

East Devon Local Plan 2021 – 2040

Issues and Options Consultation - January – March 2021 (Regulation 18)

Response to the Issues and Options Consultation for the attention of the Planning Policy Team.

LiveWest is a registered provider of social housing, and the largest landlord in the south west, managing over 38,000 homes across the region. We are building circa 6,000 new homes across our region over the next 5 years, and investing £2billion and sustaining 6,500 jobs in the building and supply chain over the next 10 years.

Our vision is to deliver a home for everyone, and we will achieve that through providing quality homes, across a range of tenures, which are as affordable as possible to as many people as possible. We strive to create places where people want to live, which protect and nurture the environment, are efficient and sustainable, with excellent local infrastructure and which promote a healthy economy that provides opportunities for all.

As a significant developer, landlord and investor in local people, LiveWest are well placed to contribute to Local Plan objectives and act as long-term partners in the community. We welcome the opportunity to make comments on this document.

Our Head Office is based at Skypark in East Devon. We manage over 2000 homes across the District and are keen to work with East Devon District Council (EDDC) wherever we can to ensure that we can deliver a home for everyone in sustainable, thriving communities.

Question 1 – Local Plan 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?

LiveWest support the Council's objectives which are:

- 1) Designing for health and wellbeing.
- 2) Tackling the climate emergency.
- 3) Meeting future housing needs.
- 4) Supporting jobs and the economy.
- 5) Promoting vibrant town centres.
- 6) Designing beautiful and healthy spaces and buildings.
- 7) Our outstanding built heritage.
- 8) Our outstanding natural environment.
- 9) Promoting sustainable transport.
- 10) Connections and infrastructure.

We are pleased to see that the Council are considering developing ambitious policies in relation to tackling the climate emergency, designing for health and wellbeing, supporting jobs and the local economy, promoting sustainable transport, improving connections and infrastructure as well as

nurturing our environment. This approach should help to ensure the District is sustainable into the future.

We are particularly pleased to see the Council’s objective of ‘Meeting future housing needs’ by providing “high quality new homes to meet people’s needs”. LiveWest is very much aligned with this objective.

Considering the ongoing housing crisis and generally high cost of housing in East Devon and the options proposed for consideration in this consultation the Council should consider strengthening this objective. The NPPF states that Local Authorities have a responsibility to “significantly boost” the supply of both market and affordable housing. As set out in our response to Question 8, in order to make significant advances in meeting the need for affordable homes across the District the Council will need to be ambitious in its housing requirement.

We also encourage the Council further strengthen this Objective by explicitly recognising the need for delivery of significant affordable housing as a vital and integral part of meeting housing needs.

Question 2 – The scope of the Local Plan.

Do you think we should?

Please tick one

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 below:

Our preference is for a Single Plan which will cover the full policy spectrum from the outset and provide greater certainty, clear and cohesive vision whilst reducing the scope for policy vacuums and / or confusion whilst individual plans for policy areas are developed.

In 2020 the Government issued the ‘Planning for the Future’ White Paper, which proposed considerable changes to the planning making system. The responses are being reviewed and, if the Paper’s proposals are implemented, EDDC recognise their approach to the Local Plan may require revision. However, we do fully support EDDC in progressing the Plan in the interim to ensure that there is a robust Local Plan in place and that key priorities, including delivery of new homes continues appropriately and sustainably and without delay.

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?

Neighbourhood Plans should broadly comply with the Local Plan which sets the strategic context. The NPPF sets out that Neighbourhood Plans should not promote less development than set out in the strategic policies for the area and should also not undermine those strategic policies.

As of late 2020 there appeared to be around 20 ‘Made’ Neighbourhood Plans in East Devon with around another 20 in the process of preparing Plans. These Plans may provide some insight into the priorities of the local communities and they could be used in part to help inform elements of the Local Plan. However, it is important to recognise that the level of detail of Neighbourhood Plans vary and that these Plans are at various stages, some of which now require review and so cannot necessarily be relied upon to provide an up-to-date snapshot of an entire community's views. It is very important that the entire community, stakeholders and interested parties have the opportunity to feed into the Local Plan and Neighbourhood Plan Groups could be included in this consultation.

Question 4 – Planning for health and wellbeing.

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

Please tick one.

