

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	Steve	Surname	Clark
Your email address	[REDACTED]				
Your telephone number	[REDACTED]				
Your postal address and post code	Wessex House, Priors Walk, East Borough, Wimborne, BH21 1PB				
Organisation name (if relevant)	Savills				
If you are an agent acting for a client please provide the name of your client	Hallam Land Management Ltd.				

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)

Land Promoter

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 representation document for details.

Question 2 – The scope of the local plan

In paragraph 2.2 of the Issues and Options report we propose producing a single plan, but it would be possible to produce a series of plans to cover the different issues. Do you think we should?

Which option do you think we should take?

- Option 1 - Single Plan.** Produce a single local plan covering all policy matters
- Option 2 - Multiple Plans.** Produce a plan that deals with strategic matters (the bigger stuff) first and then subsequent plans that deal with more local concerns and detailed matters later
- Option 3 - Other.** Do an alternative or neither of the above

Please provide any further comments in the box below

We support the intended approach to produce a single local plan for East Devon covering all key planning matters rather than a series of separate plans. It ensures that all issues are considered comprehensively rather than dealing with matters at a later date.

Question 3 - Neighbourhood Plans and the new Local Plan

Neighbourhood plans have been agreed for many of our neighbourhoods and more are in preparation. In paragraph 2.11 of the Issues and Options report we explain the role of neighbourhood and their relationship with the local plan.

How do you think we should make best use of existing neighbourhood plans to inform the new local plan that we are producing?

Question 4 - Planning for health and wellbeing

In Chapter 3 of the Issues and Options report we set out the health and wellbeing benefits of active lifestyles and the ways in which planning can promote this.

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

- Absolutely essential
- Very important
- Quite important
- Of limited importance
- Not important at all

Please provide comments below on any health and planning matters you consider to be particularly important

Question 5 - Energy efficiency of new buildings

In paragraph 4.4 of the Issues and Options report we identify ways of reducing carbon emissions from new developments, including setting higher energy efficiency standards for new buildings. Do you think we should?

Do you think we should

- Option 1 - Plan for net-zero carbon from plan adoption.** This would require all new development to be net-zero carbon upon adoption of the plan. However, it would be at a cost and as a consequence we may see less affordable housing built and maybe fewer other social and community benefits from development
- Option 2 - Plan for net-zero carbon from a future date.** This would require all new development to achieve net zero carbon from a future date in the plan process. It could allow time for the development industry to adjust to the higher standards and may mean we can secure more affordable housing and community benefits from development
- Option 3 - Do neither of the above and not have a policy.** Under this option we could just wait for and apply any Government policy

Please provide any further comments

Question 6 - Provision of solar arrays/farms and windfarms

Paragraphs 4.5 to 4.7 of the Issues and Options report deals with maximising energy from renewable sources. Question 6 seeks your views on what level of support we should give.

Which option do you think we should take?

- Option 1 - Identify suitable areas for renewable energy developments
- Option 2 - Not identify areas but offer general support
- Option 3 - Take a restrictive approach to renewables
- Option 4 - None of these options

Please provide any further comments on wind farms and solar arrays/panels

Question 7 - Carbon saving measures

Paragraph 4.8 of the Issues and Options report sets out seven policy objectives for helping to achieve carbon neutrality including using 'waste heat', and promoting community led renewable energy schemes.

Do you think we have identified the appropriate carbon saving and related policy matters to be addressed in a new local plan and are there any other policy areas that you think we should be considering?

- Yes, the appropriate carbon saving policy matters have been addressed
- No, there are other policy areas that should be considered

Please give details

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

In Chapter 5 of the Issues and Options report we set out the current Government requirement for us to build at least 928 new homes a year (although this figure can change). Paragraph 5.4 explains that we would need to almost double the number of affordable homes (to 461 every year for the next 20 years) to meet current and future needs. Do you think we should?

Which option do you think we should take?

