

# East Devon Local Plan 2021 to 2040 Issues and Options consultation - January to March 2021

Having really struggled with the internet connection over the weekend, I have had to submit this to you in part online (sections with black headings). The complete submission is below, and I have marked the additional sections in Blue.

*Sadly, I wasn't able to type my submissions into the Word document or the PDF document available as the comments sections are saved as images and not free text fields, making it impossible for someone with a computer (but no internet) to complete this on that computer. In the interest of accessibility, we will need to address this for future consultations.*

## Your details

**Your title**

Cllr

**Your first name**

Sarah

**Your surname**

Jackson

**Your email address**

[REDACTED]

**Your postal address**

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**Your age range**

26-40

**Organisation name (if relevant)**

**If you are an agent acting for a client please provide the name of your client**

**In what capacity are you responding to this consultation - what most closely describes you or if you are an agent what best describes, in respect of this consultation, what your client does?**

Private individual

## 2 - Objectives

### Question 1

In paragraph 2.1 of the Issues and Options report we set out a series of suggested objectives for the future local plan that cover issues like climate change, meeting housing needs and supporting the economy. Question 1 seeks your views on these objectives.

**Do you think these are the right objectives for the new local plan, are there any further objectives that you would wish to see added or amendments made?**

Yes, these are the right objectives

**Please give details**

My initial thoughts are that these are largely the right objectives. However, if these are in a priority order of 1 - 10, I am not sure that this is right. However, perhaps that is one of the purposes of this consultation. I would also like to see the addition of an objective named "collaborative place shaping". Whilst this would draw on elements from most, if not all, of the other objectives, its focus is more based on giving communities resilience and vibrancy, beyond (but including, of course,) just the High Street's.

This would help define and assert the individual characters of the various towns and villages across the District (perhaps giving extra weight to Neighbourhood Plans) and help shape and define the identity of East Devon as a whole. In short, give the District a strategy for growth that is focused on what our communities need and want and thus define the USP of East Devon.

### **Question 2 - The scope of the local plan**

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

**Which option do you think we should take?**

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

**Please provide any further comments in the box below**

I am concerned that Option 2 would equate to 1 top level binding policy/plan and multiple sub plans given no more weight in law other than simple guidance to developers.

### **Question 3 - Neighbourhood Plans and the new Local Plan**

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

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

A lot of resources have been invested in the production on Neighbourhood Plans. These have been given weight democratically through both consultation and a vote. These should therefore be treated in high regard with the formation of the new Local

Plan, and therefore updates only required where adopted Neighbourhood Plans deviate from major changes in strategy/policy.

### **3 - Health and wellbeing**

#### **Question 4 - Planning for health and wellbeing**

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

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

Absolutely essential

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

We should be ambitious, particularly with the inclusion of lower density development that includes green space. The health and wellbeing of a place is intrinsically linked to the health and wellbeing of both its population and natural environment. That said, we must be practical and accept that active building cannot be a way to exclude amenity (like parking spaces) from development, as an example, which - if not provided - limits access for things like emergency vehicles. This is the law of unintended consequences, and we have to be pragmatic in our understanding that this is a largely rural district and not everyone will have the ability to live and work locally to their homes.

### **4 - Climate emergency**

#### **Question 5 - Energy efficiency of new buildings**

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

**Do you think we should?**

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

**Please provide any further comments**

I would propose a graduated net zero target that increases year on year toward the target date.

#### **Question 6 - Provision of solar arrays/farms and windfarms**

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

### **Which option do you think we should take?**

Option 4 - None of these options

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

We should define robust policy for where such development shouldn't happen, but otherwise help to bring these forward. However, strict policy should also be defined for

the building of appropriate levels of battery storage for green energy generation so that

the national grid is adequately supported so there are no need for battery storage farms which present a significant risk to the natural landscape and communities as a whole.

I would also suggest that dual use of sites where agriculture, commercial / employment development and housing development can be used to also generate green energy in conjunction to its primary use and alongside enhancement to EDDC's own assets.

### **Question 7 - Carbon saving measures**

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

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

Yes, the appropriate carbon saving policy matters have been addressed

### **Please give details**

However, point 6 should also include the development and enhancement of other forms of carbon capture beyond tree planting eg. wetlands, heathland, wild meadows etc as, often, these can produce more immediate and sustainable long term carbon capture whilst increasing biodiversity. Additional schemes to assist and encourage participation from those across all commercial sectors particularly agricultural stakeholders.

