



Registered address
Vicarage Cottage
Dukes Square
Broadhembury
Honiton
Devon
EX14 3NE

Broadhembury Neighbourhood Community Land Trust (BNCLT) response to the East Devon Local Plan 2021 to 2040 Issues and Options consultation - January to March 2021

BNCLT have responded via the EDDC website. The website response fields contain a number of character limitation. For two questions (Q5, Q12 & Q32) the character limitation was too restrictive. Our response to all questions is included below.

R J Phillips
Deputy Chair
Broadhembury Neighbourhood Community Land Trust

Broadhembury Neighbourhood Community Land Trust is a charitable Community Benefit Society registered under the Co-operative and Community Benefit Societies Act 2014, registration number 8495

Question 1

[Selected](#)

[Yes, these are the right objectives](#)

[Comments](#)

We particularly note Objective 7 (To conserve and enhance our outstanding built heritage), and Objective 8 (To protect and enhance our outstanding natural environment and support an increase in biodiversity). With respect to Objective 7 - we endorse the conservation of our built heritage. However, we find the words 'and enhance' lacks clarity in the context of conservation – 'enhance' implies an alteration that maybe in conflict with conservation.

Question 2 - The scope of the local plan

Selected

Option 1 - Single Plan. Produce a single local plan covering all policy matters

Comments

East Devon is diverse in many respects. To ensure that diversity is recognised a single plan is required. Within that plan, consideration of the urban areas must always recognise the potential impact on the rural areas, in particular, encroachment of the urban into the rural requires constraint.

Question 3 - Neighbourhood Plans and the new Local Plan

Comments

Existing neighbourhood plans must be endorsed by the new local plan. In addition, those neighbourhood plans that are in preparation, should be completed to enable endorsement.

Question 4 - Planning for health and wellbeing

Selected

Absolutely essential

Comments

Paragraph 3.5 recognises the benefits of the natural environment to health and wellbeing. However, elsewhere in chapter 3 the emphasis is on design and the built environment. This chapter should make greater reference to the benefits of the natural rural environment and heritage aspects that East Devon has to offer – it is through these that considerable benefit to health and wellbeing can be gained.

Question 5 - Energy efficiency of new buildings

Selected

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

Comments

Establishing a plan for net zero carbon is fundamental to environmental protection and cannot be delayed. You say this "may see less affordable housing" - there is no established causal connection between net zero carbon and not being able to meet affordable housing needs, nor indeed the ability to provide "other social and community benefits". By implying such connection, imaginative thinking will be constrained - there are organisations already developing solutions. Additionally, we wish to particularly note your use of the phrase "maybe fewer social and community benefits from development". Along with a net zero policy, we need to collectively recognise that there are many social and community benefits that can be brought about without "development". For example, capitalising on the strengths that East Devon naturally has through its natural rural environment and heritage will both help establish a zero-carbon approach whilst simultaneously providing social and community benefits without costly development.

Question 6 - Provision of solar arrays/farms and windfarms

Selected

Option 4 - None of these options

Comments

We considered ticking option 2, but elected to tick option 4 instead. The reason for not ticking option 2 is that it does not rule out the possibility of large commercial developments. Instead, general support and encouragement should be offered to multiple small scale and localised schemes benefitting the immediate communities.

Question 7 - Carbon saving measures

Selected

Yes, the appropriate carbon saving policy matters have been addressed

Comments

We particularly endorse – and recommend greater emphasis is placed upon - para 4.8 4) (Promoting community led renewable energy schemes), and 4.8 6) (Encouraging tree planting which will help take large amounts of carbon dioxide out of the atmosphere).

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

Selected

Option 4 - Select option 4 if you think none of the above are appropriate

Comments

Q8 implies that there exists an unchallengeable connection between two points: (1) The need for Affordable Housing, and (2) The building of other housing. Firstly, consider the Affordable Housing need – the question suggests that the total number of Affordable Homes that are needed is well established - we consider the methods used to measure the Affordable Housing need requires close scrutiny and possible reassessment. Secondly, consider the connection between the number of affordable houses needed and the building of other housing - Q8 (option 3) suggests, without justification, that 7 homes characterised as non-affordable need to be built to support every 2 affordable homes. Without challenging the connection between points (1) and (2), and without establishing an accurate basis for the actual Affordable Housing need, then we are potentially entering an endless cycle of unnecessary development.

Question 9 - Sites for small scale housing developments

Selected

Option 5 - None of the above or an alternative

Comments

We have approached our answer to this question from two perspectives. Firstly, please see our response to Q8 where we challenge the basis and the method upon which the number of homes (characterised as both affordable and non-affordable) that are stated to be needed. Secondly, please refer to our response to Q12 where we highlight that infrastructure is needed to support development. Merely responding to this question (Q9) with a percentage does not fully account for the complex interactions at play between need and infrastructure. The percentage depends greatly upon the whereabouts within the East Devon district. Much lower proportions being appropriate in the more rural areas – zero in some.