- Option 1 - Plan for an average of at least 928 new homes being built each year** – This would accommodate levels of house building that accord with current Government requirements. It may mean, however, that we fall a long way short of meeting all affordable housing needs.
- Option 2 - Plan for a greater number of homes, for example 1,200** – this may meet more of the affordable housing need but not all of it.
- Option 3 - Plan to build considerably more homes each year** - A figure of 1,614 homes would align with Governments previous thinking and would potentially result in all affordable housing needs being met.
- Option 4** - Select option 4 if you think none of the above are appropriate

Please provide any further comments and justification in the box below, especially if you think a different number of new homes being built each year is appropriate.

Please see accompanying representation document for details.

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

<p>12a - Continued focus on big employment sites in the West End of the District</p>	<p><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>
<p>12b - Encouraging greater business development in other areas close to Exeter (for example expanding Greendale and Hill Barton Business Parks)</p>	<p><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>
<p>12c - Encouraging greater business development at and within the main towns of East Devon</p>	<p><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>
<p>12d - Encouraging business expansion and development in the villages and across the countryside of East Devon</p>	<p><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>
<p>12e - Encourage and enable more home working</p>	<p><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>
<p>If you have any comments on the above or alternative options please set these out below.</p>	
<div style="border: 1px solid black; height: 50px;"></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	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
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13b - More high technology jobs - focussing on high technology and high skilled jobs (including in the transformational sectors).	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
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13c - Local Entrepreneurs – promoting opportunities for more home/locally based/small businesses.	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
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13d - Traditional Sectors - Focus on growth, resilience and diversification in our traditional sectors - such as agriculture, tourism and care	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
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If you have any comments on the above or alternative options please set these out below.

Question 14 - Additional economic policy objectives

Paragraph 6.11 of the Issues and Options report identifies six areas where policies could be developed to help support the economy. These include promoting jobs close to where people live, encouraging people to patronise local businesses, supporting shared workspaces, allocating additional employment sites and links between economic development and developing a greener economy.

Do you think these are appropriate economic policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

- Yes, these are the appropriate economic policy areas
- No, I think there are other policy areas that should be addressed

Please give details

Question 15 - Town centre uses

Chapter 7 of the Issues and Options report considers options for the roles of our town centres. Question 15 seeks your views on these options. We set out below a number of differing potential uses and approaches to promoting town centre vitality and activity. Please indicate your in principle levels of support for each potential option or approach.

<p>15a - Retail to dominate – support retail uses in town centres and if possible resist other uses.</p>	<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>15b - Promote mixed commercial uses - support retail as well as other commercial uses such as café's and offices</p>	<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>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</p>	<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>15d - Support change of use to housing – allow for any shops or commercial premises to be converted to housing</p>	<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>15e - Support community uses - promote more community spaces in town centres</p>	<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>15f - Leisure uses – promote new gyms and sports facilities in town centres.</p>	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose

If you have any comments on the above or other distribution matters please set these out below

Question 16 - Additional town centre policy objectives

Paragraph 7.6 of the Issues and Options report identifies three additional area where policies may be appropriate including the use of vacant stories over shops, resisting 'out of town' uses to support town centres and producing town centre masterplans to identify key areas for improvement.

Do you think these are appropriate retail and town centre policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

- Yes, these are appropriate policy areas
- No, there are other major policy areas that should be addressed

Please give details

Question 17 - Designing beautiful spaces and buildings

Chapter 8 of the Issues and Options report explains how attractive places can be planned and Question 17 seeks to find out how important you think it is that this is done.

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

- Absolutely essential
- Very important
- Quite important
- Of limited importance
- Not important at all

Please provide comments below on design matters you consider to be particularly important. We would be especially interested in your views on whether we should include design codes in our future local plan for each allocated development site or whether we should make it simpler and just have general guidance.