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.

The Local Plan provides the framework for the future development of the District. It is essential that health and wellbeing are promoted, underpin and are integral to future proposals for East Devon.

As well as being a developer and provider of homes we also receive homes from others (e.g. through other developers Section 106 affordable homes provision). The design and quality of a home and neighbourhood is a key contributor to the health and wellbeing of the people who live there.

As a landlord of around 2000 homes across East Devon, LiveWest are keen to see health and wellbeing promoted throughout the Local Plan and are also well placed to work with the Council to input into and help shape proposals.

Question 5 – Energy efficiency of new buildings.

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 an apply any Government policy.	
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Please provide any further comments below.

LiveWest supports EDDC’s declaration of a climate emergency and to take bold and decisive action to help tackle climate change. The Council has pledged to become carbon neutral by 2040. As a Landlord of over 38,000 homes in the southwest, over 2000 of which are in East Devon and with a development pipeline of over 6000 homes in the next 5 years, a proportion of which will be in East Devon, we are aware our own impact is not only through our existing homes which we aim to be safe, secure and efficient, but also through the development of new homes.

LiveWest are committed to reducing the environmental impact of our activities and creating a clean and sustainable future for our customers, colleagues and communities. We recently launched our vision, ‘Creating Greener Futures Together’, which will support us in increasing awareness of our environmental plans and impact, and positively influence the business and our customers to be more environmentally aware. We have identified 3 main areas of focus; Shaping Futures; Sustainable Homes and Working Smarter.

LiveWest believes everyone is entitled to a decent home that is safe, secure and affordable. LiveWest has committed to delivering new homes to EPC Band high B/A using an enhanced fabric first approach to ensure our homes outperform current building regulations. We are improving our existing homes to EPC band C in advance of the government target of 2030. We also recognise the importance of existing and new green spaces to promote healthy communities and biodiversity.

LiveWest would support the application of the Energy Hierarchy within the design of buildings in order to minimise energy demand for heating, lighting and cooling through good fabric, orientation and landscape principles. We believe the focus should centre on building fabric improvements and would encourage EDDC to set a minimum carbon reduction standard for building fabric.

As well as being a developer and provider of homes we also receive homes from other developers (for example via other developers Section 106 affordable homes obligations) and we are therefore keen to ensure, for the benefits of our future customers and the environment, that these homes are as efficient and sustainable as possible.

Where renewable systems are required then we would recommend that photovoltaic (PV) systems should be named as the preference and that battery storage should be promoted in order to allow residents to realise full benefit from the electricity generated from the PV system.

LiveWest supports EDDC’s ambition with the policy Options 1 (plan for net-zero carbon from plan adoption) however, where these standards exceed requirements set out under Building Regulations, this will put additional cost burden, present potential viability challenges and possibly delay delivery of homes, all of which may ultimately reduce the level of much needed affordable housing. To avoid this, we would encourage EDDC to look to adopt incremental improvements in the performance standards with the aim to target Future Homes Standards once the industry has had the opportunity to understand how to achieve these higher performance requirements in a cost-effective manner utilising their existing supply chain.

The Future Homes Standard has been developed in order to make new homes Net Zero Carbon compliant, with any additional carbon reduction being managed through the greening of the electricity supply within the national grid, or through decentralised electricity generation. Therefore, where new buildings achieve compliance with the Future Homes Standard, they should be deemed to have met the requirements for net zero carbon and we would encourage EDDC to recognise grid decarbonisation.

The Council do mention decentralised heat networks and we would encourage the Council to potentially consider the parameters within which they may be appropriate. Our experience in delivering housing schemes in this manner is that a critical mass, often in excess of 2000 homes, is required in order to ensure that capital costs of this heat network are viable. In most instances where these district heating systems have been delivered there is often a considerable level of public subsidy.

In addition, public subsidy is often required where ground source heat pump arrays are installed to provide a decentralised heat network, in order to ensure that capital costs are viable.

Decentralised heat networks are also currently an unregulated sector. As a social housing provider, we are focused on supporting our customers and protecting them from fuel poverty associated with rising energy bills and the potential for disconnection in the event of payment default. LiveWest encourage EDDC to develop policies in order to offer greater protection to customers who live in properties where district heating systems are present both in terms of ensuring ongoing affordability and consistent provision and quality of service.

