

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 January 2021(Regulation 18)

Overview and General Statement, Persimmon Homes

Persimmon Homes (PH) welcomes publication of the Issues and Options Consultation documents as the first stage of the new East Devon Local Plan 2021-2040.

Persimmon have significant land interests in East Devon. The Company are building new homes at Cranbrook and Mosshayne, with further phases shortly to be the subject of planning submissions. The Company will also be submitting an application for the Cobdens Cranbrook Expansion Area which will deliver more than 1400 new homes, including policy compliant affordable housing, new schools, provision for the gypsy and traveller communities, a local centre and significant areas of open space and Suitable Alternative Natural Greenspace.

Persimmon own and control land at Axminster, which will play a key role in delivery of new homes and planned infrastructure for the town, allocated in the adopted Local Plan.

At Sidmouth land is owned by Persimmon on Woolbrook Road which offers the opportunity to deliver new homes including potentially homes designed for the elderly.

Together these sites will deliver more than 2000 new homes for East Devon, including policy compliant levels of affordable homes. These sites show Persimmons investment in East Devon and recognition of the strong underlying market for new homes in the District both currently and well into the new Local Plan period.

It is noteworthy however that in the case of Cobdens and Axminster these are proposals which are delivering allocations in the adopted Local Plan and the Cranbrook DPD. There have historically been significant delays in the Development Plan process in East Devon. Whilst some of these delays have been as a result of changes in Planning Legislation, others have been brought about by a failure to properly engage with adjoining Authorities under the duty to cooperate.

It is vital that the Local Plan preparation progresses quickly but is also based on a full evidence base, including a robust assessment of the level of housing required in the District.

PH generally welcome the Plan timetable set out at paragraph 2.10 but consider that the Council should prioritise the publication of draft locations for new housing development for consultation at the earliest opportunity.

Notwithstanding the need for a robust evidence base, it is unclear why it will take more than 18 months to move from Issues and Options to a Publication Plan. It would be appropriate to consider an interim publication of housing delivery options and locations for consultation.

Whilst the new Plan points to the most recent housing projections, it also notes that very recent projections from autumn 2020 supported higher levels of housing development as being required to meet housing needs in the District. The latest projections should be a starting point but it would, in Persimmons view, be entirely appropriate to consider higher levels of housing delivery in the period to 2040.

Persimmon welcome the Plans emerging approach to climate change and the need to move towards a zero carbon future. Whilst the Plan acknowledges that it is possible to set local targets and/or target dates for achieving zero carbon, Persimmon caution that adopting local standards ahead of national targets is likely to result in an impact on the viability of new housing sites, with the inevitable knock on effect on the delivery of infrastructure and in particular affordable housing.

Nationally Persimmon have recently announced their commitment to moving towards net zero carbon homes to be in use by 2030, with the aim to be net zero carbon in the Company's operations by 2040.

Persimmon are pursuing the development of ambitious science based carbon reduction targets, providing a pathway to net zero. These include reducing emissions from new homes and our supply chain by at least 22% per m² completed floor area by 2030, and reducing emissions from our own operations by 46% by 2030.

Persimmon have established Steering Groups to effectively implement carbon reduction pathways. A pilot site to design and build zero carbon homes in partnership with University of Salford has been identified and the Company are engaging with our supply chain and other stakeholders for delivery. Persimmon are Partners with the Supply Chain Sustainability School.

Whilst welcoming the publication of the Issues and Options Consultation, and the accompanying Call for Sites, it is disappointing that the Consultation does not start a more detailed consideration of the opportunities to deliver new homes in the District beyond the very high level settlement strategy/location discussion.

Persimmon consider that further housing development at the main towns must be a key part of any settlement strategy. Options for new towns/villages and Development Corporations should not be pursued at the expense of delivering housing at existing towns which already have jobs, services and facilities.

As the Consultation sets out a range of sites in different location will be required to ensure the delivery of housing across the District. Sites at existing towns are likely to be capable of being delivered in the early years of the Plan Period, helping to achieve a balanced housing trajectory and the supply of housing whilst development on planned larger strategic sites come forward.

Large scale housing delivery on the Expansion areas at Cranbrook in particular is some years away. The Plan must ensure that other housing sites are available to deliver new homes, including affordable homes.

The land at Woolbrook Road in Sidmouth offers the opportunity to deliver new housing in the short term to meet the needs of the town and assist in maintaining the delivery of new homes in the District.

