

Local Plans Team  
East Devon District Council  
Blackdown House,  
Border Road,  
Heathpark Industrial Estate,  
Honiton,  
EX14 1EJ

**Sent by Email: [tspurway@eastdevon.gov.uk](mailto:tspurway@eastdevon.gov.uk)**

Dear Sirs,

**Re: East Devon Local Plan - Issues and Options Consultation, January 2021 (Regulation 18)**

We are instructed by Mr Philip Glanvill, Sally Ann Glanvill and Jennifer Goodall, landowners within East Devon, to make representations to the above Local Plan I&O consultation. On their behalf, we have also made a submission to the SHEDLAA.

**2.11 Neighbourhood Plans**

**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?**

Paragraph 2.11 explains that Neighbourhood Plans across the District are being prepared, that they are used alongside the Local Plan and that they should broadly comply with the Local Plan rather than the other way round.

We note that Woodbury Parish Council are currently progressing a Neighbourhood Plan for Woodbury. The timeframe for progressing this plan has not been published and it has some way to go before it is heard at Examination and is 'made'. However, it is being brought forward in line with the current Local Plan which was adopted in 2016 for the plan period 2013 – 2031.

Strategy 6 of the Local Plan effectively says that development will be allowed within defined 'Built-up Area Boundaries' (BUABs), subject to certain criteria whilst Strategy 7 sets out the over-arching policy of constraint for development outside boundaries. Strategy 27 'Development at the Small Towns and Larger Villages' including Woodbury establishes built-up area boundaries for these settlements and states that if communities wish to promote development other than that which is

supported through that strategy and other strategies in the Plan, they will need to produce a Neighbourhood Plan justifying how and why in a local context, the development will promote the objectives of sustainable development. The Local Plan is supported by the Villages Plan 2018 which defines the built-up area boundaries but does not allocate any land for development within them.

The adopted Local Plan which is acknowledged within the I&O consultation as '*now becoming dated*' sets out a restrictive strategy for development in the smaller towns and larger villages. It is already 8 years into its plan period and there are currently only 10 years remaining. The Local Plan Review which will extend the Plan period to 2040, will deal with the need to allocate land for an additional 6,615 new homes. Once adopted, the Local Plan Review will supersede the current adopted Local Plan and East Devon Villages Plan with a new strategy planning for this extended period and is currently scheduled for adoption in 2023. It is likely therefore that by the time the Woodbury Neighbourhood Plan has gone through all the statutory stages including Examination, it will be out of sync and out of date with the new Local Plan as soon or almost as soon as it is 'made'. The new Local Plan will be prepared with the objective of contributing to the achievement of sustainable development, setting the strategy up to 2040. It also has to be prepared positively in a way that is aspirational it is considered that progressing a Neighbourhood Plan for Woodbury in line with the current adopted Local Plan, is premature and instead be brought forward in line with the new Local Plan Review and its emerging strategy.

We would be grateful if the Neighbourhood Plan Officer were made aware of the above points.

***The Woodbury Neighbourhood Plan is premature and should be deferred until such time as the spatial strategy and distribution of development within the new Local Plan has been advanced.***

## Chapter 2: Objectives, scope and background

### 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?

**Option 2 – Multiple Plans** - Produce a plan that deals with strategic matters (the bigger stuff) first and then subsequent plans that deal with more local concerns and detailed matters later?

**Option 3 – Other** - Do an alternative or neither of the above?

Please provide any further comments in the box below

Support is generally given to the Plan's Objectives. However, careful consideration should be given to what that actually means in today's terms, in planning for the future. The past year of the Covid pandemic has demonstrated that the country has adapted to different living and working patterns with many benefits both in terms of health and wellbeing (Objective 1 – encouraging healthy lifestyles) but also in terms of the impact on the environment (Objective 2 tackling the climate emergency – less travel to work, less traffic pollution etc). It is likely that this change to the way that people live and work will to a large extent, continue and it is important that these structural changes are taken into account in the Local Plan Review planning for the District up to 2040. How do these structural changes translate into sustainable development in a future context which is likely to be very different to how it was perceived in the past?