We note that there is no significant mention of Modern Methods of Construction (MMC) within this potential policy. LiveWest has a good history of using MMC systems, whether these are rainscreen cladding systems, panelised or volumetric construction systems. LiveWest is also a board member of Building Better which is a strategic alliance of housing associations supported by the NHF. Our aim is to encourage collaboration across the social housing sector in order to realise the true benefits of MMC in terms of quality, sustainability and better value.

We encourage EDDC to promote the use of off-site construction systems, particularly volumetric and panelised systems with a high pre-manufactured value, as a viable way to deliver new highly sustainable houses. As these dwellings are constructed in a factory environment, they have higher environmental credentials with less waste and better construction quality. MMC should be viewed as having an increasingly important future role to play in the housing sector in terms of increased delivery, waste reduction and improved environmental performance.

Question 6 – Provision of solar arrays / farms and windfarms.

Which option do you think we should take?

Please tick one

Option 1 - Identify suitable areas for renewable energy developments.	Taking into account constraints we could include a policy which seeks to identify or allocate suitable areas for solar or wind farms.	✓
Option 2 - Not identify areas but offer general support.	We could provide a more general policy of support specifically for solar projects across the district without identifying any areas or specific sites.	

Option 3 - Take a more restrictive approach to renewables.	We could make it much harder for renewable energy development to occur, however this may make it difficult, or perhaps impossible, to achieve carbon neutrality.	
Option 4 – None of the above.	Please tick the box if you think none of the above are appropriate	

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

Renewable energy developments have a significant role to play in our progress to net zero carbon emissions.

It will be important for EDDC to carefully consider the geographical location of renewable and low carbon energy generating and distribution networks so that they do not impede on either the expansion of existing settlements or creation of new residential settlements. This should consider future housing both beyond existing consented schemes, schemes within the planning system and should be mindful of future allocations and potential housing demand beyond this Plan period.

A holistic view needs to be taken on the future provision of residential and commercial developments and the generation and supply of renewable and low carbon energy in order to ensure a sustainable built environment.

Identifying areas which may be suitable for renewable energy developments would be a proactive approach by EDDC and potentially encourage greater provision. As a significant part of EDDC area is within the AONB it will also be important to potentially review elements of this and what may or may not be acceptable in these areas.

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?

LiveWest support the intention of the Council’s additional objectives and in particular support the objectives below:

- Objective 5 - Locating new development in locations that are close to local facilities so people can walk and cycle more and do not need to be reliant on the car.
- Objective 6 - Encouraging tree planting.
- Objective 7 - Mitigating and adapting to the impacts of climate change such as flooding by incorporating new environmentally sensitive drainage systems in developments. Such measures will also have wildlife benefits.

LiveWest encourage the Council to consider further the following objectives:

- Objective 1 - Promoting District Heating Networks.

We encourage EDDC to consider both the viability of delivering a decentralised heat network and measures to ensure a positive experience for future residents.

In terms of viability, our experience is that a critical mass, often in excess of 2000 homes, is required in order to ensure that capital costs of this heat network are viable. In most instances where these district heating systems have been delivered there is often a considerable level of public subsidy. In addition, public subsidy is often required where ground source heat pump arrays are installed to provide a decentralised heat network, in order to ensure that capital costs are viable.

Decentralised heat networks are also currently an unregulated sector. As a social housing provider, we are focused on supporting our customers and protecting them from fuel poverty associated with rising energy bills and the potential for disconnection in the event of payment default. LiveWest would encourage EDDC to develop policies in order to offer greater protection to customers who purchase or rent properties where district heating systems are present both in terms of ensuring ongoing affordability and quality and consistency of service.

- Objective 3 - Promoting energy storage facilities and batteries.

Where renewable systems are required then we would recommend that photovoltaic (PV) systems should be named as the preference and that battery storage should be promoted in order to allow residents to realise full benefit from the electricity generated from the PV system. This would support EDDC's additional objective 3 to promote energy storage facilities and batteries in order to store greater amounts of electricity generated.

- Further carbon saving objectives for consideration:

In terms of potentially missing objectives, as outlined in Q5, we encourage the Council to consider promoting Modern Methods of Construction (MMC) as a policy objective. LiveWest has a good history of using modern methods of construction systems, whether these are rainscreen cladding systems, panelised or volumetric construction systems.

