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**ORGANISATION NAME:** Not Applicable

**AGENT ACTING FOR CLIENT:** No

**CAPACITY I AM RESPONDING:** Private individual

**(PLEASE NOTE: Each question starts on a fresh page, with responses for questions with multiple options or items requiring a tick given in red. Comments are also provided for each of the 32 questions).**

## RESPONSES TO QUESTIONS:

**Question 1 - Local Plan 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? (See P.4)

**Response:** **Yes**

### **Further Comments/Objectives:**

For 'Objective 8, "Our Outstanding Natural Environment" (on Page 2), it does not give mention/take into account the need to protect our existing green open spaces, whether formal or informal in their use, but which still hold immense wellbeing and biodiversity value to residents and visitors. Therefore, a further objective needs to be included to recognize the recreational, wellbeing and biodiversity value of both formal and informal green open spaces to residents and visitors.

Include this further objective: "Protecting Green Open Spaces" - Objective 11 - "To recognize and protect the recreational, wellbeing and biodiversity opportunities our formal and informal green open spaces offer to our residents and visitors".

Include a further objective: "Encouraging and preserving biodiversity in the built environment" – Objective 12 – "To recognize the importance existing mature trees have in our built environment in promoting biodiversity, reducing the visual impact of the built environment and also reinforcing an important characteristic of that area".

## Question 2 – Scope of the Local Plan

Do you think we should:

Tick One Box Only

**Option 1 – Single Plan – Produce a single Local Plan  
Covering all Policy matter?**

**YES (tick)**

**Option 2 – Multiple Plans** – Produce a plan that deals with strategic matters (the bigger stuff) first and then subsequently 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 *below*:**

A limitation of this option is that it does not acknowledge the individual constraints experienced by particular towns or smaller parishes in relation to their specific landscape characteristics such as topography, which might not be covered adequately under a standardized set of policies (key planning matters). This would suggest that along with a single Local Plan there is also the need for additional, more localized supplementary planning guidance plans which will be given the same weight of consideration and status as an adopted district-wide Local Plan.

**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 that we are producing?

**Comments:**

Neighbourhood Plans provide an important representation of what aspects are considered to be important by local people in their immediate environment. This can include identifying particular design features and materials that are aesthetically valued which residents want to see influence new build projects, in order to help reinforce that village/town's identity. Residents are also able to comment on sites which have been identified suitable for new housing, employment opportunities and recreational provision, or which they want to see safeguarded from development. However, Neighbourhood Plans have notable limitations in that they are currently not permitted to provide more detailed information in relation to design matters. Many design-based issues were previously covered in supplementary Design Statement documents produced by villages and towns, although historically they have unfortunately not been given the same weight of consideration by planners or planning committees. Therefore, Neighbourhood Plans need to be given policies that will help reinforce design aspects of a parish, village or town that are considered important by its community.

#### Question 4 – Planning for health and wellbeing

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

Tick one box only

**Absolutely Essential**

**YES (tick)**

Very important

Quite important

Of limited importance

Not important at all

Please provide comments *below*:

Paragraph 3.10 (Page 9) stresses the value of open space being within easy reach of other facilities such as homes, schools, shops and other sports/recreational facilities. However, the Local Plan should recognize that all open spaces are considered of important value to communities, including those sites abutting/outside of the build environment which can still be accessed in a sustainable way, but where they have the additional benefit of being a habitat for wildlife and promoting additional biodiversity.

## Question 5 - Energy efficiency of new buildings

Do you think we should?

Tick One box only

**Option 1- Plan for net-zero carbon from plan adoption?**

**Option 2- Plan for net-zero carbon from a future date?**

**YES (tick)**

**Option 3 – Do neither of the above and not have a policy?**

**Please provide any further comments *below*:**

Reducing the carbon footprint of new developments is an important part of tackling climate change. However, this approach has a number of issues that need to be considered:

1) Reducing emissions can also be achieved by recognising the immediate and long term benefits existing mature and new trees have in absorbing airborne pollutants through various processes such as photosynthesis, dispersion and deposition. This is especially beneficial in areas where there is high population and and/or vehicular use. The value of such trees has not been acknowledged and promoted through the Local Plan which has instead focused on the design, construction and operation of new developments.