This has implications for Objective 3 – meeting future housing needs, Objective 4 – supporting jobs and the economy, Objective 9 – promoting sustainable transport and Objective 10, connections and infrastructure, and how those objectives inform the Strategy for the distribution of development (Chapter 13). Greater consideration needs to be given to what the world will look like by 2040 and therefore what we are planning for.

***Greater consideration needs to be given to what the world will look like by 2040 and therefore what we are planning for.***

## **Chapter 4 tackling Climate Change**

***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***

### **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?

Paragraph 4.3 highlights that in 2018 transport formed the largest carbon emitting sector comprising 47% of total emissions, a far larger proportion than created either by homes or industry. The subsequent paragraphs go on to talk about energy efficiency and maximising energy from renewable sources and paragraph 4.8 discusses developing a policy for carbon neutrality, mainly through renewable schemes of various sorts. Point 5. is also significant in terms of the location of new development in locations that are close to local facilities – the reason given is so that people can walk or cycle more and be less reliant on the car. This has significant implications for the spatial strategy considered later in the consultation, because it re-emphasises the importance of 'local' –

not concentrating development in the largest towns and edge of Exeter which would simply reinforce the need for commuting particularly from the east of the District but enhancing the sustainability of smaller settlements such as the larger villages.

***Support is given to 4.8 point 5: For the location of new development in locations that are close to local facilities. This has the potential to enhance the sustainability particularly of settlements in the east of the District such as the larger villages like Woodbury by supporting local services and facilities and reducing the need for transport to the main concentrations of development.***

## Chapter 5: Meeting housing needs

### ***Encouraging small and medium sized builders***

#### **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. •

Option 2 - Allocate or identify land for around 11% to 25% of homes to be on small sites – this approach would be higher than Government minimum standards. •

Option 3 - Allocate or identify land for 26% to 50% of homes to be on small sites – this approach would be substantially higher than Government minimum standards. •

Option 4 - Allocate or identify land for 51% or more of homes to be on small sites – with such a high figure this approach could fundamentally change the nature of house building in East Devon.

Option 5 - None of the above or an alternative •

Please provide any further comments in the box below.

***Support is given to an increased emphasis on smaller sites which enable small and medium sized builders a greater share of the housing requirements and in turn benefit the local economy through local employment and support for local businesses and supply chains. Smaller sites can also be appropriately allocated around smaller settlements such as the larger villages like Woodbury and in so doing enhance their sustainability through support for local services and facilities and in combination with increased remote working, a reduction in the need for travel. A radical rethink of the existing spatial strategy is required. Such encouragement must be translated into the allocation of small sites suitable for small***

**and medium sized builders to deliver.**

**Chapter 6: Supporting jobs and the economy**

**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 checked="" 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 checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>
Encouraging business expansion and development in the villages and across the countryside of East Devon	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Encourage and enable more home working	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Paragraph 6.1 states that East Devon enjoys a strong culture of self-employment but also highlights a high level of commuting out of the District. How therefore, can this strong culture be supported whilst reducing the level of out-commuting? Limited progress has been made in bringing forward allocated employment sites at the main towns and the new Local Plan provides a timely opportunity to review the current strategy of concentrating employment development at a few locations. With changes in working patterns made necessary by the covid pandemic many advantages of working locally have become apparent and this trend can be encouraged through a change in the distribution of development strategy by focussing more housing and employment in the smaller settlements.

**Support is given to encouraging local jobs and housing to enhance overall sustainability**

***and contribute to the Council's target of becoming carbon neutral by 2040.***

***This encouragement should be translated into the allocation of more sites for both employment and housing which can be access by local people not just on the edge of the main conurbation but across the District.***

## Chapter 8 Design of beautiful and healthy spaces and buildings

### 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 •

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.