LiveWest is a board member of Building Better which is a strategic alliance of housing associations supported by the NHF. Our aim is to encourage collaboration across the social housing sector in order to realise the true benefits of MMC in terms of quality, sustainability and better value.

We would encourage EDDC to promote the use of off-site construction systems, particularly volumetric and panelised systems with a high pre-manufactured value, as a viable way to deliver new highly sustainable houses. As these dwellings are constructed in a factory environment, they have higher environmental credentials with less waste and better construction quality.

MMC should be viewed as having an increasingly important future role to play in the housing sector in terms of increased delivery, waste reduction and improved environmental performance.

All the above are sensible approaches to help save carbon and at the same time provide environments that are sustainable, promote health and wellbeing and create great places to

live, work and thrive in.

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

Which option do you think we should take?

Please tick one

<p>Option 1 Plan for an average of at least 928 new homes being built each year.</p>	<p>This would accommodate levels of housing building that accord with current Government requirements. It may mean, however, that we fall a long way short of meeting all affordable housing needs.</p>	
<p>Option 2 Plan for a greater number of homes, for example 1200.</p>	<p>This may meet more the affordable housing need but not all of it.</p>	
<p>Option 3 Plan to build considerably more homes each year.</p>	<p>A figure of 1,614 homes would align with Governments previous thinking and would potentially result in all affordable housing needs being met.</p>	✓
<p>Option 4</p>	<p>Please tick the box if you think none of the above are appropriate</p>	

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.

LiveWest believe in a home for everyone.

East Devon has high levels of housing need and a significant and increasing affordability gap with average house prices around ten times average income levels. The Local Plan should seek to ensure access to quality homes across the District, across a range of tenures and recognise affordable homes as intrinsic to addressing housing need.

As EDDC’s consultants ORS identify, there is a potential affordable housing requirement of around 461 affordable homes a year. The Issues and Options report also states that frequently sites may see 20% or less of total homes built being affordable. If on average affordable provision is circa 20-25% of new homes then this would suggest that between 1844 and 2305 new homes should be provided annually, assuming the Council are seeking to fully meet the affordable housing requirement.

This may be challenging, and the Council has a range of objectives to consider however this does go some way to demonstrating that the number of new homes delivered should be significantly higher than the 928 homes set as the current minimum housing requirement and needs to be closer to Option 3. Planning for and delivering this higher number of homes should also help address issues of affordability of housing in East Devon.

The Council will also be aware of the link between sustainable development, the environment and the economy. The Council will be seeking to support the long-term sustainability of the District by achieving a sustainable balance between employment and housing growth with new homes helping to support both the economy and homes for East Devon’s workforce ensuring that a lack of local labour should not become a constraint on realising the economic growth potential of East Devon. There are also economic benefits from housing development. Research commissioned by the HBF

on ‘The Economic Footprint of Housing Building’ (July 2018), estimated that, for every additional house built in East Devon, the benefits for the local community included the creation of 3 jobs (direct & indirect), contributions of £27,754 towards affordable homes, £806 toward education, £297 towards open space and leisure, £1,129 additional Council tax and £26,339 spent in local shops.

EDDC will need to undertake further work to determine the exact requirement, including assessing the likely proportion of homes that would be affordable homes, and how far this goes to meeting housing need, in order to support any final proposals.

It is also important that any ultimate figure is set at a ‘minimum’ requirement and not viewed as the maximum number of homes to be planned for. A housing requirement beyond the minimum will help to deliver more much needed affordable homes and support economic growth and prosperity.

Question 9 – Sites for small scale housing development.

Which option do you think we should take?

Please tick one

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 below.

LiveWest recognise that Government policy anticipates that land to accommodate at least 10% of the housing requirements should be on sites that are no larger than one hectare in size, and that this may help support small and medium sized developers.

It is not clear that any kind of target beyond this figure is necessary and that it would be more appropriate to focus on ensuring the policies around identifying sustainable locations for development and the policies new developments will need to meet are more likely to lead to provision of good quality sustainable developments that meet housing need. The Council should encourage a range of development types, sizes and locations.

