

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

7631_ED_210228

10th March 2021

East Devon Issues and Options Consultation

Dear Sir/Madam,

East Devon Issues and Options Consultation

The following response to specific questions posed by the East Devon Issues and Options consultation document is by LDA Design, acting on behalf of a consortium of landowners promoting land at St.Johns, Exmouth for a strategic urban extension.

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?

Neighbourhood Plans take considerable time and effort to produce, with each stage subject to significant community input and consultation. Furthermore, a number of East Devon's Neighbourhood Plans have only been 'made' in recent years.

The Planning Practice Guidance (ref ID 61-006-20190723) (PPG) states that 'where a Neighbourhood Plan has been brought into force, the local planning authority should take its policies and proposals into account when preparing the Local Plan'. We are fully supportive of this approach in East Devon, although they should not impede future growth aspirations.

In preparing the new Local Plan, EDDC will need to appraise the development potential of land outside the existing Built Up Area Boundaries (BUAB), as defined by the Neighbourhood Plans, if district housing requirements are to be met across the existing hierarchy of settlements.

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Protective policies, like green wedges, outside the BUABs that continue to be effective can be rolled over to a new Neighbourhood Plan, along with new Local Plan allocations, either through an update of the whole Neighbourhood Plan or part of it. Alternatively, as stated in the PPG, material modifications which change the nature of the plan or order would require examination and a referendum.

Exmouth, as the biggest settlement in the district, will be expected to take a significant proportion of the area's housing requirement over the Local Plan period. Given the shortage of brownfield sites within the town's BUAB, the District Council will need to consider options for housing growth on land outside it that is not subject to environmental designations or green wedge protection policies. In assessing future growth options outside the BUAB, it will also be important to take into account Exmouth Neighbourhood Plan policy EN1, which protects both the Marley Area and the Bystock House Estate from development on visual impact grounds, and policy EN3, which identifies a large section of open countryside to the east of the town for the future designation of a proposed Littleham/Maer Valley Park. These areas should continue to be afforded protection. There are areas around the town, including St.John's, that are free from such protection and are therefore considered more suitable for accommodating future growth.

Question.4 Planning for Health and Wellbeing

How important do you think it is that we should actively promote health and well-being throughout our new Local Plan?

Absolutely essential.

Access to open space and nature has been highlighted more than ever during the Covid Pandemic as having a significant beneficial impact on peoples' health and well-being. Going forward, the planning system has a key role to play in delivering sustainable development that enhances quality life for people, ultimately helping to support improved life outcomes and health. In accordance with paragraph 91 of the National Planning Policy Framework (NPPF), planning policies and decisions in East Devon should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible, and enable and support healthy lifestyles'.

New, well-designed communities that are self-contained, connected by pedestrian, cycle and public transport modes, and that offer residents easy access to quality open spaces and nature for exercise, socialising and relaxation, should become the development standard the district must pursue. In this regard, the Ten Principles of Active Design provide a very good framework for shaping policies and a design code that will guide new development.

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

East Devon has an acute housing affordability issue. ONS data reveals that the ratio of median house price to median gross annual workplace-based earnings in the district stood at 10.47 in 2019¹, placing it in the top 25% of least affordable areas in England and Wales outside London.

Such is the problem that ORS calculate that, in order for East Devon to meet all current and future affordable housing needs, there should be a requirement for an additional 461 affordable homes

¹ ONS (2020) House Price to Workplace-based Earnings Ratio

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each year from 2020 to 2040². This represents a sharp uplift from the average of 246 affordable homes that have been delivered per annum so far in the current Local Plan period³.

If only 246 affordable homes are being delivered out of the current Local Plan target of 928 homes, it is clear that a significant uplift in overall housing requirement is needed to achieve 461 affordable units per annum. This is particularly the case if all new development is expected to be net-zero carbon as soon as the Local Plan is adopted, thereby impacting overall development viability further. Even at 30% provision, 461 affordable units corresponds to 1,536 new dwellings per annum. A lower percentage of affordable delivery would require the total new dwellings to be increased further still.