2) There is a concern that such initiatives will either be resisted by developers or it will lead to them making a case that new build projects cannot be delivered profitably and they will need to reduce/forgo making any Community Infrastructure Levy. Both of these concerns need to be considered so that residents of East Devon do not end up with compromises in the delivery of new build schemes.

## Question 6 – Provision of solar arrays/farms and windfarms

Which option do you think we should take

Tick One box only

**Option 1- Identify suitable areas for renewable energy developments**

**Option 2 – Not identify areas but offer general support**

**Option 3 – Take a more restrictive approach to renewables**

**Option 4 – Please tick the box if you think none of the above are appropriate YES (tick)**

**Please provide any further comments *below*:**

Option 1 implies there will be little or no input by local residents in the decision-making process for identified sites and that the decisions will be imposed on them in a top-down manner. Moreover, such sites might no longer be restricted by other planning policies such as design, loss of open space, loss of land which has a more productive purpose (e.g. agriculture) and the impact they have on wildlife in relation to their habit or movement corridors (e.g. bats). Option 2 suggests a lack of proactive commitment to delivering sites that could provide renewable energy opportunities, but would potentially be more considerate of local residents' concerns and actual needs identified in other parts of the Local Plan.

Sites that are identified for some of these renewable energy sources should not result in the loss of land that has a more productive value to the community, nor should it impact on the natural environment for wildlife habitation and their natural movement.

## **Question 7 - Carbon saving measures**

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?

**Response: Yes**

### **Further Comments:**

Paragraph 4.8, bullet-point 6 (Page 15), needs to also reinforce the importance existing mature trees have in/near the built environment in relation to helping filter out carbon dioxide from the atmosphere. Insufficient consideration has been given in previous Local Plans to protecting existing trees in the built environment and acknowledging their ecological benefits (amongst many benefits). Therefore, there needs to be a bullet-point 8) in the new Local Plan for a further policy area, to read as: "8) Wherever possible, we will actively look to deliver a protection policy for existing mature trees within and outside of the built environment which already provide numerous benefits, including helping to reduce levels of carbon dioxide and other airborne pollutants."

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

Which option do you think we should take?

Tick one box only

**Option 1- plan for an average of at least 928 new homes being built each year**

**YES (tick)**

**Option 2 - plan for a greater number of homes, for example 1,200**

**Option 3 - Plan to build considerably more homes each year**

**Option 4** – Please tick this box if you think none of the above are appropriate

**Please provide any further comments *below*:**

Option 1 provides a more realistic expectation on how this number of dwellings can be incorporated within the existing infrastructure. Affordable housing continues to rely on a flawed central government housing policy where the delivery of market value housing development schemes provide funds towards the provision of affordable housing, although this does not mean they will actually be provided on the same site. Some developers believe that providing affordable housing within a scheme delivering predominantly market value housing will have a negative impact on the appeal of that market value housing and the sale price they can command. As such, they will actively resist providing affordable housing within the scheme. However, neither developers, planning officers nor central government attempt to answer the obvious question: Where will this off-site affordable housing ultimately be sited? Clearly more effort needs to be made by all parties to ensure that more new housing projects deliver affordable housing on site and as part of a mixed type of housing scheme, rather than merely through voluntary funds for off-site provision.

## Question 9 – Sites for small scale housing developments

Which option do you think we should take?

