic sites for housing or mixed use development are allocated in the new East Devon local plan how important do you think the creation of a Development Corporation would be?

- Absolutely essential
- Very important
- Quite important
- Of limited importance
- Not important at all
- It would be a bad thing

Please provide any further comments below

Question 31 - Planning for development beyond 2040

Paragraph 13.20 of the Issues and Options report considers the timeframe that the local plan should consider.

Do you consider that it would be appropriate to start to plan for development in East Devon for a date well beyond 2040 in this Local Plan?

- Yes it would be very sensible whether a new town is proposed or not
- Sensible only if a new town is proposed
- It does not really matter what end date is set
- It would be undesirable and the end date should be 2040
- None of these options

Please provide any further comments below

Question 32 - And finally...?

Are there any big planning issues that you think we have missed in this report or are there any further comments you would like to make?

East Devon Local Plan

Response to Issues and Options Consultation January 2021

Representations on behalf of Concertare Burlands Mead Limited in respect of land at Burland Mead, Feniton

Question 3 (Neighbourhood Plans and the new Local Plan)

How do you think we should make best use of existing neighbourhood plans to inform the new local plan EDDC are producing?

As set out at paragraph 2.11 of EDDC's own consultation document it is acknowledged that it is for neighbourhood plans to broadly comply with the Local Plan rather than the other way round.

Therefore, whilst neighbourhood plans have been prepared throughout the district, there is a need to ensure that the Local Plan leads the way by setting the housing numbers required for the district, reviewing the settlement hierarchy to ensure development is located appropriately, and where required amending settlement boundaries and allocating sites for development. It is then for neighbourhood plans to be updated to reflect the overarching content of the Local Plan.

The Planning and Compulsory Purchase Act 2004 (s38) indicates that where there is conflict between policies, the conflict must be resolved in favour of the policy contained in the most recent plan. This means that where a Neighbourhood Plan is completed in advance of the Local Plan, the updated Local Plan in this instance, would outweigh overrule policy expressed in the earlier Neighbourhood Plan.

Question 8 (Number of Homes to be Planned for)

In Chapter 5 of the Issues and Options report EDDC set out the current Government requirement to build at least 928 new homes a year (although this figure can change). Paragraph 5.4 explains that EDDC would need to almost double the number of affordable homes (to 461 every year for the next 20 years) to meet current and future needs. What do you think EDDC should do?

We would recommend that the LPA should go for option 2 set out in their paper – this would be to plan for a greater number of homes than that specified by government (say 1200 each year) as a way of potentially meeting more affordable housing need within the district.

We would suggest that it will be necessary to plan for more than the minimum housing requirement proposed (of 928 homes per year) in order to introduce greater flexibility into the districts housing delivery and to potentially protect the authority from any future changes to the LPA's annual requirement that could be imposed by central government in the future.

This flexibility (both in terms of housing numbers and locations for development) has been noticeably lacking under the existing Local Plan, with the bulk of the housing supply based on the delivery of the Cranbrook new town. Experience has shown that this approach has been problematic due to issues of viability and the need to (for example) address SANGS provision, all of which have constrained housing delivery and slowed delivery at Cranbrook. As things stand, due to delays with the adoption of the Cranbrook DPD and the further ongoing work required the plan is some way from adoption and the delivery of housing in the line with the Council's 5 year housing land supply trajectory which supports the plan is undoubtedly at risk.

As the paper notes, the 928 home annual requirement is derived in large part from existing commitments/projections, some of which will inevitably be delayed in coming forward or which may not come forward at all. This risk is higher given that a large proportion of the existing commitments are within the gift of a limited number of developers and concentrated in relatively few different locations, for example at Cranbrook. As experience is showing, this strategy is a risky one with such concentrations of supply potentially putting at risk the delivery of a key component of the Council's overall development strategy.

Given the extent of the constraints (especially those relating to landscape and biodiversity) which affect East Devon, it is unlikely to be possible to deliver very high levels of housing without significant harm being caused to the character of the area. However, we would suggest that there is justification to plan for more than the minimum (928 dwelling per annum) level in order to ensure a properly robust supply of housing. It is also considered that there are a range of opportunities by which a modestly increased level of housing can be delivered. It seems realistic and sensible to continue to make provision for additional housing in the West End, and much more housing around the major towns and villages which are well served by public transport (e.g. villages such as Feniton and Whimple which benefit from a presence on the Exeter/London Waterloo rail line. However, there is also justification for taking a more proactive stance towards to opportunities in and around villages. Growth in such locations will need to be carefully managed but experience does suggest that if the right approach is adopted (and we would refer the Council to the approach taken in Cornwall where the Local Plan has adopted a strategy of 'infilling and rounding off' in all settlements – even those that

are small hamlets without facilities) this can be achieved in a beneficial way and in a manner which does not harm the important attributes of the area.