It should also be considered that targeting a greater proportion of homes on smaller sites is likely to reduce the number of affordable homes provided as the threshold for providing affordable homes would not be met on the very small sites.

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

Which option do you think we 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's 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 determine 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 further comments below on how we may best plan for housing for all.

All households should have access to different housing options that meet their housing needs. It is very important that the Council plan for housing for people at all stages of life and circumstances including planning for the provision of affordable housing. This will also help support balanced communities across the District as well as support the wider objectives of designing for health and wellbeing and importantly the objective of ‘meeting future housing needs’.

It is unlikely that a mandatory requirement as envisaged in Option 1 would be successful and could potentially stifle or delay development and have a detrimental impact on provision of homes. The Council should plan for acceptable mixes of dwelling types to meet housing needs and focus on ensuring appropriate sites are allocated to meet the needs of specifically identified groups of households. Consideration could be given to allocating sites specifically for older persons and other specialist housing.

Further work may be necessary to fully understand needs across different stages of life and circumstances and how and where these needs may be met. A viability assessment will also need to support any proposed policy requirements.

Question 11 – Additional housing policy objectives.

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

- Additional Housing Objective 1 – encouraging more self and custom build housing.

It is appropriate that the Council should support and promote Self Build and Custom Build housing as set out in the NPPG.

As the Draft Local Plan is progressed, it is important that the distinction between Self Build and Custom Build is made clear as they are quite different, and each should be considered.

- Additional Housing Objective 2 – requiring a proportion of homes on all larger development site to be custom or self-build.

We do not believe that progressing a policy which would require a proportion of homes on larger newbuild sites to be custom build or self-build plots would be beneficial or effective and adds a further layer of complex logistics to delivering such sites and is likely to slow overall delivery.

As developers and housing providers, whilst the drivers for the policy are understood, we have experienced the difficulties that such requirements can cause including impact on both the quantum and delivery of affordable homes, viability issues, delay and ‘incomplete’ developments.

It is also not entirely clear whether there is demand for self-build plots as part of larger developments and there are sometimes difficulties for many people in securing appropriate finance for custom build and, in particular self-build. Further work should be considered to better understand this.

On a practical level, self-build and custom build plots can often not be delivered during a development due to safety requirements and may result in ‘unfinished’ developments and / or potential issues of prolonged ad-hoc construction adjacent occupied homes. It should not be assumed that such homes are appropriate for large sites and the Council may find that self-builders often prefer individual building plots or as part of smaller developments rather than as part of a larger development.

It may be more appropriate to encourage self-build and / or custom build towards more smaller scale sites or supporting individual self-build plots (e.g. 1-3 homes). With one of the main drivers for self-build and / or custom build is to help meet local housing need the Council may also wish to consider undertaking further work to understand the need, viability, financing and potentially local connection.

- Additional Housing Objective 6 - setting minimum floor space or room size standards for new homes that must be met in new developments.

We encourage the District Council not to set their own separate space or room size standards but to effectively utilise the existing ‘Technical Housing Standards – nationally described space standard (NDSS)’, published by DCLG (now MHCLG). Housing associations and housebuilders are familiar and utilise these already. This would provide a more consistent approach, reduce the potential for conflicts with national standards yet ensure appropriate standards and have less impact on viability. Creating additional sets of standards beyond the NDSS could result in viability pressures, potential delay and ultimately potentially less homes delivered.

- Additional housing Objective 8 - setting standards for the density of development.

The Council is considering whether to set density standards for development to both support extra housing development and improve design standards.

Density is not automatically a measure of good design and a blanket approach would be inappropriate. It is not clear whether the Council are seeking to ensure a relatively high level of density or low density. In our experience it is important to try and ensure the best use of available land, however the appropriate density of a site will vary depending on its location, setting and any constraints. Good quality design and place-shaping, creating great homes and great spaces is about much more than density. The Council will also be aware of the work of the Building Better Building Beautiful Commission and of the current National Model Design Code consultation, which should be considered in any draft Local Plan policies.

- Additional housing Objective 9 - ensuring adequate space to accommodate home working and suitable broadband connectivity

We support ensuring that new homes have adequate space to accommodate home working and suitable broadband connectivity, including ensuring new homes, across tenures, have adequate space to accommodate home working and suitable broadband connectivity.