Question 18 - Additional design policy objectives

Paragraph 8.8 of the Issues and Options report identifies two areas with the potential for additional policy work. These are encouraging innovative designs and incorporating wildlife friendly elements into developments.

Do you think these are appropriate design policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

- Yes, these are appropriate housing policy areas
- No, there are other major policy areas that should be addressed

Please give details

Question 19 - The importance of conserving and enhancing heritage assets

Chapter 9 of the Issues and Options describes our heritage assets and sets out the positive impacts they can have on our quality of life and local economies.

Through a new local plan (and in the work of the council more generally) how important do you think it is that we should conserve and enhance our heritage assets?

- Absolutely essential
- Very important
- Quite important
- Not really of any importance

Please provide any further comments on heritage asset conservation and enhancement below including on any specific matters you think a new local plan should address.

Question 20 - Development in protected landscapes

Paragraphs 10.3 & 10.4 of the Issues and Options report sets out the importance of protecting our protected landscapes and the potential limitations this may place on how much and where development should be placed. Question 20 seeks views on the levels of restriction you favour.

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

- Option 1 - Place significant restrictions on development.** This approach would apply very tight constraints on development. However, it could mean more development pressure elsewhere in East Devon.
- Option 2 - Allow for development to meet local needs.** This would allow for limited development, specifically where it will meet smaller scale local social, housing or economic needs, it could still mean more development pressure elsewhere in East Devon.
- Option 3 - Allow for greater levels of development.** This approach would allow for much more development in protected landscapes, in so doing it could however reduce the need to build elsewhere.
- Option 4 - None of the above or an alternative**

Please provide any further comments in the box below

Question 21 - Net gains in biodiversity

Paragraphs 10.5 to 10.7 of the Issues and Options report explains the new approach of quantifying the potential impact of development on biodiversity to inform planning decisions and ensure that there is a 'net gain'. Question 21 seeks views on the approach you would favour to gain biodiversity improvements.

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

- Option 1 - On-site provision**
- Option 2 - Secure the habitats locally**
- Option 3 - Pay a cash tariff towards a strategic delivery scheme**
- Option 4 - A combination of the above**
- Option 5 - None of the above or an alternative**

Please provide any further comments in the box below

Question 22 - Additional natural environment policy objectives

Paragraph 10.8 of the Issues and Options report identifies 10 additional themes for the natural environment that may benefit from policies in the local plan.

Do you think these are appropriate natural environment policy issues to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

- Yes, these are the appropriate natural environment policy issues
- No, there are other major policy areas that should be addressed

Please give details

Question 23 - Promoting accessibility by walking and cycling

Chapter 11 of the Issues and Options report sets out the issues for promoting sustainable transport. Question 23 seeks your views on how important you think it is that new development is sited so that it is within walking distance of services and facilities.

In order to promote walking and cycling and ensure that facilities are accessible we could adopt the possible approaches detailed below, which one would you favour?

- Option 1 - Focus new development as small clusters of growth in locations within easy walking or cycling distance of existing services and facilities** - This will limit the potential location of new development and will require existing facilities and services to have the capacity to cope with extra customers/users
- Option 2 - Focus new development on a small number of growth areas where the large scale of development will support the delivery of new accessible services and facilities** - This may require very high levels of development to support facilities, which may overwhelm a small settlement.
- Option 3 - A combination of options 1 and 2** – This will enable some growth where existing facilities and services are accessible and have capacity with the remainder focused on growth areas to be developed with new services and facilities.
- Option 4 - Do not require facilities and services to be within walking or cycling distance of new development but require them to be available within the settlement** - This option would not require access by foot or cycle to facilities and services but would require them to be available locally. It may however encourage car use.
- Option 5 - None of the above** - Perhaps you think that accessibility by walking or cycling is not a relevant concern?

Please provide any further comments in the box below

Question 24 - Additional sustainable transport policy objectives

Paragraph 11.7 of the Issues and Options report identifies 13 key issues that may need to be considered around the theme of sustainable transport.