East Devon is a district where housing is becoming increasingly expensive and where issues of affordability are becoming increasingly acute. Recent research published by the Institute of Policy Research indicates that nationally, only 8% of the rural housing stock could be classed as affordable, compared to a figure of 20% for housing in urban areas. This differential would appear to be born out in East Devon and this suggests that there is a need for more housing to be provided right across the district in order to address the imbalance and allow local people greater choice in where they live.

As the paper notes, increasing the overall supply of housing will also help to increase the amount of affordable housing as well.

Question 9 (Sites for Small Scale Housing)

Paragraphs 5.5 to 5.7 of the Issues and Options report sets out Government policy that at least 10% of new homes should be built on smaller sites (below 1 hectare). This provides more opportunities for smaller, local businesses and is more likely to reflect local character than mass produced homes.

Do you think we should?

There are strong arguments in support of raising the provision for more smaller sized housing schemes to come forward. Over reliance on large scale housing schemes renders local authorities more vulnerable to not meeting their housing commitments in the event that development of those schemes fails to take place. At the same time an over-emphasis on large sites reduces competition within the market place. There is strong evidence to suggest that some of the effects of this are to reduce the quality and appropriateness of the housing which is built. Reliance on a fewer number of larger scale housing schemes is also likely to mean that housing is less likely to be provided in locations where it is truly needed.

There is a role for large scale housing schemes to continue to be used. However, we would suggest that in a rural authority like East Devon, such schemes should be provided for alongside a greater range of smaller sites in both the main towns and larger villages, such as Feniton. Such sites are more suitable to being provided in a diverse range of locations across the district and therefore in locations which can help achieve wider objectives relating to housing need, supporting the vitality of rural settlements and reducing the prevalence of commuting. By virtue of their smaller size, such sites are likely to be more attractive to local developers who are likely to be more willing to adopt more sympathetic and bespoke design, an approach which is more appropriate to addressing the

environmental sensitivities of the area. Furthermore, small developments on sites of 1ha can still play an important role in the delivery of affordable housing provision, with only the smallest (i.e. five or less units) being exempt from such a requirement.

Question 11 (Additional Housing Policy Objectives)

Paragraph 5.10 of the Issues and Options report identifies nine additional housing policy objectives, including encouraging more self-build homes, allocating sites for retirement housing and setting minimum space standards for new homes.

It is important for local plan policy to create opportunities for the diversification of the range of housing types which can be delivered.

The demographic character of the district, with a large proportion of older people, means that there are strong grounds that policies be established to allow the provision of specialist housing for older people and those in need in care (which are not always the same thing).

Greater emphasis should be made for self and custom build housing. This should not be provided simply as a 'bolt on' to larger development sites, which is the current strategy with EDDC seeking to currently locate the vast majority of their self-build requirements in the new town of Cranbrook.

Such an approach is rarely attractive to the genuine custom builder who by their nature is looking to very specific locations and types of sites, typically in more rural locations rather than as part of an urban development site.

Although allowing such types of housing in a more geographically diverse way does raise potential issues of concern, for example in relation to the proliferation of such schemes and the potential that they could be used as a back door to open market development. However, these concerns can be addressed through the use of carefully worded and detailed development management policies and the application of legal agreements to remove the potential for open market re-sale.

Question 12 (Preference for Location of Future Job Provision)

Paragraphs 6.4 to 6.7 of the Issues and Options report explains why much recent employment development has occurred near to Exeter and where future job growth would best be located. EDDC have suggested a number of differing potential areas in East Devon that could accommodate future job growth and development. Please indicate your in principle levels of support for each option

Greater provision should be made for employment to come forward at locations right across the district. This should not only continue to be located around the main towns but also in and around all the main towns and the villages in the district.

There is an acute need for more business space, especially that suitable for small and medium sized businesses, to be provided in East Devon and this is a problem which is already by the Council. As the Council's own economic development team note, the district's economy is characterised by lower than average wages and low levels of productivity. The number of jobs provided in the area falls well behind the delivery of new housing, making the district unduly reliant on surrounding economies. With the increasing age of the population, the already lower than average proportion of working age in the area is forecast to reduce further, a trend which is expected to continue, and which will accentuate the existing area's existing economic problems.

Given these issues, the Council's policies need to help facilitate new business development and opportunities to increase the number of skilled jobs, apprentices and training.

Large scale employment provision in the West End plays an important role, being well sited to serve Exeter and also with good connections to the strategic road network. However, this location is geographically remote from much of the district and is typically of a type which serves regional or national markets rather than a local one. Much of the provision in the West End and at established locations like Hill Barton and Greendale is in the form of 'sheds' which have a large footprint but low employment density and therefore does not offer the scale of job provision needed, for example, to meet the high levels of housing growth which have been taking place.