Tick one box only

**Option 1** - Allocate or identify land for around 10% of homes to be on small sites

**YES** (tick)

**Option 2** - Allocate or identify land for around 11% to 25% of homes to be on small sites

**Option 3** - Allocate or identify land for 26% to 50% of homes to be on small sites

**Option 4** - Allocate or identify land for 51% or more of homes to be on small sites

**Option 5** - None of the above or an alternative

**Please provide any further comments *below*:**

This option may reduce the pressure to build on smaller sites which currently prevent settlements from coalescing and also ensuring there a number of subtle schemes with a more distinctive design nature. However, there should not be the assumption that small and medium builder developments will raise design standards in terms of architectural style, the appropriateness of materials used and the ability of new housing to sit well in the context of the existing built environment. Many smaller spaces left within or abutting the built environment, including windfall sites, also help to reduce the feeling of urban ‘cramming’ or development encroaching into the countryside. Therefore, smaller sites should not be seen as an easy opportunity to deliver more housing and reduce the wellbeing and quality of lives of those already living nearby. Wherever possible, delivering high design standards which sit well in their context should be enforced by the Local Planning Authority at the outset of pre-application advice given, with poor design standards being considered as robust grounds for refusing planning applications.

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

Which option do you think we should take?

Tick one box only

**Option 1- We should explicitly require housing provision for people at all stages of life**

**Option 2 – We should encourage but not require housing provision for people at all stages of life**

**Option 3 – not set standards for differing types of housing provision**

**Option 4 – None of the above or an alternative.**

**YES** (tick)

**Please provide any further comments *below*:**

By placing demanding standards on developers to provide housing for all stages of people lives may not actually deliver the type of housing that buyers of a particular demographic category actually want.

The Local Plan's recommendations do not identify that many types of housing can be adapted to suit people at all stages of their life through instigating a more flexible approach during the design stage. For example, having reinforced roof joists included in the design specification of a new build house can enable roof space to be more easily converted later on to provide additional accommodation space (subject to meeting planning policies), the positioning of built-in cupboards above each other over two floors can provide the ability to deliver a floor lift for those with impaired mobility. This is also about promoting the design standards within the dwellings themselves which can enable those occupiers at changing stages of their life to remain in the home they want to live in.

## **Question 11– Additional housing policy objectives**

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?

**Response: Yes**

### **Further Comments:**

Item No. 8 (Page 20) is conflicting in its objectives, as having standards relating to the density of development will not necessarily deliver improvements in design standards or reinforce occupiers having their 'own space'.

The following additional housing policy needs to be included: Item 10) "Encouraging new build projects, whether large scale, custom or self-build, to consider more flexible adaption measures within both the external and internal design aspects of the property, to enable it to meet changing occupier demands. This could include reinforced joists to enable easier conversion for providing additional accommodation space within the roof space (subject to meeting planning and building regulations), building cupboard/storage provision above each other on two levels or more within the dwelling to enable them to be converted into access lifts for those occupiers with impaired mobility. A further consideration could be designing stairways which can be easily configured for stair-lift provision."

## Question 12 - Preference for location for future job provision

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.

Tick one box for each option

Continued focus on big employment sites in the West End of the District

**'Neither oppose nor support'** (tick)

Encouraging greater business development in other areas close to Exeter (for example expanding Greendale and Hill Barton Business Parks)

**'Support'** (tick)

Encouraging greater business development at and within the main towns of East Devon

**'Support'** (tick)

Encouraging business expansion and development

in the villages and across the countryside of East Devon **'Neither support nor oppose'** (tick)

Encourage and enable more home working

**'Neither oppose nor support'** (tick)

**Please provide any comments *below*:**

Scenario 3) (Page 23) quotes: "Encouraging greater business development at and within the main towns of East Devon". This section does not identify which towns are the 'main' towns in East Devon. Is it just Axminster, Exmouth and Honiton, or does it include all seven towns? This statement needs to be further qualified by the document's authors. Smaller towns such as Seaton face its own challenges to offer competitively paid employment opportunities and create new, sustainable business opportunities beyond tourism, retail and care provision. Therefore the Local Plan should seek to extend its commitment to encouraging greater business development in these smaller towns.