We encourage the Council to be mindful that the Government have confirmed future legislation to ensure that new build homes are built with gigabit-capable broadband. The Building Regulations Part R (Physical Infrastructure for High-Speed Electronic Communications Networks) is to place obligations on housing developers to work with network operators to install gigabit broadband, where this can be achieved within a cost cap.

- Additional Housing Objectives - Affordable Homes

Finally, we suggest the Council includes a specific objective which would be to ensure provision of affordable homes across East Devon and to make clear that the provision of affordable homes is intrinsic to all housing related objectives in the plan. As currently drafted, there are very few references to affordable homes, but primarily the provision of homes generally.

If the Council are to help meet housing need as set out in overall Local Plan objective 3, then a Local Plan that explicitly supports and plans for ensuring affordable homes provision is essential.

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?

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.

We believe it is essential for the Council to plan to create beautiful spaces and buildings. As the Council recognise the Building Better Building Beautiful Commission set out the importance of considering beauty at three scales during the planning process:

- Beautifully placed (sustainable settlement patterns, sitting in the landscape)
- Beautiful places (streets, squares and parks, the 'spirit of place')
- Beautiful buildings (windows, materials, proportion, space).

What is 'beautiful' can be very subjective, however the Commission helpfully defines a beautiful place as 'a place in which people wish to walk, rather than a place that the car helps them to avoid.....buildings that reflect the history, character and identity of their community and that belong in their surroundings; somewhere, not anywhere..... a walkable settlement, in which the streets are an improvement on what preceded them, even when what preceded them was open countryside'.

The Local Plan is the most appropriate place in which to set the parameters for achieving the first element (beautifully placed) in terms of sustainable settlement patterns and setting in the landscape.

LiveWest supports the production and use of design guides and codes to help inform the design of new communities. We also support that the National Design Guide and National Design Code (currently the subject of National consultation) and the Revised Manual for Streets should inform and set the framework for any local design guides and codes and that any local guides should provide specific local guidance developed to reflect local characteristics and settings, rather than repeat national policy or guidance.

We do not believe that it is necessary to set detailed design guides for every new allocated site (except for very large strategic developments, new villages or towns where it is likely to be appropriate).

It would be more appropriate to use a combination of the principles of the National Design Guide along with local guidance and allow for creative approaches and evolution of good design. Any design guides or guidance should be subject to inputs from interest parties and stakeholders as well as the local community and, if appropriate may need to be viability tested.

LiveWest is clear that it is important that any design guidance also consider that 'beautiful' design can be subjective, so they do not stifle, but instead encourage the evolution of new quality design. It is also particularly important that innovation or creativity are not stifled (for example not only design but also the use of MMC etc) and that any design codes also ensure buildability and are compatible with modern methods of building, safety and ongoing management and maintenance. It is essential to have considered these factors if good design is to be sustainable and also stand the test of time.

Question 18 – Additional design policy objectives.

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?

We welcome the identified additional design objectives to:

1. Encouraging innovation and interesting new designs
2. Promoting and incorporating wildlife friendly schemes and elements into developments.

We are pleased to see that the Council would like to encourage innovation and interesting new designs and refer the Council to our response to Question 17.

LiveWest are keen to work with the Council to bring forward innovative projects with exemplar design creating quality homes in great spaces.

As referenced in our response to Question 17, the Council may wish to consider how it encourages the use of MMC on appropriate sites which may have both sustainability and delivery benefits.

Question 20 – Development in protected landscapes.

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 housing, community or economic needs, though 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 below.

East Devon’s landscape provides the community with outstanding beautiful places in which to live, work and thrive, provides biodiverse habitats, is important environmentally and positively impacts health and wellbeing.

There is also a pressing need for more homes to be provided across the District to meet housing need and that some of this need is in areas, particularly around our coastal towns, which are tightly constrained by protected environments. Such needs must be balanced, and the Council should consider reviewing some of our protected landscapes to allow for relatively small scale and careful release of some areas to enable homes to be provided to meet local housing need, whilst being sensitive to the environment and setting.

Question 21 – Net gains in biodiversity.

In order to gain biodiversity improvements which option would you prefer.

