

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	Mr	First name or initial	Stephen	Surname	Morgan-Hyland
Your email address					
Your telephone number					
Your postal address and post code	Beehive Lofts, Jersey Street, Manchester, M4 6JG				
Organisation name (if relevant)	Maddox Planning				
If you are an agent acting for a client please provide the name of your client	OXW Catalina UK 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 accompanying 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 accompanying 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 accompanying 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

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 accompanying 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

12a - Continued focus on big employment sites in the West End of the District	<input checked="" 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.	
<div style="border: 1px solid black; padding: 5px; min-height: 40px;">Please see accompanying letter.</div>	

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

- Strongly support
- Support
- Neither oppose nor support
- Oppose
- Strongly oppose

13b - More high technology jobs - focussing on high technology and high skilled jobs (including in the transformational sectors).

- Strongly support
- Support
- Neither oppose nor support
- Oppose
- Strongly oppose

13c - Local Entrepreneurs – promoting opportunities for more home/locally based/small businesses.

- Strongly support
- Support
- Neither oppose nor support
- Oppose
- Strongly oppose

13d - Traditional Sectors - Focus on growth, resilience and diversification in our traditional sectors - such as agriculture, tourism and care

- Strongly support
- Support
- Neither oppose nor support
- Oppose
- Strongly oppose

If you have any comments on the above or alternative options please set these out below.

Please see accompanying 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

Please see accompanying letter.

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.

Strongly support
 Support
 Neither oppose nor support
 Oppose
 Strongly oppose

15b - Promote mixed commercial uses - support retail as well as other commercial uses such as café's and offices

Strongly support
 Support
 Neither oppose nor support
 Oppose
 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

Strongly support
 Support
 Neither oppose nor support
 Oppose
 Strongly oppose

15d - Support change of use to housing – allow for any shops or commercial premises to be converted to housing

Strongly support
 Support
 Neither oppose nor support
 Oppose
 Strongly oppose

15e - Support community uses - promote more community spaces in town centres

Strongly support
 Support
 Neither oppose nor support
 Oppose
 Strongly oppose

15f - Leisure uses – promote new gyms and sports facilities in town centres.

Strongly support
 Support
 Neither oppose nor support
 Oppose
 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

Please see accompanying letter.

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

Please see accompanying letter.

Please see accompanying 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

Please see accompanying letter.

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 accompanying 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

Please see accompanying letter.

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?

For each option please tick one box only						
How do you feel about the development types and locations listed below	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 play 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?

Please see accompanying letter.

MADDOX PLANNING

LONDON & MANCHESTER

0845 121 1706

Planning Policy
East Devon District Council

15/03/2021

**EAST DEVON LOCAL PLAN 2021–2040: REGULATION 18 ISSUES AND OPTIONS CONSULTATION
FURTHER DETAILS SUPPORTING RESPONSES TO QUESTIONS**

Dear Sir/Madam

We write for our client OXW Catalina UK Limited (OXW Catalina), the new conditional owner of the 7.7 hectare site known as 'Airpark', and with the approval of the current owner AD Land Exeter Limited. Airpark is adjacent to Exeter International Airport at Clyst Honiton, Exeter and is part of the East Devon West End. The location of the Airpark site is identified on the attached location plan.

A completed .pdf version of the interactive Issues and Options (I&O) response form is attached. The commentary below provides further detail behind responses given to specific consultation questions.

The 7.7 hectare Airpark site is also put forward as a proposed employment land allocation, in response to the call for sites exercise which parallels the I&O consultation. The Airpark site is part of the Exeter and East Devon Enterprise Zone. Airpark in its entirety is also included in the most recent employment land review (ELR) of 31 March 2020¹ as site 44 – *Exeter Airport Business Park (Phase 2)*. It is included in a table at paragraph 6.1 of the ELR as part of 64.16 hectares detailed as subject to land allocation or otherwise identified as available at 31 March 2020. A 5.0 hectare parcel of the site is an existing allocation in the adopted local plan.

Our client is keen for an early meeting to discuss its intentions for Airpark in context with the emerging local plan, and looks forward to this opportunity being offered.

Given the context of the potential economic effects of UK departure from the EU, both in terms of trading relationships and an ends to structural funds, and the fall out of the Covid-19 pandemic it is imperative that the local planning authority supports and encourages the private sector by having the right mechanisms in place to facilitate deliverable employment sites coming forward early in the plan period. Prior to the Covid-19 pandemic, East Devon was showing an economic activity rate greater than the UK average² and it is important that the right provisions are made to regain that local momentum.