***The sentiment of Objective 6 to promote high quality beautiful development supported by the National Design Guide and other initiatives from the Building Better Building Beautiful Commission is a good one. However, caution should be exercised in seeking to introduce guidance which is too detailed and too prescriptive in order to allow innovation and a suitable degree of variety (NPPF paragraph 126).***

## Chapter 10: Our outstanding natural environment

### ***Development in protected landscapes***

### Question 20 - Development in protected landscapes

In considering whether we should allow for development in protected landscapes do you think:	tick one box only
<b>Option 1 - Place significant restrictions on development</b> - This approach would apply very tight constraints on development. However, it could mean more development pressure elsewhere in East Devon.	<input type="checkbox"/>
<b>Option 2 - Allow for development to meet local needs</b> - This would allow for limited development, specifically where it will smaller scale local social, housing or economic needs, it could still mean more development pressure elsewhere in East Devon.	<input checked="" type="checkbox"/>
<b>Option 3 - Allow for greater levels of development</b> - 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"/>
<b>Option 4 - None of the above or an alternative</b>	<input type="checkbox"/>
Please provide any further comments in the box below.	

### Enhancing bio-diversity

#### Question 21 - Net gains in biodiversity

In order to gain biodiversity improvements which option would you prefer:	Tick one box only
<b>Option 1 - On-site provision</b> - 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"/>
<b>Option 2 - Secure the habitats locally</b> - This would require a legal agreement with a landowner near to the development to deliver and maintain it.	<input type="checkbox"/>
<b>Option 3 - Pay a cash tariff towards a strategic delivery scheme</b> - 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"/>
<b>Option 4 - A combination of the above</b>	<input checked="" type="checkbox"/>
<b>Option 5 - None of the above or an alternative</b>	<input type="checkbox"/>
Please provide any further comments in the box below.	

Government proposals to introduce a 10% bio-diversity net gain are to be supported by a tariff cost estimated by the Government as being set between £9-15,000 per home. This is a significant cost and will impact on development viability, particularly for smaller sites and smaller developers.

***The affordability of tariff costs to enhance bio-diversity must be calculated together with other costs such as affordable housing and CIL to ensure required development remains***

**viable.**

## Chapter 11 Promoting sustainable transport

### Question 23 – Promoting accessibility by walking and cycling

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 – Allocate new development only in locations within walking distance of existing services and facilities - This will limit the potential location of new development and will require existing facilities and services to have the capacity to cope with extra customers/users

Option 2 – Allocate sufficient new development to support and deliver new services and facilities - This may require very high levels of development to support facilities, which may overwhelm a small settlement.

Option 3 – Do not require facilities and services to be within walking distance of new development but require them to be available within the settlement - This option would not require access on foot to facilities and services but

would require them to be available locally. It may however encourage car use.

Option 4 – None of the above - Perhaps you think that accessibility by walking is not a relevant concern?

Please provide any further comments in the box below.

### 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?

Objective 9 discusses the need to prioritise walking, cycling and public transport and making provision for charging electric vehicles in order to reduce reliance on fossil fuelled vehicles. It is the Government's target that the sale of new petrol and diesel vehicles will stop by 2030 and therefore there will be an automatic and progressive reduction in reliance on fossil fuelled vehicles from that point on. What the new Plan should be considering is the opportunity that this significant change will have on the scope to amend the spatial strategy of the District and encourage greater sustainability at the local level. Rather than reinforcing the strategy of concentrating development on the edge of Exeter, which requires everyone to commute, a more sustainable strategy would be to focus a proportionate amount of development on the smaller settlements. This should be reflected in the list of other sustainable transport policy objectives at paragraph 11.7.