Option 1 - On-site provision.	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.	
Option 2 - Secure the habitats locally.	This would require a legal agreement with a landowner near to the development to deliver and maintain it.	
Option 3 - Pay a cash tariff towards a strategic delivery scheme.	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.	
Option 4 - A combination of the above.		✓
Option 5 - None of the above or an alternative.		

Please provide any further comments below.

Option 4 or 5 would be most appropriate. Option 4 aligns most closely with what is proposed through the Environment Bill and will enable the delivery of new homes and appropriate biodiversity net gains. Most provision is likely to be on site however restricting it to on site provision could stop some developments from progressing and potential stifle deliver of new homes.

Question 23

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? Please tick one

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	This option would not require access by foot or cycle to facilities and services but	

but require them to be available within the settlement.	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 below.

To meet housing needs across the District it is likely that Option 3, provision of homes across a range of development types is likely to be the most appropriate, and the most sustainable, supporting existing facilities and services and the delivery of new accessible services and facilities where appropriate.

This combined approach should also help ensure that development is distributed across the District in areas of housing need and not focused primarily in one area.

Question 24 – Additional sustainable transport policy objectives.

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

We are pleased to see the ambitious additional sustainable policy objectives, particularly around promoting public transport quality and use and providing and promoting high quality walking and cycling networks and supporting cycle parking.

We also agree that development should be focused in sustainable locations where most journeys can be made by walking, cycling and public transport, however it is important to recognise the rural nature of much of the District and the need for improved transport / movement infrastructure to support sustainable living across the District.

It is important, as set out that the Council work to protect much needed public transport services and facilities and we are also pleased to see the recognition that electric charging for vehicles is to be considered.

Objective 6 proposes to set walking distances from new homes to a range of identified services (including bus stops) with 800m being proposed. Whilst we support this in principle it is important that there is flexibility around this, and that the nature of the walking routes is considered.

Objective 7 seeks to set targets for new development relating to the proportion of people who will walk, cycle and use public transport. Any targets are likely to need to be broad targets rather than absolute targets and will require the Council to plan for and promote safe cycle and pedestrian routes to encourage their use. Increasing cycling and walking has many benefits.

The Council should also be mindful that, whilst it is important and recognised that even with a move to increase walking and cycling, for health and environmental reasons, most households are very likely to still need to and want to have access to and use a car. Cycling and walking are not always practical or possible for every journey and circumstance.

The types of vehicles people use are evolving, in particular to greater use of electric vehicles. These have less impact on our environment, and it is important that the Council still plans for vehicle use across the District including appropriate car parking provision. Car club promotion and provision may also be something the Council wishes to consider as part of these objectives.

Objective 11 – considering the need for electric charging for vehicles and, Objective 13 – requiring electric charging for bicycles.

LiveWest agree that electric vehicles are part of achieving a low carbon future and that we need to plan for electric vehicles. With the Government intending to introduce a new requirement for Electric Vehicle Charging Points (EVCP) under Part S of the Building Regulations, a standardised approach should be in place across the country and negate the need for the Council to develop its own policy.

If the Council do retain their own policy approach the Council should consider not requiring the installation of ‘active’ EVCP’s but for a passive cable and duct to be installed. With automotive technology moving quickly this would allow for householders to install a physical EVCP suitable for their vehicle and the appropriate technology at the time and reduce the likelihood of technology being installed that may quickly become obsolete.

The Council should also consider that the power grid is significantly constrained in many areas and with the move from gas to electric heating and towards electric vehicles, the capacity of the existing network in the UK is under pressure. Major reinforcement will be needed over the coming years and we encourage the Council to support this.

Question 25 – Facilities and services that are important.