Do you think these are appropriate sustainable transport policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

- Yes, these are appropriate sustainable transport policy areas
- No, there are other major policy areas that should be addressed

Please give details

Question 25 - Facilities and services that are important

Chapter 12 of the Issues and Options report deals with infrastructure requirements and asks what facilities are important to people to help us prioritise what may be needed and where. Please score the services and facilities listed below in accordance with their importance to where you live or would want to live

Please score the services and facilities listed below in accordance with their Importance to where you live or would want to live?	Please tick one box only for each item			
	Essential	Very Important	Quite Important	Of little Importance
Convenience store/Post Office	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Supermarket	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Childcare and nursery school provision	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Primary school	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Secondary school	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Children’s play area	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sports & leisure facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Health care facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Open spaces	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Easy access to a range of jobs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Regular bus service (5 plus per day)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Train station	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Paths for walking and cycling	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Access to full fibre broadband	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public house	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Place of worship (e.g. a church)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
High quality road links	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Emergency services (police, fire, ambulance)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Community hall	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Youth facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you have any other comments or would identify other facilities please set these out below.

Question 26 - Additional infrastructure and service provision policy objectives

Paragraph 12.9 of the Issues and Options report identifies five other infrastructure and service policy objectives.

Do you think these are appropriate infrastructure and service provision policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

- Yes, these are appropriate policy areas to be addressed
- No, there are other major policy areas that should be addressed

Please give details

Question 27 - Retaining and refining the existing settlement hierarchy

Chapter 13 of the Issues and Options report considers strategic options for the distribution of new development expressed in terms of a settlement hierarchy. Question 27 seeks your views on what your preferred pattern of development would be.

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

- Option 1** - Same hierarchy as current local plan: 7 Towns plus Cranbrook and the 15 Villages
- Option 2** - A hierarchy that retains the towns and Cranbrook but has a lower number of villages that may accommodate development
- Option 3** - A hierarchy that retains towns and Cranbrook but has a higher number of villages that may accommodate development
- Option 4** - Do something different in terms of a hierarchy or not have one

Please provide any comments below on the potential hierarchy, especially if you do not support the listed options.

Question 28 - Broad distribution of housing development

Paragraphs 13.12 to 13.14 of the Issues and Options report considers the strategic spatial options for accommodating housing growth. Question 28 asks which broad approach to the distribution of housing development you favour.

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

- Option 1 - As existing.** Continue with a distribution pattern of planned new development that is in line with the current local plan – for 60% of new homes at the West End, 30% in Towns and 10% in Villages and rural areas.
- Option 2 - More West End focused.** This approach would focus more of the future new house building close to Exeter, perhaps as much as 75%, with the remaining 25% being in town and villages (for example 20% in towns and 5% in villages).
- Option 3 - A less West End focused pattern.** This approach would seek to accommodate far less development close to Exeter, maybe as little as 20% of future new homes, with the bulk of new housing, 80% of provision, being dispersed across towns and villages (for example 50% in towns and 30% in villages and rural areas).
- Option 4 - An alternative to the above.** You may consider that there are different ways or approaches to look at development distribution (if so we would welcome your thoughts and comments)

Please provide any comments on the above in the space below

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

Paragraphs 13.15 & 13.16 of the Issues and Options report sets out a range of option for accommodating development. Which do you prefer?

How do you feel about the development types and locations listed below	For each option please tick one box only					
	Strongly support	Support	Neither oppose or support	Oppose	Strongly oppose	None of the options
Infilling in towns and at larger villages	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Building one or more additional new towns	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Planning for new villages	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
large scale (over 50 home) urban expansions to existing towns	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
small scale (under 50 home) urban expansions to towns	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Building houses on the edges of East Devon villages	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Do you have any further observations on the alternative development options and approaches? Please provide comments below						

Question 30 - Establishment of a Development Corporation

Paragraphs 13.17 to 13.19 of the Issues and Options report explain the role that a development corporation could plan in delivering very large scale developments. Question 30 asks for view on how important you consider this would be.