Paragraph 16 of the NPPF sets out that should 'be prepared positively, in a way that is aspirational but deliverable'. Paragraph 20 goes on to state that 'strategic policies should make sufficient provision for housing (including affordable housing)'. Accordingly, the Council should plan positively, making sufficient provision for affordable housing, as well as meeting the housing needs of families, the elderly, people with disabilities etc in line with paragraph 61 of the NPPF. This means that the Council will need to plan for considerably more homes each year, potentially aligning with the 1,614 dwelling annual target previously calculated by the Government, in order to achieve its affordable housing needs.

It remains to be seen how much of Exeter's surplus housing requirement will need to be provided in East Devon, over and above its own housing requirement. Development constraints within the city limits, coupled with a number of difficult to deliver strategic brownfield sites, indicate that the surplus could be quite significant. We would encourage the Council to test the potential of the existing settlement hierarchy for accommodating the increase in housing in a sustainable manner before assessing new settlement options, which require considerably longer planning lead in times.

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?

Absolutely essential

East Devon is fortunate to have an abundance of attractive historic settlements that are dispersed across a high-quality landscape. Accepting ugly or mundane new development in this context would be a mistake - one that is irreversible. We are therefore in full agreement with the recommendations of the Building Better, Building Beautiful Commission and welcome the strong emphasis placed on design in the Issues and Options consultation document. Quoting from the Living with Beauty report, "we need to move from the assumption that beauty is a property just of old buildings that is threatened by new ones, to the assumption that everyday beauty is a controlling aim in all that we do, and that new developments can be, and must be, improvements to the place where they occur".

To achieve this, we consider that strategic growth plans should be shaped first and foremost by landscape context. The Landscape Character Assessment is a useful guide for appraising

² Opinion Research Services (2020) East Devon Local Housing Needs Assessment

³ EDDC (2021) Review of the East Devon Local Plan 2013-2031

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- development locations, although it is important to note that, due to its broad area approach, there may well be locations within or on the edge of more sensitive Landscape Character Areas that can be made suitable through considerate landscape-led approaches to masterplanning and design. Working carefully and positively with the landscape context is one of the principal means of achieving development of beauty and character that puts nature and the environment at the heart of new communities. It is therefore important that each promoted site is appraised within its
- location context, rather than being simply ruled out as unsuitable based on a desk-based review of the relative landscape sensitivity of the broad Character Area within which it sits.

New development should be expected to sit well in the landscape, respecting both natural and built heritage and drawing existing trees, hedgerows and habitats into the layout wherever possible. Furthermore, masterplan aspirations for new urban extensions should be expected to create inclusive developments where people want to live and visit, thereby enhancing the existing settlement and the health and well-being of its existing communities as well as new residents. In this regard, integrated community, high quality open spaces, access to nature, pedestrian and cycle connectivity, and well-designed streets and buildings are key components of good design that must be pursued by the Council.

Question.23. Promoting access to facilities

Option 3 – A combination of options 1 and 2

New development should be located and designed with the purpose of reducing reliance on private motor vehicles as far as possible, without reducing resident mobility. Ideally new development outside the West End should be located in or on the edges of existing settlements within easy access to existing services and employment by foot, cycle and bus. Creating new edge-of-settlement communities that have their own identity but are still well connected, with high quality streets, open spaces and facilities, will further help to beneficially influence modal shift towards active travel and public transport and reduce private vehicle trip rates.

Question.27 Retaining and refining the existing settlement hierarchy

Option 1 – Same hierarchy as current Local Plan: 7 Towns plus Cranbrook and the 15 villages.

In accordance with paragraph 8 of the NPPF, spatial planning across the district should set out to achieve the 3 overarching principles of sustainable development – economic, social and environmental. The starting point for identifying the most appropriate growth strategy should therefore be to test the assumption that the existing settlement hierarchy must be functioning to its optimum in accordance with sustainable development principles before new spatial options are considered.

