

East Devon Local Plan – 2021 to 2040 - Issues and Options consultation for the attention of the Planning Policy team

We would encourage you to complete the on-line response form – see:

<https://eastdevon.gov.uk/planning/planning-policy/emerging-local-plan/initial-consultations/>

Please only use this paper version of the questionnaire if you lack internet access. Receiving on-line submissions will help us save time and money and will mean we can be more accurate in our work.

Your Title	<input type="text"/>	First name or initial	<input type="text"/>	Surname	<input type="text"/>
		Your email address	<input type="text"/>		
		Your telephone number	<input type="text"/>		
		Your postal address and post code	<input type="text"/>		
		Organisation name (if relevant)	<input type="text"/>		
		If you are an agent acting for a client please provide the name of your client	<input type="text"/>		

Your Age Range

- 0-18
- 19-25
- 26-40
- 41-55
- 56-70
- 70 plus

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
- Environmental body
- Government department or agency
- Local authority
- Parish or town council
- Politician
- Religious body
- Cultural group or body
- Education provider
- Amenity group
- Land owner
- Developer
- Private company
- Emergency service provide
- Utility or transport provider
- Community or resident group
- Representative of commercial organisation or business
- Other – Please specify (in the box below)

Guidance notes

We have produced a local plan issues and options consultation document that we are consulting on from 18 January 2021 to midday on 15 March 2021. In the consultation document we include a series of questions. Please note that this questionnaire should be read alongside the full consultation document.

Please respond to this consultation event, on-line, if possible, see:

<https://eastdevon.gov.uk/planning/planning-policy/emerging-local-plan/initial-consultations/>

Paper copies of this completed of this questionnaire should be posted to:

Planning policy
East Devon District Council
Blackdown House, Border Road
Heathpark Industrial Estate
Honiton
EX14 1EJ

To arrive no later than 12.00 noon on Monday 15 March 2021.

Data Protection

Any personal information which you provide will be held and used by East Devon District Council for the purpose of local plan production. Your information may also be shared within East Devon District Council for the purposes of carrying out our lawful functions. Otherwise your personal information will not be disclosed to anybody outside East Devon District Council without your permission, unless there is a lawful reason to do so, for example disclosure is necessary for crime prevention or detection purposes. Your information will be held securely and will not be retained for any longer than is necessary. There are a number of rights available to you in relation to our use of your personal information, depending on the reason for processing. Further detail about our use of your personal information can be found in the relevant Privacy Notice which can be accessed at: <https://eastdevon.gov.uk/access-to-information/data-protection/privacy-notices>

Please note that responses received will not be treated as confidential and they will be published on our council web site along with your name and if relevant the name of the organisation you represent. If you are an agent your name and organisation will be published as well as those of your client. Postal or email address will not be published unless they are embedded in documentation and cannot be readily blacked out.

Question 1 - Local Plan Objectives

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
- No, there are further objectives or amendments I would like to add

Please give details

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
- 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

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?

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
- 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

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?

Do you think we should

- 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
- 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
- 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

Please provide any further comments

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 1 - Identify suitable areas for renewable energy developments
- Option 2 - Not identify areas but offer general support
- Option 3 - Take a restrictive approach to renewables
- Option 4 - None of these options

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

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
- No, there are other policy areas that should be considered

Please give details

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

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.

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 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

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 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.
- 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.
- 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
- 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.

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?

- Yes, these are appropriate housing policy areas to be addressed
- No, there are other major policy areas that should be addressed

Please give details

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	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
12b - Encouraging greater business development in other areas close to Exeter (for example expanding Greendale and Hill Barton Business Parks)	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
12c - Encouraging greater business development at and within the main towns of East Devon	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
12d - Encouraging business expansion and development in the villages and across the countryside of East Devon	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
12e - Encourage and enable more home working	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
If you have any comments on the above or alternative options please set these out below.	

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	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
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13b - More high technology jobs - focussing on high technology and high skilled jobs (including in the transformational sectors).	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
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13c - Local Entrepreneurs – promoting opportunities for more home/locally based/small businesses.	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
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13d - Traditional Sectors - Focus on growth, resilience and diversification in our traditional sectors - such as agriculture, tourism and care	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
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If you have any comments on the above or alternative options please set these out below.

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?

- Yes, these are the appropriate economic policy areas
- No, I think there are other policy areas that should be addressed

Please give details

Question 15 - Town centre uses

Chapter 7 of the Issues and Options report considers options for the roles of our town centres. 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.