Scenario 4) quotes: “Encouraging business expansion and development in the villages and across the countryside of East Devon”, implies the Local Plan will support employment opportunities which develop across the unspoilt countryside. Or is this statement about opportunities that generate productive use of the countryside without spoiling it, e.g. farming, timber harvesting, animal grazing and sites used for events? This statement needs to be better explained by the authors.

### Question 13 – Differing jobs sectors in East Devon

To what degree do you support, or not, the following approaches to future jobs or differing types of jobs

Tick one box for each option

**More jobs overall**

**'Support'** (tick)

**More high technology jobs**

**'Support'** (tick)

**Local Entrepreneurs**

**'Support'** (tick)

**Traditional Sectors**

**'Support'** (tick)

**Please provide any comments *below*:**

The approach by the Local Plan to adopt a flexible approach to the types of employment sectors it can encourage and support is welcomed. This will ensure that a variety of different employment sectors will be actively encouraged within East Devon, ensuring a wider range of opportunities to meet the needs of different skillsets and age groups of employees at various stages of their working life.

## **Question 14 – Additional economic policy objectives**

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?

**Response: Yes**

### **Additional Comments:**

The additional economic policies being proposed (Pages 24-25) will hopefully enable the Local Plan to adopt a more flexible and dynamic response to changing employment needs in particular areas in the district. For example, creating employment opportunities nearer to where people live in order to reduce the amount of travel involved. However, this will only be successful if such opportunities also recognize the skillset on offer from those living in that particular geographical locality.

## Question 15 – Town centre uses

We set out below a number of differing potential uses and approaches to promoting town centre vitality and activity. Please indicate you're in principle levels of support for each potential option or approach.

Tick one box for each option

- |   |  |
|---|--|
| Retail to dominate                          | <b>'Neither support nor oppose'</b> (tick) |
| Promote mixed commercial uses               | <b>'Support'</b> (tick)                    |
| Redefine town centres to smaller core areas | <b>'Oppose'</b> (tick)                     |
| Support change of use to housing            | <b>'Oppose'</b> (tick)                     |
| Support community uses                      | <b>'Support'</b> (tick)                    |
| Leisure uses                                | <b>'Support'</b> (tick)                    |

Please provide any comments *below*:

Paragraph 7.4 (page 26) quotes: "Where vacant shops have been taken over, they are often filled by cafes and coffee shops and health and beauty businesses, a shift towards offering experiences rather than products." This sentence also needs to include/mention charity shops which do offer products and further competition in the retail sector, but they receive certain tax reliefs that are not extended to other trading businesses, thereby giving them imbalanced advantages. The Local Plan should not encourage a quick or automatic assumption that vacant premises should be converted into housing. Instead, it should actively seek to prioritise encouraging alternative employment generating uses that promote the economy of the town.

## **Question 16 – Additional town centre policy objectives**

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?

**Response: Yes**

A key consideration to attract footfall into retail and town centres is the visual ambience of that setting in relation to its cleanliness, maintenance of buildings and sympathetic enhancements that do not detract from the character of the area. Maintenance and sympathetic enhancements can include the design, materials and colours used for doors, windows, rendering and even shop front signage. Open spaces with seating is also something that encourages people to a town centre/retail area, along with good mobility access. Town centres and retail areas encouraging outdoor seating opportunities for formal and informal dining also reaffirm the relaxed, welcoming ambience of that area, which will hopefully encourage others to spend more time in that area.

## Question 17 – Designing beautiful spaces and buildings

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

Tick one box only

**Response:**

**'Absolutely essential'** (tick)

**Please provide comments *below*:**

Actively planning to create “beautiful” spaces and buildings has not been robustly delivered by previous generations of the Local Plan, with many small and larger scale development programmes delivering ‘more of the same’ uninspiring designs. This has done little to reinforce the individual character of a settlement or the residents’ pride in living there. This is evident at Cranbrook where monotonous architecture has not delivered design distinction, instead resembling the more recent Holland Park development in Exeter.

