

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

Our Ref: HP0146

Date: 12<sup>th</sup> March 2021

Dear Sir/Madam

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

**a) Introduction**

We are writing in connection with the East Devon District Local Plan, 2021 to 2040, Issues and Options Consultation, January 2021 (Regulation 18) referred to as 'the Plan' in this representation.

In preparing the representations, consideration has been given to the contents of the Plan, supporting evidence and other material considerations including the National Planning Policy Framework (NPPF) and Planning Policy Guidance (PPG) published by the Government.

**b) The Representations**

We have the following observations to make.

Our particular interest is in the delivery of new residential development as part of the Plan. However, in terms of all types of development, the Council will be aware of the need to balance delivery with environmental considerations and also the delivery of sustainable patterns of development within the District.

Future levels of housing that the Plan will have to cater for and deliver are identified. The analysis provided in Chapter 5 is based, in part, on evidence provided to support the Plan at this stage of preparation and given how far it has progressed (see footnotes on P.16 where evidence to support the Plan is referenced). Clearly, the Plan will have to identify and deliver a housing requirement using a clearly set out and established process/procedure as set out in NPPF/PPG. We do not wish to repeat national policy/guidance here suffice to say that the content of the Plan will have to reflect the evidence base and will have to pass the tests of soundness (paragraph 35 of the NPPF) in order for it to be adopted.

Once the Council is clear as exactly what the housing requirement should be, it is important that it is delivered in locations and on sites that are both sustainable and deliverable/viable. It

is also important to note that national planning policy, as set out in the NPPF, expects local plans, as far as plan making is concerned, to *“positively seek opportunities to meet the development needs of their area”* (paragraph 11). Further, it states at paragraph 59 that *“to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed ...”*. At paragraph 61 it states that *“the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies ...”*

To ensure the objectives highlighted above are met, it is important that a range of sites and land is identified in the Plan. Much of the focus will be on larger sites that will be allocated for development. However, the NPPF states at paragraph 68 that *“Small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly”*. The Council will also be aware of the contribution that windfall development can make to meeting the housing requirement (paragraph 70 of the NPPF refers).

Noting the above, we consider it right for the Council to provide some focus on sites for small scale housing developments as set out at paragraphs 5.5 to 5.7. Obviously, the minimum requirement needs to be achieved (NPPF, paragraph 68, sub para. a) refers) but noting the rural characteristics of the District then the Council should give serious consideration as to whether this figure should be increased. The evidence base should examine this matter in some detail.

Chapter 13 examines the development strategy as far as the distribution of development is concerned. Clearly many of the issues identified in previous Chapters e.g. those relating to housing need, the economy, sustainable transport and environment need to be considered as part of the consideration of this particular issue. Ultimately, development needs to be delivered where it addresses issues of need and where it can be provided in a sustainable way considering other environmental considerations.

The introduction to the Chapter quite rightly identifies and summarises the current strategy incorporated into the current adopted Local Plan. Much of the development required under the current Local Plan is focussed towards Exeter which is understandable given that it borders the District. In terms of creating sustainable patterns of development and linking future development to growth points where there is access to services and facilities then a continuation of this approach would seem appropriate.

However, communities situated away from Exeter, particularly in rural areas, should be catered for noting the characteristics of the District. Clearly as the Council assembles its evidence base it will be able to establish the proportion of development to be attributed to various locations but at this stage it would seem appropriate that there continues to a focus for development being targeted towards the western end of the District.

We should add that in directing development to this location it need not be the case that the Council looks to provide more development ‘hard up’ to the administrative area of Exeter. Further, we would not necessarily advocate an extension of Cranbrook or a new settlement particularly as there are significant complexities in identifying and arranging for delivery of such a significant development (Note: there were delivery issues with Cranbrook particularly in its early years of development).

A simpler approach would be to identify those settlements in this part of the District that have good access to services and facilities and, more importantly, means of access to sustainable transport services (and there a good number of them e.g. Exmouth/Lympstone are situated on the Exmouth/Exeter branch line as are Whimble/Feniton which are situated on the mainline to London Waterloo from Exeter. Beyond any allocations a significant amount of small-scale

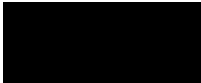
development can be accommodated in these locations without there being detriment to their character.

Careful consideration should be given to the capacity of those settlements that have high sustainability credentials to accommodate more development. With that in mind and in respect of Q. 27, 28 and 29 we would advocate a continuation of the existing strategy with a greater emphasis placed on those towns and villages at the western end of the District that have the ability to accommodate additional development both in terms of allocating new sites and infilling where appropriate. It is important to realise that if a policy were introduced that supported such an approach the development process could still maintain adequate control as to which sites come forward. Neighbourhood plans would also have a role in delivery. Such an approach wouldn't necessarily lead to every space being developed. Furthermore, villages do need sustaining with communities evolving and that can be assisted by small scale development.

In respect of the villages we would advocate i) undertaking capacity exercises of the larger villages to accommodate development and ii) reviewing built up area boundaries (as set out in the Villages Plan adopted in 2018) so that opportunities can be taken for providing infill development that can be undertaken in an appropriate manner. In that context and in relation to the questions posed at Q.29 we strongly support infilling at towns and larger villages and building houses on the edge of East Devon's villages.

Please confirm receipt of the representations. We also wish to be kept informed of the future progress of the Plan.

Yours faithfully

A black rectangular redaction box covering the signature of Edward P Heynes.

**Edward P Heynes MA MRTPI PGCM**  
**Director**