15a - Retail to dominate – support retail uses in town centres and if possible resist other uses.	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
15b - Promote mixed commercial uses - support retail as well as other commercial uses such as café's and offices	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
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	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
15d - Support change of use to housing – allow for any shops or commercial premises to be converted to housing	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
15e - Support community uses - promote more community spaces in town centres	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
15f - Leisure uses – promote new gyms and sports facilities in town centres.	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose

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

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?

- Yes, these are appropriate policy areas
- No, there are other major policy areas that should be addressed

Please give details

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
- 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.

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?

- Yes, these are appropriate housing policy areas
- No, there are other major policy areas that should be addressed

Please give details

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?

- 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.

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 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.
- Option 2 - Allow for development to meet local needs.** This would allow for limited development, specifically where it will meet smaller scale local social, housing or economic needs, it could still mean more development pressure elsewhere in East Devon.
- 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.
- Option 4 - None of the above or an alternative**

Please provide any further comments in the box below

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 1 - On-site provision**
- Option 2 - Secure the habitats locally**
- Option 3 - Pay a cash tariff towards a strategic delivery scheme**
- Option 4 - A combination of the above**
- Option 5 - None of the above or an alternative**

Please provide any further comments in the box below

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?

- Yes, these are the appropriate natural environment policy issues
- No, there are other major policy areas that should be addressed

Please give details

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

Please provide any further comments in the box below

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?

Yes, these are appropriate sustainable transport policy areas

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

Please give details

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

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)	<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.				

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?

- Yes, these are appropriate policy areas to be addressed
- No, there are other major policy areas that should be addressed

Please give details

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 1** - Same hierarchy as current local plan: 7 Towns plus Cranbrook and the 15 Villages
- Option 2** - A hierarchy that retains the towns and Cranbrook but has a lower number of villages that may accommodate development
- Option 3** - A hierarchy that retains towns and Cranbrook but has a higher number of villages that may accommodate development
- Option 4** - Do something different in terms of a hierarchy or not have one

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

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 - 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
- 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).
- Option 3 - A less West End focused 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).
- Option 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)

Please provide any comments on the above in the space below

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

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

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						

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?

- Absolutely essential
- Very important
- Quite important
- Of limited importance
- Not important at all
- It would be a bad thing

Please provide any further comments below

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?

- 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

Please provide any further comments below

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?

East Devon Local Plan – 2021 to 2040 - Issues and Options consultation for the attention of the Planning Policy team

Hawkchurch Parish Council Response

This document should be read in conjunction with the questionnaire and the consultation document. The selected responses to the consultation questions have been repeated here for ease of reference.

Question 1 - Local Plan Objectives

Q1 Response:

No. For clarity, where there are factors that would mean the objective would need to be different for different locations or communities, it would be helpful if that can be captured in the objective. For example, where the demographic is biased toward the elderly vs young families, the housing and services needs are significantly different. Where the location is rural and the economy is dependent more on farming, tourism or local small businesses, the demands on infrastructure and transport are different to locations that are more urban and within reach of larger enterprises and employment opportunities – the local economies are in fact different. East Devon has a distinct mix of such things and plans, and planning policies, need to reflect these.

As an example, Objective 1 could be rewritten to make it stronger:

“To facilitate healthy lifestyles and living environments for all East Devon residents, taking account of the local needs.”

The same approach can be taken for objectives 3 & 4 which are also dependent on location and community demographics.

1. The climate emergency is key and difficult and Objective 2 is very high level.

We suggest that there is a separate plan that brings together the different environmental and energy related strands, so they are clearly integrated and cohesive for example:

- green energy generation supporting the national grid
- green energy generation supporting local developments
- energy conservation in new developments
- environmental protection
- maximising the opportunities for mitigating climate change through diversification of land use

Question 2 – The scope of the local plan

Q2 Response:

Option 2

The East Devon area is a mix of different demographics and economies according to location. To have a single plan covering all aspects would be unwieldy and more difficult to ensure engagement of the community in the development of the plan. The consultation document suggests that masterplans are drawn up for more local aspects of planning and we support this approach.

Consideration should be given to draw out the cross-cutting aspects of climate change mitigation into a further single document that ensures the different strands of the strategy to address this are coherent.