***The list of other sustainable transport policy objectives at paragraph 11.7 should be reconsidered. In particular it should answer the question as to how existing smaller settlements can be made more sustainable through proportionate additional development to support services and facilities and reduce the need for commuting to the urban centres.***

## Chapter 12: Infrastructure and facilities

### ***Facilities and services***

#### **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?

***The covid pandemic has demonstrated that there needs to be less reliance on the place of work with more people working remotely from home. This in turn means that more people are supporting local services and facilities. We should be planning for more local housing and employment facilities to reinforce this trend.***

## Chapter 13: Developing a strategy for the distribution of development

### ***Developing a spatial strategy: settlement tiers.***

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

Which of the following options do you prefer for a potential settlement hierarchy?	Please tick one box below
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 checked="" type="checkbox"/>
Please provide any comments below on the potential hierarchy, especially if you do not support the listed options.	

Question 28 – Broad distribution of housing development	
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 checked="" 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.	

Paragraphs 13.9-13.11 set out the current settlement tiers which essentially group towns and villages according to the level of facilities and services they provide. Paragraph 13.10 advises that evidence is being produced to inform which settlements should go in which tiers for the future but doesn't set out what the basis for that is. Nor does it consider how an appropriate strategy to deliver sustainable development for the future might be informed by the change in living and working patterns that have taken place over the pandemic and are likely to continue into the future. For instance, what is required to facilitate more home-working and less reliance on central office accommodation and the consequential reduction in need for the daily commute to work. Implications of the Government's phase-out of the sale of new petrol and diesel which has been brought forward to 2030, 10 years before the end of the new Local Plan period should also be factored in and how this alters our view of sustainable locations. Such changes are significant in determining future strategy for the distribution of development because they also have the potential to make villages of all sizes more sustainable – more people working from home will support more local facilities and services without the need to commute.

Paragraph 13.13 recaps that the existing principle of focussing development close to Exeter could be carried forward to the new Local Plan or extended further with a higher proportion of development going to this area. It states that such an option would benefit from proximity to the existing jobs and services in Exeter and should minimise the need for travel. Conversely it recognises the particularly high levels of commuting to Exeter and that a strategy of concentration would make it less easy to

meet housing needs elsewhere in the District and a lack of employment development elsewhere may make out-commuting more likely with fewer residents to support services in towns, villages and rural areas. It is considered that the existing principle of focussing development on the edge of the main conurbation of Exeter and at Cranbrook is fundamentally flawed in the objective of making the rest of the District sustainable.

***On this basis support is given to Option 3 – Dispersed Approach with a greater proportion of development being concentrated at the villages.***

### **Potential forms of development**

Question 29 - Future options for the type and location of development						
For each option please tick on box only						
How do you feel about the development types and locations listed below	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 checked="" 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 checked="" type="checkbox"/>
Planning for new villages	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>
small scale (under 50 home) urban expansions to towns	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Building houses on the edges of East Devon villages	<input checked="" 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						

In reality, it is unlikely that any one form of development is going to be effective in accommodating sufficient development in the right place at the right time across the District. However, Option 6 building on the edges of villages have the potential to play an important role. Not only will this help to meet local housing needs and but will also help to reinforce the ‘new sustainability’ that is a greater working from home, less commuting and a strengthening of the rural economy through additional spending power to support local services and facilities; and assist small and medium sized builders to deliver locally and in so doing support the local economy. Residual day to day travel needs will



*dynamic development solutions™*

also be more sustainable as petrol and diesel vehicles are phased out in favour of electric vehicles within the life of the Plan thus changing the current view of villages as 'less sustainable locations'; rather further, proportionate development at villages will enhance their sustainability. It will also promote opportunities for smaller house builders who are likely to be able to bring forward development more quickly than large urban extensions and new villages and provide employment for the local workforce.

The accommodation of further development on the edge of villages can be done proportionately and appropriately whilst supporting and enhancing their sustainability.

***Support is therefore given for Option 6 Building on the edges of East Devon villages.***