If one or more big strategic sites for housing or mixed use development are allocated in the new East Devon local plan how important do you think the creation of a Development Corporation would be?

- Absolutely essential
- Very important
- Quite important
- Of limited importance
- Not important at all
- It would be a bad thing

Please provide any further comments below

Question 31 - Planning for development beyond 2040

Paragraph 13.20 of the Issues and Options report considers the timeframe that the local plan should consider.

Do you consider that it would be appropriate to start to plan for development in East Devon for a date well beyond 2040 in this Local Plan?

- Yes it would be very sensible whether a new town is proposed or not
- Sensible only if a new town is proposed
- It does not really matter what end date is set
- It would be undesirable and the end date should be 2040
- None of these options

Please provide any further comments below

Question 32 - And finally...?

Are there any big planning issues that you think we have missed in this report or are there any further comments you would like to make?

Please see accompanying representation document for details - Specifically matters under the duty to cooperate and cross boundary issues with Dorset Council in relation to the settlement of Lyme Regis.

East Devon Local Plan Issues and Options Representation

Land at Sidmouth Road, Lyme Regis

Prepared by Savills on behalf of Hallam Land Management Ltd.

March 2021

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1. Introduction

- 1.1. Savills are instructed on behalf of our client Hallam Land Management Ltd (hereafter referred to as "Hallam Land"), to respond to the East Devon Local Plan 2021 to 204 Issues and Options (Regulation 18) Consultation. This representation specifically relates to Hallam Land's interests at Sidmouth Road, Lyme Regis.
- 1.2. Having considered the East Devon Local Plan Issues and Options report we set out below specific representations to the following:
 - Local Plan objectives;
 - The Scope of the plan;
 - How many homes should we plan for each year;
 - Lyme Regis; and
 - The duty to cooperate
- 1.3. Hallam Land is a wholly owned subsidiary of Henry Boot PLC and has been promoting development land successfully for over 30 years. Hallam Land has delivered a range of strategic projects comprising residential, commercial, retail and mixed use development. The portfolio ranges from small town/village extensions to new communities. Recent projects include Cranbrook, near Exeter (currently 3,500 dwellings), Bridport, West Dorset (760 dwellings), Melksham, Wiltshire (225 dwellings) and Yatton, Somerset (170 dwellings). Hallam Land has built a strong reputation working with local communities and has a proven track record of delivering quality schemes.
- 1.4. Hallam Land has been involved with the promotion of this site for a number of years now and has made previous representations to the East Devon Local Plan process as well as the West Dorset, Weymouth & Portland Local Plan Review. The site was also submitted to East Devon Council's 2017 call for sites process and is being presented again alongside these representations to East Devon's current call for sites process.
- 1.5. Previous representations have consistently raised concerns that the housing needs of Lyme Regis are not being adequately considered or met as a result of inappropriate levels of housing allocations for the town and that the duty to co-operate across the administrative boundary is not being satisfactorily addressed. These latest representations to the East Devon and Dorset Local Plan consultations maintain a consistent concern to the approach being taken to planning for the housing needs of Lyme Regis.