The new Local Plan must consistently encourage more aesthetically pleasing designs that enhance the existing built environment and at the same time robustly resist more ‘generic’ designs. Locally produced Design Statements are a useful supplementary document produced by residents in villages and towns containing comprehensive design guidance, although they have not been given equal consideration by planners. Open spaces have traditionally resembled space left over after development, and little consideration has been given to promoting biodiversity in the built environment or the aesthetics of materials used for hard surfaces.

## **Question 18 – Additional design policy objectives**

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?

**Response: Yes**

### **Additional Comments:**

“Encouraging innovation and interesting designs” (page 30) is subjective in its interpretation, although it should not be to the detriment of accepting ego-fuelled ‘grand designs’ that jar/conflict with the recognised design vernacular, density and fenestration characteristics of an established residential area. Robust design based policies need to guide both home designers and planning officers throughout the whole design and planning process. This will ensure that designs which could detrimentally conflict with existing architectural styles and irreversibly change or erode the character of an established area, are ultimately not approved nor delivered. Planners need to give greater consideration to design based issues raised by individuals as it is the residents who ultimately have to live with the ‘after effect’ of planning consent being granted.

Promoting wildlife friendly schemes into developments is widely supported. This can be further enhanced through initiatives such as creating/retaining green open spaces and the planting of vegetation and trees, which also help to soften the impact of some designs on the immediate area.

## Question 19 - The importance of conserving and enhancing heritage assets

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?

Tick one box only

**Response:**

**'Absolutely essential'** (tick)

**Please provide any further comments *below*:**

Heritage assets can also include open spaces, commons, common land and ancient woodlands. Therefore the Local Plan needs to take a wider perspective in relation to recognising locally identified heritage assets which help give identity and heritage value to a village or town and seek to protect them wherever possible.

This can also include aspects such as materials used for buildings, whether structural or superficial, and even shop/commercial buildings fascia signs, which also help reinforce the heritage character of a settlement.

## Question 20 - Development in protected landscapes

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

Tick one box only

**Option 1- Place significant restrictions on development**

**YES** (tick)

**Option 2 – Allow for development to meet local needs**

**Option 3 – Allow for greater levels of development**

**Option 4 – None of the above or an alternative**

**Please provide any further comments *below*:**

Protected areas such as AONBs, Areas of Great Landscape Value and Coastal Preservation Areas form an intrinsic part of the character and unique identity of the villages, towns and the undeveloped rural landscape in the district of East Devon. This can include their special topography and ability to promote and safeguard wildlife havens, including for rare species of bats, birds and reptiles. Some sites also deliver natural biodiversity which has not been deliberately instigated through recent reactive practices being created. Many of these areas also provide opportunities for engaging in informal recreational activities and enjoying the wildlife. Therefore, their unique value needs to be acknowledged by the Local Plan and preserved for future generations to enjoy rather than be considered for any development. This also includes sites abutting the built environment/built up area boundary.

## Question 21 – Net gains in biodiversity

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

Tick one box only

**Option 1 – On-site provision**

**YES (tick)**

**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 *below*:**

Option 1 delivers more commitment to maintaining wildlife habitats within the development. Option 3 is completely unacceptable as providing a cash tariff towards a strategic delivery scheme is merely 'passing the buck' and delivering a token gesture to preserving wildlife habitats rather than a confirmed commitment. Nor are any of the parties involved, such as the developer and/or Local Authority, acknowledging the difficulties there may be in finding an alternative strategic habitat to offset the impacts of a number of developments.

In reality, all of these options suggest that biodiversity and the interests of protecting existing wildlife habitats take second place to the Local Plan's obvious enthusiasm to deliver more development. More stringent standards to protect and retain existing biodiversity sites, such as those with wildlife havens, from the threat of development plans for the site would have been preferable.

