



**Planning, Transportation and Environment**

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15<sup>th</sup> March 2021

Dear Matt,

**RE: A new Local Plan for East Devon – Issues and Options consultation**

Thank you for providing the opportunity to comment on the Issues and Options consultation for the new East Devon Local Plan.

The County Council welcomes this as a positive step towards updating the planning policy direction for East Devon.

As the plan progresses we look forward to working together on considering the implication of development options and preparing an Infrastructure Delivery Plan (covering the full range of services which DCC has responsibility for) which will aid the consistent identification of infrastructure needed to support the plan. We expect this work to also involve developing secure arrangements for their funding and implementation.

Below are our comments on the consultation document, framed around the objectives identified. It is our view that the fulfilment of the Local Plan objectives should govern the development strategy and development form pursued.

Early in the policy document, it would be useful to refer to the Devon Waste Plan (2014) and Devon Minerals Plan (2017) as forming part of the development plan.

**Objective 1 – Designing for health and wellbeing**

Our Public Health colleagues intend to respond directly and will expand on this topic.

Within planning there are opportunities to achieve multiple benefits from green infrastructure elements, including establishing and maintaining more trees in development and insisting on high quality design of sustainable drainage features that can enhance biodiversity and local amenity, known to improve wellbeing. Our flood risk management team welcome involvement in design codes and master planning, as early engagement is often crucial to achieve above

ground sustainable drainage solutions which bring these benefits. This also helps to avoid less sustainable options such as underground attenuation tanks.

## **Objective 2 – Tackling the climate emergency**

Like East Devon District Council, Devon County Council has declared a climate emergency. We have committed to facilitating the reduction of Devon’s carbon emissions to net-zero by 2050 at the latest and have collaborated with other organisations in Devon to implement a response, with recent consultation on a Draft Interim Devon Carbon Plan. Achieving a response to climate change requires collaboration and action from everyone. The new Local Plan should maximise its role in mitigating and adapting to climate change. We look forward to working with East Devon on the contents of the Local Plan as it develops to dovetail and maximise our efforts.

Paragraph 4.3 highlights that for East Devon, transport formed the largest carbon emitting sector comprising 47% of total emissions. The following chapter then only covers, ‘locating development in locations...so people can walk and cycle more’ as measures to address this (para 4.8 part 5). Whilst this is one factor, the new Local Plan should seek to achieve other outcomes to reduce transport related emissions. These include factors such as utilising digital transformation to reduce the need to travel, facilitating the transition to electric vehicles, public transport links etc. To achieve a reduction in travel demand and carbon emissions, types of development and transport implications need to be considered hand in hand. In addition, it is important to recognise the key role the Local Plan can play in the design of future development, including density and car parking, which are fundamental drivers of viable transport services, reducing transport demand and supporting local facilities.

The Interim Devon Carbon Plan identifies that there is the need for both thriving urban and rural communities, with access to the things they need within local reach to reduce their emissions. As Devon is a predominantly rural county, approaches to emissions reduction must speak to rural communities. The re-localisation of employment, services and amenities, including cultural spaces, is key to reducing travel demand. This means delivering high quality new mixed-use developments and, crucially, supporting the revitalisation of communities that have become almost entirely residential.

Regarding ‘maximising energy from renewable sources’ and the provision of solar arrays/farms and wind farms, we would like to highlight that other Devon districts have adopted a landscape sensitivity approach based on Landscape Character Assessment analysis as promoted in Devon Landscape Policy Group Advice Note 2: [Accommodating Wind and Solar PV Developments in Devon's Landscape](#). This seeks to ensure a balanced approach to resolve conflicts between natural beauty and the adverse visual impacts of these development types. It suggests areas of lowest sensitivity to solar PV are within urban areas /on building roofs, which could be a policy steer.

For the ‘additional carbon neutrality policy objectives’:

- We note point 2 is consistent with the approach in Policy W6 of the Devon Waste Plan which seeks to support the use of waste heat from energy recovery facilities.
- We support point 7 but suggest it could have more comprehensive content, with the inclusion of retrofitting or incorporating sustainable drainage systems which are environmentally sensitive in all developments.