¹ East Devon – Employment Land Review (for the year ending 31 March 2020)

² Greater Exeter Economic Development Needs Assessment Final Report (March 2017) – Hardisty Jones Associates

Responses to individual questions follow.

QUESTION 1 – LOCAL PLAN OBJECTIVES

The overall thrust of the local plan objectives is supported, including a focus on healthy living, the environment and sustainability. Objective 4 should make specific reference to responding to economic challenges and opportunities resulting from the UK exit from the EU, and it should also explicitly set out a need to be proactive in addressing the economic fallout of the Covid-19 pandemic. Objective 6 responds directly to ‘*Living with Beauty: promoting, health, well-being and sustainable growth*’, the January 2020 report of the Building Better, Building Beautiful Commission, and the Government response to this of January 2021. The driving force behind *Living with Beauty* is a desire for good quality homes, communities and places and the emphasis is that high quality homes become the norm. Objective 6 refers to beautiful and healthy spaces and buildings, and high quality beautiful development. Whilst good design is relevant to all development, not all development by definition can be beautiful. Some development, such as employment development, can be expected to adopt good design principles and provide a health working environment but ultimately functional and not necessarily beautiful; which in any event is a subjective judgement. Objective 6 should be tempered to reflect this.

QUESTION 2 – THE SCOPE OF THE LOCAL PLAN

Option 1 is a justifiable approach to adopt given that the current process is working towards an update of the existing single local plan – the East Devon Local Plan 2013 to 2031 adopted in January 2016 (the adopted local plan) – which covers all policy matters of both a strategic nature and to provide the detailed basis for development management.

QUESTION 5 – ENERGY EFFICIENCY OF NEW BUILDINGS

The local plan should aim for net-zero carbon from a future date. Local plan Objective 2 *Tackling the climate emergency* is seeking to ensure that all new development helps move the district towards delivering net-zero carbon emissions by 2040. This does not mean that all development will be net-zero carbon from plan adoption, rather that this will be a graduated process to achieve the 2040 net-zero carbon objective. All development can be expected to contribute in some way. Local plan policy can set energy efficiency goals for development, with the objective of meeting the net-zero carbon objective by the end of the plan period.

QUESTION 7 – CARBON SAVING MEASURES

Paragraph 4.8 identifies a range of potential policy initiatives that have the potential to assist in meeting the 2040 net-zero carbon objective. These are not all initiatives that can be the subject of prescriptive development plan policy, but can reasonably feature as part of an overall local strategy to encourage environmental sustainability. Whilst locating new development in locations that are close to local facilities is consistent with an agenda of sustainable development and reducing the need to travel, and is justified as an overarching policy objective, not all development can or will be in a location that is close to local facilities. This would be true of any administrative area, but is the case more so in rural locations where some development will be less well connected given the geographical distribution of homes, jobs and services. The approach of the local plan should be to encourage development that people can walk and cycle to where this is appropriate and achievable, but acknowledge that travel to some development will always be necessary and in such cases encouragement for public transport and car sharing is appropriate.

QUESTION 12 – PREFERENCE FOR LOCATION FOR FUTURE JOB PROVISION

There should be a continued focus on large employment sites in the West End of the District (the West End). The current 5.0 hectare Exeter Airport Business Park allocation at Long Lane should be extended to the full 7.7

hectares identified as Airpark in the Exeter and East Devon Enterprise Zone (EEDEZ) . A focus on the West End is not a development plan strategy at the expense of new employment spaces elsewhere, rather an acknowledgement that the West End sites are strategically important and critical to the success of the employment land strategy for East Devon and the Greater Exeter area.

I&O paragraph 6.4 details an approach in recent years of concentrating larger scale employment sites in the west of the district, and the promoting of sites including Airpark including through their inclusion in the EEDEZ. EEDEZ is designated to encourage economic growth and attract business, and the new local plan should be consistent with this by ensuring that employment land allocations are consistent with those included in the EEDEZ. Further context for this is I&O paragraph 6.6, which details limited progress in bringing forward allocated employment sites elsewhere in the district and paragraph 6.7 sets out the likelihood of a continued focus of demand for inward investment being for locations with proximity to Exeter and the M5 motorway. These points further emphasise the importance of the West End and a need to ensure consistency between the development plan and the EEDEZ.

A continued focus of employment land supply in the West End is critical to meeting employment land requirements in locations that align with demand and on sites that are deliverable, particularly in context with barriers to delivery elsewhere resulting in limited progress in allocated sites coming forward.