## **Question 22 – Additional natural environment policy objectives**

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?

**Response: Yes**

### **Further comments:**

I support all of the ten key issues made in respect of extending the Local Plan's natural environment policy objectives. All ten key issues have significant objectives in recognizing the need to acknowledge and protect landscape characteristics, their biodiversity and amenity value to residents. However, the commitment to protect existing green open spaces – whether offering formal or informal use – needs to be further emphasized, as they have a vital role to play in encouraging healthy lifestyles to be maintained, as well as offering mental wellbeing benefits to those who either live nearby or who make a conscious choice to visit them to enjoy their appeal.

Setting minimum standards for the amount and quality of green open spaces provided in development sites is something I support, as previous generations of the Local Plan have not delivered a robust commitment to this. As a consequence, new open space provision provided by developers has either been of low quality or it has been targeting specific users, such as young children in the provision of play parks, rather than considering the needs of the wider community.

### Question 23 – Promoting access to 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?

Tick one box only

**Option 1 – Focus new development as small clusters of growth in locations within easy walking or cycling distance of existing services and facilities**

**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**

**Option 3 – A combination of options 1 and 2**

**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**

**YES (tick)**

**Option 5 – None of the above**

**Please provide any additional comments *below*:**

The Local Plan does not identify other factors that can limit the opportunity to walk, cycle or use public transport. These can include the topography of some settlements where for those living on a steep hillside they are less inclined to walk or cycle. In addition, there are also some existing residential areas where there is not a consistent network of public footpaths to enable individuals to safely access facilities and services on foot.

Paragraph 11.4 (Page 39) – The towns of Sidmouth and Ottery St. Mary do benefit from a variety of frequent buses services (some operated by different bus companies), most of which provide access to the majority of the residential areas. In addition, Sidmouth also benefits from

a seasonal town bus service providing further coverage around the town for residents.

Dedicated town bus services in other towns such as Seaton are often limited in their frequency and the time of day they operate for and there can be the issue of competing bus operators not accepting tickets from other bus companies.

## **Question 24 - Additional sustainable transport policy objectives**

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?

**Response: Yes**

### **Additional Comments:**

Quote: Item 3) "Focus development in the most accessible locations where most journeys can be made by walking, cycling and public transport." This should not be seen as a justifiable reason for delivering development in areas which might be afforded protection from other policies and issues contained in the Local Plan. Further consideration also needs to be made in relation to people's shopping habits, such as for example, travelling outside of the immediate village or town where they live for essential food shopping and clothing because there is a greater availability of retail providers elsewhere.

Item 10 (page 42) – I fully support the ambition of the Local Plan to recognize of the importance of Exeter Airport as a regional airport which has an important part to play in the economic success of both East Devon and the wider South West region.

## Question 25 – Facilities and services that are important

Please score the services and facilities listed below in accordance with their Importance to where you live or would want to live?

Tick one box for each item.

Convenience store/Post Office

**'Essential'** (tick)

Supermarket

**'Essential'** (tick)

Childcare and nursery school provision

**'Quite important'** (tick)

Primary school

**'Quite important'** (tick)

Secondary school

**'Of little importance'** (tick)

Children's play area

**'Very important'** (tick)

Sports & leisure facilities

**'Very important'** (tick)

Health care facilities

**'Essential'** (tick)

Open spaces

**'Essential'** (tick)

Easy access to a range of jobs

**'Quite important'** (tick)

Regular bus service (5 plus per day)

**'Essential'** (tick)

Train station

**'Of little importance'** (tick)

Paths for walking and cycling	<b>'Essential'</b> (tick)
Access to full fibre broadband	<b>'Essential'</b> (tick)
Public house	<b>'Quite important'</b> (tick)
Place of worship (e.g. a church)	<b>'Essential'</b> (tick)
High quality road links	<b>'Essential'</b> (tick)
Emergency services (police, fire, ambulance)	<b>'Essential'</b> (tick)
Community hall	<b>'Essential'</b> (tick)
Youth facilities	<b>'Quite important'</b> (tick)