The district's towns already offer a good range of employment provision, services and facilities. Furthermore, they have well established town centres that require, more than ever before, increasing levels of patronage to protect their on-going vitality and viability. It should also be noted that the district's population is ageing fast, with the average age of its residents now at 50.7 years (national average is 40.1 years). It is important that the settlements are allowed to grow to accommodate the housing that younger age groups require to help balance the population age profile, and to provide dwellings for the workforce employers need to help balance and sustain the local economy.

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Expansion only becomes a problem when edge of town expansion is so far away from central services that residents need to drive to get to them. That is not the case in East Devon, where settlements are small enough to walk, cycle or take the bus to the town centres without the need for a car. Planning for a large proportion of the district's housing requirements in or on the edge of existing settlements therefore makes sense.

Cranbrook is well placed to accommodate Exeter's projected population growth overspill. That said, given the scale of growth that is required, especially if the district is to meet its affordable housing needs, it is unlikely that the existing settlements can absorb all the growth on their own.

Question.28 Broad distribution of housing development

Option 4 – an alternative to the above

Whilst we agree that it makes sense to allocate some additional housing in the West End adjacent to Skypark and the Science Park to help meet Exeter's surplus housing needs, it is essential that the Council first assess the capacity of the existing settlement hierarchy to accommodate the district's housing requirement. Within the existing hierarchy, the larger existing settlements have the greatest potential to accommodate additional growth. Furthermore, the larger towns need additional growth to help to achieve a better-balanced resident age profile; to support and sustain existing services and local economies; and/or deliver the new facilities that communities need.

Exmouth, in particular, has significant growth potential. It is, by some distance, the largest town in East Devon with almost 36,000 residents, representing approximately 25% of the district population⁴. The town is a popular residential location and is very much on an upward curve with major investments being delivered along the seafront. The outstanding quality of life on offer acts as a magnet for attracting elderly residents in particular. So much so that the town has recently been identified by the ONS as being within the top ten towns in England for most elderly median age residents⁵. Indeed, Figure 1 shows that approximately 28% of the resident population are now over 65 years old, which is significantly higher than the England average of 18.4%. Furthermore, between 2011 and 2019 alone, the percentage of Exmouth residents aged over 65 years old grew from 24.3% to 28.0%, representing a faster growth rate than Devon and England. The older age profile looks even more dramatic when benchmarked against East Devon's newest town (see Figure 2), with 49.2% of Exmouth's residents aged over 50, compared to just 13.4% in Cranbrook. Looking forward, demographic projections suggest that without intervention, Exmouth's age profile is going to become more exaggerated, with more over 65-year-olds and proportionately fewer young people and families of working age.

Despite the size of the resident population in Exmouth in comparison to other towns in the settlement hierarchy, housing delivery over the current Local Plan period has been low. Figure 3 shows that between 2014 and 2020 Cranbrook received approximately 42.5% of housing growth across the East Devon towns. Of the remainder, Axminster, which had a population of less than 7,000 in 2019, received 14.8% of the housing delivery share across the towns. This represented a greater share of housing than Exmouth, a town 5 times the size of Axminster.

⁴ ONS (2019) Population Estimates

⁵ BBC (2014) 'The Town That Thronged With Old People'

