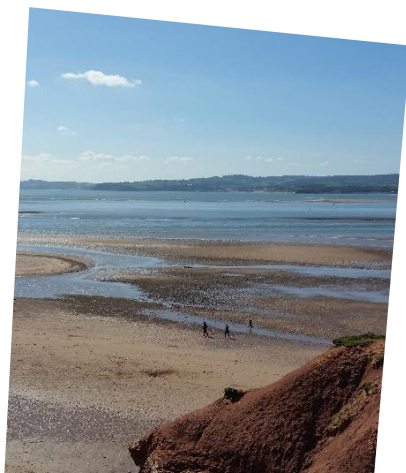




East Devon Local Plan
2021 to 2040
Issues and Options Consultation
January 2021 (Regulation 18)



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This consultation is undertaken in respect of support of the requirements of 'Regulation 18' of 'The Town and Country Planning (Local Planning) (England) Regulations 2012'. See:

<https://www.legislation.gov.uk/ukxi/2012/767/regulation/18/made>

Chapter 1 - Introduction

The role of a local plan

- 1.1 A Local Plan shows how an area will develop in the future and provides policies which will guide decisions on whether or not planning applications are granted. We want our local plan to support high quality new development in the right locations to meet future needs whilst also protecting and enhancing the exceptional natural and built environment that residents and visitors treasure.
- 1.2 This 'Issues and Options' report is the first stage of plan making. We concentrate on what we think are likely to be the major planning issues for the future, and in particular those where there could be significant differing options and approaches that the local plan could take.

Why we need a new local plan

- 1.3 We have an existing local plan that was adopted in January 2016, however it is now becoming dated. The new local plan will supersede the existing East Devon Local Plan and the East Devon Villages Plan, though it remains to be determined if or which parts of the emerging Cranbrook Plan are superseded. The new local plan will start to carry some weight as it progresses through the plan making stages and on adoption will carry full weight and fully supersede the other plans.

How to make comments

- 1.4 We are seeking your feedback to help us shape our local plan. There are questions in full in this document but we have an online questionnaire that we would encourage you to complete. See:

<https://eastdevon.gov.uk/planning/planning-policy/emerging-local-plan/initial-consultations/issues-and-options-consultation-jan-2021>

Paper copies of the questions are available on request.

Chapter 2 - Objectives, scope and background

2.1 At the outset we think it is important to set out objectives for a new local plan.

Designing for health and well-being	Objective 1	To encourage healthy lifestyles and living environments for all East Devon residents.
Tackling the climate emergency	Objective 2	To ensure all new development moves the district towards delivering net-zero carbon emissions by 2040 and that we adapt to the impacts of climate change.
Meeting future housing needs	Objective 3	To provide high quality new homes to meet people's needs.
Supporting jobs and the economy	Objective 4	To support business investment and job creation opportunities within East Devon and support a resilient economy.
Promoting vibrant town centres	Objective 5	To promote the vitality of our town centres, encourage investment, greater flexibility and a wider range of activities to increase footfall and spend.
Designing beautiful and healthy spaces and buildings	Objective 6	To promote high quality beautiful development that is designed and constructed to meet 21 st century needs.
Our outstanding built heritage	Objective 7	To conserve and enhance our outstanding built heritage.
Our outstanding natural environment	Objective 8	To protect and enhance our outstanding natural environment and support an increase in biodiversity.
Promoting sustainable transport	Objective 9	To prioritise walking, cycling and public transport and make provision for charging electric vehicles, whilst reducing reliance on fossil fuelled vehicles.
Connections and infrastructure	Objective 10	To secure infrastructure needs at an appropriate time to support new development

Question 1 - Local Plan 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?

The scope of the local plan

- 2.2 We consider that it is best to produce a single local plan for East Devon covering all key planning matters rather than a series of separate plans. However, an alternative option might be to first produce a strategic plan covering core issues and then to produce one or more separate plans addressing additional less strategic matters or particular concerns in greater detail.

Question 2 – The scope of the local plan

Do you think we should?	Tick one box only
Option 1 - Single Plan - Produce a single local plan covering all policy matters?	<input type="checkbox"/>
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?	<input type="checkbox"/>
Option 3 – Other - Do an alternative or neither of the above?	<input type="checkbox"/>
Please provide any further comments in the box below	

East Devon District Council Boundary



What East Devon is like now

- 2.3 East Devon is a District of contrasts. The spectacular coastline and hills and valleys provide for a stunning countryside within which nestle traditional villages and vibrant market and coastal towns; much of East Devon conjures up a 'chocolate box' picture of Devon. However, this contrasts with a more dynamic reality, particularly for the western edge of our District close to the city of Exeter. Here there have been significant levels of development with large new housing estates, as well as employment and business parks, supporting infrastructure and the new town of Cranbrook.
- 2.4 Agriculture remains important to the district, and it shapes our countryside. We are also home to services and businesses to support our resident's daily needs, and tourism forms an important part of our economy. However, new technologies and businesses are also emerging and investing in East Devon as shown by enterprises at the Science Park in East Devon, including the recent addition of the Met Office 'super computer'.
- 2.5 Most of our residents are comfortably off and unemployment levels historically have been low. However, this does mask areas of poverty and deprivation and the need for investment and wealth creation in what is a low wage area. We also have a large and growing elderly population with the challenges that this can create.
- 2.6 Across the world, however, things are changing. In early 2020 the Covid-19 pandemic struck and this has led to all sorts of temporary changes, though some may become permanent, and they will impact on East Devon. Negative economic impacts and significant increases in levels of unemployment seem inevitable. As our future local plan develops we will need to consider what East Devon should be like after Covid.

Working with our neighbours

- 2.7 In plan making we need to go through a process called the 'Duty to Co-operate'. This requires us to work with other councils and bodies in Devon, Somerset and Dorset alongside organisations such as the Environment Agency, Natural England and the health service. This joint working can be especially important where infrastructure such as roads or railways run across local authority boundaries.
- 2.8 Up until the summer of 2020 we were working on a joint local plan with neighbouring Devon local authorities, this was to be called the Greater Exeter Strategic Plan. This formal plan is not now going to progress though we are exploring options for a shorter informal plan.

Proposed Government changes to the planning system

- 2.9 In August 2020 the Government issued a discussion document, a White Paper, which set out proposed changes to the plan making system as well as wider reforms to planning. We do not know yet what changes, if any, will be made or when they

may come into effect. At this point in time we are working to the plan making system applicable in early 2021. If changes are made by central Government we may need to change our approach. However, we consider it is better to proceed now with what we know and accept that there can always be uncertainties ahead.

Timetable for East Devon local plan production

2.10 We have set out a number of steps for local plan production. This issues and options report is the first stage of consultation and then in early 2022 we plan to produce a draft plan that will also be consulted on. Responses received to consultation will be used to help draft the formal Publication version of the plan which will be made available for comment, this should be in late 2022. The Publication draft of the plan, comment received on it and evidence and supporting documents will be submitted for Examination. A Planning Inspector will consider if the plan, subject to any modifications, is appropriate to be adopted, this should be in 2023

Where neighbourhood plans fit in

2.11 Neighbourhood plans are local area plans that have been or are being produced by many East Devon communities. They contain local area initiatives and policies that may support certain types of development and also to offer protection. They are used alongside the local plan and their production has been strongly supported and encouraged by East Devon District Council. It is for neighbourhood plans to broadly comply with the Local Plan rather than the other way round, however it is important that we listen to our communities and their wishes.

Question 3 - Neighbourhood Plans and the new Local Plan

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

Evidence to inform the local plan and other tasks

2.12 Local plans need to be supported by evidence. In this report we refer to existing specific studies, where they exist, as well as future work we may need to undertake to inform the plan. On our web site we will include details of documents and studies that are completed or are to be produced.

2.13 Alongside consulting on this issues and options report we are also:

- Inviting people to submit sites that they consider may be suitable for development through a process called the Housing and Employment Land Availability Assessment – <https://eastdevon.gov.uk/planning/planning-policy/emerging-local-plan/initial-consultations/housing-and-economic-land-availability-assessment-helaa>;

and

- Consulting on a document called a Sustainability Appraisal scoping report which is part of work that will eventually identify potential positive and negative environmental, social and economic impacts that may result from the plan - <https://eastdevon.gov.uk/planning/planning-policy/emerging-local-plan/initial-consultations/sustainability-appraisal-sa>

Chapter 3 - Designing for health and wellbeing

Objective 1: To encourage healthy lifestyles and living environments for all East Devon residents

- 3.1 There are many influences upon people's health and wellbeing. Some, such as old age cannot be changed, but there are other features, including the design of our neighbourhoods, homes, places of work, streets and open space that can all help to support good mental and physical health. National planning policy is clear that the planning system should promote healthy communities and this theme runs throughout this document.
- 3.2 East Devon's public health strategy¹ sets out issues including the District's growing older population and its many dispersed rural communities noting that depression, social isolation and loneliness are concerns, as well as the more physical health issues developing with age. The NHS also has a Long Term Plan² which has a big focus on ill-health prevention, which the planning regime has a role in facilitating.