Strategy 18 (Future Development of Exeter Airport Business Park) of the adopted local plan identifies 5.0 hectares of additional land for business/employment generating uses to the south of the airport in the location that is now referred to as Airpark. Paragraph 7.47 of the adopted local plan details that the business park has proved to be a very successful business location, with proximity to the M5 and the A30 being key to its success.

Strategy 18 acknowledges the need for highway improvements to access the Airpark site. The Airpark site is yet to come forward as it is dependent upon highway improvements to Long Lane, which are currently on-site and scheduled for completion in spring 2023.

Paragraph 23 of the National Planning Policy Framework (the Framework) is clear that strategic development plan policies should provide a clear strategy for bringing sufficient land forward, at a sufficient rate, to address objectively assessed needs over a plan period. This should include planning for and allocating sufficient sites to deliver the strategic priorities of an area. Under regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) local planning authorities must review a development plan at least once every five years to ensure that policies remain relevant and effectively address local needs. The Planning Practice Guidance (the PPG) sets out that policies age at different rates according to local circumstances and that the review process is to ensure that a plan and its policies remain effective³.

Airpark is part of a clear employment land strategy and the strategic priorities of the district, particularly given its enterprise zone status. The continued allocation of land, and indeed an extended area, at Long Lane as an employment site remains relevant and up-to-date planning policy, as it can effectively address the objectively assessed need and demand for employment floorspace.

Changes in local circumstances since the 2016 adoption of the local plan include: (1) the Exeter and East Devon Enterprise Zone; (2) delivery of highway improvements to Long Lane thereby unlocking access to Airpark; (3) loss of businesses locally; (4) limited progress in other allocated sites coming forward; and (5) greater certainty over deliverability. Each point is addressed in turn.

³ Paragraph: 064 Reference ID: 61-064-20190315

1) EXETER AND EAST DEVON ENTERPRISE ZONE

A 7.7 hectare site at Airpark is part of the Exeter and East Devon Enterprise Zone, offering potential business rate relief. The Enterprise Zone, designated in April 2017 through the Statutory Instrument 2017 No. 318, will remain in place for a period of 25 years. Airpark is referred to in the statutory document as '*Heart of the South West – Exeter Airport Business Park Expansion Area*' and as Airpark in enterprise zone documentation and literature. It would be illogical and contrary to the enterprise zone status and the objectives of the enterprise zone to not extend the current allocation at Airpark to the full 7.7ha as is identified as part of the enterprise zone.

2) LONG LANE HIGHWAY IMPROVEMENTS

A report from the Head of Planning, Transportation and Environment to the Devon County Council Cabinet meeting of 13 March 2019 sets out that Long Lane widening is intended to provide sufficient access in order to develop the employment Enterprise Zone area known as Airpark. This is a clear indication of intent that employment development of the full 7.7 hectare site is a joint objective of enterprise zone status and the highway improvement works, which are on-site and due for completion in spring 2022. The current local plan allocation of 5.0 hectares is out of step with the objectives of the enterprise zone and Long Lane highway improvement works. The new local plan should bring the Airpark allocation into line with strategic objectives for the site.

3) LOSS OF BUSINESSES LOCALLY

I&O paragraph 6.5 refers to notable losses of employers offering high skilled employment, and particularly the closure of Flybe at Exeter airport. It is imperative that the local planning authority acts on the full potential offered by Airpark to help offset job losses locally. I&O paragraph 2.6 highlights the further impact of the Covid-19 pandemic, which has wrought particularly hard hitting economic impacts on the airline industry. It is inevitable that part of the fallout from the Covid-19 pandemic will be negative economic impact and job losses. It is incumbent on the local planning authority to use tools that it has available to offset the economic impacts of the pandemic. Identifying the 7.7 hectare Airpark site as part of the employment land supply for the plan period is a positive move and is a justified response to business impact locally; impact which started pre-pandemic but are heightened by its ongoing effects.

4) LIMITED PROGRESS ON ALLOCATED SITES

I&O paragraph 6.6 details limited progress in bringing forward allocated employment sites elsewhere including larger sites at Honiton, Axminster and Exmouth. The adopted local plan includes some 33.75 hectares across the three towns that is subject to employment land allocations. The 2020 ELR quantifies total allocated land (or land otherwise available) at 31 March 2020 64.16 hectares⁴. Paragraph 9.5.6 of a 2017 Economic Development Needs Assessment⁵ (the 2017 EDNA) responds to questions raised about deliverability and sets out that '*...due to both site-specific barriers and constraints, and also the general difficulty of delivering viable development any distance from the city of Exeter and main transport routes*'. This provides further justification for a continued and extended focus of employment land strategy on the West End.