Question 3 - Neighbourhood Plans and the new Local Plan

Q3 Response:

Your document highlights the contrasts across the district. It is essential that the Local Plan, which sets out the principles and policies for the entire district, is built upon the needs of local communities. The neighbourhood plans, together with consultation of local parishes to identify strengths, opportunities and needs in their areas, should be at the heart of developing detailed proposals and development of masterplans.

Question 4 - Planning for health and wellbeing

Q4 Response:

Absolutely essential.

This is particularly important as we recover from the impacts of the COVID epidemic. The immediate impact for many is on mental health for example due to isolation, however there will be a long tail of economic impact that will also have an effect on mental health and the wellbeing of many.

The local demographics and the nature of the local environment will be key to developing suitable plans. The Sports England principles might mean very different solutions depending on locality and demographics.

It will be important to look at how planning for health and wellbeing fits with other local aspects for example:

- Opportunities for promoting engagement and interaction as part of town centre regeneration,
- Opportunities for building a desirable destination environment that promotes tourism, extends the tourist season, supports diversification of enterprises and thereby supporting the local economy.

- Opportunities for exercise, more open spaces, cycle lanes etc.

Question 5 - Energy efficiency of new buildings

Q5 Response:

Option 2 – Plan for net-zero carbon from a future date.

Purely from a practicality point of view – a lead in period is important to allow industries to adapt. It may be possible to impose certain criteria (that lead toward a net-zero carbon goal) earlier than others and this should be considered, criteria identified, and relevant early requirements set out, such as:

- ensuring new homes have sufficient space planned at the outset for the installation of alternative heating or energy capture systems, or
- all new homes to be built with solar panels and a small battery grid.

See also the answer to Q7.

We believe energy efficiency needs to be considered alongside other environmental aspects of developments as set out in the report of the Building Better, Building Beautiful Commission.

Question 6 - Provision of solar arrays/farms and windfarms

Q6 Response:

Option 1

There is a significant danger with Option 2 that developments of solar farms cut across other goals of local development. We believe this is an opportune time to conduct a review of the implementation of solar farms to date across the District, looking at the pros and cons and whether the benefits are being realised, particularly in terms of environmental protection. There have been numerous developments within the Hawkchurch Parish and the collective impact is significant on the area. While sheep are often grazed on the fields where solar panels are sited, it is not clear that wildlife and other environmental benefits are being achieved or that wildlife networks are being protected. An objective review could look at lessons learned, assess individual vs collective impact, and develop principles and policies for the siting, size and density of such farms in the future across the District. Such policies could also specify the minimum quid pro quo environmental benefit that should be achieved, e.g., a proportional area of tree planting in such a way as to safeguard or strengthen wildlife networks.

Hawkchurch Parish would be a welcome participant in such a review.

Question 7 - Carbon saving measures

Q7 Response:

No, it is too narrowly focused at the moment.

1. In paragraph 4.5 you state:

'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.'

While wind and solar power generating systems have a clear role in future energy supply, there are other key sources of power that must be incorporated into future planning. The National Grid's 'Future Energy Scenarios Report' 2020, sets things out clearly. In this it is clear that they envisage a large commitment to hydrogen as a fuel (for example hydrogen boilers and hobs) and that heat pumps (primarily air source for individual properties) will play a major role in future heating for housing. There are significant impacts of such scenarios on the space needed for housing hydrogen storage or for air source heat pumps, and these should be considered as early requirements for planning criteria for net-zero housing.

We believe there should be a strategy developed that reflects the distinct and different needs across the District – be they industrial high power usage sites, towns, new housing developments or rural properties. This should set out the likely developments, reflecting the local needs and opportunities.

In turn this should then form the basis of planning policies and be the driver for encouraging investment and control of siting of various elements of the new grid energy generation system. For example, there may be an opportunity to develop hydrogen generation plants on industrial sites that are ripe for regeneration or need a change of use.

2. We support 1-7 of para 4.8 with the exception of paragraph 3 – promoting energy storage facilities and batteries etc. While we recognise the need for energy storage, we are very concerned that the current model and policies are driving financial investment in short term storage solutions, specifically Lithium-ion battery storage. While this type of storage may have a place in the scheme of things there are several serious concerns:

- a) Battery storage will only ever provide short term storage and the long-term scenarios set out in the National Grids Future Scenarios show that the critical storage issue will be the ability to hold power derived from green energy in the summer months for use in the winter when it is cold and dark. The short-term battery storage requires a charge/discharge cycle that is measured in hours rather than days and certainly not months. This also means it does not reduce the carbon footprint. We should therefore be encouraging investment in alternative longer-term solutions and although they are not common, they do exist. Getting ahead in this regard would help future proof the solutions and not lead to 'temporary' developments that are financially attractive to investors because of price arbitrage schemes.