Persimmon Homes (PH) responses to Issues and Options Consultation Questions

Question 1 - Local Plan Objectives

PH consider that the listed objectives are appropriate but consider the Objective 3, Meeting future housing needs should be amended to 'provide high quality new homes including in particular affordable homes to meet people's needs'.

The Consultation notes the very high level of affordable housing need in the District; delivery of affordable homes should be a key objective. New housing development offers the best means to deliver new affordable homes.

As noted in responses to other questions, unless housing sites are identified at existing main towns there will be a continuing restriction on supply and a widening of the affordability gap as house prices rise.

Whilst the Consultation implies a ranking of the Objectives, PH consider that meeting future housing needs should be the number one priority and objective of the new Local Plan.

Question 2 – The scope of the local plan

PH strongly support the approach of preparing a single Local Plan rather than a Strategic document and further separate DPDs.

A single Local Plan which identifies development sites across the Plan period is the most appropriate way to minimise delays in housing delivery and ensure the continued supply of new homes across the District.

Producing separate Plans has caused significant delays in East Devon. New policies for development sites must set out full policy requirements and not defer to the need to produce other Plans in the future.

Timetable for East Devon local plan production (paragraph 2.10)

PH generally welcome the Plan timetable set out at paragraph 2.10 but consider that the Council should prioritise the publication of draft locations for new housing development for consultation at the earliest opportunity.

Notwithstanding the need for a robust evidence base, it is unclear why it will take more than 18 months to move from Issues and Options to a Publication Plan.

It would be appropriate to consider an interim publication of housing delivery options and locations for consultation.

Question 3 - Neighbourhood Plans and the new Local Plan

Neighbourhood Plans have a clear role defined in National Guidance and legislation. They can empower local communities to make decisions that reflect local issues but all too often they are used as a tool to frustrate the delivery of new homes.

The new Local Plan must clearly identify housing development sites in and adjoining the main settlements in the District and, where appropriate, identify landscape and other designations such as green space.

Placing reliance on Neighbourhood Plans to deliver housing in the adopted Local Plan has not worked. In 2014 the Local Plan Examination Inspector noted 'The Council is confident that new housing will come forward through Neighbourhood Plans but there is no guarantee that they will nor does this strategy give the Council any control over when or where they will be delivered'.

The new Local Plan must address the full need for housing and not rely on Neighbourhood Plans.

As the Consultation notes it is for NPs to comply with the policies of the Local Plan when adopted, and not the other way around.

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?

PH considers that it is essential that health and wellbeing are promoted in the policies of the Local Plan. PH support principles of best practice in planning for health and wellbeing contained in the Sport England guide 'Building for a Healthy Life' and 'Active Design'.

The Ten Principles of Active Design set out in the Diagram on P10 can be best achieved by delivering new developments in and adjoining existing main towns and in new towns such as Cranbrook. Main towns such as Sidmouth and Axminster offer the best opportunities to deliver development which is located close to existing services and facilities.

Development in villages and rural areas can contribute to supporting local communities but are less well placed to meet the all the active design principles.

Question 5 – Energy efficiency of new buildings.

PH do not believe it will be possible nor appropriate for the new Local Plan to set a requirement for net zero carbon from the date of Plan adoption.

National Guidance notes that Authorities can pursue locally based approaches to carbon reduction and achieving zero carbon but, any such approach must be based on clear evidence of the impact of achieving zero carbon on build costs and thus the overall viability of new housing developments.

PH and the development industry are committed to moving towards a zero carbon future but the technology to achieve this is still being developed and refined. There will be a lead in time from setting targets to achieving zero carbon.

Nationally Persimmon have recently announced their commitment to moving towards net zero carbon homes to be in use by 2030, with the aim to be net zero carbon in the Company's operations by 2040.

Persimmon are pursuing the development of ambitious science based carbon reduction targets, providing a pathway to net zero. These include reducing emissions from new homes and our supply chain by at least 22% per m² completed floor area by 2030, and reducing emissions from our own operations by 46% by 2030.

Persimmon have established Steering Groups to effectively implement carbon reduction pathways. A pilot site to design and build zero carbon homes in partnership with University of Salford has been identified and the Company are engaging with our supply chain and other stakeholders for delivery. Persimmon are Partners with the Supply Chain Sustainability School.

Setting an arbitrary date for net zero carbon such as the date of adoption of the Local Plan will not allow the development industry the time required to bring forward cost effective solutions to the delivery of new homes.