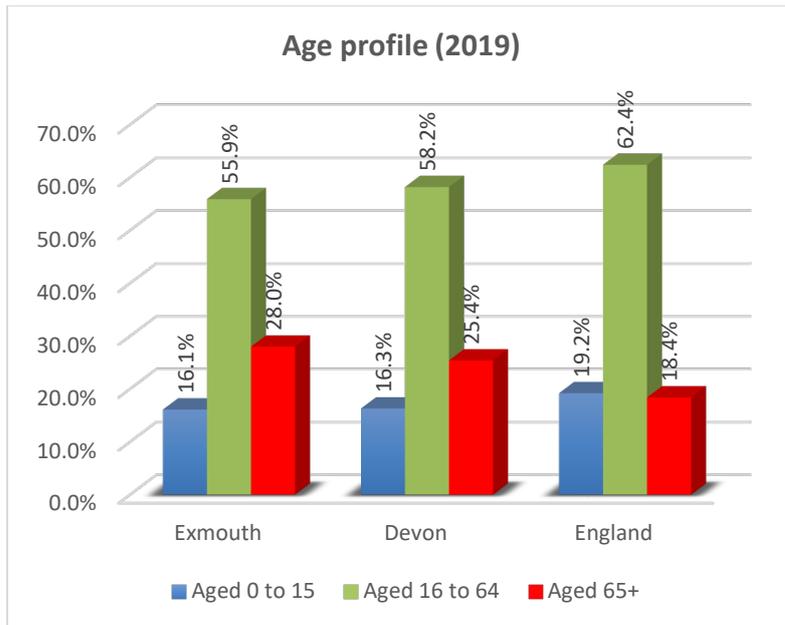
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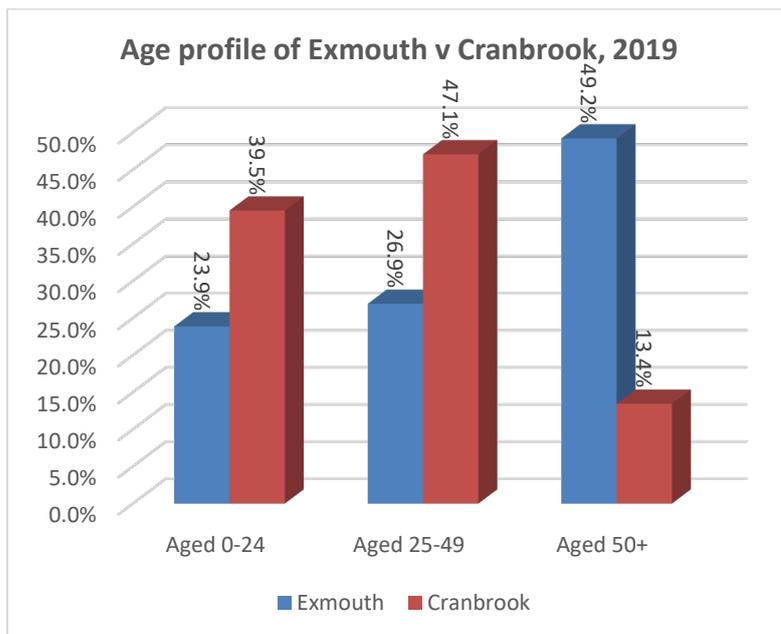
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Figure 1 Age Profile of Exmouth (% of total residents in broad age groups)



Source: ONS Population Estimates, 2019

Figure 2 Age Profile of Exmouth v Cranbrook (% of total residents in broad age groups)