- b) Lithium-ion battery storage facilities have no specific safety protocols, however the fire risk from these batteries is well known. Siting of such facilities must take into account the hazard that a fire would cause, including site and air contamination. Siting must also take into account the accessibility and proximity of fire-fighting services. We recommend that serious consideration is given to drawing up a protocol to define where such facilities, perhaps over a certain size, may be sited. As with windfarms, we believe they should be designated in a plan in order to be allowed to proceed. Alternative storage solutions could be encouraged. In addition, lithium itself has a high carbon footprint and is a finite resource so its use on a major scale should not be encouraged.

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

Q8 Response:

Option 2. The figures in the report are based on data from an old census and we are in the middle of a new census. If possible, develop an alternative approach to the balance of affordable vs other homes, that avoids being constrained by what big developers will be prepared to do. It seems logical to have policies that somehow result in more than 20% of new homes being affordable but this may vary significantly by area within the District and the new census data should help with modelling what is needed and where.

Question 9 - Sites for small scale housing developments

Q9 Response:

Option 2

We believe this needs to be informed by information on a local basis. We note the parallel call to identify suitable locations for development. Encouraging smaller builders makes sense unless there is an identified need for a major development. Smaller developments minimise the impact on services, infrastructure and character of the landscape. Smaller developments are also integrated more easily than large new developments and are less likely to change the character of a place.

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

Q10 Response:

Option 4. The other options aren't helpful as there is no guarantee the development would meet local needs given the variations in demographics across the District. We should encourage housing provision based on the demographics and local needs. While we clearly need housing for people at all stages of life Option 1 may result in the wrong balance for a particular place – for example some places may need more housing suitable for the elderly, other places may need more for young families.

Question 11 - Additional housing policy objectives

Q11 Response:

Yes

We believe that the local plan should embrace the principles set out in the report of the Building Better Building Beautiful Commission and commit to engage with local communities to develop 'a sense of place' – leading to development of *places not just houses*. This approach is more likely to lead to integrated, coherent and healthy developments that are fit for the future.

Question 12 - Preference for location for future job provision

Q12 Response:

12a Neither oppose nor support

12b Support

12c Strongly support

12d Strongly support (note caveat to say we do not support industrial development in villages and across the countryside)

12e Support

Note 12d caveat - we do not support *industrial* development in villages and across the countryside

There needs to be support for both the urban economy in the Exeter area and for the more rural economy in the towns and villages across the District. By concentrating purely on the Exeter areas, we would risk losing opportunities to strengthen the traditional core of the economy across the District which over time would draw things into the Exeter area and lead to a need for regeneration everywhere else.

Question 13 - Differing jobs sectors in East Devon

Q13 Response:

13a Support

13b Neither oppose nor support

13c Strongly support

13d Strongly support

What does our demographic need? Do we have lots of highly skilled or potentially highly skilled people for example. Are we losing people from the area and if so why? We need to be realistic and practical and support the needs... but do we have info?

Question 14 - Additional economic policy objectives

Q14 Response:

No.

Development of visions for different localities and promoting the right opportunities to support the relevant vision is key – it is essential to know whether you are driving the development of a high tech, advanced science community with all of the facilities and activities that would attract relevant people, or a desirable destination for tourists, with activities, places to eat, stay and be entertained throughout the year with local artisans, rural retreats etc. They can require very different developments and many of the planning policies are interconnected and need to work coherently toward the same vision.

Question 15 - Town centre uses

Q15 Response:

15a Oppose

15b Strongly support

15c Support

15d Neither oppose nor support

15e Strongly support

15f Strongly support

It would be worth learning from other European towns that have regenerated successfully - there are examples both in the UK and elsewhere. Often this is a result of repurposing surplus shops for other uses that both create a more attractive environment for a wider range of businesses (such as quality office space) and a more attractive space for people to spend time or live in (which in turn will create more footfall for retail, restaurants and cafes). Improving public spaces (greening, opening up and providing areas for relaxation), removing the impact of traffic where needed, and potentially introducing more housing to blend residential areas into the centre which helps with the engagement of the community in development and stewardship of the centre. Many of the areas above shops in older town centres could be converted to one, perhaps two, bedroom apartments or offices or arts and crafts workshops if a blend of purposes is permitted, encouraged and facilitated in accordance with a sensible vision for the area.

