

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

**Date:** 15 March 2021  
**Our ref:** 04051/61/NT/STi/  
**Your ref:**

Dear Sir or Madam

## **East Devon Local Plan 2021-2040 Issues and Options: Representations**

On behalf of our client, Bourne Leisure Limited (“Bourne Leisure”), please find below representations on the East Devon Local Plan 2021-2040 Issues and Options consultation document, published for comment until 15 March 2021.

By way of background, Bourne Leisure operates more than 50 holiday sites in the form of holiday parks, family entertainment resorts and hotels in Great Britain and is therefore a significant contributor to the national tourist economy, as well as local visitor economies. Within East Devon, Bourne Leisure operates Devon Cliffs Holiday Park.

We provide comments below on the following questions and elements of the consultation document. Our details are provided in the attached consultation form.

### **Chapter 2: Objectives, Scope and Background**

- 1 Question 1 - Objectives 2 and 4;
- 2 Question 2;

### **Chapter 4: Tackling the Climate Emergency**

- 3 Question 5;
- 4 Question 6; and,
- 5 Question 7.

### **Chapter 6: Jobs and the Economy**

- 6 Question 13.

### **Chapter 10: Natural Environment**

- 7 Question 20; and,
- 8 Question 21.

**Chapter 11: Sustainable Transport**

9 Question 23.

We trust that these representations are clear and will assist in the finalisation of the emerging Local Plan. Please do not hesitate to contact either my colleague Stephanie Irvine or me should you require clarification on any points made. We would also be grateful if you would continue to keep us informed on progress on the development of the emerging Local Plan and any other planning documents that are prepared by the local planning authority.

Yours faithfully



**Helen Ashby-Ridgway**  
Planning Director

Copy Bourne Leisure

## Representations on behalf of Bourne Leisure Limited

### 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

- No – there are further objectives or amendments I would like to add

### Objective 2

Bourne Leisure endorses draft Objective 2, which states:

*“To ensure all new development moves the district towards delivering net-zero carbon emissions by 2040 and that we adapt to the impacts of climate change.”*

Bourne Leisure welcomes the approach in this draft objective, which states that new development should move the district towards delivering net-zero carbon emissions, rather than mandating that all development becomes zero-carbon. This is a pragmatic and proportionate approach that takes account of the need to support sustainable progress whilst recognising the need for flexibility to ensure that appropriate development is not made unviable by onerous policy requirements. The approach rightly identifies climate change as a critical challenge that needs to be addressed while providing a period of transition to support continued investment in East Devon. It will allow technological and industry change at a pace which reflects the needs to make sustainable interventions that will provide benefits in the medium to long term and not just the short term.

### Objective 4

Draft Objective 4 states:

*“To support business investment and job creation opportunities within East Devon and support a resilient economy.”*

Bourne Leisure endorses the proposed approach at Objective 4 to support business investment, job creation opportunities and to support a resilient economy. However, this objective should include specific support for the visitor economy, as a key driver of jobs and investment in East Devon.

The NPPF states at paragraph 83(c) under the section entitled *“Supporting a prosperous rural economy”* that planning policies should enable *“sustainable rural tourism and leisure developments which respect the character of the countryside.”* Hence, support for tourism and leisure should feature in the objectives for the emerging East Devon Local Plan, as a rural District with a significant visitor economy.

Draft Objective 4 should therefore be amended as follows:

*“To support business investment and job creation opportunities within East Devon and support a resilient economy, including a thriving visitor economy.” (proposed amendments underlined)*

## Chapter 2: Objectives, scope and background

### 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

- Option 1 – Single Plan

Bourne Leisure endorses the option for a Single Plan, rather than separate strategic and detailed plans. The provision of a Single Plan will help to provide alignment between strategic and detailed policies without a disconnected development plan that can create tensions and uncertainty during the determination process. The Single Plan approach will provide clarity that will assist in facilitating sustainable development.

## Chapter 4: Tackling the Climate Emergency

### 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

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

Bourne Leisure recognises that it is vitally important to identify ways to reduce carbon emissions from new development. However, it is important that the emerging Local Plan does not prevent sustainable development from coming forward due to feasibility or viability constraints.

Given the value of tourism to the East Devon economy, it is important to ensure that emerging policies are viable. For companies that operate across England and the UK, as Bourne Leisure does, there is a need for consistent standards and development requirements otherwise costs will spiral from ad hoc approaches. Taking an ad hoc approach in East Devon that might set requirements ahead of national standards would have a negative impact on the investment decisions of the Company for particular locations. In particular, it could mean that the Company decides to invest at its other holiday parks rather than in East Devon. Accordingly, we conclude that the policy should follow national guidance.