5) DELIVERABILITY

The 2017 EDNA states that '*...it is imperative that any site allocations in future local plans give strong consideration to the likely deliverability of those sites. Allocating undeliverable sites will constrain future economic growth*' (paragraphs 0.8.5/9.5.6). A coalescence of factors including implementation of the Long

⁴ The 64.16 hectares figure includes Airpark, quoted as 7.54 hectares

⁵ Greater Exeter Economic Development Needs Assessment Final Report (March 2017) – Hardisty Jones Associates

Lane highway improvement works mean that the wider 7.7 hectare Airpark site is considered to be deliverable early in the new local plan period. The 2017 EDNA concludes on viability that it is strongest, and therefore deliverability of employment sites is easiest, close to Exeter and main transport routes. An extended allocation at Airpark would be an appropriate response to the conclusions of the EDNA.

SUMMARY

OXW Catalina is the new conditional owner the 7.7 hectare site known as Airpark, currently owned by AD Land Exeter Limited, which is adjacent to Exeter International Airport and part of the East Devon West End. OXW Catalina intends to make an early start on bringing forward development of the 7.7 hectare site. The site is considered to be deliverable early in the plan period.

Airpark alongside other sites in the West End should continue to be the focus of the employment land strategy of the local planning authority. The 2017 EDNA sets out that enterprise zone status as part of the EEDEZ will make the site even more attractive. Airpark is dependent upon highway improvements to Long Lane and these works are on site and due for completion in spring 2022. Airpark is in the enterprise zone as a 7.7 hectare site, and this wider site area is identified as part of the potential employment land supply detailed in the most recent ELR where it sets out future employment land supply. The 5.0 hectare allocation in the adopted local plan is now out of step with economic strategy. The new local plan should respond to the enterprise zone status and other changes in circumstances that provide support for Airpark by including the wider 7.7 hectare site as an employment land allocation.

QUESTION 13 – DIFFERING JOBS SECTORS IN EAST DEVON

The objective should be to be to support more job creation overall including attracting inward investment across a broad spectrum of sectors, as is set out at 13a of the question. This should include an emphasis on seeking to attract new/larger employers, but not exclusively. In tandem with this it is right to seek to maintain a supply of jobs in traditional employment sectors, seek to build on previous successes locally in attracting high technology and high skilled jobs and provide policy support for entrepreneurs including through policies that allow for flexible working practices.

QUESTION 14 – ADDITIONAL ECONOMIC POLICY OBJECTIVES

Consideration of additional employment sites to address any shortfall in meeting objectively assessed need should be preceded by a consideration of the potential for intensification of activity at existing sites and opportunities for the extension of existing allocations, such as the Airpark site adjacent to Exeter airport. Sites that are already allocated in the adopted local plan for new employment floorspace should be carried forward unless there are clear reasons to suggest that delivery within the plan period to 2040 is very unlikely.

QUESTION 18 – ADDITIONAL DESIGN POLICY OBJECTIVES

Innovative and interesting design and the promotion of wildlife friendly design are justifiable policy objectives, but if included should detail principles of good practice rather than being prescriptive. The 'yes' response to the question is in the context of these being appropriate housing policy areas. Any policy objectives of this nature included in the local plan should be related explicitly to housing development, if, as appears logical, this is the intention. More generally, not all development will lend itself to innovation or design interest, and the extent to which developments can deliver positive wildlife benefit will vary greatly.

QUESTION 21 – NET GAINS IN BIODIVERSITY

The approach to biodiversity net gain should be one of flexibility. A local planning authority cannot set out prescriptively that provision must be on-site, as in some circumstances this will not be possible. I&O paragraph

10.7 reflects the position of the Government that adverse impacts to wildlife should be avoided where possible, and if not feasible, then mitigated, and only as a last resort compensated. There will be instances where there is likely no net gain on site or indeed a loss of biodiversity but biodiversity compensation alongside the overriding local benefit of a proposed development are justification for a grant of planning permission. This means that where it is not possible for biodiversity gain to be achieved on a development site, then it should be expected that it is provided off-site or the loss is otherwise appropriately compensated.