Question 16 - Additional town centre policy objectives

Q16 Response:

Yes. We believe it is important to do what is proposed in sections 1 and 3 of para 7.6 (transforming upper storeys, producing masterplans) We think both are important and the production of masterplans is critical to successful transformation.

On resisting out of town centres for retail, this needs closer definition. There are good reasons for encouraging big commercial outlets where they are really needed to be sited away from the town centres (superstores, DIY etc) however and there should be careful control on these types of development to ensure they do not impact on the ability of the town centre to thrive. However, there are some commercial outlets such as farm shops and garden centres that offer retail opportunities which do not cut across the services offered in the towns, attract wider custom and offer local job opportunities. Again, they need to fit within an overall plan for the area.

Question 17 - Designing beautiful spaces and buildings

Q17 Response:

Absolutely essential.

We would strongly support having design codes and that these are based on a vision set out in a masterplan or similar document. There needs to be a sensible definition of a locality for the masterplan or equivalent – perhaps such as those determined by neighbourhood plans. The current basis for defining areas for planning purposes often encompasses an area where there is a town and includes surrounding villages for some purposes (Axminster is a good example). The masterplan for the town and for different villages are likely to be very different. There is a danger that masterplans will be developed for the towns, but villages and rural areas will be overlooked. This would be a mistake given the changes that are needed to meet environmental, climate and economic goals.

It is not clear from the proposal who would develop or 'own' the design codes. Are they included in the masterplan or are they produced once a site is identified for development? This needs to be clear, as does the governance of design code maintenance over time.

Question 18 - Additional design policy objectives

Q18 Response:

No.

While both 1 and 2 (Encouraging innovation and new designs, and promoting wildlife friendly schemes) are important, it is also important at the outset to look at:

- how energy capture, storage and use will be developed and implemented for the area.

- How transport works currently and can be transformed to improve environmental (not just wildlife), green energy use, promote health benefits and support economic activity in keeping with the vision for the locality.
- How communications infrastructure can be utilised or transformed to support the vision.

Question 19 - The importance of conserving and enhancing heritage assets

Q19 Response:

Absolutely essential

The future of relevant heritage assets should be clearly drawn out in the masterplans so that it is clear the role they play in the vision of the future of each place.

Question 20 - Development in protected landscapes

Q20 Response:

Option 4

This must be a balance between local and wider needs and protecting the environment and natural assets in a given area. Options 1-3 oversimplify the matter. If masterplans are developed for distinct localities across the District, then the extent to which any area of the environment is protected can be clearly set out (using GIS mapping as suggested in the Building Beautiful, Building Better Report). These considerations need to take account of both local and networked (wider interdependencies) needs and goals.

We welcome in principle the possibility of extending AONBs and the possible creation of new National Parks.

Question 21 - Net gains in biodiversity

Q21 Response:

Option 4

A combination of approaches seems sensible as it will depend on the scale, density and location of the development and the nature of biodiversity being protected. Piecemeal approaches are not helpful, so masterplans should set out the natural assets of a location and an approach to protecting and promoting biodiversity that is in keeping with the vision of the place.

Question 22 - Additional natural environment policy objectives

Q22 Response:

No.

Environment policy is complex, and it is important to be clear about the different goals that relate to it. Energy and climate change as well as biodiversity and the benefits of the environment to human health, the economy and food production. With many farmers gradually retiring or withdrawing from farming and the impacts of climate change and its mitigation, there are doubtless major changes ahead. The local plan for the District should consider all of these aspects and identify where there are opportunities to offer encouragement to diversify, or areas that are in need of protection from the impacts of climate change, in line with local and district wide visions for the area.

Bogs, freshwater and seagrass meadows have been shown to be valuable approaches to carbon capture, as well as important for biodiversity. Given the nature of much of the East Devon district, it would be sensible to look at the potential for designation of areas to develop along the lines of the Lower Otter restoration project.

Question 23 - Promoting accessibility by walking and cycling

Q23 Response:

Option 3

However, given the diversity in the localities across the district, we believe the appropriate approach should be set out in principle for each area (in Masterplans where relevant).

Disabled access should also be considered.