The Government accepts that achieving zero carbon is a gradual process, as evidenced by the recent announcements on Future Homes Standards and not something that can be delivered in the very short term.

PH therefore support a variant of Option 2 and 3 in Q5: a Policy is required to provide a commitment to move to zero carbon and Future Homes Standards, but recognising that the ability to do this will be led by Government policy and the need to ensure that this does not impact on the viability of new housing delivery.

Question 7 - Carbon saving measures

PH note the identification of potential carbon saving and related policy matters to be addressed in a new Local Plan and reference to promoting District heat networks to provide heat from renewable or low carbon fuels to homes and businesses through a network of pipes carrying hot water.

As the document sets out this type of heating currently supplies the town of Cranbrook.

The Cranbrook Plan Examination is currently considering the requirement for CHP to be delivered for the Cranbrook expansion areas.

The main developers bringing forward the next major housing areas at Cranbrook continue to question the combined cost of, and priority attached to, carbon reduction and district heating set out in the emerging Cranbrook Plan. This remains a matter central to the viability discussions and what can be afforded by the Cranbrook expansion areas development, notwithstanding the conclusions of the Inspector in relation to district heating.

If the new Local Plan is to promote the use of CHP there must be a robust consideration of the costs of delivery of such schemes and an assessment of the impact on the viability of new housing proposals.

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

PH note that a 20 year requirement (from 1 April 2020 to 31 March 2040) at 928 homes per year would give a grand total of 18,560 homes needed. Deducting 11,945 already projected to be built from a need of 18,560 leaves a residual figure of at least an extra 6,615 new homes up to 2040.

It is critical to note that a substantial proportion of the committed 11,945 new homes will be built in the Cranbrook expansion areas where the affordable housing policy requirement is set at 'just' 15% as a result of the significant infrastructure burdens associated with bringing forward the next phases of the new town.

Meeting the requirement to deliver affordable housing should be a priority for the new Local Plan. Central to affordable housing delivery will be the identification of sufficient new housing on sites which can offer affordable housing delivery at higher percentages than at Cranbrook.

The 928 homes per year figure results in a 19 year annual delivery of 348 new homes. This would result in development rates below the adopted Local Plan, at a time when the need to deliver affordable housing in particular has never been higher.

At 25% this would equate to the delivery of less than 90 new affordable homes per year, in turn less than a quarter of the required affordable homes in the District identified by ORS.

If the Local Plan is to address affordable housing requirements a housing target in excess of the 928 new homes should be set out.

PH consider that a range of new home delivery figures should be tested, from a base of at least 1200 homes per year, to the higher figure of c1600 homes per year identified by Government projections as recently as autumn 2020.

Question 9 – Sites for small scale housing developments

PH question a number of the assertions set out in paragraph 5.7 about smaller builder developments.

The Government and the national house builders are committed to the delivery of new homes which are distinctive, high quality and reflect local character. Many of the examples of good practice cited in the National Design Guide are developments built by the larger house builders. PH are committed to employing more local labour and supporting local businesses and supply chains. As the Consultation notes local developer built homes may be more expensive to buy than ‘mass produced’ homes.

Further, small builders are often unable to deliver housing on larger sites which will be able to fund the delivery of affordable housing.

The large housebuilders will continue to be responsible for bringing forward the substantial majority of affordable new homes in East Devon.

Any new Local Plan policy related to small sites should not exceed 10% of allocated land.

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

PH do not consider that is appropriate to explicitly require housing provision for people at all stages of life. As Option 2 notes this approach would place demanding standards on developers to provide housing for all stages of people lives. It would reduce monies available to pay for other wider community benefits from development and, potentially impact on the delivery of affordable housing.

It should be noted that a key issue in delivering smaller homes is the high cost of land and the significant timescales and costs required to obtain planning permission for new housing.

Restricting the supply of new housing to below market needs and/or placing reliance on a handful of very large strategic development sites will further restrict the supply of land and increase land costs. This will lead to a continuing need to deliver larger new homes which allow developers to recover their costs.

PH therefore support Option 2, encourage, but not require housing provision for people at all stages of life.

Question 12 - Preference for location for future job provision and Question 13 – Differing jobs sectors in East Devon

Both of these questions, despite referring to ‘job provision’ appear predicated on the continued delivery of jobs in what were classes B1, B2 and B8. It is clear that the ‘new’ Class E – Commercial,

business and service introduced from September 2020 envisages a much wider scope for delivery of jobs in from different sectors and not just the B use classes that remain.