Active lives

- 3.3 Regular exercise has an important role to play in our physical and mental health, reducing the levels of many major diseases including heart disease, cancer and diabetes and conditions such as obesity and high blood pressure. It can also improve levels of mental well-being, by releasing natural chemicals to improve mood and bring benefits in reducing tension, stress and mental fatigue whilst helping to give a natural energy boost, a healthy appetite and to improve sleep.



Cranbrook Country Park

- 3.4 Social interaction and access to community facilities are also key to good mental health, with supportive social contact helping to lower levels of anxiety and

¹ EDDC (2020): East Devon Public Health Strategic Plan (2019 – 2023)
https://eastdevon.gov.uk/media/3721228/ph_strategicplan-19-23-final-v2.pdf

² See: <https://www.longtermplan.nhs.uk/online-version/>

depression. The proximity of local services including those offering training and employment also have an impact, with unemployment and low income sometimes contributing to poor mental health.

- 3.5 Further, access to the natural environment by means of shared green spaces can offer higher levels of peace and quiet for reflection, leading to reduced levels of stress, anxiety and depression whilst encouraging physical and social activity. Benefits can be gained from allotments and community gardens which have the added attraction of encouraging the consumption of affordable healthy food.

The quality of our homes and built environment

- 3.6 In our homes, a lack of daylight, exposure to too much noise, or poor levels of privacy and comfort can affect well-being. These can be addressed by good design, for example in considering layout, orientation and room sizes. The condition of housing may also influence health, with excess cold and damp contributing to heart and lung diseases.
- 3.7 In the wider neighbourhood poor air quality is strongly linked to asthma and respiratory and cardiovascular illness whilst development that is designed to be clear, attractive and has a strong identity can help to deter the mental fatigue that can occur in a more unattractive setting.
- 3.8 The quality of spaces shared by the public can also influence wellbeing, with well-designed streets, parks and squares helping to reduce the risk of crime, and for people to feel safe, whilst encouraging them to meet.

Designing for active lives

- 3.9 A well designed neighbourhood will encourage people to increase their physical activity and to meet other members of the community. Physical exercise can be encouraged with the provision of safe and pleasant cycling and walking routes between services and facilities, and good access to sports, recreational and play facilities along with other green spaces.



Hayes Square, Cranbrook

- 3.10 Where homes, schools, shops, community facilities, workplaces, play spaces, open spaces and sports facilities are within easy reach of each other, there is more chance of people walking or cycling to them, and of using more than one facility on any trip. In doing so they also increase the chances of interacting with other people. This is especially so where streets feel like safe and pleasant places to stop and meet,

walk, cycle and play, helped by lower traffic speeds as well as lower levels of noise and air pollution.

- 3.11 Lower levels of air pollution resulting from less car use also help to reduce the impact of climate change, and in turn support better health and wellbeing for communities.
- 3.12 The most recent principles of best practice in planning for health and wellbeing are contained in the Sport England guide 'Building for a Healthy Life'³ and 'Active Design'⁴.



Diagram: the Ten Principles of Active Design
“Achieving as many of these as possible, through the new local plan, will optimise opportunities for active and healthy lifestyles.”

- 3.13 As we develop our local plan we will need to ensure health considerations are taken into account and this will include the need to establish policies for provision of recreation space and encouraging people to participate in formal and informal recreation activities.

³ Design for Homes (2020) Building for a Healthy Life <http://www.designforhomes.org/wp-content/uploads/2020/07/14JULY20-BFL-2020-Brochure.pdf>

⁴ Sports England (2015) Active Design <https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design>

Question 4 - Planning for health and wellbeing

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

Please tick one box only

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.

Chapter 4 - Tackling the climate emergency

Objective 2: To ensure all new development moves the district towards delivering net-zero carbon emissions by 2040 and that we adapt to the impacts of climate change.

4.1 Climate change is one of the biggest threats faced in thousands of years. Human activities since the industrial revolution have led to an enormous increase in greenhouse gas emissions which trap heat in our atmosphere. A warming planet is already having visible impacts; sea levels are rising, extreme weather events are more common and the rate of species extinction is increasing. These impacts will affect East Devon and its residents both now and in the future. Taking bold and decisive action over the next 20 years (or sooner) will be critical if we are to avoid global temperature rising beyond 2 degrees Celsius, which is identified as a critical level, above pre-industrial levels.



Students protesting climate inaction

4.2 In response to these risks East Devon District Council declared a climate emergency in 2019. The pledge is for the Council to become carbon neutral by 2040. This means that the Council will ensure, for its activities, it will minimise carbon emissions and take measures to ensure there is removal of as much carbon dioxide from the atmosphere as it produces.

4.3 For East Devon, in 2018, transport formed the largest carbon emitting sector comprising 47% of total emissions, followed by homes with 29% and industry with 24%⁵. Planning has a key role to play in facilitating the changes we need to make to ensure we make the change towards a net-zero carbon future. This chapter identifies several direct policy responses but climate change considerations also run through the whole of this report.

Reducing carbon emissions from new developments

4.4 It is identified as essential to minimise emissions in the design, construction and operation of new developments. This can be done by incorporating measures such as better insulation, glazing and renewable technologies like solar panels in

⁵ See: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2018>

developments. There are also low carbon heating options such as district heating systems as installed at Cranbrook where hot water is pumped around all houses to supply heating. Local authorities currently have the ability to set energy efficiency standards for new build developments that go beyond the minimum levels set out in building regulations.

Question 5 – Energy efficiency of new buildings

Do you think we should?	Tick one box only
<p>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.</p>	<input type="checkbox"/>
<p>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.</p>	<input type="checkbox"/>
<p>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.</p>	<input type="checkbox"/>
Please provide any further comments in the box below	

Maximising energy from renewable sources

- 4.5 Making a transition towards a zero carbon future requires moving from non-renewable energy sources like gas and coal towards a low carbon system based on renewable technologies such as wind and solar. By promoting these technologies the planning system has a vital role to play.
- 4.6 The Government's planning policy is strongly supportive of increasing the use and supply of renewable and low carbon energy and indicates that local plans may identify areas where they may be located (windfarm sites have to be identified in a plan if they are to be built). It also identifies that plans may locate green energy developments close or accessible to customers. There is clear recognition, however, that wider environmental impacts, especially on the landscape, need to be taken into account.
- 4.7 Solar and wind offer an opportunity to deliver large scale renewable energy projects in East Devon that could generate a lot of green energy. Other technologies, such

as hydro-electric schemes and heat pumps, drawing heat from below ground level, are not as commonly developed at a commercial scale but may come forward in the future. Land used for windfarms and solar panels, especially where taken out of agricultural use, offers real potential for creating wildlife habitats.

Question 6 – Provision of solar arrays/farms and windfarms

Which option do you think we should take?	Tick one box only
Option 1 - Identify suitable areas for renewable energy developments - Taking into account constraints we could include a policy which seeks to identify or allocate suitable areas for solar or wind farms.	<input type="checkbox"/>
Option 2 – Not identify areas but offer general support - we could provide a more general policy of support specifically for solar projects across the district without identifying any areas or specific sites.	<input type="checkbox"/>
Option 3 – Take a more restrictive approach to renewables – we could make it much harder for renewable energy development to occur, however this may make it difficult, or perhaps impossible, to achieve carbon neutrality.	<input type="checkbox"/>
Option 4 – Please tick the box if you think none of the above are appropriate	<input type="checkbox"/>
Please provide any further comments on wind farms and solar arrays/panels.	

Additional carbon neutrality policy objectives

- 4.8 As we develop policy for carbon neutrality we will also look at other emerging themes and issues that we may wish to address in our plan. Key policy development may include:
- 1) Promoting District heat networks to provide heat from renewable or low carbon fuels to homes and businesses through a network of pipes carrying hot water. This type of heating currently supplies the town of Cranbrook.
 - 2) Utilising 'waste heat' generated from industrial, commercial and other sources.
 - 3) Promoting energy storage facilities and batteries in order to store greater amounts of electricity generated during the day for use in the evenings and at times when it is most needed.
 - 4) Promoting community led renewable energy schemes where residents can come together to collectively invest in smaller scale renewable energy installations in their local area, including solar, wind and hydro-electricity.
 - 5) Locating new development in locations that are close to local facilities so people can walk and cycle more and do not need to be reliant on the car.

- 6) Encouraging tree planting which will help take large amounts of carbon dioxide out of the atmosphere. Also we can promote other land use changes to promote carbon removal or storage. The Committee on Climate Change⁶ recommended that overall woodland coverage in the UK should be raised from 13% to 18%.
- 7) We will also need to mitigate or adapt to the impacts of climate change, such as flooding by incorporating new environmentally sensitive drainage systems in developments. Such measures will also have wildlife benefits.

Question 7 - Carbon saving measures

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?