Source: ONS Population Estimates, 2019

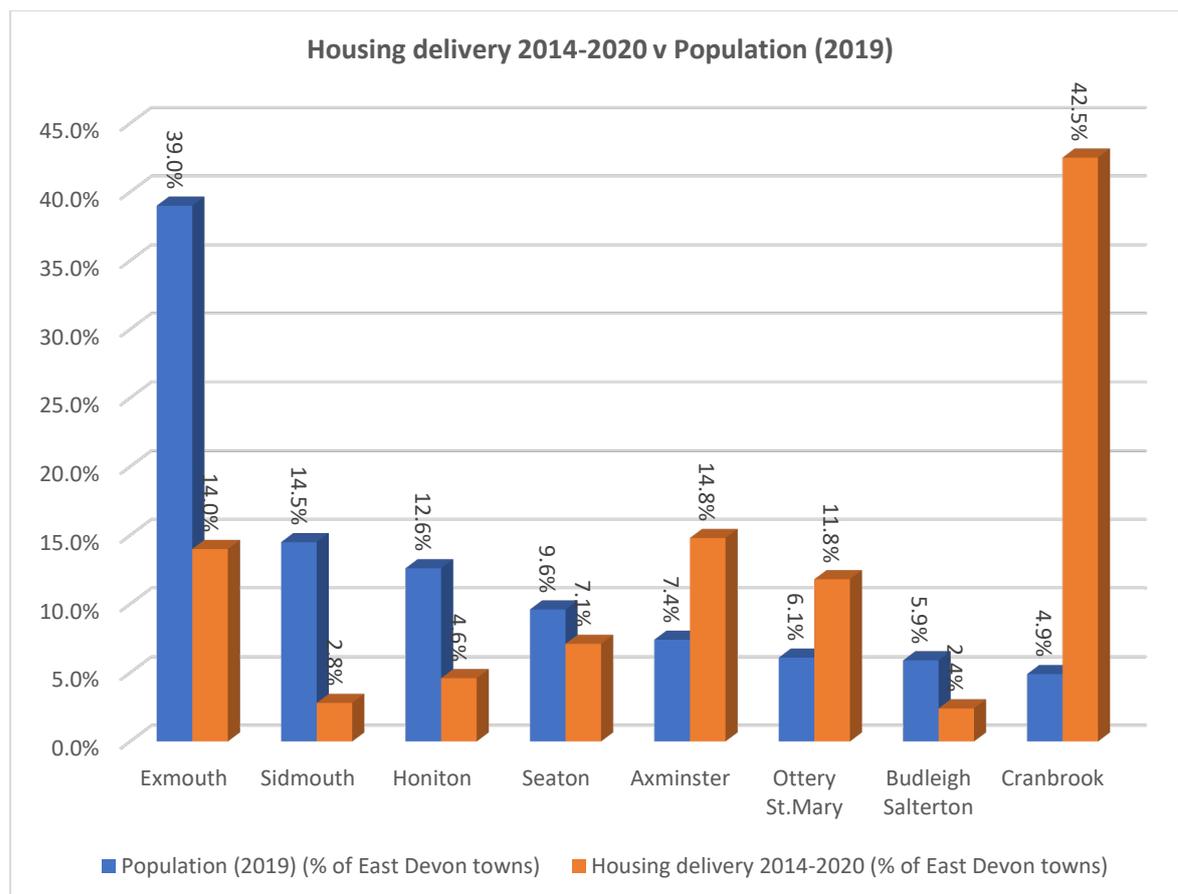
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Figure 3 Housing delivery v population across East Devon towns



Source: EDDC Annual Monitoring Reports 2014-2020 and ONS Population Estimates, 2019

If the low proportion of housing delivery continues in Exmouth, the younger age groups in particular will be forced to move elsewhere to secure accommodation. This will only serve to further imbalance the population age profile and stifle the growth and diversification of the local economy.

Based on research undertaken by ORS for EDDC, it is projected that an indicative estimate of 5,280 new households will form in Exmouth between 2020 and 2040 (see Figure 4). Of this total, some 746 households will require affordable housing and should be provided for in the town as far as possible. These housing requirements are significantly greater those calculated for the other East Devon towns.

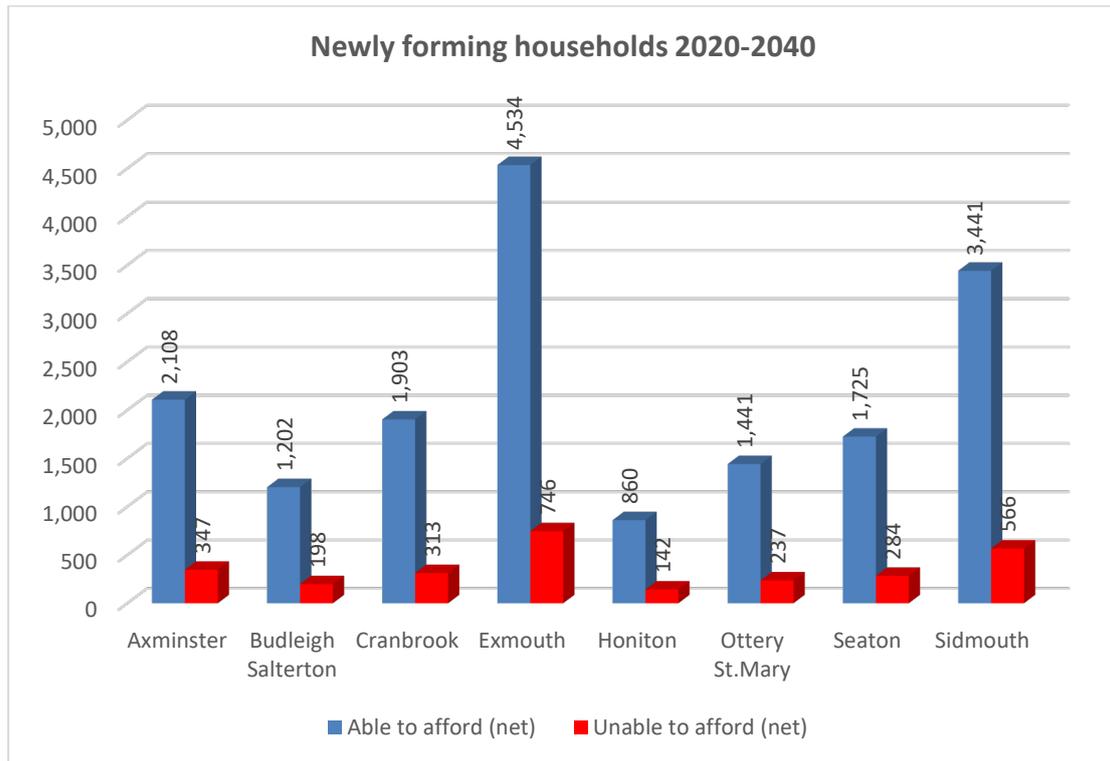
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Figure 4 Newly forming households projected for 2020-2040 that will be able or unable to afford housing