2. Site Context

- 2.1. The site is located on the western edge of the coastal town of Lyme Regis. It is on the Dorset and Devon border approximately 40km east of Exeter and 40km west of Dorchester. A site location plan is provided at **Figure 1**. The site comprises one large agricultural field measuring approximately 5.3 hectares (13 acres) and is bordered to the east by Shire Lane, to the south by the A3052 (Sidmouth Road) and to the west by existing agricultural fields. The site benefits from direct access from Sidmouth Road as does the park and ride facility located to the west.
- 2.2. The site is free from physical and environmental constraints other than being within the Area of Outstanding Natural Beauty (AONB), which covers a very broad area of Dorset and Devon extending from Exmouth to Swanage. It covers approximately 69% of West Dorset, Weymouth and Portland, washes over Lyme Regis and as a result any development at Lyme Regis will be within the AONB.
- 2.3. The built up edge of Lyme Regis adjoins the eastern edge of the site, with open countryside to the west of the site. Adjacent to the site to the west is a seasonal park and ride for Lyme Regis, with regular shuttle buses into the town over the summer holiday and at bank holidays.
- 2.4. The site is located on a gently sloping plateau and is defined by mature, well established hedgerows along its boundaries. Nearby areas of woodland and adjoining development to the east result in the site being well screened by topography and vegetation from local views within the town of Lyme Regis and the outlying settlements of Uplyme and Ware. The retention of existing vegetation, supplemented by additional strategic planting and careful design would minimise impacts on the wider landscape and provide a well contained and clearly defined extension to Lyme Regis.
- 2.5. Hallam Land continue to present this site as available for development and our initial appraisal work indicates that the site could provide approximately 120 new homes, with 50% of these being affordable, built in one development phase delivered over an 18 month to 2 year period, within the next five years. The site is therefore both deliverable and achievable.

Figure 1 – Site Location Plan



3. Local plan objectives, scope and background

Objective 3

- 3.1. We generally support the objectives for the new Local Plan set out at Chapter 2, however, we consider that Objective 3: Meeting future housing needs should be amended. It currently states an objective of *“Providing high quality new homes to meet peoples need’s.”* We consider the objective should be expanded to also include the need for the plan to address the assessed housing needs of the plan area and any needs that cannot be met within neighbouring areas as well as providing a clear strategy for bringing sufficient land forward to meet the future housing needs.
- 3.2. An amendment of this nature to objective 3 would ensure that the Local Plan’s housing objective is consistent with the requirements of paragraphs 23 and 65 of the National Planning Policy Framework which states:
- 3.3. *“10. Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development...”*
- 3.4. *“65. Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period....”*

The Plan Period

- 3.5. The East Devon Local Plan Consultation sets out that the Local Plan will cover the period from 2021 to 2040. We support the plan period covering a minimum period of 15 years post adoption as required by the Framework and agree with the Council’s approach of planning beyond that period to 2040 to build in further flexibility to account for potential delays to the Local Plan programme to adoption.

4. Meeting the housing need

- 4.1. The East Devon Local Plan issues and options consultation indicates that the housing requirement when applying the Government's standard housing methodology would result in a need for 928 new homes per annum or 18,560 new homes over the plan period. The Council's own recent housing need analysis however demonstrates a significant affordable housing issue as a result of increased house prices and a decline in the provision of new affordable housing stock in recent years. The evidence base provides a robust and strong justification to plan for higher levels of housing growth across the plan area if the increasing affordability concerns are to be addressed.
- 4.2. For these reasons we support Option 3 of Question 8 and consider that the new Local Plan should plan to build considerably more homes each year than the standard housing methodology figure in order to address the affordable housing need of the plan area. We support the option of planning for a figure of 1,614 homes per annum or 32,280 over the plan period in line with the Government's previous targets.