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

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

### **Which option do you think we should take?**

Option 1 - Plan for an average of at least 928 new homes being built each year – This would accommodate levels of house building that accord with current Government requirements. It may mean, however, that we fall a long way short of meeting all affordable housing needs.

**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.**

I feel this is a VERY leading question designed to incite a specific reply through fear of not meeting affordability targets where this is clearly not the only consideration. Inappropriate!

## **5 - Housing**

### **Question 9 - Sites for small scale housing developments**

Paragraphs 5.5 to 5.7 of the Issues and Options report sets out Government policy that at least 10% of new homes should be built on smaller sites (below 1 hectare). This provides more opportunities for smaller, local businesses and is more likely to reflect local character than mass produced homes. Do you think we should?

#### **Which option do you think we should take?**

Option 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.

#### **Please provide any further comments in the box below**

I think we should be more ambitious than Government's minimum standards. However, I am deeply concerned about the density suggested on these small sites as these would simply fall short of any other targets we have for health and wellbeing, the environment, and carbon neutrality.

A key overriding issue throughout this whole section of the consultation is OUR definition of "affordable" which also needs to be more ambitious than the definition set out by Central Government, which - in East Devon - is not affordable in many cases when compared to local wages.

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

Paragraphs 5.8 and 5.9 of the Issues and Options report sets out the reasons for building a range of homes that can accommodate different circumstances. What approach should we take to encourage this, or is it not something the local plan should deal with?

#### **Which option do you think we should take?**

Option 4 - None of the above or an alternative

#### **Please provide any further comments in the box below on how we may best plan for housing for all.**

I would choose option 1, however I don't think this is something we can force as development will only then happen in areas where it is more lucrative. Additionally, this

is an ever-evolving picture and a strategy which meets the face value needs of the market (young person/family homes) may actually undermine the true requirements where properties for the elderly might encourage downsizing, freeing up existing

properties suitable for those younger people and families – thus meeting the needs of the whole community.

### **Question 11 - Additional housing policy objectives**

Paragraph 5.10 of the Issues and Options report identifies nine additional housing policy objectives, including encouraging more self-build homes, allocating sites for retirement housing and setting minimum space standards for new homes.

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

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

#### **Please give details**

There needs to be more robust policies; second homes, holiday homes and the development of ancillary buildings that later become separate dwellings ie. annexes

## **6 - Jobs and economy**

### **Question 12 - Preference for location for future job provision**

Paragraphs 6.4 to 6.7 of the Issues and Options report explains why much recent employment development has occurred near to Exeter and where future job growth would best be located. We set out below a number of differing potential areas in East Devon that could accommodate future job growth and development. Please indicate your “in principle” levels of support for each option

#### **12a - Continued focus on big employment sites in the West End of the District**

Strongly support

#### **12b - Encouraging greater business development in other areas close to Exeter (for example expanding Greendale and Hill Barton Business Parks)**

Support

#### **12c - Encouraging greater business development at and within the main towns of East Devon**

Strongly support

#### **12d - Encouraging business expansion and development in the villages and across the countryside of East Devon**

Support

#### **12e - Encourage and enable more home working**

Strongly support

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

In regards to 12b & 12d, this should however only be undertaken where it is 1) sympathetic to the location. 2) sustainable in both business and environmental terms. 3) not over development. 4) supported by the neighbourhood plan of the area. 5) supported by sufficient infrastructure, eg. roads.

12e. The biggest limiting factor here is broadband and network speed. If these can be addressed in collaboration with the parties who can tackle this issue and concurrently with policy that encourages home-working, I would support this fully. Housing development should factor in delivery of FTB wherever possible.

### **Question 13 - Differing jobs sectors in East Devon**

Paragraphs 6.8 to 6.10 of the Issues and Options report discuss what sort of jobs the local plan should encourage, including the opportunities to attract new and emerging sectors with highly skilled jobs. To what degree do you support, or not, the following approaches to future jobs or differing types of jobs?

**13a - More jobs overall – with an emphasis on attracting new/larger employers and inward investment in any or all sectors**

Strongly support

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

Strongly support

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

Strongly support

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

Strongly support

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

Diversity in the job market will deliver better resilience and whilst I support 13d, it's 13a, b, and c that perhaps offer would offer more long term economic & employment resilience and career prospects and have a knock on effect in encouraging those under 65 to stay and work in East Devon, rather than gravitate to very large Towns and Cities in other regions of the country.

13d – I support this more so with Tourism and Agriculture than with Care. The reason being that with Agriculture and Tourism, I would expect to have more wide reaching benefits to the economy as a whole including leisure, hospitality, retail, marketing etc. The Care sector in the region is – I understand – typically under resourced. Jobs are available but staff retention often low, not least due to working conditions. I am unsure as to where the District Council fits with regards to improving such things.