Persimmon support the delivery of greater business development at and within the main towns of East Devon, but any policy should recognise that jobs provision can come from a wide range of development types within Class E.

Question 14 – Additional economic policy objectives

PH support the development of policies that may seek to promote more jobs close to where people live so there is less need to travel to other locations for work purposes.

As noted at paragraph 4.3 transport formed the largest carbon emitting sector comprising 47% of total emissions, followed by homes with 29% and industry with 24%. Delivery of jobs close to where people live will reduce the need to commute and result in a more sustainable pattern of development, contributing to making the change towards a net-zero carbon future.

Question 17 – Designing beautiful spaces and buildings and Question 18 – Additional design policy objectives

It is evident that nationally the Government is bringing forward a range of measures related to design. These include the National Design Guide and the recently published draft National Model Design Code.

These measures show the clear direction of travel of Government policy on design. The new Local Plan should frame design policies which follow national guidance.

PH are committed to delivered high quality design in all its developments and continue to work closely with Councils and local communities to deliver new homes which reflect local character.

Question 20 - Development in protected landscapes

PH acknowledge the importance of the AONBs in East Devon and the level of protection afforded to these landscapes.

Given however the extent of AONBs and the fact that they 'wash over' large areas and main towns in the District, it is clear that a balance needs to be struck between protecting the AONBs and allowing for development at towns like Sidmouth which can be brought forward without impact on the overall objectives of AONB designation.

The Consultation document rightly acknowledges that AONB designation is not an embargo on new development but that AONBs are not normally appropriate for large scale development schemes.

A detailed assessment is required of land around towns within the AONBs to identify areas which can be developed without impacting on the key features and underlying principles of the AONB.

PH support Option 3. This would allow for greater levels of development in locations which have the least impact on the AONB. As the consultation acknowledges, this approach will reduce the need to build elsewhere in potentially less sustainable locations.

The PH owned land at Woolbrook Road, Sidmouth lies within the AONB but lies adjacent to new high quality housing which has been developed in recent years and also lies within the AONB.

The development of further land at Woolbrook Road can deliver new homes, including affordable housing, and can be delivered without impacting on the landscape protection objectives of the AONB.

Further details of the site can be found in the PH Call for Sites submission.

Question 21 – Net gains in biodiversity

PH support Option 4. In order to gain biodiversity improvements a combination of policy approaches will be required.

Option 3 refers to tariffs. The supporting text cites figures that the Government's estimate is that the tariff costs might be set at between £9,000 and £15,000 per new home. This level of tariff would be likely to affect the viability of new housing developments and lead to further pressure on the delivery of affordable housing.

As the consultation sets out the fundamental issue with a tariff approach is that the recipients of the tariff and the means of delivery and monitoring/implementation and outcomes have not been identified.

There should be no tariff based policy unless the impact on development costs has been fully assessed and, the issues related to delivery and implementation have been resolved.

Question 22 – Additional natural environment policy objectives 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?

PH object to the use of 'Local Green Space' designations which are already in many of the Neighbourhood Plans to be extended to cover all of the towns and villages in the District. Local Green Space cannot be a default designation that is applied to any undeveloped land as a way of frustrating the delivery of housing and development.

The Local Plan should set out a clear Policy identifying the criteria that must be met in Neighbourhood Plans in order to designate land as Local Green Space.

Question 23 – Promoting access to facilities

PH support Option 3 – A combination of options 1 and 2 which 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.

As has been noted in response to other questions in the consultation, the development of new housing in particular should continue to be delivered at the main towns in the District. Whilst some of the towns are very highly constrained, there are opportunities to deliver new housing at Sidmouth which has accessible existing services and facilities.

Development at towns like Sidmouth will aid self-containment, reduce the need to travel and deliver affordable homes.

Question 25 – Facilities and services that are important

PH consider that the tick box schedule in Q25 is too simplistic. All of the listed services and facilities are important elements in ensuring healthy, vibrant communities.

The new Local Plan needs to frame policies that focus the identification of new development in locations which offer the best scope to make use of existing services and facilities, such as at the main towns.

Question 26 – Additional infrastructure and service provision policy objectives

PH note the challenges set out at paragraph 12.9. PH consider that affordable housing delivery should be a key priority for the new Local Plan, together with identification of sufficient housing land to meet future needs.