**Additional comments *below*:**

Paragraph 12.4 (page 43) Quote: "...flows have remained relatively constant on the A375 and A3052". The data used by the Local Plan does not acknowledge the actual steady year-on-year increase in the volume of traffic using the A3052. As a daily commuter on this route, the amount of time it takes to get into Exeter has been increasing for the last three years, usually linked to long tailbacks, which during the evening can be as far back as Hill Barton Trading Estate. These delays create significant inconvenience for car, bike and public transport users. A similar issue also exists on the A376 near Clyst St Mary (in East Devon), despite there being strong use of public transport services by residents living in Exmouth.

Improvements to the A3052 carriageway leading towards Sandygate are not possible due to the adjacent land being a floodplain. Therefore transport connections will continue to be compromised for those users of the A3052 and even the B3181 when travelling from Broadclyst (in East Devon) through Pinhoe into Exeter.

## **Question 26 – Additional infrastructure and service provision 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?

**Response: Yes**

### **Additional Comments:**

The Local Plan does not recognize that many infrastructure facilities such as healthcare services are already oversubscribed in terms of demand for them from residents, and that by building more housing it will not guarantee additional funding is available to expand or improve service provision. In addition, many local primary schools do not have sufficient land available to increase the number of classrooms, indoor facilities (e.g. multi use assembly halls) and/or outdoor sports pitches. This needs to be taken into account when determining the number of new houses to be built in a village or town. The Local Plan, therefore, should look to include infrastructure policies which aim to improve healthcare and outdoor sports pitch provision in communities where there is an identified need for them.

## Question 27 - Retaining and refining the existing settlement hierarchy

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

Tick one box only

**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 the 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

**YES** (tick)

**Please provide any comments *below*:**

Paragraph 13.6 (Page 148) – This statement does not acknowledge that Seaton has also “accommodated high levels of development in recent years”, providing approximately 400 new homes in the last 8 years, predominantly through the redevelopment of the former holiday park. Grouping all seven towns together into one category does not consider the individual strengths and/or weaknesses of each one. For example, towns such as Budleigh Salterton and Seaton have a higher proportion of elderly residents. Seaton has fewer sports facilities and restricted public transport services to meet the needs of its residents. Exmouth and Sidmouth offer more diverse employment and tourism opportunities; Exmouth and Honiton have more out-of-town retail parks, while Axminster and Ottery St. Mary benefit from having a number of large employers. Axminster also benefits from having various public transport services to neighbouring counties. Therefore it would be appropriate to look at and acknowledge the individual benefits, limitations and challenges of each town on an individual basis.

## Question 28 – Broad distribution of housing development

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

Tick one box only

**Option 1 - As existing**

**YES (tick)**

**Option 2 – More West End focused**

**Options 3 – A less West End focussed pattern**

**Options 4 – an alternative to the above**

**Please provide any comments *below*:**

Any new developments in the 'West End' need to consider how to address the current issues of peak time congestion experienced by those commuting from further east in the district, including those using public transport. What other initiatives might encourage fewer people needing to drive directly into Exeter city itself? For example, a park and ride scheme near Clyst St Mary with secure parking and a frequent commuter link bus into Exeter city centre. Perhaps a further park and ride scheme by the A30 itself, east of Sowton? The Local Plan also needs to be mindful of the need to improve existing infrastructures such as road links and public transport in more rural locations where there is growing employment or recreational opportunities, such as in Dunkeswell which has a thriving industrial site. In addition, in the east of the district, links with neighbouring counties Dorset and Somerset which provide facilities, services and well paid employment opportunities, should also be considered.