District heating network pipes waiting to be installed

⁶ See: <https://www.theccc.org.uk/publication/sixth-carbon-budget/>

Chapter 5 - Meeting housing needs

Objective 3: To provide high quality new homes to meet people's needs.

- 5.1 It has always been important to plan for future housing and in East Devon we have seen a population that has grown year on year. Access to good housing, for those with less money, has however become an increasing concern. House prices, whether to rent or buy, have increased dramatically whilst availability of social and other forms of affordable housing⁷ has declined.
- 5.2 The Government set out minimum numbers of homes that should be built each year. In December 2020 the Government advised⁸ that the figure for East Devon should be at least 928 new homes per year (but it is subject to year on year review). It is marginally below our current local plan policy that identifies a need for an average of 950 homes to be built each year. It is also considerably lower than the figure of 1,614 homes per year that a now abandoned Government proposal, from autumn 2020, generated.
- 5.3 Analysis from a base date of 1 April 2020⁹ shows a projected 11,945 extra homes will be built in East Devon under the current local plan up to 31 March 2031. A 20 year requirement (from 1 April 2020 to 31 March 2040) at 928 homes per year would give a grand total of 18,560 homes needed. Deducting 11,945 already projected to be built from a need of 18,560 leaves a residual figure of at least an extra 6,615 new homes up to 2040.
- 5.4 We have a recent housing study from the consultants ORS¹⁰ that indicates that if we were to meet all current and future affordable housing needs there would be a requirement for around an extra 461 affordable homes each year from 2020 to 2040. This is near to double the level of affordable homes that have been built in recent years. New affordable homes are typically built as a developer contribution on market housing development schemes, though financial viability considerations often place limits on amounts that can be secured. Frequently sites may see 20% or less of total homes built being affordable.

⁷ For a formal definition of affordable housing see the NPPF – https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf

⁸ See: <https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>

⁹ See: <https://eastdevon.gov.uk/media/3721230/housing-monitoring-update-to-year-end-31-march-2020.pdf>

¹⁰ See:

<https://eastdevon.gov.uk/papers/strategicplanning/201020bpitem9afinalhousingneedsineastdevonappendix%201orsaug2020.pdf>



New affordable homes at Ottery St Mary

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

Which option do you think we should take?	Tick one box only
<p>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.</p>	<input type="checkbox"/>
<p>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.</p>	<input type="checkbox"/>
<p>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.</p>	<input type="checkbox"/>
<p>Option 4 – Please tick this box if you think none of the above are appropriate</p>	<input type="checkbox"/>
<p>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.</p>	
Empty box for comments	

Encouraging small and medium sized builders

5.5 The house building industry in England is dominated by a small number of major firms that typically build on larger sites (generally sites of 50 homes or more). In East Devon, in recent years, big development sites have supplied many of the new homes built. The Government has indicated, however, that across England they wish to see many more homes built by smaller companies.

- 5.6 Under Government policy the expectation is that land to accommodate at least 10% of the housing requirements should be on sites that are no larger than one hectare in size (this site size may typically accommodate around 20 to 40 homes).
- 5.7 Smaller builder developments can have a number of advantages over big developments. They may employ more local labour and support local businesses and supply chains. The homes built may be more likely to meet local needs and reflect local character rather than being the volume builder's national design and standards. However, local developer built homes may be more expensive to buy than mass produced homes.

Question 9 – Sites for small scale housing developments

Which option do you think we should take?	Tick one box only
Option 1 - Allocate or identify land for around 10% of homes to be on small sites – this approach would meet minimum government standards.	<input type="checkbox"/>
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.	<input type="checkbox"/>
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.	<input type="checkbox"/>
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.	<input type="checkbox"/>
Option 5 - None of the above or an alternative	<input type="checkbox"/>
Please provide any further comments in the box below.	

Housing for people at all stages of their life

- 5.8 As people go through their lives their housing needs can change. Younger people may start off with smaller homes but trade up as they have children and can afford more. As their children leave home parents may decide to downsize to smaller homes and in older age specially adapted or care homes may be appropriate. In addition people of all ages may be disabled or less mobile and have specific housing needs.
- 5.9 Private developers will cater, to some degree at least, to different sectors of the market. However, a criticism is sometimes made that house builders can concentrate on building 'family sized' three or four bedroomed houses, that may not

be priced at levels that all people can afford or be suitable for those with mobility problems or caring needs.

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

Which option do you think we should take?	Tick one box only
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.	<input type="checkbox"/>
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.	<input type="checkbox"/>
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.	<input type="checkbox"/>
Option 4 – None of the above or an alternative.	<input type="checkbox"/>
Please provide any further comments in the box below on how we may best plan for housing for all.	

Additional housing policy objectives

5.10 As we develop policy for housing provision we will also look at other emerging themes and issues that we may wish to address in our plan. Key issues identified so far include:

- 1) Encouraging more self and custom build housing so that people may be able to build their own home to meet their particular needs and aspirations.
- 2) Potential for requiring a proportion of homes on all larger development sites to be custom or self builds.
- 3) Encouraging community housing developments so that local communities can determine locally the housing needs that they have and the types of development that may be appropriate.
- 4) Planning specific sites and areas for retirement housing developments.
- 5) Recognising the importance of and planning for appropriate accommodation for gypsies and travellers.

- 6) Setting minimum floor space or room size standards for new homes that must be met in new developments.
- 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.
- 8) To consider whether we should set standards for the density of development, potentially both as a means to support extra housing development but also to improve design standards.
- 9) Ensuring new homes have adequate space to accommodate home working and suitable broadband connectivity.

Question 11– Additional housing policy objectives

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?

Chapter 6 - Supporting jobs and the economy

Objective 4: To support business investment and job creation opportunities within East Devon and support a resilient economy.

The East Devon Economy

- 6.1 East Devon enjoys a strong culture of self-employment and family businesses and a generally low level of unemployment. However, there are a range of long-standing issues in the local economy including a high proportion of lower paid, lower skilled and often seasonal jobs, primarily in traditional sectors (agriculture, tourism, care, retail, construction and transport & distribution). Many residents of East Devon commute out of the district, especially to Exeter, for higher paid jobs.
- 6.2 There are identified barriers to business growth across much of the District, these include poor internet and mobile connections, limited availability of investment-ready sites for development, and a shortage or mismatch of the skills that businesses need¹¹.
- 6.3 Very importantly, however, as is the case nationally, the economy of East Devon is feeling the effects of the Covid-19 pandemic. This includes a significant rise in unemployment levels, reduced business revenues, and increased home-based working. Whilst this may be a temporary 'shock' it may accelerate some pre-existing trends such as an increase in on-line shopping. Leaving the European Union may also have economic impacts as may the continued trend in the automation of processes.

Locations for employment growth

- 6.4 The approach in recent years has been to concentrate larger scale employment development sites close to the City of Exeter. This has included promoting four large sites (the Science Park, Skypark, Airport Business Park and Cranbrook town centre) as the Exeter and East Devon Enterprise Zone. Enterprise Zones are designed to encourage economic growth and attract business, especially in high technology sectors, to invest, start-up and grow.
- 6.5 Recent major developments include the Amazon and Lidl distribution depots. However, whilst these have delivered new jobs, and this is to be welcomed, there

¹¹ Greater Exeter Economic Development Needs Assessment (Hardisty Jones Associates, 2017) <https://eastdevon.gov.uk/media/3721683/edna-final-report-2018.pdf>

are limitations to the economic benefits of storage and distribution developments. At the same time, there have been some notable losses of large employers offering high skilled employment, particularly with the closure of Flybe, based at Exeter Airport.



Skypark, next to Exeter Airport, during construction

6.6 Further away from Exeter, there has been limited progress in bringing forward allocated employment sites at our main towns, including the larger sites at Honiton, Axminster and Exmouth – these are towns which now feature highly on a Devon County Council Covid Vulnerability Index¹². It will clearly be important to unblock any barriers to investment and ensure viable development opportunities are made available.

6.7 Whilst it seems likely that the greatest demand for inward investment will continue to lie close to Exeter and the M5 motorway, the potential exists to re-consider where future job growth may be best located.

Science park centre in the west end of East Devon



¹² <https://eastdevon.gov.uk/media/3721684/covid-19-economic-response-and-recovery.pdf>

Question 12 - Preference for location for future job provision

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.	Please tick one box only for each option				
	Strongly support	Support	Neither oppose nor support	Oppose	Strongly Oppose
Continued focus on big employment sites in the West End of the District	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Encouraging greater business development in other areas close to Exeter (for example expanding Greendale and Hill Barton Business Parks)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Encouraging greater business development at and within the main towns of East Devon	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Encouraging business expansion and development in the villages and across the countryside of East Devon	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Encourage and enable more home working	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If you have any comments on the above or alternative options please set these out below.					

