

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?

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

By email to:
planningpolicy@eastdevon.gov.uk

15th March 2021

WCN055/VO

Dear Sir/ Madam,

East Devon Local Plan 2021-2040

Issues and Options Consultation January 2021 (Regulation 18)

We write on behalf of Hallam Land Management Limited (HLM) and Taylor Wimpey Developments Limited (TW) in respect of their interests in land allocated in the draft Cranbrook Plan as "Bluehayes". The land has also previously been known as the Cranbrook Western Expansion Area and is allocated for development as such, via Strategies 9 and 12 of the East Devon Local Plan 2013-2031.

As has been discussed in relation to the Cranbrook Plan, there is an urgency to deliver the western expansion area/Bluehayes. To this end applications have been submitted and amended and await determination. In order to fulfil the housing needs of the area, and to better deliver on the housing trajectory and the overall objectives for Cranbrook, HLM and TW are looking for an early determination of the extant consents. Given the established policy context for the western expansion area, HLM and TW do not believe that the Issues and Options paper or the forthcoming Local Plan to 2040 should have any bearing on the grant of planning permission for the western expansion area. Therefore commentary on the Issues and Options Paper is limited to a number of general observations.

HLM and TW reserve the right to make further comments upon the Issues and Options Consultation with respect to their interests elsewhere in the District.

HLM & TW submit comments, as an interested party, to the East Devon Local Plan Issues & Options Consultation. HLM & TW's representations include:

- This comments/ covering letter;
- Completed Issues & Options questionnaire;

It should also be noted that the "Bluehayes" site has also been submitted to the Call for Sites via the Housing and Economic Land Availability Assessment (HELAA) update – although as an allocated site this is unnecessary. It is submitted for completeness.

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Question 1 - Objectives

HLM & TW broadly support a number of the objectives set out by East Devon District Council (EDDC) in the Issues and Options Report (January 2021). In particular, HLM and TW support Objectives 1 (Designing for health and well-being), Objective 3 (Meeting future housing needs) and Objective 9 (Supporting Sustainable Transport) for the district as a whole.

Objective 2 is imprecise but should not be seeking to set out an East Devon objective in relation to the delivery of zero carbon emissions (by 2040) that is outside the objectives and mechanisms set out at national level. National priorities, evidenced, costed and balanced, should be adopted.

Question 2 – The scope of the local plan

HLM & TW have no strong view in relation to the scope of the local plan but would not object to EDDC choosing to pursue option 1 (single local plan covering all policy matters). A single local plan would ensure that East Devon has an up to date local plan and would avoid delays and expenses associated with the making of multiple local plans (an issue that has arisen in the previous plan cycle with the preparation of the Cranbrook DPD pursuant to the adopted Local Plan).

Question 4 – Planning for health and wellbeing

HLM & TW are pleased to see photographs of Cranbrook Country Park and Hayes Square within Chapter 3 of the Issues & Options Report as evidence of successfully planning for health and wellbeing in new development.

Question 5 – Energy efficiency of new buildings

HLM & TW consider that EDDC should pursue Option 3, set out by question 5, in the Issues & Options Report. Government policy and building regulations are progressing fast and so rather than EDDC setting out local standards for energy efficiency of new buildings, the Council should rely upon the progression of energy efficient standards at national level – a view which is consistent with policy guidance and advice. The government has set out its intentions in the “Future Homes Standard”, which was the subject of public consultation earlier this year.

MHCLG has suggested that it may prevent local authorities from setting local energy efficiency targets as part of the wider Planning System Reform consulted upon in the “Planning for the Future” consultation. Instead of setting a target that will be superseded by government policy, EDDC should ensure the Local Plan is consistent with national policy as it is anticipated the ‘Future Homes’ standard will be adopted by MHCLG in 2024.

Question 7 – Carbon Saving Measures

HLM & TW note the range of potential additional carbon neutrality policy objectives including opportunities for certain types of initiatives – e.g district heating schemes, use of waste heat.

HLM & TW consider that the Local Plan should not set out specific policy requirements of any specific measure – such as District heating. Setting aside the difficulties and rapidly changing circumstances in relation to such areas, it should not be a matter for the Local Plan to stipulate how national carbon standards should be achieved locally, or impose additional requirements.

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

HLM & TW encourage EDDC to avoid option 1 – essentially planning for only the baseline levels of future housing provision. As the Issues & Options Report states, other options have the potential to better meet EDDC’s affordable housing needs. Housing affordability is an issue across the District.

Question 10 – Planning for housing for people at all stages of life

HLM & TW consider that EDDC should pursue Option 2 – encouraging but not requiring housing provision for people at all stages of life. Requiring housing provision for all stages of life could, as indicated reduce monies available for other wider community benefits as a result of development and could cause serious viability concerns for many developers operating in the area.

Question 21 – Net gains in biodiversity

Option 4 – A combination of options should be available to meet national biodiversity obligations.

Question 27 – Retaining and refining the existing settlement hierarchy

HLM & TW note that Cranbrook is retained as a main town within the settlement hierarchy, as set out in Options 1, 2 and 3 and this will inevitably be the case given the allocations at Cranbrook that will have to be delivered in the early years of the Local Plan period.

Question 28 – Broad distribution of housing development

HLM & TW do not support any particular option regarding West End focus, although Option 1 or 2, if chosen by EDDC addresses the point outlined elsewhere in the Issues & Options report, that the District contains a number of protected areas and natural and built heritage assets. A development distribution directing the majority of new growth towards the existing built-up area of Exeter ensures that growth is functionally linked to facilities and employment opportunities within Exeter itself and the wider West End area.

Thank you for giving HLM & TW the opportunity to comment upon the Issues & Options arising from the East Devon Local Plan. We respectfully request to be kept up to date with all stages of plan making, including future consultations.

Yours faithfully,



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CHAIRMAN

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cc: Hallam Land Management & Taylor Wimpey