At the same time, there is clear evidence of a strong demand for small scale employment uses right across the district. This is clear from the success of many small scale employment operations which exist, many of whom are at, or close to capacity. This position has been acknowledged by East Devon's own economic development team in relation to various recent planning schemes.

The provision of a greater number of small employment sites in locations across the district will help to encourage small scale enterprise in rural settlements and will help to support their vitality through job creation and increasing direct and indirect spend in the area and will help to support other rural businesses in the area.

Finally, in order to encourage businesses to success and to grow, a greater supply of commercial land is required in order to offer the ability for companies to re-locate. The absence of such choice risks businesses choosing to re-locate to outside the district.

Question 19 (Importance of Conserving and Enhancing Heritage Assets)

Chapter 9 of the Issues and Options describes EDDC's heritage assets and sets out the positive impacts they can have on our quality of life and local economies.

It is very important that policies in the local plan have proper regard to the need to conserving and enhancing heritage assets. East Devon is blessed with many such assets and proper regard should be had to their protection. It is important, however, that in developing its policy approach for the management of development which may affect heritage assets, relevant policies also recognise that such assets, especially those with a lower level of designation, are capable of accommodating change and that such change may be beneficial to the long term protection of the asset involved. Heritage policy is too often rigidly applied by both the Council itself or by third parties who may have NIMBY type interests in mind. Overly prescriptive policy application risks heritage assets, which might otherwise be capable of (for example) beneficial conversion becoming allowed to decline to such a point where such a change is no longer a viable proposition. This is clearly self-defeating to the wider objective seeking the retention of heritage assets. In developing its policy approach, we would recommend that the Council seek to enshrine greater opportunities for heritage assets to be re-adapted for use.

Question 20 (Development in Protected Landscapes)

Paragraphs 10.3 & 10.4 of the Issues and Options report sets out the importance of protecting our protected landscapes and the potential limitations this may place on how much and where development should be placed. Question 20 seeks views on the levels of restriction you favour.

East Devon is a district which is blessed with a considerable amount of beautiful and sensitive landscapes. This is reflected in the extent of the district – approximately half of its area – which is subject to nationally important designations, such as the two Areas of Outstanding Natural Beauty. However, the extent of these designations means that there are many settlements which within such protected landscapes, not least the significant towns of Sidmouth and Budleigh Salterton. It is therefore wholly reasonable that the Council facilitate some development within these areas in order to meet the needs of the various communities which are located within protected landscapes.

Furthermore, there are a range of issues which are particularly acute within these protected areas. Typically, communities within these areas have low levels of housing supply and low housing affordability. Opportunities for economic activity of all types in such areas are often limited. Reflecting

these pressures, many of these communities have high levels of older or retired residents or holiday housing.

These factors mean it is important that opportunities are provided for new development to take place within protected landscapes. Such development can be used to provide much needed new housing, including affordable housing, and to deliver new commercial premises. It is vital that sufficient flexibility is provided to allow some growth within all but the smallest settlements in the district in order that local growth needs are met. It is recognised that opportunities for development should be focused on meeting the needs of local people. However, relevant policies should accept that in order to meet this need, it will often be necessary in the case of housing schemes, to allow open market development in order to inject the required level of viability. Reliance on exceptions housing schemes, even where part funded by an open market element, to meet local need in such areas is very unlikely to be a successful approach. The process for advancing such schemes is too onerous and the incentives too limited for a pure exceptions led approach around rural settlements to work.

Furthermore, the Council's alternative approach of relying on neighbourhood plans (NPs) to deliver local growth has not proved successful. In the main, neighbourhood plans have been used as a platform for NIMBY interests and have not sought to allocate land for development.

Mechanisms are available to manage the potential impacts of development within protected areas. Carefully worded development management policies can be used to control the overall scale of development possible and to require very high standards of design to be adopted to ensure that the resulting development is of a quality commensurate with its location.

Question 27 (Retaining and Refining the Existing Settlement Hierarchy)

Chapter 13 of the Issues and Options report considers strategic options for the distribution of new development expressed in terms of a settlement hierarchy. Question 27 seeks your views on what your preferred pattern of development would be.

The settlement hierarchy needs to be revised so that it allows a greater number of locations where some development can be accommodated. We would suggest option 3 is the most appropriate. It will retain focus on the West End and main towns, but also allow villages to accommodate growth. It is important that the approach is amended along these lines in order to introduce greater flexibility into the supply of housing and jobs and to ensure that local needs are more adequately met.

Within this context, the role of the West End will still remain important, given that area's relationship with the Exeter and in order to help support the city's future growth requirements and it is important that further consideration be given to development at the main towns, as these are inherently sustainable locations for growth.