Future types of jobs in East Devon

- 6.8 Whilst East Devon is home to a wide range of differing jobs, and will continue to be in the future, it is relevant to consider whether there are particular additional job types that the local plan should seek to encourage and promote.
- 6.9 A current focus for economic growth has been in areas that fall under the title of 'transformational sectors', which include:
- Smart Logistics and Transport;
 - Data Analytics;
 - Health Innovation;
 - Knowledge Based Industries; and

- Environmental Futures.

6.10 A Transformational Sectors Action Plan for the Greater Exeter area¹³ explains more about what these titles mean. They are, however, new and emerging job sectors for which East Devon offers strengths and growth opportunities. They offer the potential for higher skilled and better paid jobs, though there will remain the need to ensure there are employment opportunities for all.

Question 13 – Differing jobs sectors in East Devon

To what degree do you support, or not, the following approaches to future jobs or differing types of jobs?	Please tick one box only for each option				
	Strongly support	Support	Neither oppose nor support	Oppose	Strongly Oppose
More jobs overall – with an emphasis on attracting new/larger employers and inward investment in any or all sectors.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
More high technology jobs - focussing on high technology and high skilled jobs (including in the transformational sectors).	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Local Entrepreneurs - promoting opportunities for more home/locally based/small businesses.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Traditional Sectors - Focus on growth, resilience and diversification in our traditional sectors - such as agriculture, tourism and care.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If you have any comments on the above please set these out below.					

6.11 In considering how to best support the economy, we may also seek to develop policy in the following areas:

1. That may seek to promote more jobs close to where people live so there is less need to travel to other locations for work purposes.
2. Which encourage an increase in local spend at and with businesses in East Devon.

¹³ <https://eastdevon.gov.uk/media/3721682/transformational-sectors-action-plan.pdf>

3. To provide facilities where people from different businesses can share working spaces or premises as well as supporting services.
4. That may allocate further or additional sites if there are shortfalls identified or review shows that existing employment sites are unlikely to be developed or built-out.
5. Considering how we may embed environmental and sustainability considerations more fully into economic development objectives and in so doing how this can support a transition to low carbon/greener economy.

Question 14 – Additional economic policy objectives

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?

Chapter 7 - Promoting vibrant town centres

Objective 5: To promote the vitality of our town centres, encourage investment, greater flexibility and a wider range of activities to increase footfall and spend.

- 7.1 Town centres are at the heart of community life. Attractive, prosperous and vibrant town centres meet the needs of residents, are inviting to visitors and can attract growth and investment into the wider area.
- 7.2 East Devon's main town centres are located at Axminster, Budleigh Salterton, Exmouth, Honiton, Ottery St Mary, Seaton and Sidmouth. Cranbrook town centre is currently being established. The range and level of facilities tends to vary with the size of the town but all of the established centres are attractive, historically significant and have high numbers of independent shops, some have specialist street markets.

Retail and other activities in Town Centres

- 7.3 Retailing has for many years been the core activity in town centres. But there has been a decline of traditional shops as more people shop online. Whilst East Devon's High Streets are still relatively vibrant, there are fewer vacant units and more independent shops than the national average¹⁴, there are real concerns about retailing in the future.
- 7.4 Where vacant shops have been taken over, they are often filled by cafes and coffee shops and health and beauty businesses, a shift towards offering experiences rather than products. Vacant units and new uses with 'blank' frontages reduce the interest and bustle generated by diverse window displays, although by-appointment businesses can be an excellent way to bring upper floors into use. However, there is the real danger, potentially greatly increased by Covid, that there will be more vacancies in the future and there just will not be the retail or other commercial interests to take over occupancy.
- 7.5 There are important decisions to be taken over the role and approach that a new local plan may take for our town centres. We could continue to seek to prioritise retail uses, though recent Government changes to planning rules now provide far more flexibility to change to differing commercial activities anyway. Bearing in mind new flexibilities to make changes we could more actively embrace and promote a wide range of commercial also community activities in town centres. This approach would broadly align with the Government Inquiry into the future of the high street¹⁵. A more

¹⁴ <https://brc.org.uk/retail-insight/>

¹⁵ <https://publications.parliament.uk/pa/cm201719/cmselect/cmcomloc/1010/1010.pdf>

radical approach could be to do nothing and let the market decide, although this does risk losing shopping uses in the town centre altogether.

Question 15 – Town centre uses

We set out below a number of differing potential uses and approaches to promoting town centre vitality and activity. Please indicate you're in principle levels of support for each potential option or approach.	Please tick one box only for each option				
	Strongly support	Support	Neither oppose nor support	Oppose	Strongly Oppose
Retail to dominate – support retail uses in town centres and if possible resist other uses.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Promote mixed commercial uses - support retail as well as other commercial uses such as café's and offices,	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Support change of use to housing – allow for any shops or commercial premises to be converted to housing.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Support community uses - promote more community spaces in town centres.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Leisure uses – promote new gyms and sports facilities in town centres.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If you have any comments on the above or other distribution matters please set these out below.					



Sidmouth town centre during folk festival week

- 7.6 In considering town centre vitality and retail issues more generally we may also need to look at the following areas when developing policy:
1. How we might promote greater use of vacant upper storeys above ground floor shops.
 2. Whether we should seek to resist out-of-town retail, or other commercial activities, in the hope that we may see more town centre shopping and investment.
 3. Whilst it would probably be outside of the scope of local plan policy we could look to producing masterplans for town centres to identify key areas for improvement.

Question 16 – Additional town centre policy objectives

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?

Chapter 8 - Designing beautiful and healthy spaces and buildings

Objective 6: To promote high quality beautiful development that is designed and constructed to meet 21st century needs

- 8.1 We want the local plan to ensure we build attractive places by prioritising beauty when considering land allocations and policies. To be successful we believe that the local plan should help us to achieve beauty and to refuse ugliness.
- 8.2 Beauty is subjective but may be measured by popular local support and often reflects what is special or distinctive about a place. The National Design Guide¹⁶ illustrates how well-designed places that are beautiful and successful can be achieved in practice and supports local design guidance that meets the priorities of local communities.
- 8.3 The Building Better Building Beautiful Commission is an independent body set up to advise the government on how to promote and increase the use of high-quality design for new build homes and neighbourhoods. Its report¹⁷ sets out the importance of considering beauty at three scales during the planning process. These are:
- Beautifully placed (sustainable settlement patterns, sitting in the landscape)
 - Beautiful places (streets, squares and parks, the "spirit of place")
 - Beautiful buildings (windows, materials, proportion, space)
- 8.4 The Commission defines a beautiful place as 'a place in which people wish to walk, rather than a place that the car helps them to avoid... buildings that reflect the history, character and identity of their community and that belong in their surroundings: somewhere, not anywhere... a walkable settlement, in which the streets are an improvement on what preceded them, even when what preceded them was open countryside'. These are the kinds of places that we want to plan for and we are considering how the local plan can help to deliver them.
- 8.5 The first scale of planning for beauty set out by the Building Better, Building Beautiful Commission is sustainable settlement patterns and development that sits well in the landscape. When it comes to identifying land for development we will use our

¹⁶https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/843468/National_Design_Guide.pdf

¹⁷ <https://www.gov.uk/government/publications/living-with-beauty-report-of-the-building-better-building-beautiful-commission>.

established landscape character assessment¹⁸ approach to consider site choices and how they might be developed. The second scale of planning relates to beautiful places and concerns the spaces between buildings like streets, squares and parks. The third scale relates to buildings. Previously our local plans have focussed on the first 'beautifully placed' scale of planning with general policies to guide the second (beautiful places) and third (beautiful buildings) elements. We are considering taking a new approach with more emphasis on how beautiful places and buildings can be planned at the outset through the local plan rather than relying on subsequent master planning or individual planning applications. This would be likely to involve the use of design codes and master planning as part of the local plan.

- 8.6 Master planning sets out the principles for a development concentrating on the high level structure for a site, such as how people will get in and out of it, the main routes through it, and the landscape features, although it can show in some detail how development will be implemented.
- 8.7 A design code is a set of illustrated design requirements for a site. They can include graphic and written components and should build upon a design vision set out in a masterplan or similar document¹⁹.

Question 17 – Designing beautiful spaces and buildings

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

Please tick one box only

Absolutely essential	Very important	Quite important	Of limited importance	Not important at all
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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.

- 8.8 In considering design considerations we will also look to the following areas where we may develop policy:

¹⁸ <https://eastdevon.gov.uk/planning/planning-policy/environment-and-green-infrastructure/landscape/the-2019-landscape-character-assessment/>

¹⁹ <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>

1. Encouraging innovation and interesting new designs.
2. Promoting and incorporating wildlife friendly schemes and elements into developments.

Question 18 – Additional design policy objectives

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?

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Chapter 9 - Our outstanding built heritage

Objective 7: To conserve and enhance our outstanding built heritage.

The Historic Environment of East Devon

9.1 East Devon has a rich historic environment and an abundance of heritage assets which have helped to shape its distinctive character and identity. We are fortunate to have over 3,200 assets of importance nationally for their architectural and historic interest. There are also many heritage assets of more local interest in our towns, villages and countryside that contribute to the special character of their location.