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

How do you feel about the development types and locations listed *below*

For each option tick one box only

Infilling in towns and at larger villages

**'Strongly Oppose'** (tick)

Building one or more additional new towns

**'Neither Oppose or Support'** (tick)

Planning for new villages

**'Support'** (tick)

Large scale (over 50 home) urban expansions  
to existing towns

**'Strongly Oppose'** (tick)

Small scale (under 50 home) urban expansions  
to towns

**'Strongly Oppose'** (tick)

Building houses on the edges of East Devon  
villages

**'Support'** (tick)

**Please provide any comments *below*:**

Infilling in towns and larger villages will lead to the loss of much valued land which has either an established or future amenity value and/or biodiversity benefits, as well as helping to reduce urban cramming. Building an additional new town enables planners to take a more long term view on the provision of infrastructure and delivering more sustainable transport/commuting options. However, such schemes are usually delivered by large developers who do not place a high emphasis on delivering high quality architectural standards or individual designs, either in specific roads/housing estates or throughout the whole development scheme. Planning for new villages will be less intrusive on the landscape, although the Local Plan would need to demand

good design practices which can lead to individual styles rather than 'more of the same' being delivered. Small and/or large scale expansion to existing towns might not address their legacy economic or lack of facilities issues, while remaining undeveloped land may be compensating residents for the loss/lack of existing open space.

### **Question 30 - Establishment of a Development Corporation**

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?

**Response:**

**'Of limited importance'** (tick)

**Please provide any further comments *below*:**

Paragraph 13.18 (page 54) refers to the role of development corporations acting as a “Master Developer” acquiring land and commissioning building work and selling land onto other developers. However, it does not state whether this relates to all sizes of land or just major sites and what public involvement there will be in such a corporation. This reads more as ‘legitimized’ opportunistic land trading by local authorities which could reduce the ‘say’ of local residents where housing is built or what land is actually used for, if they identify an alternative use for it. Question 30 (page 55) then refers to the scenario of the allocation of a big strategic site for housing or mixed used development. What is the Local Plan actually proposing for the role of a development corporation – all sites within the district or just allocated large sites? This is conflicting information. Further information and/or a cited reference would have been helpful to learn more about this initiative.

### Question 31 – Planning for development beyond 2040

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?

Tick one box only

**Response:** **'It would be undesirable and the end date should be 2040'** (tick)

**Please provide any further comments *below*:**

It would be highly speculative and not based on robust evidence to try and plan for development within East Devon beyond 2040. Recent published research by the Campaign to Protect Rural England has established that East Devon has already exceeded its house building targets, while the current government White Paper on planning is currently being reviewed in the light of unrealistic house building targets having been set by central government. Planning so far ahead in relation to future development would not take into account changes in factors such as population demographics or identify changes to other services and facilities. Nor will it be flexible enough to consider potential other initiatives which might improve or erode residents' quality of life, employment opportunities and lifestyles. Therefore it would seem appropriate to plan to deliver a plan which ends in 2040 but which will hopefully also have some lasting principles and policies which extend beyond the life of the current version of the document.

### **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?

#### **Comments:**

The Local Plan has not mentioned the growing problem of partially occupied second homes which impact on the housing stock for those looking for full time occupation accommodation. Design policies have also not been given adequate weight/significance in the Local Plan in relation to new buildings and the changing/enhancement of existing buildings, suggesting such policies no longer figure as highly when determining planning applications. Sports pitches have been given a scant mention and the Local Plan has not been proactive enough in trying to safeguard existing sports pitches or deliver new pitches in towns where there is established evidence they are needed. Instead, when it comes to infrastructure and service provision, the Local Plan places greater importance on considering affordable housing over recreational opportunities to benefit the wider community, which is not appropriate in every community. The Local Plan has not identified opportunities to address congestion at the 'West End' by proposing opportunities for new park and ride schemes that could be introduced just outside of Exeter.