## Question 14 -Additional economic policy objectives

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

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

### **Please give details**

I notice there are only 5 areas highlighted in the proposed policy, rather than the 6 indicated.

Perhaps the 6th could be a policy that EDDC develop strategies to encourage upskilling and apprenticeships within new business development particularly with young people in mind as well as with those who have had to change career due significant changes in the market. This could be done in partnership with centres of education and recruitment in order to bolster opportunities (even if not in the District) in order to avoid the “*brain drain*” where qualified school/college/university students leave the South West due to a lack of opportunity or career progression options.

## 7 - Town centres

### Question 15 - Town centre uses

Chapter 7 of the Issues and Options report considers options for the roles of our town centres including. Question 15 seeks your views on these options.

We set out below a number of differing potential uses and approaches to promoting town centre vitality and activity. Please indicate your “in principle” levels of support for each potential option or approach. To what degree do you support, or not support, the following approaches to future jobs or differing types of jobs?

**15a - Retail to dominate – support retail uses in town centres and if possible resist other uses.**

Oppose

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

Strongly support

**15c - Redefine town centres to smaller core areas – concentration on retail and commercial uses in the core and allowing much greater flexibility for other uses in peripheral areas**

Oppose



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

Neither Oppose or Support

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

Strongly support

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

Support

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

15a - I am happy to support COU on unused premises above or behind retail/service/hospitality as many retail units no longer hold stock but I can't support conversion for shop front premises as I believe there can be more commercially and sociably valuable options available.

EDDC should take a more proactive approach to enforcement where neglected premises have a negative impact on the perception of the towns by its community and visitors alike and undermining the appeal for potential tenants/businesses wanting to move into the neighbouring premises.

EDDC could also be encouraging/implementing schemes in place which enables landlords of empty retail premises to work with temporary commercial/community/environmental/arts based projects in order to ensure town centre vibrancy during the period of vacancy.

### **Question 16 - Additional town centre policy objectives**

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

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

The issue with point 2 is that often "out of town" premises are also subject to lower rents. As retail is largely becoming an online experience, many retailers no longer feel so tied to town centre premises and the high rents associated with those "prime" locations. To force them to retain these by limiting options beyond the High Street would, I fear, have negative economic consequences. Supermarkets are an exception to this rule and I would support very careful analysis of the impact on retail and hospitality in the close vicinity of any proposed supermarket/ or superstore type developments. The future of High Street's doesn't appear to be driven by retail so

any restrictions for “out of town” development or COUs need to be very sensitive in light of this emerging picture.

Re: Masterplans, I am not sure if this is the appropriate vehicle or not, but I do believe the District (in collaboration with the County Council and other agencies) should be more proactive in helping to develop “Place Shaping” plans in order to bolster long-term recovery of town centres and High Streets. I don’t believe that allowing them to evolve naturally is a viable option, and some gentle encouragement in the right direction may be necessary for long term resilience at this precarious time.

## 8 - Design

### Question 17 - Designing beautiful spaces and buildings

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

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

Absolutely essential

**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.**

We should absolutely ensure design codes on all non-negotiables and offer further guidance on any “nice to haves”. I think it is essential that housing density is not used as a way to justify viability. Housing development on any proposed site must conform to all policies

laid out in this, and other, sections of the local plan unless otherwise able to demonstrate significant community/economic/environmental value and justification. If a development is designed sensibly, the negative impacts can be mitigated, the sense of place can be retained, and even large scale developments can be less costly to the existing assets and feel less dominating, overwhelming and all-consuming!

### Question 18 - Additional design policy objectives

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

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

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

### **Please give details**

On point 1 – include the caveat, “*without becoming incongruous with the existing surroundings and landscape*”

Other Policy Areas for inclusion:

Sympathetic design to blend with in the natural environment

Promoting designs that accommodate adequate car parking and future vehicle charging innovations, in such a way that the pedestrians, and not vehicles, become the priority on streets, pavements and neighbourhoods.

Innovative green energy and carbon neutral concepts to help reach carbon neutral standards, but critically to lower the cost of living for new occupants – affordable in the truest sense

Minimum standards implemented for room sizes

## **9 - Built heritage**

### **Question 19 - The importance of conserving and enhancing heritage assets**

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

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

Very Important

**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.**

I absolutely support retention of our heritage assets wherever possible as these can often be the key defining elements of our towns and parishes character, particularly their visual, external appearance. However, this should not stifle future proofing and internal renovation either to help meet our current and future needs whilst protecting the heritage of the location.