9.2 The district has a range of historic settlements, including Victorian and Edwardian seaside resorts along the coast, Saxon and Roman influenced market towns in the central area and many medieval farmsteads scattered amongst the countryside. Buildings of considerable architectural value can be seen throughout, revealing the story of our social, agricultural and



East Budleigh conservation area

industrial legacy. Medieval places of worship, thatched cob cottages, fine Georgian, Victorian and Edwardian residences and factories of the Industrial Revolution are all examples of buildings that contribute to our distinctive landscapes. East Devon is also notable for its archaeology, including the remains of Iron Age and Roman forts.

The role of our heritage assets

9.3 Our heritage assets, which are valued parts of the historic environment, are an irreplaceable resource that provide significant social, economic and environmental benefits for the district. They can play a very positive role in promoting our town centres for local businesses, they appeal to tourists and create a pleasant environment where people want to live, work and invest. Our historic buildings can stimulate the regeneration of areas and inspire high quality design.

- 9.4 Research by Historic England²⁰ has also shown a very positive relationship between communities involved in their local heritage and their quality of life, and it is important that our heritage is conserved and enhanced, for this and future generations.
- 9.5 The maintenance (and management of change) of our heritage assets (such as important old buildings) including sensitive improvements, can help to sustain and enhance their significance. This in turn can help to maximise their contribution towards wider social, economic and environmental benefits.

Question 19 - The importance of conserving and enhancing heritage assets

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?

Please tick one box only

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.



View along Sidmouth seafront

²⁰ See: <https://historicengland.org.uk/research/heritage-counts/heritage-and-society/>

- 9.6 Heritage assets may be designated nationally by Historic England (this is the Government body responsible for heritage matters) and include listed buildings, scheduled monuments and registered parks and gardens. The council has a statutory duty to conserve, that is, to maintain and manage change to each asset “in a way that sustains, and where appropriate, enhances its significance²¹”.
- 9.7 However many buildings, structures, landscapes and archaeological sites contribute to the special character of their locality in East Devon but do not meet the criteria for national listing. Such “undesigned” heritage assets that meet locally agreed criteria may be placed on the East Devon List of Local Heritage Assets, in order to give recognition to their significance. In addition East Devon District Council define conservation areas, which are areas that are afforded protection because of the buildings, structures and landscapes of heritage importance that they contain.
- 9.8 The Council has a Heritage Strategy²² which sets out a range of actions in accordance with national policy²³ to help to widen people's knowledge and understanding of the historic environment, positively manage its heritage assets and to enhance and benefit from the heritage of East Devon.
- 9.9 The strategy includes proposals to involve the community and to work with partners more, to make the most of the social, economic and environmental benefits that heritage can bring.

²¹ DGLC (2019) National Planning Policy Framework, Annex 2: Glossary

²² <https://eastdevon.gov.uk/planning/planning-policy/east-devon-heritage-and-local-heritage-assets/>

²³ DGLC (2019): National Planning Policy Framework (para 185)

Chapter 10 - Our outstanding natural environment

Objective 8: To protect and enhance our outstanding natural environment and support an increase in biodiversity.

- 10.1 East Devon is blessed with a truly outstanding natural environment. Around two-thirds of East Devon falls within Areas of Outstanding Natural Beauty (AONB). These areas have the highest level of landscape protection in England, equal to that for National Parks. There are two AONBs in East Devon, the East Devon AONB occupies much of the south of the District, and the Blackdown Hills AONB which although mostly in East Devon also extends into neighbouring mid Devon and Somerset and occupies much of the north of the District.
- 10.2 The majority of the coast line of East Devon, along with the coast of neighbouring Dorset, forms part of the Jurassic Coast World Heritage Site. In addition there are numerous sites and areas of great wildlife value in the District as well as many smaller and more local and intimate areas of value. The outstanding natural environment of East Devon helps make it a truly exceptional place to live and for people to visit.

Development in protected landscapes

- 10.3 The AONBs and other protected landscapes of East Devon are both of national and local importance, the countryside and coast that falls within them helps define much of the essence of the District. Protecting and indeed seeking to enhance our environment may, however, place limitations on the amount and subsequent locations for development. Government policy states that AONBs are not normally appropriate for large scale development schemes, though to help support local communities and enterprises there is scope for smaller developments.



View from Mutters Moor towards Woodbury castle

- 10.4 Development can result in unacceptable negative impacts on areas of wildlife value. It is for this reason that new housing in much of the western side of East Devon

pays money to mitigate impacts that would otherwise occur through increased user pressure on the Exe Estuary and the East Devon Pebble bed Heaths.

Question 20 - Development in protected landscapes

In considering whether we should allow for development in protected landscapes do you think:	Tick one box only
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.	<input type="checkbox"/>
Option 2 – Allow for development to meet local needs - This would allow for limited development, specifically where it will meet smaller scale local housing, community or economic needs, though it could still mean more development pressure elsewhere in East Devon.	<input type="checkbox"/>
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.	<input type="checkbox"/>
Option 4 – None of the above or an alternative	<input type="checkbox"/>
Please provide any further comments in the box below.	

Enhancing biodiversity

- 10.5 In the past development has often had adverse impacts on biodiversity (the amount and diversity of plant and animal life) and it is rare for the net result to be a biodiversity gain. However things are now changing with the Government setting out that in the future development should now lead to a net increase in biodiversity²⁴ of at least 10%.
- 10.6 As biodiversity is such a complex matter and difficult to quantify, the Government have introduced a standardised 'biodiversity unit' calculation which is based on habitat-types and considers the extent of the area, distinctiveness (value to wildlife) and condition. The calculation will enable habitat on a site prior to development to be compared to proposed new habitat. The calculation takes account of risk factors such as technical difficulty to create, length of time to establish, location and distance from the development site. It does not take account of individual species of plants or animals but the current legal and policy protection given to designated

²⁴ <https://www.gov.uk/government/publications/environment-bill-2020>

wildlife habitats, 'irreplaceable' habitats and legally protected species will remain in place.²⁵

- 10.7 The Government are clear that adverse impacts to wildlife should be avoided where possible, and if not feasible, then mitigated, and only as a last resort compensated. This means that where it is not possible for biodiversity gain to be achieved on a development site it should be provided off-site if necessary. The price for securing the necessary habitat through a local agreement, or for a payment towards a larger scheme offsetting several development sites, would reflect the costs of creating and managing the compensation habitat in a suitable location for 25 years. The Government's estimate is that the tariff costs might be set at between £9,000-£15,000 per new home ²⁶. At this stage, the recipients of the tariff and the means of delivery and monitoring implementation and outcomes remain unclear.

Question 21 – Net gains in biodiversity

In order to gain biodiversity improvements which option would you prefer:	Tick one box only
Option 1 – On-site provision - this would see new habitats created on site as part of the development, however they are likely to be small and would sit alongside housing.	<input type="checkbox"/>
Option 2 – Secure the habitats locally - This would require a legal agreement with a landowner near to the development to deliver and maintain it.	<input type="checkbox"/>
Option 3 – Pay a cash tariff towards a strategic delivery scheme - This would require a developer to make a cash payment (to the Local Authority or other organisation) towards a central fund so that a large area of strategic habitat can be provided to offset the impacts of a number of developments.	<input type="checkbox"/>
Option 4 – A combination of the above	<input type="checkbox"/>
Option 5 – None of the above or an alternative	<input type="checkbox"/>
Please provide any further comments in the box below.	

Other natural environment policy objectives

- 10.8 As we develop policy for our natural environment we will also look at other emerging themes and issues that we may wish to address in our plan. Key issues identified so far include:

²⁵ <https://jncc.gov.uk/our-work/uk-bap/#the-uk-post-2010-biodiversity-framework>

²⁶ <https://www.gov.uk/government/publications/25-year-environment-plan>

1. Support designation of open spaces (for example green wedges) between settlements and local landscape protection areas.
2. Policies in the plan for wildlife friendly spaces that respond to the impacts of a changing climate.
3. Potential for expansion of the Clyst Valley Regional Park.
4. Placing greater emphasis on landscape character assessment and evaluation of landscape impacts when determining planning applications. This may require us to develop new designations for some areas or define zones of high, medium and low sensitivity.
5. Offer increased protection from development of land that may have some biodiversity importance including lower grade agricultural land and previously developed land.
6. Set minimum standards for the amount and quality of green space in development sites.
7. Encourage new and existing green spaces to be more wild and nature friendly and less manicured and carefully managed.
8. Extend the 'Local Green Space' designations in many of the Neighbourhood Plans to cover all of the towns and villages in the District.
9. With increasing coastal erosion we will need to plan for areas that are potentially going to be lost to the sea. These are called coastal change management areas and in them we will need to consider what types of development may be acceptable and also whether and where we need to relocate existing uses.
10. Look more closely at controls over large scale farm buildings and the adverse landscape impacts they can have.

Question 22 – Additional natural environment policy objectives

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?