Source: Opinion Research Services (2020) East Devon Local Housing Needs Assessment

Given the growing demand for housing in the town and the shortfall in housing provision compared to other East Devon towns in recent years, it is vital that significant new housing is provided in Exmouth in the new Local Plan. New, carefully planned, housing development is required to help provide for all age groups, including younger workers and families; to strengthen the community further; and support the town’s transition towards a more self-sustaining, balanced economy.

Extending housing development to the north east of the Exmouth’s current settlement boundary can be achieved in a manner that is sensitive to both landscape and ecology. The St. John’s Woodland Village Call for Sites submission demonstrates the availability, suitability and deliverability of this location, highlighting the exciting potential of the site to deliver a new, highly sustainable and well-designed development that draws on the landscape, ecology and heritage context and setting to create a special place for people to live. Furthermore, the land can be delivered relatively easily and early in the plan period without the need for large scale strategic transport and utilities infrastructure.

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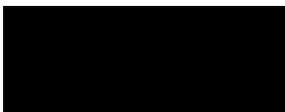
Question.29 Future options for the type and location of development

We would urge the Council to focus on the large-scale urban expansion of existing towns. This would preferably be aligned with the settlement hierarchy, with the largest towns accommodating the most growth.

Exmouth, for example, has significant growth potential, despite the obvious constraints of the Exe Estuary and Jurassic Coast. The town is already a highly popular residential location, offering a superb quality of life, a good range of facilities and services, and a regular train service to Exeter and beyond. As such, it is a sustainable location with capacity to grow further to support a more balanced resident age profile; a more diversified employment base; and a stronger services and facilities offer, which will in turn enable it to become more self-contained. and reduce the need to travel, especially by car. While there are areas that are protected from growth by the current Local Plan and Neighbourhood Plan which should be retained, there still opportunities to bring forward well integrated development to the north east of the town, between Dinan Way and the B3179, that respects and responds to the landscape context and setting. Growth at this location can be achieved with minimal landscape impact, whilst also providing the potential to improve the management of existing pressures on the Pebblebed Heaths and the protecting the habitat corridors linking to them.

To complement growth in the main towns, there may also be potential to accommodate some new housing in the West End, close to Exeter and the Skypark and Science Park employment allocations. It should, however, be noted that new, standalone settlements take considerable time to plan and deliver. The strategy for spatial growth needs to take this into account and ensure that there is an appropriate balance of housing provision across the district that is in sustainable locations and that can be readily delivered in the early part of the Local Plan period without the significant delays generally associated with the funding and delivery of large-scale infrastructure that is required to unlock strategic sites.

Yours sincerely,



Ed Salter MRTPI
Principal Consultant