## 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**

- Option 4 – None of these options

Bourne Leisure considers that the emerging Local Plan should identify some suitable areas for renewable energy generation but should also provide general support for solar projects across the District (a mix of Option 1 and 2). This approach would provide the benefits of a plan-led approach, whilst also offering the flexibility for additional renewable energy schemes to come forward in appropriate locations.

Any future policy on renewable energy generation should provide adequate amenity protection for sensitive uses, including visitor accommodation and static caravans, against adverse impacts of renewable energy generation. These uses are particularly sensitive to adverse impacts, such as noise, which can result in a loss of visitor expenditure and hence result in a negative impact on the local economy.

## 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**

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

Bourne Leisure considers that future policy should provide the flexibility for new development to provide carbon saving measures that are appropriate to its type, scale and location. It should not simply set out a “one-size-fits-all” approach.

For example, point 5 on page 14 states that key policy development may include:

*“Locating new development in locations that are close to local facilities so people can walk and cycle more and do not need to be reliant on the car.”*

It is important to note that tourism accommodation is often situated in rural locations and is not necessarily in ready walking distance to existing facilities. East Devon District in particular is a rural authority where tourism is particularly important to the local economy. Hence, it is vital to ensure that emerging policy does not stifle appropriate tourism development. It is also important to note that tourism development can serve to support walking and cycling by providing opportunities for visitors to access the countryside away from busy urban centres. This can in turn help to encourage people to continue walking and cycling when they return home.

## **Chapter 6: Jobs and the Economy**

### **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?**

<b>13a - More jobs overall – with an emphasis on attracting new/larger employers and inward investment in any or all sectors</b>	<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
<b>13b - More high technology jobs - focussing on high technology and high skilled jobs (including in the transformational sectors).</b>	<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
<b>13c - Local Entrepreneurs – promoting opportunities for more home/locally based/small businesses.</b>	<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
<b>13d - Traditional Sectors - Focus on growth, resilience and diversification in our traditional sectors - such as agriculture, tourism and care</b>	<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
<p><b>If you have any comments on the above or alternative options please set these out below.</b></p> <div style="border: 1px solid black; height: 50px; width: 100%;"></div>	

- 13a – Strongly support
- 13d – Strongly support

Bourne Leisure strongly supports the approach for traditional sectors, including tourism, that focuses on growth, resilience and diversification. The needs of the tourism sector and demands of tourists are continually changing, and it is important to cater for and adapt to these needs and demands in order to continue to attract visitors, increase the level of year-round expenditure and support local jobs. This includes supporting a longer holiday season.

The East Devon District Council area needs to encourage and welcome a wide range of different employers to ensure a healthy economy. There is synergy between different businesses. Tourism for example has positive spin off benefits and supports other activities/businesses. It should be a “both and” approach, not one of “either or.”

This approach would align with national policy in the NPPF at paragraph 80, which states:

*“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt.”*

Bourne Leisure also considers that there is a need for the emerging Local Plan to recognise the value of the tourism industry for the local economy.

Paragraph 6.1 in the Reg. 18 consultation document states:

*“...there are a range of long-standing issues in the local economy including a high proportion of lower paid, lower skilled and often seasonal jobs, primarily in traditional sectors (agriculture, tourism, care, retail, construction and transport & distribution).”*

Bourne Leisure considers that paragraph 6.1 in the consultation document misrepresents the key role of the tourism sector in the local economy. Bourne Leisure is a key employer in East Devon and provides a range of employment opportunities, including managerial, administrative, sales and seasonal roles. The Company also offers a number of training and development opportunities for staff, ranging from in-house service-based training to nationally recognised courses, including:

- 1 Apprenticeships;
- 2 National Vocational Qualifications (NVQs);
- 3 Open University degree;
- 4 Management training;
- 5 RLSS training (lifeguard training);
- 6 Safety training; and,
- 7 Food hygiene.

The emerging Local Plan should therefore recognise that the tourism sector can be an important provider of career development opportunities and jobs that meet the needs of younger people – and is not simply a provider of lower paid, lower skilled and seasonal jobs.