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Chapter 11 - Promoting sustainable transport

Objective 9: To prioritise walking, cycling and public transport and make provision for charging electric vehicles, whilst reducing reliance on fossil fuelled vehicles.

- 11.1 The Government define sustainable transport²⁷ as “any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra-low emission vehicles, car sharing and public transport”. Promoting sustainable transport in new development can have multiple benefits – these include reducing traffic congestion, reducing carbon dioxide emissions, improving air quality, and improving both physical and mental health.
- 11.2 Further to these benefits those without access to a car (specifically including young people, often older people and those with disabilities, as well as low income households) can suffer from social exclusion and difficulty in accessing jobs, shops, leisure, education and other activities.
- 11.3 East Devon has relatively low levels of walking, cycling and public transport, whilst car ownership levels are high – the 2011 census reports that just 16% of households in East Devon do not own a car, compared to a national average of 26% and nearly two thirds of people in East Devon drive to work. This is partly due to the rural nature of much of the district, where access to jobs, services and community facilities can be some distance away (particularly for those in more rural areas). However, figures show that 43% of journeys in the south west are under 2 miles²⁸ – these shorter journeys offer the greatest potential for people to get out of their car and walk or cycle instead. Currently, 65% of all trips are made by car (either as a driver or passenger).²⁹
- 11.4 Exmouth, Honiton, Seaton and Ottery St Mary all have bespoke bus services that travel around these towns, whilst there are other routes linking settlements across East Devon and beyond. East Devon benefits from having a total of nine train stations.
- 11.5 During the Covid lockdown there have been fewer cars on the roads, more cyclists, but lower use of public transport. If these short term trends continue it will be positive for walking and cycling, but for public transport less use could threaten the viability of services in the future.

²⁷ NPPF, Annex 2: <https://www.gov.uk/government/publications/national-planning-policy-framework-2>

²⁸ See: <https://www.gov.uk/government/statistical-data-sets/nts99-travel-by-region-and-area-type-of-residence#trip-length>

²⁹ see <https://www.gov.uk/government/statistical-data-sets/nts99-travel-by-region-and-area-type-of-residence#trip-length>



Exe Estuary trail and train line

The importance of walking and cycling

- 11.6 The ability to walk to services and facilities (or to walk to public transport) is a critical factor in determining where development should go. The distance, the nature and quality of a route, and its security are three key factors that affect the attractiveness of walking and cycling.³⁰ New development can be designed to promote walking, cycling and public transport by incorporating attractive and easy to use routes within sites themselves and connecting destinations with a direct network of safe, convenient walking and cycling routes. The sport England Guidance indicates reasonable walking distances of up to 800 metres and cycle distances of up to 5 kilometres.

³⁰ Active Design, Sport England, 2015: <https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design>

Question 23 – Promoting access to 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?	Tick one box only
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	<input type="checkbox"/>
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.	<input type="checkbox"/>
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.	<input type="checkbox"/>
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.	<input type="checkbox"/>
Option 5 – None of the above - Perhaps you think that accessibility by walking or cycling is not a relevant concern?	<input type="checkbox"/>
Please provide any further comments in the box below.	
<div style="border: 1px solid black; height: 100px;"></div>	

Other sustainable transport policy objectives

- 11.7 As we develop policy for sustainable transport we will also look at other emerging themes and issues that we may wish to address in our plan. Key issues identified so far include:
1. To look more fully at bus routes and accessibility when planning for new development and consider ways we can promote public transport quality and use.
 2. Providing and promoting high quality walking and cycling networks and support cycle parking.

3. Focus development in the most accessible locations where most journeys can be made by walking, cycling and public transport.
4. Protect existing valued services and facilities from being lost to other uses.
5. Require large scale development to provide a mix of uses on site and/or show how a range of different uses can be easily accessed from the development by walking, cycling and public transport.
6. Set walking distances from new homes to a range of identified services (including bus stops) – generally 800m is a comfortable walking distance.³¹
7. Set targets for new development relating to the proportion of people who will walk, cycle and use public transport.
8. Identify and protect sites and routes which could be critical to widen transport choice.
9. Provide for large scale transport facilities such as public transport projects and roadside services.
10. Recognise the importance of Exeter airport with the expectation of a specific policy for the airport and its future.
11. Consider levels of car parking in new development and the need for electric charging for vehicles, specifically given the proposed ban on the sale of new petrol and diesel cars from 2030.
12. Recognise the importance of providing adequate overnight lorry parking facilities.
13. Require cycle racks and electric charging for bicycles.

Question 24 - Additional sustainable transport policy objectives

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?

³¹ Active Design, Sport England, 2015: <https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design>

Chapter 12 - Infrastructure and facilities

Objective 10: To secure infrastructure needs at an appropriate time to support new development.

Infrastructure delivery

- 12.1 The delivery of infrastructure alongside housing and economic development is vital in creating sustainable communities. Transport, flood risk measures, utilities connections, and habitat mitigation are often critical to allow new development to take place; whilst people should be able to access facilities such as education, health, open space and play areas on a day-to-day basis.
- 12.2 Infrastructure can be funded and delivered in a variety of ways. New development is required to address its direct impacts by directly providing infrastructure or paying for it, through planning obligations, also known as section 106 agreements and where relevant under legal agreements for highway works. Under legislation there are specific tests that need to be met³². The council also charges Community Infrastructure Levy, which is collected when new homes are built and put into a 'pot' for future infrastructure projects. Sometimes grants or loans to fund infrastructure from national or local government may become available. Infrastructure may also be funded by organisations that have statutory powers and funding drawn from charges to customers (e.g. utilities companies), or central Government (e.g. works to protect existing development from flooding).

Transport connections

- 12.3 Transport connections are typically one of the most important infrastructure issues when considering new development.
- 12.4 In terms of the mains roads in East Devon, traffic has increased slightly on the M5 and A30 since 2005, but flows have remained relatively constant on the A375 and A3052³³. Although outside of East Devon, the main road links in the eastern parts of Exeter suffer from congestion which affects those living and working in East Devon, particularly at peak times. East Devon has a large number of train stations for its size (nine in total), across two lines, and usage has increased significantly over the last 20 years. East Devon is also home to Exeter Airport, which provides routes to a number of domestic and international locations.

³² See CIL Regulation 122 for highways they are called 278 agreements.

³³ Exeter Transport Strategy – Transport Empirical Data Report, Devon County Council, Jan 2019: <https://www.gesp.org.uk/evidence/>

12.5 A variety of projects are already in the pipeline to improve transport connections and support development across East Devon.³⁴ These include a passing loop for the train line near Cranbrook/Whimble to improve reliability and increase train frequency; a cycle path linking Cranbrook to Exeter; and a 'park and change' site at Exeter Science Park. Additional projects are likely to be needed alongside development proposed in this emerging Local Plan.

Digital communications

12.6 The Government is clear that advanced, high quality and reliable communications infrastructure is essential for economic growth and social well-being; and planning policies should support the expansion of electronic communications networks. Full fibre connections to existing and new developments should be prioritised.³⁵

12.7 Internet access has improved dramatically in the last few years, with superfast broadband coverage now available to 89% of premises in East Devon, and 11% able to get a full fibre connection. However, these figures are lower than the average for England as a whole, where 97% of premises can access superfast broadband and 17% full fibre.³⁶

Facility and services

12.8 When we plan for future development we need to have a good understanding of the services and facilities that are important to people and to the area they live in. In the question below we ask about the things that are important to you in the area you live in or would like to live in. Answers given will help us understand more about where priorities should lie when it comes to securing new facilities and also the types of locations that might be most appropriate for future development.



Cranbrook education campus

³⁴ East Devon Infrastructure Delivery Plan review, Nov 2017: https://eastdevon.gov.uk/media/2270747/idp-review-2017_report.pdf ; and Transport Infrastructure Plan, Devon County Council, March 2020: <https://www.devon.gov.uk/roadsandtransport/traffic-information/transport-planning/>

³⁵ National Planning Policy Framework, paragraph 112.

³⁶ Data from <https://labs.thinkbroadband.com/local/E07000040> accessed on 02.11.20.

Question 25 – Facilities and services that are important

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 ³⁷)	<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.

³⁷ Five bus services per day is defined as a category by Devon County Council at Travel Devon: <https://www.traveldevon.info/bus/interactive-bus-map/>

Other infrastructure and service provision policy objectives

- 12.9 As we develop policies around infrastructure and service provision we will also look at other emerging themes and issues that we may wish to address in our plan. Key issues identified so far include:
1. How we prioritise the money available for infrastructure particularly between facilities such as sports pitches and play areas needed by the local community and other needs such as affordable housing.
 2. How do we balance the government requirement to ensure that developments are viable and deliverable with the need to deliver the infrastructure needed to support them.
 3. How do we access more government funding to bridge the gap between the funding that is available from developments to fund infrastructure and the cost of delivering what is needed.
 4. How do we engage with our communities to ensure that the infrastructure that is delivered is designed to meet their needs.
 5. We are interested in the facilities that are needed in villages and rural areas, such as shops, schools and meeting places and approaches we may take to sustain these into the future, including whether additional housing or other development initiatives may support service provision.