If the level of delivery of affordable housing is to be ensured, it is critical that new development is not overly burdened by high infrastructure costs.

A balance needs to be found between meeting housing needs and ensuring that developments are viable and deliverable and the need to deliver the infrastructure to support them.

The evidence base for the Local Plan must include a robust assessment of deliverability costs and the impacts of infrastructure delivery on the viability of any proposed developments.

Question 27 - Retaining and refining the existing settlement hierarchy

PH broadly support Option 2: A hierarchy that retains the towns and Cranbrook but has a lower number of villages that may accommodate development.

Further comments are set out in the response to Q28.

Question 28 – Broad distribution of housing development

PH support Option 3 – A less West End focussed pattern – This approach would seek to accommodate far less development close to Exeter, maybe as little as 20% of future new homes, with the bulk of new housing, 80% of provision, being dispersed across towns and villages.

Options 1 and 2, which focus further development, above commitments, in the West End, inevitably leads to the conclusion that this will require the building one or more additional new towns or new village(s) as the table as 13.15 set out.

The table also sets out that a new town would probably need at least 6,000 homes to support a new secondary school and many other facilities. This would represent almost the entirety of the required new homes above commitments (6615) based on the 928 pa annual homes requirement.

New villages of up to 1500 homes would not be likely to be able to deliver services and facilities and risk being large dormitories of housing in the countryside which ‘force’ residents to drive elsewhere for work

A new town approach would provide no new development above commitments in the Districts main towns such as Sidmouth.

The Local Plan Inspector in his Report into the adopted Local Plan, in 2014, noted ‘Turning to the rest of the District, I am concerned that too little growth is planned for the other main towns and larger villages’.

He continued ‘Axminster (the only Town Council attending the examination which welcomed growth) has an allocation for 650 dwellings but Exmouth, the largest town in the District has only one allocation of 350 dwellings, Honiton only 150 and Sidmouth 125. I accept that dwellings have been built or granted planning permission in all these settlements since April 2013. I also

acknowledge the environmental considerations referred to above and that the NPPF does not require the assessment of housing need to be broken down below the District level. Nevertheless, I have significant concerns regarding the impact of the Plan's strategy on satisfying the need of their indigenous populations, particularly for affordable housing'.

He concluded that 'The Plan's strategy risks the coastal towns becoming the preserve of affluent retirees which cannot be healthy or sustainable. The Plan's strategy risks the coastal towns becoming the preserve of affluent retirees which cannot be healthy or sustainable'.

Any distribution strategy which repeats the adopted Local Plans reliance on the West End will only exacerbate the issues highlighted with the Strategy of the adopted Local Plan.

The Inspector questioned the Councils (then) assertions that Neighbourhood Plans would deliver housing on non-allocated sites outside of the West End. Neighbourhood Plans have not delivered housing at the Districts Towns.

The new Local Plan must make suitable provision for housing at the main towns such as Sidmouth. Failure to do so will reinforce the pattern the Inspector identified of towns becoming the preserve of affluent retirees and a failure to delivery any affordable housing in these areas.

PH consider that Option 3 is the closest to a strategy for resolving these issues, but town based development must be prioritised ahead of a more dispersed pattern of housing delivery in the rural areas.

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

PH strongly support the option of delivering large scale (over 50 home) urban expansions to existing towns such as Sidmouth.

As noted in the response to Q28, the new Local Plan must make suitable provision for housing at the main towns such as Sidmouth. Failure to do so will reinforce the pattern the Inspector identified of towns becoming the preserve of affluent retirees and a failure to deliver any affordable housing in these areas.

The PH owned land at Woolbrook Road, Sidmouth has the potential to accommodate up to 150 new homes including affordable housing. The site can be developed without impacting on the AONB.

The site also has scope to deliver a mixed housing development including a care community.

Further details of the site can be found in the Call for Sites pro forma completed by PH.

Question 30 - Establishment of a Development Corporation

PH do not support the development of additional large scale new towns or villages over and above those committed at Cranbrook. PH do not therefore support the establishment of a Development Corporation.

Question 31 – Planning for development beyond 2040

PH consider that the priority for the new Local Plan should be the delivery of housing sites at the Districts main towns. These developments can come forward in the short to medium term and can deliver affordable housing. This should be the focus of the Plan and there should not be consideration of planning for development in East Devon for a date well beyond 2040.