## Chapter 10: Natural Environment

### 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**

- Option 3 – Allow for greater levels of development

The value of protected landscapes includes, amongst other significant benefits, the attraction of visitors from across the UK. It is important that these landscapes are protected to avoid an adverse impact upon their integrity. However, there are opportunities to balance such protections alongside the facilitation of sustainable development.

Bourne Leisure considers that provision should be made for sensitively designed tourist accommodation development in or in the setting of protected landscape areas to respond to the changing needs of the industry and demand from tourists. The changes would, among other benefits, support a longer holiday season, with the economic and social benefits this brings.

A realistic approach needs to be taken when assessing landscapes and impacts. Where development already has an effect, then further development should be analysed in terms of its net effect (rather than looked at in isolation) and this weighed against other benefits, such as sustainability. This approach can apply to various forms of development, not just tourism.

Having a more flexible policy in relation to development in protected areas would allow for each proposal to be assessed on its merits and could facilitate development that is highly beneficial for the local area and its economy.

### **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

- Option 4 – A combination of the above

Bourne Leisure considers that there should be flexibility in policy as to how developers can achieve biodiversity net gain, which could include onsite or offsite provision of habitat or, importantly, a financial contribution. Whilst from a biodiversity perspective, in some locations it can be preferable to provide habitat onsite or in close proximity, this is not always possible. Hence, it is important to provide a policy option for a financial contribution towards a strategic delivery scheme, as a valuable method of delivering biodiversity net gain and in order to ensure otherwise sustainable development is not prevented from coming forward.

## **Chapter 11: Sustainable Transport**

### **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**

- Option 5 – None of the above

Bourne Leisure considers that there should be a tailored policy for different types of development in relation to accessibility by walking and cycling. In particular, tourism development should not be subject to the same requirements as housing in relation to accessibility by walking and cycling due to the particular requirements of the sector. Holiday accommodation, particularly those that were historically located away from town, district and village centres, is often located in rural areas, away from existing services and facilities.

The NPPF states at paragraph 108(a) that, when considering development proposals, it should be ensured that:

*“appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location.” (emphasis added)*

Hence, the emerging Local Plan should allow for the Council to consider each development proposal based on its context. In this context, it is important to ensure that appropriate tourism development is not prevented from coming forward due to a restrictive policy that is designed with housing schemes in mind.

## 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	Ms	First name or initial	Helen	Surname	Ashby-Ridgway
Your email address					
Your telephone number		02920 435880			
Your postal address and post code		Helmont House, Churchill Way, Cardiff, CF10 2HE			
Organisation name (if relevant)		Lichfields			
If you are an agent acting for a client please provide the name of your client		Bourne Leisure Limited			

**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**

Please see attached letter

### 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**

Please see attached letter

### 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**

Please see attached letter

### 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

Please see attached letter

### 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

Please see attached letter

### 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

<b>12a - Continued focus on big employment sites in the West End of the District</b>	<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
<b>12b - Encouraging greater business development in other areas close to Exeter (for example expanding Greendale and Hill Barton Business Parks)</b>	<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
<b>12c - Encouraging greater business development at and within the main towns of East Devon</b>	<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
<b>12d - Encouraging business expansion and development in the villages and across the countryside of East Devon</b>	<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
<b>12e - Encourage and enable more home working</b>	<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
<b>If you have any comments on the above or alternative options please set these out below.</b>	

### 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?

<b>13a - More jobs overall – with an emphasis on attracting new/larger employers and inward investment in any or all sectors</b>	<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
<b>13b - More high technology jobs - focussing on high technology and high skilled jobs (including in the transformational sectors).</b>	<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
<b>13c - Local Entrepreneurs – promoting opportunities for more home/locally based/small businesses.</b>	<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
<b>13d - Traditional Sectors - Focus on growth, resilience and diversification in our traditional sectors - such as agriculture, tourism and care</b>	<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.

Please see attached letter

**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.

<b>15a - Retail to dominate – support retail uses in town centres and if possible resist other uses.</b>	<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
<b>15b - Promote mixed commercial uses - support retail as well as other commercial uses such as café's and offices</b>	<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
<b>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</b>	<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
<b>15d - Support change of use to housing – allow for any shops or commercial premises to be converted to housing</b>	<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
<b>15e - Support community uses - promote more community spaces in town centres</b>	<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
<b>15f - Leisure uses – promote new gyms and sports facilities in town centres.</b>	<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

Please see attached letter

## 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

Please see attached letter

### 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**

Please see attached letter

**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?**