## **Objective 3 – Meeting future housing needs**

Devon County Council is keen to see the delivery of extra care housing schemes in East Devon. The new Local Plan can play an important role in recognising the importance of this provision

(continuing to reflect the latest DCC needs analysis for extra care) and aid delivery with site identification. The need for extra care housing has recently been discussed as part of the Cranbrook Plan hearing sessions, where the Inspector confirmed the provision of a site and the requested partial funding are justified.

As the plan progresses we welcome involvement in viability work on site allocations, ensuring sites can deliver DCC functions (including necessary transport and community infrastructure), policy requirements and affordable housing.

#### **Objective 4 – Supporting jobs and the economy**

The Covid-19 pandemic has had a profound impact on our economy. We look forward to continuing to work with the East Devon on the economic components of the new Local Plan as they develop, responding to the new landscape we find ourselves in. In the relative short term, the Team Devon COVID-19 Economy and Business Recovery Prospectus provides a framework for the next three years. This work illustrates the benefits of collaboration, seeking to achieve the best outcomes for all partners. Learning from this work and future analysis will help inform the contents of the long term economic aspirations of East Devon.

Regarding the list of future job provision locations within Question 12, all the options are supported, subject to providing necessary infrastructure, being in sustainable locations, and not having high environmental impacts. The viable delivery of the allocation and associated infrastructure should be considered during plan making.

All sectors of job creation should be supported, especially considering the contraction of the retail sector.

#### **Objective 5 – Promoting vibrant town centres**

Town centres need to be supported to ensure they remain vibrant places to visit. Alternative uses should be carefully considered and residential should be used where possible to support the viable delivery of other ground floor uses that keep live frontages like offices / cafes / leisure etc. Careful consideration should be given to encourage these alternative uses and policy to ensure their delivery. As part of this consideration, the built form of town centres and historic buildings should be protected to avoid losing the physical infrastructure of larger spaces for key uses. Residential development can lead to the loss of larger format spaces that may be attractive for the uses to support a vibrant town centre. Out of town retail should be resisted where there would be a negative effect on a town centre.

#### **Objective 6 – Designing beautiful and healthy spaces and buildings**

**AND**

#### **Objective 7 – Our outstanding built heritage**

Regarding Objective 6, planning to ensure the correct siting in the landscape/respect of characteristic settlement pattern is particularly important, creating new places that echo the character of villages/towns in the wider landscape character area and celebrate local distinctiveness using local materials and building styles.

The new Local Plan could encourage Neighbourhood Plans to prepare local townscape/village character assessments as evidence base to inform design codes for new development in their patch – in response to NPPF 127, 129 and 130, also helping to fulfil Objective 6 and 7. General guidance could set down key principles, supplemented by design codes for development in distinct character areas - underpinned by Local Character Assessments.

The landscape characteristic of many of the local villages and towns within East Devon is for open watercourses, and we would like to see this considered as the plan progresses. We would welcome the development of a policy to limit culverting of watercourses, not only due to a flood risk / biodiversity perspective, but also because of its effect on the beauty, heritage and landscape character of the area.

### **Objective 8 – Our outstanding natural environment**

This objective could be improved by rephrasing ‘...and support nature recovery and resilience’. This would incorporate themes in the Government’s 25 year Environment Plan such as nature recovery networks, working with natural processes, natural flood management, more trees (multiple objectives not just biodiversity).

We would expect to see a specific section addressing managing flood risk under the natural environment heading. Flood risk is and will continue for the lifespan of the new local plan to be a key issue in East Devon and its surrounding areas. We are encouraged to see a focus on a major green infrastructure project, the Clyst Valley Regional Park, blue-green infrastructure can with good design help to reduce flood risk and should be promoted in the local plan. We are aware of the developing Strategic Flood Risk Assessment and would expect reference to this key document. Guidance documents that DCC have produced which should be considered include our Natural Flood Management Guidance, Sustainable Urban Drainage Guidance and the Devon Local Flood Risk Strategy.

The priority for protected landscapes is to conserve and enhance natural beauty. The extent of development in these areas should be limited - meeting local need and are exceptionally well sited, designed and generally of a small scale. There should be a presumption against major development unless the NPPF tests of exceptional circumstances are met. There should also be Local Plan policy that relates to all landscapes, not just protected landscapes. See the European Landscape Convention, NPPG and also NPPF 170, 171, 172, 173, 180 (maintain character of undeveloped coast, special character of heritage coast, tranquil areas, inherently dark landscapes, the intrinsic character and beauty of the countryside, ‘valued landscapes’).