5. Planning for Lyme Regis

- 5.1. Lyme Regis is located at the most western coastal extent of the administrative area of Dorset Council. It straddles the administrative boundary between Dorset Council and East Devon District Council and therefore presents cross boundary issues.
- 5.2. Lyme Regis faces a number of issues which include a low wage economy, an ageing population; a lack of affordable housing; and a high level of second home ownership. The draft Dorset Local Plan states that *“Tourism is a major source of employment in the town, but has also resulted in high house prices and more than 20% of the housing stock becoming second or holiday homes. As a result the lack of affordable housing is an issue in the town”*
- 5.3. To address these issues it is of vital importance to increase the supply of housing to the area to provide more affordable housing and greater stock to the market with a range of affordable home ownership products to enable younger families to make the step onto the property market rather than being forced out of the town.
- 5.4. Dorset Council’s current draft Local Plan concludes that *“Development opportunities in and around Lyme Regis are very limited due to land instability and both highway and landscape constraints. The development of an extant permission on land south of Colway Lane will provide a further 45 houses, but otherwise sites on the edge of the town, further from town centre services and facilities, have had to be considered, with the only development opportunity identified being 40 units as an extension to Woodberry Down.”*
- 5.5. We disagree to the assertion that the Woodberry Down Extension is the only identifiable development opportunity. We consider that land at Sidmouth Road, Lyme Regis is also a sustainable and viable development opportunity to increase the housing provision to meet the acute need for housing in the town. Dorset Council and East Devon District Council can, through the duty to cooperate, seek to work collaboratively to make an appropriate allocation on this site to meet the needs of the town. The current emerging allocation of 40 units in the draft Dorset Local Plan is considered woefully inadequate.
- 5.6. Lyme Regis has a good range of services and facilities, including two primary schools and a secondary school, GP surgery, town hall, shops, pubs, restaurants and tourist attractions. The town has always been considered as a sustainable settlement capable of accommodating new residential development but has seen limited historic growth in recent years given the surrounding constraints to the town including topography, flood risk and landscape designations.

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- 5.7. The town of Lyme Regis is however one of Dorset's principal tourist resorts, is well related to East Devon and an important centre for visitors to the World Heritage Coast. A consequence of this is that the town has a high proportion of second homes and holiday homes. When considered in conjunction with an ageing population in the town and the limited residential growth of the past, the resultant effect is the displacement of young families out of the town to seek affordable and available family housing elsewhere.
- 5.8. Average house prices in Lyme Regis exceed £400,000 with prices up 3% over the last year reaching similar average prices of the peak of £410,000 in 2018 (Source: Rightmove and Zoopla), significantly higher than national averages. As the town is an attractive tourist destination, much of its employment is in the accommodation and food industries, which are often associated with lower salaries. With average salaries in Dorset at around £22,000 (Source: payscale.com), the average cost of housing in Lyme Regis is now more than 18 times average salaries. The high house prices and low salaries presents a real and current issue for young people and families who live and work in Lyme Regis, creating an acute affordability issue.
- 5.9. We consider that the current proposed allocation of 40 homes in Lyme Regis would be entirely inadequate to address these issues and plan for the needs of Lyme Regis for the plan period. The proposed allocation represents a plan of less than 2 dwellings per annum over the draft Dorset Local Plan period for a town experiencing significant social and demographic issues, exacerbated by the impact of second homes.
- 5.10. We are therefore objecting to levels of proposed growth in Lyme Regis through the Dorset Local Plan Consultation process. Furthermore, we consider that suitable, sustainable housing sites, such as land at Sidmouth Road should be seriously considered to make available the essential housing required to support local people, local employers, the local economy and local services in Lyme Regis.

6. Duty to Cooperate

- 6.1. Section 110 of the Localism Act 2011 sets out a 'duty to co-operate', requiring that Councils and public bodies engage constructively, actively and on an ongoing basis to develop strategic policies, and consider joint approaches to plan making in order to ensure the planning of sustainable development. It is also one of the tests of soundness against which local plans are assessed and whilst its future is under consideration by the Government it remains a relevant test at the time of this consultation.
- 6.2. The issue of the duty to co-operate in the area of Lyme Regis has been a long running debate as previously set out in our representations to the plan making process of the former West Dorset, Weymouth & Portland Council. Both the West Dorset, Weymouth & Portland Local Plan process and the East Devon Local Plan process were subject to scrutiny in this area with both Local Plan Inspector's raising concerns regarding soundness and the requirement for further work to be undertaken to assess housing needs in the area. The East Devon Local Plan Inspector commented that *"Engagement has not led to complete agreement with regard to how any un-met need in Lyme Regis would be addressed but there is a willingness to work together."*
- 6.3. The East Devon Local Plan Inspector also recommended modifications to ensure that collaboration in the future occurs. The modifications recognised that at Lyme Regis there is a local expression of need for housing and employment, although this is not quantified through formal local housing and employment needs assessment in this area. A commitment is then made that *"East Devon District Council will work with West Dorset District Council, Uplyme Parish Council and Lyme Regis Town Council to ensure over the long term that the most appropriate solutions to meeting the local needs of both communities are fully understood and explored and thereafter expressed in future policy documents."*
- 6.4. The East Devon Local Plan Issues and Options consultation report sets out at paragraphs 2.7 and 2.8 the Council's intention to work with its neighbours through the duty to cooperate. We welcome this acknowledgement, however, it is not clear from the information presented either through the East Devon Local Plan Consultation or Dorset Council's Local Plan consultation, the extent to which these discussions have taken place at this stage. We are unable therefore to determine the extent of assessment or collaborative discussions that have taken place between the Councils to address the needs of Lyme Regis.