Question 26 – Additional infrastructure and service provision 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?

Chapter 13 - Developing a strategy for the distribution of development

- 13.1 As part of the work on producing a new local plan we will need to establish an overarching strategy for the distribution of new development. A strategy will set out how much of what types of developments should go to what locations and why.

The recent pattern of development

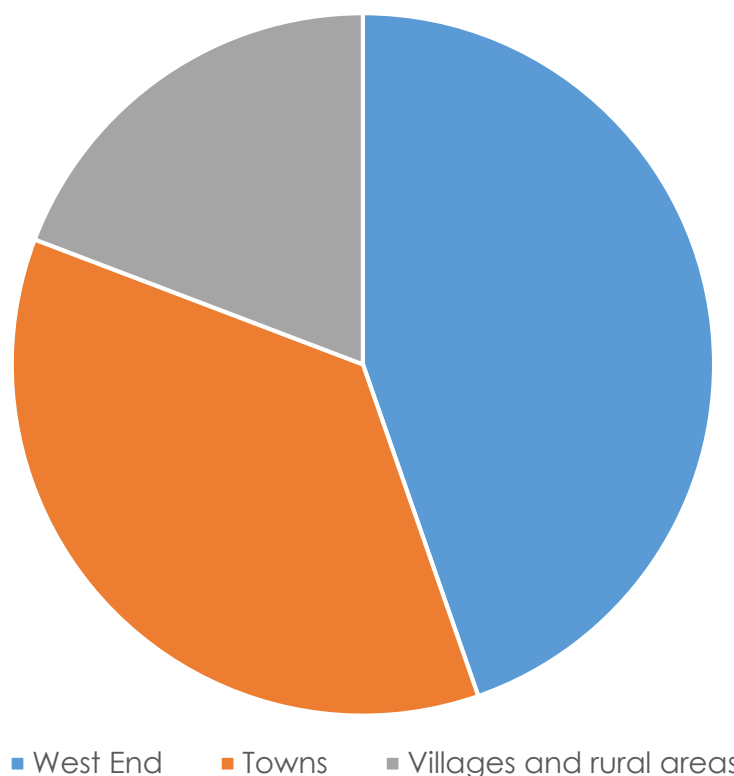
- 13.2 Over recent years much of the development in East Devon has occurred on the western side of the District close to the city of Exeter. We have a specific part of East Devon close to Exeter called the 'West End' that has seen significant growth in recent years. Under our current local plan we estimate that, for the period from 2013 to 2031, around 59% of all new homes will be built in the West End and 41% elsewhere in East Devon (most at the towns and some in villages and the countryside). There are also large amounts of employment land being developed at the West End and elsewhere close to Exeter.



Aerial view of Cranbrook new town

- 13.3 This concentration of development reflects the fact that Exeter is a vibrant city that supports many jobs, with many East Devon residents travelling into the city for work and also for the services and facilities. By building new homes close to the City it has meant that people can benefit from shorter journey distances.
- 13.4 The importance and draw of Exeter provides a sensible planning reason to seek to accommodate growth in close proximity to the City boundary and with very good road links this is one area where companies have been keen to invest. An approach of concentrating development close to Exeter is reinforced by the fact that there are significant environmental and other constraints in much of the rest of East Devon that place limits on potential for development.
- 13.5 The pie chart below shows the distribution of housing development across East Devon for the period from 2013 to 2020.

Distribution of new housing built in East Devon, 2013 - 2020



- 13.6 Outside of the West End the towns of Axminster and Exmouth have seen significant levels of new housing growth and are projected to do so in the coming years, other towns see much less future growth though Ottery St Mary has accommodated high levels of development in recent years.
- 13.7 A large part of the employment land delivery has also been at the West End as well as at Hill Barton Business Park and Greendale Business Park which are also close to Exeter.

Objectives

- 13.8 It is important that any spatial strategy delivers on the objectives set out for the plan earlier in this document as where growth goes will be key to delivering many of these particularly protecting our natural environment and promoting sustainable transport.

Developing a spatial strategy: settlement tiers

- 13.9 It is common for local plans to identify groups of settlements that share similar characteristics in terms of population and levels of facilities. These settlement tiers (also known as a 'settlement hierarchy') help to inform a strategy for distributing development. The current Local Plan strategy is made up of the following settlement tiers:
1. **'West End'** - comprising the developing new town of Cranbrook and other large sites at North of Blackhorse and Pinhoe.

2. **Seven Towns of** – Axminster, Budleigh Salterton, Exmouth, Honiton, Ottery St Mary, Seaton, and Sidmouth.
3. **15 Villages that provide a range of facilities and services** - to meet some of the basic needs of their residents and nearby rural areas: Beer, Broadclyst, Clyst St Mary, Colyton, East Budleigh, Feniton, Kilmington, Lypstone, Musbury, Newton Poppleford, Sidbury, Uplyme, West Hill, Whimble, Woodbury. (Colyton is actually a town but on account of its small size and facilities we put it into a 'village' category).

13.10 The council is producing evidence to inform which settlements should go into which tiers and feedback from this report will help with our ongoing work.

Where villages might sit in a new hierarchy

13.11 The seven main towns of East Devon plus Cranbrook would appear a logical grouping, all have at least a reasonably wide range of facilities and services. The distinction between the 15 larger Villages with Built-up Area Boundaries in our current local/village plan and other villages is less clear cut. It may be that some other villages, on account of the services they provide, should be added to the list of locations that may be appropriate to accommodate development.

Question 27 - Retaining and refining the existing settlement hierarchy

Which of the following options do you prefer for a potential settlement hierarchy?	Tick one box only
Option 1: Same hierarchy as current Local Plan: 7 Towns plus Cranbrook and the 15 Villages	<input type="checkbox"/>
Option 2: A hierarchy that retains the towns and Cranbrook but has a lower number of villages that may accommodate development	<input type="checkbox"/>
Option 3: A hierarchy that retains the towns and Cranbrook but has a higher number of villages that may accommodate development	<input type="checkbox"/>
Option 4: Do something different in terms of a hierarchy or not have one	<input type="checkbox"/>
Please provide any comments below on the potential hierarchy, especially if you do not support the listed options.	

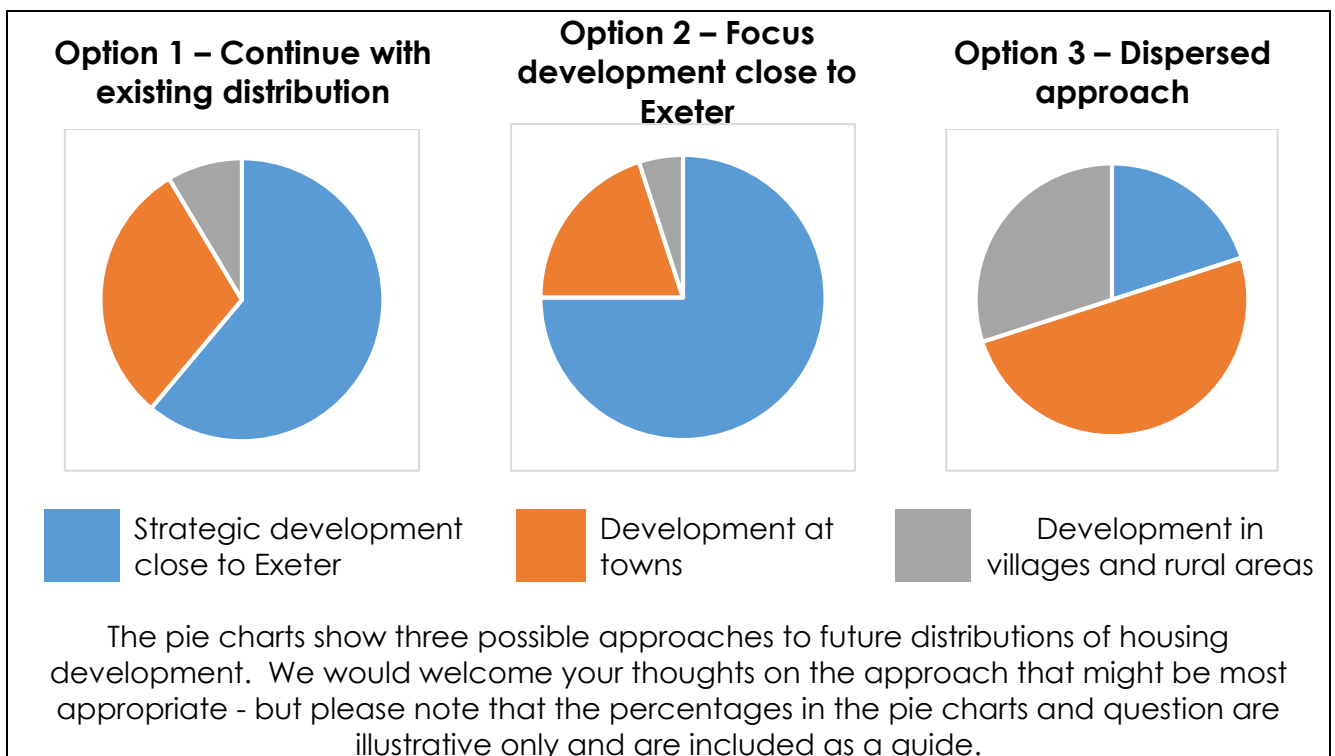
Developing a spatial strategy: Distribution of development