QUESTION 22 – ADDITIONAL NATURAL ENVIRONMENT POLICY OBJECTIVES

If the local plan is to place greater emphasis on landscape character assessments and evaluation of landscape impacts when determining planning applications, then it will need to be unequivocal on what specifically it is seeking to protect in any given context. This means that it will be necessary to consider designations or protection zones, and this could be affording locations a broad grading of likely sensitivity. In terms of protecting land of biodiversity importance, this has to be consistent with the approach adopted to net gain in biodiversity. There will be instances where there is likely no net gain on site or even a loss of biodiversity but biodiversity compensation alongside the overriding benefit of a development proposal are justification for a grant of planning permission. It would not be appropriate for a policy to seek to offer increased protection from development to, as I&O paragraph 10.8 sets out, land that may have some biodiversity importance without acknowledgement that it is overall planning balance and any biodiversity compensation that will ultimately inform whether there is justification for a grant planning permission for a particular proposal on a specific site.

QUESTION 23 – PROMOTING ACCESSIBILITY BY WALKING AND CYCLING

An overall promotion of accessibility by walking and cycling is entirely justified as part of an overarching local plan strategy. Not all development can or will be in a location that is close to local facilities. This is true of any administrative area, but is the case more so in a rural location. The approach of the local plan should be to encourage development that people can walk and cycle to where this is appropriate and achievable, but acknowledge that travel to some destinations will always be necessary and in such cases encouragement for non-car modes and car sharing is appropriate. With regard to the options set out in question 23, the requirement should be a combination of option 1 and option 2 but with an acknowledgement that in some circumstances neither will be achievable and there will be justification, having regard to an overall consideration of planning balance, for development that does not have a direct relationship with existing or proposed services and facilities.

QUESTION 24 – ADDITIONAL SUSTAINABLE TRANSPORT POLICY OBJECTIVES

The overall thrust of the sustainable transport themes at I&O paragraph 11.7 is generally consistent with local and national agendas and is therefore justified. Promoting accessibility to, quality of and use of public transport (issue 1) is fully justified. The same is true of providing and promoting high quality walking and cycling networks and appropriate levels of cycle parking (2), albeit it should not be expected that all new development can or will contribute to the provision of new networks. The proposition that new development be focussed in the most accessible locations where most journeys can be made by walking, cycling and public transport (3) is an issue that question 23 seeks to address. The approach of the local plan must be flexible. It will be possible to direct some new development to growth locations that are within easy walking or cycling distance of homes and/or jobs and services (both new and existing) or are accessible by public transport. In some circumstances this will not be possible and there will be justification, having regard to an overall consideration of planning balance, for development that does not have a direct relationship with other land uses, including large scale employment development that is located away from existing or proposed homes and/or services.

It is too prescriptive to require that all large scale development provides a mix of uses on site and/or shows how a range of other uses can be accessed on foot or by cycling or public transport (5). Some large scale development sites will not be suited to mixed use development. As per the response to sub-section (3) of this

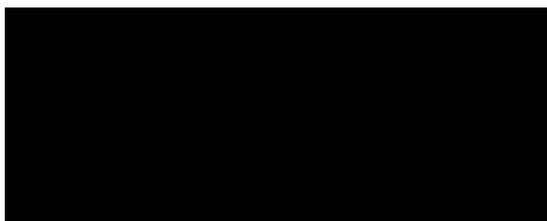
question in some instances accessibility by walking, cycling or public transport will not be easily demonstrated. That does not make a proposed development unacceptable, when all matters are considered in the round as part of an assessment of planning balance. Taking this a stage further, it is entirely reasonable to set targets for new development in terms of accessibility by walking, cycling and public transport (7) provided that it is acknowledged that such travel plan targets will vary greatly by location and development type.

The importance of Exeter airport (10) and the uses that immediately surround it, including employment parks and sites that are included in the EEDEZ, should be recognised. There should be a specific pro-development local plan policy relating to the airport, and uses that are directly associated with it. There should also be a policy that directly addresses the objectives of the enterprise zone and the intentions for the sites that are included within it.

The number of electric vehicle charging points required with new development (11) should be informed by the forthcoming ban on the sale of new petrol and diesel cars, but also advances in battery technology, the future potential for a predominance of home-charging and the potential for a modal shift away from the private car to public transport or to car sharing/car clubs. The same considerations are relevant to policy expectations in respect of cycle racks and charging points for electric bicycles.

We reserve the right to amend, add to or withdraw our representations.

Yours faithfully



Stephen Morgan-Hyland
Planning Director

cc: T Bradshaw – OXW Catalina UK Limited