Regarding ‘other natural environment policy objectives’ we support higher profile of Landscape Character Assessments, but are cautious about creating new designations based on landscape sensitivity assessments. The latter requires consideration of a landscape sensitivity to a particular type of development, not inherent landscape sensitivity. There are different approaches to assessment of landscape quality and value.

An additional area that could be considered is identifying and protecting areas of tranquillity and inherently dark landscapes. CPRE light pollution data could be used as evidence base, and Institution of Lighting Professionals approach to ‘environmental zones’ adopted (would require co-operation between DCC and EDDC). The issue of tranquillity in planning was explored a couple of years ago by a cross-discipline working group - see report published here: [Devon's tranquil areas](#).

### **Objective 9 – Promoting sustainable transport**

Emphasising linkage into sustainable transport is welcomed. As this section of the new Local Plan develops it should ensure aspirations for development accord with latest guidance, including LTN1/20 and Gear Change.

Under ‘other’ sustainable transport policy objectives it is suggested that the new Local Plan could ‘set targets for new development relating to the proportion of people who will walk, cycle

and use public transport'. This aspiration has potential but may require different targets for different types of development (rural/urban) and would need to be developed in discussion with DCC.

As highlighted in our response to Objective 2 (tackling the climate emergency) the Local Plan has a key role shaping the design of development, including density and car parking which are fundamental drivers of viable transport services, reducing transport demand and supporting local facilities. In addition, the new Local Plan should seek to achieve outcomes that reduce transport related emissions, including facilitating the transition to electric vehicles.

### **Objective 10 – Connections and infrastructure**

This objective wording could be improved by reflecting strategic infrastructure needs as well as those required to support new development. East Devon has important strategic transport connections and other infrastructure within it that will need to continue to be supported and improved. For example, Tipton St John Primary School which has highly concerning flood risk and requires solution.

Devon County Council is the Local Education Authority (LEA) and therefore has a statutory duty to ensure that all children have access to statutory early years and school education. The way in which the County Council undertakes school place planning is set out in our Education Infrastructure Plan and the Education Section 106 Infrastructure Approach, which are available on [our website](#). In accordance with the above, the Department for Education<sup>1</sup> and County Council position is that new education facilities required to serve new development should be funded by that development through fair and proportionate contributions. The new Local Plan will need to identify sites for new schools where they are required by large developments. Section 106 agreements for contributions for new education infrastructure are preferred to CIL, as they provide greater certainty that funding will be available for the required statutory early years and school education provision.

The transport connections section of the report does not emphasise the importance of bus provision in East Devon (particularly its higher frequency services), with significantly more people moved by bus than by rail. The district also has high quality active travel corridors (Exe Estuary and Clyst Valley). Transport analysis should be a key determiner in allocation location and development form choices, to ensure sustainable lifestyles and modal shift is both feasible and deliverable. This includes the NW quadrant of East Devon on the A3052 corridor, which while on the periphery of Exeter has transport constraints particularly in terms of public transport.

The digital communications element should emphasise the role it has in responding to the climate emergency due to its impact on demand management for transport and reducing the need to travel.

While many of the components of green infrastructure are identified in this chapter, this area is best planned collectively, harnessing potential for multiple benefits to people and wildlife.

As mentioned above, as the development strategy is defined we look forward to working together to on developing an Infrastructure Delivery Plan, covering the full range of services which DCC has responsibility for – some of which are not easily identified in the list of

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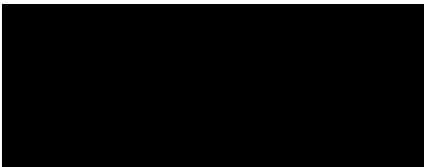
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infrastructure included in the consultation document, including special education needs provision, household waste recycling centres and libraries. The DCC developer contributions methodology for [waste management and recycling](#) has identified the need for a new facility to serve the Honiton area. As the new local plan progresses, this infrastructure requirement should be included within relevant policies to support its future delivery.

Referring to the SEA, we note that the Devon Local Flood Risk Strategy will need to be updated to refer to our current strategy for 2021-2027.

I hope these comments are useful for taking forward the new Local Plan. If you have any queries, please do not hesitate in contacting me.

Yours sincerely,



**Mike Deaton**  
**Chief Planner**