13.12 The total amount of development required in East Devon is still to be finalised so we can't yet identify actual precise amounts. Nevertheless, it is important to think about the overall strategy for distributing development, and the various options that should be considered when doing so. Government planning guidance is clear that options

do though need to be realistic, consistent with national policy, and sufficiently distinct from each other to be worth considering.³⁸

- 13.13 The existing principle of focussing development close to Exeter could be carried forward to a new Local Plan, or even extended further with a higher proportion of development going to this area. This could include the development of one or more additional new towns. Such an option would benefit from proximity to the existing jobs and services in Exeter, it should minimise need for travel, whilst avoiding environmental constraints in other parts of East Devon. However, it would make it less easy to meet housing needs elsewhere in East Devon (including affordable housing) and a lack of employment development elsewhere may make out-commuting more likely and there maybe fewer residents to support services in towns, villages and rural areas – there are particularly high levels of commuting to Exeter from Exmouth residents (27% work in Exeter), Honiton (19%), and Sidmouth (15%).³⁹
- 13.14 Given the amount of development that is likely to be required in East Devon, and the environmental constraints across much of the eastern and southern parts of the district, it seem unlikely that an option of no development close to Exeter would be credible (especially if housing numbers are higher than current requirement levels).

Possible alternative distribution options for future development



³⁸ Planning practice guidance Reference ID: 11-018-20140306: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#strategic-environmental-assessment-and-sustainability-appraisal> and NPPF paragraph 35d.

³⁹ Census 2011 Travel to work data, sourced from Exeter Transport Strategy – Transport Empirical Data report, Devon County Council, Jan 2019: <https://www.gesp.org.uk/evidence/>

Question 28 – Broad distribution of housing development

Which broad approach to the distribution of housing development would you favour in a new local plan?	Tick one box only
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.	<input type="checkbox"/>
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).	<input type="checkbox"/>
Options 3 – A less West End focussed 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).	<input type="checkbox"/>
Options 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).	<input type="checkbox"/>
Please provide any comments on the above in the space below.	

Potential forms of development

13.15 In line with developing an over-arching strategy for the distribution of development we also need to think about the specific types of development that could be appropriate in East Devon. In the table below we set out some differing options with brief commentary on each. In reality it is likely that many differing forms of development will be needed, and probably will be desirable, but it is helpful to set out options and from this we can further develop our thinking on where priorities may be set.

Description	Some opportunities	Some challenges
<p>Infilling in towns and at larger villages – this would involve building on vacant land or converting or replacing existing building. It has many positives as a form of development but there are limitations on potential available sites.</p>	<ul style="list-style-type: none"> • Potential to reuse previously developed (brownfield) land. • Can make rundown areas look more attractive. • Development can be in walking distance to facilities. 	<ul style="list-style-type: none"> • Limitations on available sites. • Could result in a loss of employment land and jobs. • Potential for town cramming. • May involve loss of land that could have amenity, recreational or wildlife value.
<p>Building one or more additional new towns - East Devon is already seeing a new town being built in the form of Cranbrook. A new town would probably need at least 6,000 homes to support a new secondary school and many other facilities.</p>	<ul style="list-style-type: none"> • Potential to accommodate lots of new homes. • Planning for new facilities can take place alongside new homes. • Offers a holistic view to be taken of development. 	<ul style="list-style-type: none"> • Not a short term option. • Can be extremely complex to plan for and deliver. • May need a lot of expensive infrastructure. • May be dependent on Government grants. • Facilities may lag behind housing development, or even not be provided.
<p>Planning for new villages - New villages are likely to be much smaller than any new town - maybe around a 1,000 homes. They may be stand-alone developments or could be built around existing settlements.</p>	<ul style="list-style-type: none"> • Potential to accommodate larger numbers of new homes. • They could have less visual impacts than a new town. • They could allow new residents easy access to the countryside. 	<ul style="list-style-type: none"> • Quicker to build than new towns but development could still be complex. • Could provide limited services and facilities in their own right. • They may end up being housing estates in the countryside with high levels of car dependency.
<p>Large scale urban expansion to existing towns These can be seen as big developments (typically 50 homes or more) on the edges of towns and there have been a number in East Devon in recent years.</p>	<ul style="list-style-type: none"> • Potential to accommodate larger numbers of new homes. • May provide some new facilities. • If they lie close to facilities they can draw on and support existing facilities (but some sites could be in some distance from facilities, especially town centres). 	<ul style="list-style-type: none"> • They can provide homes relatively quickly. • There may be comparatively few land areas surrounding East Devon towns that are suitable for development. • The AONBs come close to or wash over most East Devon towns and this could limit potential.

Description	Some opportunities	Some challenges
<p>Small scale urban expansion of towns - Smaller scale extensions may be able to take up to around 50 homes and can sometimes be 'tucked in' to the edges of built-up areas.</p>	<ul style="list-style-type: none"> • They can often be built relatively quickly. • They can draw on and support existing facilities. • They can promote opportunities for smaller house building companies. 	<ul style="list-style-type: none"> • There may be comparatively few land areas surrounding East Devon towns that are suitable for development. • They will not typically be big enough to add many if any facilities.
<p>Building on the edges of East Devon villages - East Devon villages vary in size and may offer scope for further smaller scale development.</p>	<ul style="list-style-type: none"> • May meet local housing needs. • Could help support, to some degree, local services and facilities. • Could promote opportunities for smaller house building companies. 	<ul style="list-style-type: none"> • Many East Devon villages are in sensitive countryside locations. • Future residents may be car dependent for accessing services and facilities.

13.16 Bearing in mind the differing types of development options that exist in the question below we ask how strongly you would support or oppose these types of schemes. At this stage specific development sites are not identified, rather we are interested in some over-arching ideas and principles about development. At a future date we will need to look at possible actual specific development sites.

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

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						

Potential for a Local Development Corporation in East Devon

- 13.17 This report highlights potential for new large scale developments in East Devon, potentially including an additional new town. Ensuring timely delivery of services and facilities and addressing up front infrastructure costs can be especially challenging for such development. One option for encouraging better quality growth with services and facilities being provided alongside new housing would be the establishment of a local development corporation.
- 13.18 Development corporations are public sector bodies that take an active involvement in supporting and promoting development and delivering services and facilities. They can act as "Master Developer" acquiring land and commissioning building work and 'parcelling-up' and selling land onto other developers. Development Corporations have existed in various forms in England since the mid 20th century and where created they have typically secured high quality development and the timely delivery infrastructure.

13.19 Typically a development corporation would draw on Government or other public sector loans or may have money raising powers of its own. The Government have endorsed, in principle, the creation of new development corporations and if one were created in East Devon it would be hoped that it would help secure additional Government grants and funding. Development Corporations can also lead to better arrangements for the long term management of community assets such as open spaces and reduce the burden often left by developers on future residents.

Question 30 - Establishment of a Development Corporation

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?

Please tick one box only

Absolutely essential	Very important	Quite important	Of limited importance	Not important at all	It would be a bad thing
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide any further comments below.

Plan Period

13.20 At the present time we envisage that the local plan could have an end date of 2040, however, this remains to be determined. If large scale developments are made in the plan, especially another new town or other big strategic developments, it might be desirable to plan for a longer period or to refer to development beyond a 2040 end date. This approach would give clarity to the community and the development industry about where large scale strategic growth would be accommodated in the future and help us to plan how we deliver the infrastructure to support development in that area in the future.

Question 31 – Planning for development beyond 2040

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?

Please tick one box only

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
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide any further comments below.

Chapter 14 - What happens next

- 14.1 This issues and options report forms just the first step in helping us produce our new local plan. In the Spring of 2021 we plan to assess the feedback we receive and this will be used to help inform our thinking on the plan strategy and preferred policy approaches.
- 14.2 In the draft plan we will set out what we consider to be the most favourable policies and in supporting documentation, specifically in a Sustainability Appraisal report, we will also report on other options and approaches that we have considered.
- 14.3 We will consult on the draft plan, in order to ensure we are heading in the right directions, and taking comments into account we will seek to produce a final plan that will be submitted for examination by a Planning Inspector.
- 14.4 We will ensure that we keep everyone that has expressed an interest in the plan informed of its progress and the key steps that are being taken. Though of course if you no longer retain an interest please advise us and we can remove you from contacts lists.

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?