There should be policies and schemes in place to ensure that heritage assets are properly maintained and don't fall into ruin simply as a way to justify removing them entirely in favour of new developments. However, where this does happen, we need to move forward. Derelict, dilapidated and unsalvageable premises serve no community well.

I support any attempts to preserve areas of archaeological interest for future generations and believe we could be better capitalising on these, oft hidden, gems when promoting the District as a tourist/education destination

## 10 - Natural environment

### Question 20 - Development in protected landscapes

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

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

Option 2 - Allow for development to meet local needs

#### **Please provide any further comments in the box below**

This should also apply to those communities directly adjacent to areas of protected landscapes as unfettered growth can have negative consequences to areas close by.

To limit growth entirely is unwise as it reduces the sustainability of those communities

but it should be sensitive to local need and of the impact on neighbouring residents.

### Question 21 - Net gains in biodiversity

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

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

Option 4 – a combination of the above

#### **Please provide any further comments in the box below**

Whilst I have chosen Option 4, Option 2 must always be the primary route followed closely by 2 and, finally, by Option 3. That Option must only ever be considered if 1 and 2 are impossible. I am not a fan of throwing cash at habitat development where there are

habitats to protect already.

Once habitats are destroyed, it takes a long time to establish them; similarly, ecological diversity takes a long time to develop and properly establish itself where it may not have naturally occurred in the first place. Green buffers and wildlife corridors are critical for enabling development which allows us to live alongside habitats that we should be fiercely protecting for a great many reasons.

That said we should also be seeking to create new areas of biodiversity to improve the damage done historically and we must be learning from other parts of the world who have done this with great success.

## **Question 22 - Additional natural environment policy objectives**

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

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

No, there are other major policies that should be addressed

**Please give details**

**In all of our policies we should be seeking to improve our natural environments not just mitigate against damage done by development.**

We should also consider carefully our policies around nutrient management, and our watercourses right across the District as these are the arteries of the natural world.

We should give greater weight to ecological assessments when considering planning applications and seek to undertake assessments from our own skilled officers or a series

of validated organisations rather than enabling developers to “independently” undertake these studies themselves, as they are often contradictory to local knowledge of the areas

in question and greater mitigation requirements may be required.

We should also seek to preserve areas of scientific and ecological interest with robust policies that extend beyond the area identified in order to help these thrive rather than die out in time.

## **11 - Transport**

### **Question 23 - Promoting accessibility by walking and cycling**

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

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

Option 3 - a combination of options 1 and 2

**Please provide any further comments in the box below**

Sadly, in isolation, neither of these are realistic. There is no “one size fits all” here. We must strive to see development that includes safe cycling and walking routes wherever possible, but between areas of habitation often the only routes available are not served by safe roads, footpaths and cycle paths, and in many cases too far to walk or cycle by road.

In addition, the provision for public transport links is not a commercially viable option without subsidy. That said, wherever possible we should be requiring developments to deliver such things.

In addition, the Sports England guidance may not adequately consider the demographic of East Devon where much of our population are older and less physically able. In addition, we live in a very hilly part of the country with poor road surfacing, dangerous fast country roads and a lack of safe inter-town cycling and walking routes. Therefore, these distances may not be realistic.

**Question 24 - Additional sustainable transport policy objectives**

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

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

**Please give details**

With regards to point 13 in the policy, electric bicycle charging needs to be sensitive to the market which sees a plethora of charging requirements and attempts to meet this will be quickly out-dated. At present, charging of most bicycle batteries takes several hours and is done via a regular mains electricity provision which does not enable cyclists to leave their bicycles on charge whilst they go and get a coffee in the same way a car user would. This technology is rapidly changing however and I hope that charger standardisation will come in future.

Most e-bike batteries are removable and are often the most expensive component of a bike. Most will get you 20 – 30+ miles, i.e further than you would probably cycle as part of a commute. However, I would support provision for fire-safe charging lockers for bike batteries at key locations, eg. alongside bus stops and at train stations, where heavy batteries could be secured and charged while travellers continue an onward commute by public transport

In all reality, in this rural location, the only way car-less travel will only be viable as a combination of walking/ cycling and public transport for any given journey.

This will require the provision of large scale foot and cycle paths development as well as substantial secure bike storage facilities (Think lockable bike pods for electric bikes as well as regular bike racks, as all bikes are a high theft items, but particularly electric bikes) and improved public transport provision.

For the larger towns, or if an inter village or costal cycle network could be established, cycle hire, ride, and replace schemes could not only encourage health and wellbeing but may also facilitate tourism in the area.