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- 6.5. If a site in East Devon was objectively assessed as the most sustainable location for housing growth, we consider that East Devon have it entirely within their power to allocate a site for housing in their Local Plan that could meet the housing needs of Lyme Regis in Dorset. The lack of commentary in the Local Plan consultations do not provide clarity as to whether such discussions have been had and we are therefore concerned that the duty to co-operate has not yet been met.
- 6.6. An example of the duty to co-operate working successfully can be seen in the adopted Cheltenham, Gloucester and Tewkesbury Joint Core Strategy. In making provision for an adequate supply of housing in Tewkesbury Borough Council, the Joint Core Strategy identified a provision of 500 houses in Mitton, a site located in the neighbouring authority area of Wychavon District Council. This was not a formal allocation but shown as a location that would deliver the housing requirements of Tewkesbury beyond its administrative boundary.
- 6.7. In this example, Wychavon District Council, without needing to review its own Local Plan, agreed to contribute 500 dwellings to Tewkesbury's supply and the Local Plan Inspector accepted a Planning Statement signed by both Tewkesbury Borough Council and Wychavon District Council setting out an agreement for delivery of this cross-boundary site.
- 6.8. This example clearly demonstrates how cross boundary sites can be brought forward for development and we are concerned from the lack of available information as to whether Dorset Council and East Devon Council are working together effectively to support the long term growth needs of Lyme Regis. This needs to be addressed urgently, and the Local Plan should not proceed further without it considering how the needs of Lyme Regis can be sustainably met.

7. Conclusions

- 7.1. In summary, we support the approach to the Local Plan period and the objectives proposed subject to an expansion on meeting objectively assessed housing needs of the Local Plan area. We also consider that the Council should be planning for the evidence based higher housing requirements in the Local Plan area to address the issue of affordability.
- 7.2. Hallam Land present the Sidmouth Road site as available and developable to make an important contribution towards meeting the future growth needs of Lyme Regis to include much needed, and currently under-provided, affordable housing. The site represents a sustainable and deliverable opportunity for high quality development and should be identified for development.
- 7.3. Contrary to the requirements under the 'duty to co-operate', we have not seen any evidence that Dorset Council and East Devon Council have undertaken sufficient evidence gathering or collaborative working to bring forward suitable proposals to meet the long term needs of Lyme Regis, with the current lack of identified options and indicative capacity leaving a large hole in meeting the housing needs of the town.
- 7.4. The issue of future growth and meeting housing need in Lyme Regis is a strategic, cross boundary issue and one that we do not believe has been dealt with adequately in previous Local Plans and does not appear to have been addressed adequately in the emerging draft Dorset Local Plan. The matter requires constructive and active engagement between the two Local Planning Authorities to provide a sound planning policy framework that addresses and responds to these needs. To fail to provide adequate opportunity for housing growth in Lyme Regis will be to the detriment of the sustainability of the town, its local economy, tourist industry and the community that it supports.