However, there is a greater scope for villages to play in delivering growth for the district. Particularly those villages which have excellent accessibility and access to rail infrastructure

The future settlement hierarchy should, however, put more emphasis on the potential of the larger and most accessible villages that are less environmentally constrained to deliver development. A prime example is Feniton, which due to a number of factors (including its railway station and lack of landscape sensitivity) is very well placed to accommodate growth. The scale and form of growth can be carefully controlled through local development management policies so that it complements the character of the area and helps meet local needs.

We would draw the LPA's attention to the work that was undertaken as part of the GESP (Great Exeter Strategic Plan) Draft Policies and Site Options Consultation (Regulation 18 stage) which highlighted Feniton as a potential area for growth. Feniton was highlighted as a location for consideration in the GESP because:

- It is close to Feniton train station and the A30
- Feniton includes a number of essential services already which could be enhanced
- It could potentially help to address existing issues of flood risk (noting the villages location within a Critical Drainage Area)

All of the above criterion remain relevant and suggest Feniton (and villages like Feniton which have rail access to locations like Cranbrook and Exeter where West End and Exeter City jobs are located) are excellent locations to encourage growth. The Waterloo Line provides a mainline rail service from Exeter to London, linking to a number of towns and villages within the eastern part of the Greater Exeter area. The market towns of Honiton and Axminster have economic and housing potential, while settlements with existing stations like Feniton, provide the opportunity for strategic expansion.

Question 28 (Broad Distribution of Housing Development)

Paragraphs 13.12 to 13.14 of the Issues and Options report considers the strategic spatial options for accommodating housing growth. Question 28 asks which broad approach to the distribution of housing development you favour.

We would suggest that the most appropriate distribution would be **Option 3 (less West End focused)**.

The west end is currently benefiting from much of the district's housing growth through the current allocations at Cranbrook.

To date, a west end focused approach has led to inflexibility and stalled housing delivery due to a number of complex issues, including development viability and the need to (for example) address SANGS provision, all of which have constrained housing delivery and slowed delivery at Cranbrook. As things stand, due to delays with the adoption of the Cranbrook DPD and the further ongoing work required the plan is some way from adoption and the delivery of housing in the line with the Council's 5 year housing land supply trajectory which supports the plan is undoubtedly at risk.

Greater flexibility can be built into any plan by pursuing Option 3 which would see as 20% of future housing growth sited within the West End of the district, with 50% of housing in the main towns and 30% in the villages. This will allow for a much more robust distribution of housing and also open up development opportunities for SME builders, rather than large scale allocations in the west end which are generally monopolised by the PLC housebuilders.

A change of this nature could be justified if development is located in the right place (e.g. on the edge of towns and villages that are free from environmental constraint and with excellent accessibility credentials).

This overall approach would allow some focus to remain on the West End (noting that significant infrastructure is still to be located in Cranbrook) acknowledging the locations inherent attributes and linkages, whilst making careful adjustments to allow for more growth to come from other parts of the district.

The main towns, including those with capacity outside and within the AONB (such as Honiton), should be able to accommodate some carefully planned growth reflecting their own sustainability attributes, and the smaller settlements, which are free from landscape constraint and served by public transport allowed to accommodate significant growth (whilst acknowledging the level of growth achievable pegged to the settlement size and sensitivity of the location).

A settlement like Feniton could take a sizeable allocation, and along with other rural settlements, the aggregate effect would be noticeable, given the number of suitable villages across the district will be to make sizeable contribution to the Council's overall housing supply requirement. At the same time, growth of this type will help diversify supply, support more local businesses, meet local need and facilitate affordable housing in many of the areas of most need.

Question 29 – Future Options for the Type and Location of Development

Paragraphs 13.15 & 13.16 of the Issues and Options report sets out a range of option for accommodating development. Which do you prefer?

Following through the approach set out above, there seems to be several development types and locations that would help deliver the strategy. However, we would suggest that the LPA should avoid taking to narrow an approach which is currently the case with the existing local plan that focuses everything in Cranbrook and limited growth anywhere else.

Many differing forms of housing development should be provided for in order to deliver the housing that is needed. The new local plan needs to be flexible and support a range of options. This should include large scale urban expansions at the existing towns (such as Honiton) and building houses on edges of the larger villages, for example Feniton, and allowing some limited development in certain smaller villages and hamlets in less environmentally sensitive locations in order to support rural local facilities.

Policies in the new local plan must recognise opportunities to build on vacant land and/or underutilised sites that may sit outside of, but be well-related to, towns and villages. There is land across the district (our client's land at Burland Mead, Feniton being a prime example) that falls outside of town and village built-up area boundaries, but nonetheless could make a meaningful contribution to housing land supply, optimise the use of sites which currently have little beneficial use and would make tired run-down sites more attractive. Ultimately, significant flexibility is needed in the new development management policies to allow good sensible sites like this to be considered on their merits.