Question 10 - Planning for housing for people at all stages of their life

Selected

Option 4 - None of the above or an alternative

Comments

We do consider the need to provide housing for people at all stages of life to be important. We considered selection 'option 1', but did not because that option implies that the analysis of what is needed where is passed to 'developers' instead of being the decision of local communities.

Question 11 - Additional housing policy objectives

Selected

Yes, these are appropriate housing policy areas to be addressed

Comments

We particularly endorse – and recommend greater emphasis is placed upon - para 5.10 7) (Considering whether it's appropriate to support the sub-division of homes and annexes as a way of providing a wider choice of housing). Additionally, we recommend the following as an emerging theme: Consider whether it's appropriate to repurpose unoccupied buildings such as disused shops into homes – this would have the additional benefit of breathing life back into town centres.

Question 12 - Preference for location for future job provision

Selected

12a - Support

12b - Oppose

12c - Oppose

12d - Strongly oppose

12e - Strongly support

Comments

The transport and communication infrastructures in the west end of the district (near Exeter) already exists. Thus, any further development in that area would have the double benefit of reduced infrastructure costs, and reduced environmental harm elsewhere. We do not wish to imply that job provision is not needed elsewhere in the district – we argue that it is needed on a smaller scale that can be accommodated using existing, and declining, industrial and business sites. The Covid argument of lost jobs that is presented should be recognised as also providing newly vacant business and industrial buildings that could be repurposed – rather than presenting an argument for new development on green spaces. Additionally, providing much improved internet capabilities would enable greater homeworking thus reducing transport needs, emissions, and other environmental damages. We consider this as key to supporting village and other rural life whilst enabling the success of rural conservation efforts.

Please note that we have marked Q12d as 'strongly oppose' – the reason for this marking is because the scale of such expansion has not been quantified in the question. Conversion of small-scale redundant buildings to house shared business services for individuals or small partnerships (where it may not always be practical or realistic for family members to operate from home) would be 'supported'.

Question 13 - Differing jobs sectors in East Devon

Selected

13a - Support

13b - Support

13c - Support

13d - Support

Comments

We have selected 'support' on all categories (13a through 13d). Although in doing so we understand that some categories (13a and possibly 13b) are perhaps more appropriate in the western end and urban areas of the district. Whereas, 13c and 13d are possibly more appropriate elsewhere.

Question 14 - Additional economic policy objectives

Selected

Yes, these are the appropriate economic policy areas

Comments

We would support such initiative if small scale, well placed, and if for local people.

Question 15 - Town centre uses

Selected

15a - Neither oppose nor support

15b - Support

15c - Neither oppose nor support

15d - Strongly support

15e - Support

15f - Neither oppose nor support

Comments

Town centre decline should be seen as an opportunity for rethinking the use of those buildings and spaces. Empty shops and spaces above existing shops should be looked upon as providing not only places for offices, cafes, etc – but also places for affordable living. Using those spaces to provide some of the needed affordable homes will additionally place people at the heart of our town centres to breathe life back into the business that are there.

Question 16 - Additional town centre policy objectives

Selected

Yes, these are appropriate policy areas

Comments

Our comments at Q15 to be equally relevant here.

Question 17 - Designing beautiful spaces and buildings

Selected

Very important

Comments

Incorporating the natural environment as an integral element in design is essential for East Devon.

Question 18 - Additional design policy objectives

Selected

Yes, these are appropriate housing policy areas

Comments

Although we support these principles, we have assessed that they do not additionally and adequately address the essential need for the natural rural environment to be a part of the innovative designs. We consider that allowing the natural environment to be an integral element in design is essential for East Devon.

Question 19 - The importance of conserving and enhancing heritage assets

Selected

Absolutely essential

Comments

Yes, this is absolutely essential. Additionally, we recommend that not only the asset itself is conserved, but also the setting it is in should be conserved. This setting aspect is, we consider, to be the meaning of 'enhancing' in the phrase 'conserving and enhancing'.

Question 20 - Development in protected landscapes

Selected

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.

Comments

The natural environmental and rural aspects of East Devon are its heritage. It is the protection of these landscapes, as you state in para 10.3 and 10.4, that will enable the true opportunities for economic growth, and the wellbeing of the local communities to occur.

Question 21 - Net gains in biodiversity

Selected

Option 4 - A combination of the above

Comments

Please refer to our comments at Q20.

Question 22 - Additional natural environment policy objectives

Selected

Yes, these are the appropriate natural environment policy issues

Comments

Please refer to our comments at Q20.

Question 23 - Promoting accessibility by walking and cycling

Selected

Option 5 - None of the above - Perhaps you think that accessibility by walking or cycling is not a relevant concern?

Comments

We have selected option 5 – this is not because we do not think access to services and facilities is not important. Instead, it is because: (1) We recognise that some people wish to live in a rural setting for their own wellbeing, or for the support of family or others they have a close connection with who reside in those places. (2) A greater recognition that online activity is rising in proportion to travel, and will continue to do so. This, together with the delivery of goods to the door, reduces the extent to which travel is becoming important. (3) The travel that remains will be by ever increasing low carbon means – not just electric cars and bikes, but also by other upcoming means.