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

	Essential	Very important	Quite important	Of little importance
Convenience store / Post office	✓	✓	✓	
Supermarket	✓	✓	✓	
Childcare and nursery school provision	✓	✓	✓	
Primary school	✓	✓	✓	
Secondary school	✓	✓	✓	
Children’s play area	✓	✓	✓	
Sport & leisure facilities	✓	✓	✓	
Open spaces	✓	✓	✓	

Easy access to a range of jobs	✓	✓	✓	
Regular bus service (5 plus per day)	✓	✓	✓	
Train station	✓	✓	✓	
Paths for walking and cycling	✓	✓	✓	
Access to full fibre broadband	✓	✓	✓	
Public house	✓	✓	✓	
Place of worship (e.g. a church)	✓	✓	✓	
High quality road links	✓	✓	✓	
Emergency services (police, fire, ambulance)	✓	✓	✓	
Community hall	✓	✓	✓	
Youth facilities	✓	✓	✓	

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

We have selected all options from Quite Important through to Essential for the above response. This is because we believe that most of the above facilities will be of some importance to most people, however how important they are will be subjective, depend on where people live and personal preferences. In our experience it is important that new homes are provided in sustainable locations with a range of local facilities and affordable and sustainable access to wider ranges of facilities if these are not in the immediate vicinity.

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?

We agree with the Council’s Objective 10 – Infrastructure and Service Provision that infrastructure should be secured at the appropriate time to support new development.

Question 27 - Retaining and refining the existing settlement hierarchy.

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

<small>Please tick one</small>		
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 the 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.

LiveWest support Option 3 – a hierarchy that retains the towns and Cranbrook but has a higher number of villages that may accommodate development but only if they are sustainable with appropriate facilities.

This would focus housing delivery in existing sustainable settlements but also potentially include a wider range of sustainable locations to better meet housing need across the District and to enhance and / or maintain the vitality of communities, including rural communities.

Question 28 – Broad distribution of housing development.

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

Please tick one

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 housing 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.

LiveWests’ preference is for a development pattern that provides a more even distribution pattern across the District and not the extremes of Option 2 or Option 3 but likely to be closer to Option 1 but with a greater level of distribution across the District including in some of East Devon’s towns and villages where there is pressing need for homes but little or no development currently planned.

Question 29 – Future options for the type and location of development.

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.	✓					
Building one or more additional new towns.			✓			

Planning for new villages.		✓				
Large scale (over 50 homes) urban expansions to existing towns.	✓					
Small scale (under 50 homes) urban expansions to towns.	✓					
Building houses on the edges of East Devon villages.	✓					

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

Providing homes across the range of the above options will help meet a range of housing needs across the District including the provision of affordable homes. Providing homes where there are already existing facilities and community will help ensure this is done in a sustainable way whilst also helping to maintain and enhance existing facilities, services and economies.

LiveWest therefore supports a combination of infilling in towns and larger villages-, large- and small-scale expansion to existing towns and edges of villages and around the new town of Cranbrook and West End area. The Council will need to plan to ensure supply for both short and long term and likely to require a combination of brownfield and greenfield sites. By providing a wide mix of sites housing delivery should be optimised, the widest range of housebuilders and developers supported including small and medium sized developers and importantly a broad mix of sites and choice for customers and options for a broad range of housing needs including the provision of affordable homes.

In terms of a new towns or villages, the Council is already enabling the ongoing delivery of the new town of Cranbrook, where LiveWest own and/or manage almost 600 homes, with more in development. Cranbrook is set to potentially more than double in size in the coming years, if the expansion sites progress, and the Council has a lead role to play in ensuring the infrastructure needs of the new community are planned for and met and that Cranbrook’s expansion is careful, well planned and delivered.

As the Council will know from experience, delivery of a new town will take considerable time, resource and planning. It also needs to be appropriately located and does tend to address housing need in a particular area rather than across the District. Early provision of infrastructure, and appropriate infrastructure funding are also essential to bring forward a new town or village with early planning essential.

Question 31 – Planning for development beyond 2040.

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

Please tick one

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.

If the Council deem a further new town appropriate, then the Council will need to plan for development beyond 2040. Draft revisions to the NPPF proposes that “where larger scale development such as new settlements form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery”.

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?

The Issues and Options consultation document does not specifically cover the delivery of affordable housing and includes very few references to affordable homes. We believe this is crucial to ensure the District’s housing needs are planned for and met.

There is also no discussion around available tenures and need for different tenures which will need to be considered, particularly in light of the revised NPPF new tenure definitions which will change the type of households requiring affordable homes.

The Issues and Options document also does not particularly mention housing associations as key providers and receivers of affordable homes in East Devon. The Local Plan should recognise this and encourage developers to engage with housing associations early in the development process and including in the plan making process which will enable an active role in the planning and design of development to ensure that developments address local housing need both now and in the future.

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