## 12 - Infrastructure/facilities

### Question 25 - Facilities and services that are important

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

#### **25a - Convenience store / Post Office**

Essential

#### **25b – Supermarket**

Quite important

#### **25c - Childcare and nursery school provision**

Very important

#### **25d - Primary school**

Very important

#### **25e - Secondary school**

Quite important

#### **25f - Children's play area**

Very important

#### **25g - Sports and leisure facilities**

Very important

#### **25h - Healthcare facilities**

Essential

#### **25i - Open spaces**

Essential

**25j - Easy access to a range of jobs**  
Essential

**25k - Regular bus service**  
Essential

**25l - Train station**  
Quite important

**25m - Paths for walking and cycling**  
Essential

**25n - Access to full fibre broadband**  
Essential

**25o - Public house**  
Quite important

**25p - Place of worship (e.g. a church)**  
Quite important

**25q - High quality road links**  
Essential

**25r - Emergency services (police, fire, ambulance)**  
Essential

**25s - Community hall**  
Very important

**25t - Youth facilities**  
Essential

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

Allotments, public toilets, adequate public car parking, broadband.

## **Question 26 - Additional infrastructure and service provision policy objectives**

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

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



Liaison with non-housing development stakeholders to work in a coordinated way to identify needs of the local communities which they could deliver and contribute toward where mutually beneficial.

Point 5 is very loaded and suggests only one solution to the wider problem of sustaining and delivering rural infrastructure provision.

## 13 - Development strategy

### Question 27 - Retaining and refining the existing settlement hierarchy

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

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

Option 4

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

Unfortunately, I can't support any of the proposed options as they are simply too ambiguous. They don't consider issues such as local need, impact on the areas character, impact on infrastructure, and resources, sustainability, impact on the natural environment.

### Question 28 - Broad distribution of housing development

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

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

Option 1

**Please provide any comments on the above in the space below.**

However, I would like to see a more refined plan about how this might be achieved in sensitive, sustainable and appropriate ways, particularly in regard to the development within our existing communities.

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

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

Please score the services and facilities listed below in accordance with their importance to where you live or would want to live

**29a - Infilling in towns and at larger villages**

Neither oppose or support

**29b - Building one or more additional new towns**

Neither oppose or support

**29c - Planning for new villages**

Neither oppose or support

**29d - Large scale (over 50 homes) urban expansions to existing towns**

Neither oppose or support

**29e - Small scale (under 50 homes) urban expansions to towns**

Neither oppose or support

**29f - Building houses on the edges of East Devon villages**

Neither oppose or support

**Do you have any further observations on the alternative development options and approaches? Please provide comments below**

Each option has merits and each has disadvantages. The needs of each community should be carefully be considered before a planning strategy is defined.

**Question 30 - Establishment of a Development Corporation**

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

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

**Please provide any further comments below**

I would like to better understand the implications of such things before committing to a position on this

**Question 31 - Planning for development beyond 2040**

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

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

It would be undesirable and the end date should be 2040

**Please provide any further comments below**

A lot can change in such a large time frame and we are in a state of flux at present. To commit ourselves beyond 2040 would be deeply unwise.

## 14 - Any extra comments

### 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?**

Retrospective planning applications – I would like to see these separated from other planning applications so that they are dealt with first before further development is considered. There may be occasions where a land owner, or a third party, may seek planning consent which then flags up a retrospective planning issue that needs to be addressed before subsequent planning applications are considered. We should be prepared to enforce in these instances and put the subsequent application on hold until the matter of the retrospective development is resolved.

Enforcement - I would like to see a bolder, more proactive and even-handed approach to enforcement. Frequently, larger developers seem to be given more flexibility and leeway where individuals are not. There are other national enforcement policies which are in place for a reason, e.g. s215, which are not made use of. I do support a collaborative “carrot, not stick” approach to enforcement issues in the first instance, so that all parties have an opportunity to correct issues, but if EDDC are not prepared to follow through with the stick, the carrot somewhat loses its value.

Ensure developers have appropriate policies in place to mitigate against patches of orphaned land after development is complete.

I note there was little emphasis on agricultural practices or concerns in this consultation.

Tree and hedgerow and habitat protection should be a strong focus within our local plan especially those within the two AONB's which cover the majority of our District.

I would like to see emphasis on our building control policies in the Local Plan review as the 2 are intrinsically linked but often used against one another when it suits an interested party to do so. Greater transparency on these policies from the beginning would ensure that all parties are aware of their responsibilities, to manage expectations and to mitigate against later conflict.