Question 24 - Additional sustainable transport policy objectives

Selected

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

Comments

Within urban areas the objectives set out are applicable. Within rural areas another set of objectives are needed. In order to set a framework for rural areas it is recommended that consideration is given to our response at Q23.

Question 25 - Facilities and services that are important

Selected

- 25a - Very important
- 25b - Quite important
- 25c - Very important
- 25d - Very important
- 25e - Quite important
- 25f - Very important
- 25g - Of little importance
- 25h - Essential
- 25i - Essential
- 25j - Quite important
- 25k - Very important
- 25l - Quite important
- 25m - Very important
- 25n - Essential
- 25o - Quite important
- 25p - Quite important
- 25q - Of little importance
- 25r - Essential
- 25s - Quite important
- 25t - Quite important

Comments

We have considered our responses to the above from the perspective of the rural locations within East Devon. For urban areas many of the responses may well be different. We recommend that the potential for different responses in those respect is accounted for. Furthermore, the selection of criteria proved in Q25a to Q25t focus primarily on the human built environment. We recommend that

more focus is placed upon the importance of the natural and rural environment here, together with the interaction that the natural environment should play not only in the rural aspects of East Devon, but also its potential for better incorporation into the towns.

We wish to particularly note Q25n. This is no longer a 'nice to have': internet access has become an essential utility, along with electricity and water. It must be accessible to all, no matter where they live in rural areas. Additionally, mobile phone coverage is essential – but (for unknown reason) is not listed in your options above.

Question 26 - Additional infrastructure and service provision policy objectives

Selected

Yes, these are appropriate policy areas to be addressed

Comments

We recognise that the provisions need to be proportionate to the needs of the specific locations.

Question 27 - Retaining and refining the existing settlement hierarchy

Selected

Option 2 - A hierarchy that retains the towns and Cranbrook but has a lower number of villages that may accommodate development

Comments

The existing draft of the East Devon Local Plan appears to be silent on the roles played by towns, larger villages, and other facilities 'just over the border' in Mid-Devon, Somerset, and Dorset. Are these accounted for?

Question 28 - Broad distribution of housing development

Selected

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).

Comments

Unlike most of East Devon, the west end of the district has the existing infrastructure that enables the economic viability of focused development there.

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

Selected

29a - Support

29b - Oppose

29c - Oppose

29d - Strongly oppose

29e - Support

29f - Strongly oppose

Comments

We have difficulty answering Q29d in a constructive manner because it is not a well bounded question: "over 50 homes" does not limit development in anyway, thus we strongly oppose.

Similarly, Q29f is not bounded. This question highlights the importance of mandating Neighbourhood Plans which truly support the desires and aspiration of individual communities – what is appropriate for one community may not be for another.

Question 30 - Establishment of a Development Corporation

Selected

It would be a bad thing

Comments

We find it impossible to answer this question in a constructive manner given the information provided. We have elected to say “It would be a bad thing” because: (1) it has not been established whether a development of a size and nature that would benefit from a Development Corporation is required. (2) The terms and conditions that such a Development Corporation would be required to adhere to have not been presented.

Question 31 - Planning for development beyond 2040

Selected

Yes, it would be very sensible whether a new town is proposed or not

Comments

Yes, it is wise to establish the envisaged key points of a long-term plan - it is through such a process that the near term becomes clearer. Such a long-term strategy should, however, recognise that many things that are currently unknown will occur in the interim – thus adaptability needs to be included as one of the key aims. In particular, caution would be needed in setting the scene too specifically for long term infrastructure projects (especially involving transport) where emerging technologies and policies in response to the climate crisis may result in a very different set of ideas to those we might envisage today.

Question 32 - And finally...?

We wish to make final comments under two headings: The Built Environment and the Natural Environment. Although we recognise the importance of both, we assess the draft local plan is focused too greatly upon the former. There are a number of measures that possibly could, or should, be taken to address that balance (see below), but key is the need for EDDC to drive a requirement for Neighbourhood plans which truly support the aspirations of individual communities.

(1) Built Environment

We find the draft local plan has an overemphasis on the built environment. The built environment is needed, but its rate of expansion cannot continue to increase. Homes are required, but a more rationalised and justifiable basis for the quantity and type is needed. In particular, we recognise the need for affordable homes for genuinely local people. The method of fulfilment of affordable housing has to be thought about more imaginatively. Simply proportioning the number of market value homes to provide affordable homes cannot be sustainable. Instead, consideration should be given to other options such as reallocation of housing stock into the affordable housing category.

(2) Natural Environment

Although the draft local plan does recognise the natural environment, the emphasis of its importance appears to be secondary to the built environment. The natural environment must be regarded as ‘the host’ in which the built environment resides and, as such, must respect. To a large extent it is the natural and rural aspects that enable wellbeing of many in our communities. It is important to maintain and expand AONBs. Additionally, it is essential to both maintain greenbelts between communities, and to establish green spaces within those communities. Key to the conservation and the establishment of thriving natural and rural environments is ‘home (or local) working’ – for this, high-speed internet capability across the whole of East Devon is essential.