While walking and cycling facilities have significant health and mental welfare benefits, these benefits are lost if they are in areas of air pollution e.g., alongside main roads with heavy traffic and nothing is done to manage this impact.

Question 24 - Additional sustainable transport policy objectives

Q24 Response:

No

While the transport policy areas set out are very important, we believe that the impact of both tourism and heavy goods transport is an important consideration. They are beneficial to the area but are also a burden. Transport policies should take this into account where necessary, so that the road infrastructure enables efficient flow of through traffic in particular.

Question 25 - Facilities and services that are important

Q25 Response:

Convenience store/Post Office	Essential
Supermarket	Of little importance
Childcare and nursery school provision	Very important
Primary school	Very important
Secondary school	Quite important
Children's play area	Very important
Sports & leisure facilities	Very important
Health care facilities	Essential
Open spaces	Very important
Easy access to a range of jobs	Quite important
Regular bus service (5 plus per day)	Of little importance (but see note)
Train station	Of little importance
Paths for walking and cycling	Very important
Access to full fibre broadband	Very important
Public house	Quite important
Place of worship (e.g. a church)	Quite important
High quality road links	Quite important
Emergency services (police, fire, ambulance)	Essential
Community hall	Very important
Youth facilities	Very important

While we recognise that regular, frequent, bus services are not a tenable option for villages across the district, some form of public transport that enables access to key services and destinations is very important if we are to reduce the use of private transport and cater for elderly or disadvantaged residents.

Question 26 - Additional infrastructure and service provision policy objectives

Q26 Response:

No

While these are important aspects of infrastructure and service provision, we believe it is essential to be clear about how these are developed to form an integrated policy for any particular location.

For example, it is pointless trying to develop a town such as Axminster without the appropriate infrastructure. Without a new bypass and considerable investment in drainage etc. more housing would just impose an intolerable strain on the community. Already the centre of what was once a small market town of character has become blighted by heavy traffic disgorging toxic fumes along the high street. The town would have a promising future as a desirable location if there was a masterplan that drew together relevant aspects of development and ensured this supported transformation towards a clear vision for the town.

Question 27 - Retaining and refining the existing settlement hierarchy

Q27 Response:

Option 3

Question 28 - Broad distribution of housing development

Q28 Response:

Option 4

Although more difficult to achieve, we believe that planning for housing should be based on relevant local information such as need and opportunity. We are in a new Census year which will help provide more up to date information. Development of options could be addressed with individual town and parish councils. Simply using a percentage distribution is unlikely to result in developments that address local needs or drive towards a sensible vision for any particular area.

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

Q29 Response:

Infilling in towns and at larger villages	Support*(see caveat in note)
Building one or more additional new towns	Oppose
Planning for new villages	Oppose
large scale (over 50 home) urban expansions to existing towns	Support
small scale (under 50 home) urban expansions to towns	Support
Building houses on the edges of East Devon villages	Support** (see caveat in note)

Note caveats:

*We support infilling of towns and larger villages where there are:

- a. appropriate brownfield sites or
- b. where there are opportunities for conversion of use that fits with the vision for the future of the locality
- c. and where there is demand.

**We support building houses on the edges of *larger* villages, but such development should be proportional, meet District needs and be supported by necessary infrastructure and not affect the overall character of the place. We oppose ribbon development. In addition, care should be taken to ensure such developments are not likely to increase the ratio of holiday lets or second homes in comparison to residential homes.

Question 30 - Establishment of a Development Corporation

Q30 Response:

Quite important

Question 31 - Planning for development beyond 2040

Q31 Response:

Yes

It will take time for Masterplans to be produced and developments to happen and the vision for future planning needs to be stable for as long as possible. It would make sense to put a review date

in to ensure that plans are proving successful. Perhaps setting out a planning cycle and a way of adjusting rather than completely rewriting would be helpful.

Question 32 - And finally...?

Q32 Response:

It would be helpful to clearly draw out the strengths and things that need to be kept and protected across the District. This can best be achieved using the Masterplan approach as these are likely to be things that are specific to any given area. In parallel it would be sensible to identify the weakness in an area and what needs to be done in order to transform them, so creating opportunities for development.

We believe it is important that the plan take into account as far as possible what will be happening over time. There may be different scenarios that need to be considered. There are likely to be changes in the demographics, there is bound to be an impact both of COVID and Brexit, leading to many changes. Setting out expectations helps to make sure the plan actually responds to these things.

Hawkchurch Parish Council

15th March 2021