

East Devon Local Plan 2021 to 2040

Issues and Options Consultation
March 2021 (Regulation 18)

Chapter 1

Introduction

Thank you for sharing and facilitating commentary on the proposed East Devon Local Plan. Responses provided here are in relation to the East Devon Local Plan 2021 to 2040, issues and options consultation of 2021.¹ Please refer to this when considering this response. We welcome the focus around people's health and wellbeing together with responding to the climate emergency. Comments are as 'critical friends' as we work together with local organisations and communities to address the challenges ahead. We look forward to further close collaboration in the creation of the Local Plan, working alongside our planning colleagues.

Chapter 2 - Objectives, scope, and background

As the plan progresses, we look forward to working together in considering the implications of development options on public health. The comments provided here are in addition to those provided by Planning, Transportation and Environment at Devon County Council.

Question 1 - Local Plan Objectives

Objective 1 We welcome the prioritisation of encouraging healthy lifestyles and living environments, promoting sustainable transport, and protecting the environment, whilst working towards net-zero and a resilient economy. The built and natural environments contribute to a range of social determinants of health and wellbeing in supporting the environment, human health, and economies. In many ways Objective 1 is a primary objective – our environment, in the broadest sense, is entwined with our health and happiness. Objectives 2 to 10 further support the first objective.

Objective 2 Climate change is a significant threat to human health and requires both mitigation and adaptation to reduce downstream harms. Climate

¹ <https://eastdevon.gov.uk/media/3721875/issuesandoptionsreport-jan2021.pdf>

change has already shifted determinants of health at a global level, with evidence of more local effects. We welcome the recognition of delivering net-zero. Planning could perhaps be more explicitly aligned to the proposed Devon Carbon Plan. Additionally, this would include not only adapting to, but mitigating against climate change, linked to social objectives.

Objective 3 We welcome high quality homes, where these are designed to support good health and wellbeing. Evidence suggests that living in warm and energy efficient homes can improve health outcomes. However, with proposed Government funding for retrofitting houses to increase energy efficiency we would like to see consideration of both new and existing housing stock, particularly in relation to cold weather, heatwaves, and humidity/moisture. Meeting people's needs should include mitigating, not just adaptive measures, so would expect properties to protect against both higher and lower temperatures whilst minimising energy required (e.g., passive measures), and meeting design need for good physical and mental health. Consideration should also be given to traditional housing construction (e.g., cob) associated with the area in relation to sustainable housing, particularly in smaller developments within sensitive areas.

Objective 4 Would suggest the aim is a resilient economy that is created by a sustainable environment, and resilient communities, the outcome is good environmental and human health, so objective is perhaps supporting people through business investment in local economies. A resilient economy and the future provision of jobs could look to draw on an inclusive economic model, investing in local economies in a way that respects environmental limits and promotes equity.

Objectives 5 to 8 fits with and support aspects of the determinants of health and wellbeing around natural environment, built environment, and activities.

Objective 9 We welcome promoting sustainable travel, particularly 'active travel' including walking, cycling and public transport. Suggest promoting sustainable and healthy travel; that the key drivers are not just reducing demand on fossil fuels, or seen as just focusing on 'cars', but a positive opportunity to offer people the ability to adopt different travel options that benefit planetary, population, and personal health. Population and personal health have become increasingly important in relation to the Pandemic and protecting health services.

Objective 10 Identifying and coordinating the provision of the right infrastructure at the right time is crucial in new development, especially in support of tackling climate change. We would expect alignment of infrastructure as set out in the National Planning Policy Framework to support physical, mental, and social wellbeing through provision and use of shared spaces, community facilities, and other local services to enhance the sustainability of communities.

Question 2 – The scope of the local plan

Preferred Option 2. Our preferred option would be around ‘Option 2 – Multiple Plans’ in producing a plan that deals with strategic matters, such as the climate change emergency, first and then subsequent plans that deal with more local concerns and detailed matters later with communities. This would be in line with s.14 of the National Planning Policy Framework (NPPF), particularly in relation to para. 152 in supporting community led initiatives. Some core planning needs to be agreed around climate change with later developments informed through coproduced knowledge. This would enable “Think globally, act locally” in achieving the Sustainable Development Goals.

Please provide any further comments in the box below

Option 2 provides opportunity to set out and agree upon the main strategic matters, particularly in responding to the Climate Emergency. Secondly, local communities will need to be able to respond to the strategic direction through Neighbourhood Planning or other more local concerns that may require more detail and engagement with regard to the local plan as well as national policy and guidance. These may in turn, inform subsequent local planning (see Question 3). Thirdly, flexibility will be required to respond locally to the COVID-19 recovery, with consideration for equity and those most affected, ongoing Climate Emergency considerations, and changes resulting from Government review of planning policy.

Question 3 - Neighbourhood Plans and the new Local Plan

Local communities are already responding in creating successful and sustainable communities whilst protecting the unique character of their areas. The neighbourhood plans may inform future local plans by providing insight into the local settings, what local concerns and needs are, and how these are responded to appropriately given the setting. It is also crucial to engage local communities in responding to global concerns through local actions, especially where there may be new constraints, and new opportunities. Evidence suggests that empowering communities can improve a sense of wellbeing, belonging, and trust.

There needs to be continued close links between the global, national, county, district, and local level planning – although strategic documents can provide overall evidence and direction, local evidence and knowledge can inform nuance at a micro-level in what will actually work in a given setting or situation. This supports flexibility within the NPPF s.14 for local communities to provide additional provision in addition to the Local Plan. It also places action at manageable scales. Communities could identify sites to develop for renewables, as well as housing and employment land, though renewables should also support local employability.

Chapter 3 - Designing for health and wellbeing

The paragraphs 3.1 and 3.2 could perhaps better reflect and introduce the purpose reflected in subsequent paragraphs which sets out key public health areas. Central to public health is supporting the social determinants of health; the environmental, social, and economic conditions that influence the health of individuals and populations. Planning has a key role in forming structural influences on health.

3.1 Influences of old age can be changed in that supporting the social determinants of health can improve healthy life expectancy. We obviously cannot stop people getting older, as stated, but we can influence health in old age at a population level and reduce inequalities. It should also be borne in mind that mobility difficulties are not just a problem of 'old age'. Consideration should be given to the Equality Act 2010 around protected characteristics, such as disability, to facilitate equitable spaces. We support the alignment to the National Planning Policy Framework (NPPF) in promoting healthy communities and would like to see a clear life course approach through supporting social determinants of health through healthy lifestyles, community cohesion, education etcetera.

3.2 The NHS long-term plan focus on prevention is to help people stay healthy and tackle health inequalities through upstream prevention avoiding or reducing the impacts of non-communicable disease. Local government, including planning, plays a key role in delivering preventive health measures. Although there is a predominantly older population there are still unmet health needs around young people's mental health and other areas.

3.3 Perhaps suggest 'activity and exercise', exercise may have connotations of training and exertion, to be welcomed of course, but may exclude those for whom any level of activity will have exponential health benefits. The emphasis is, as the section title suggests 'active lives', with activity being part of, not adjunct to, daily lives.

3.4 Unemployment and low incomes are key social determinants which may impinge upon physical health, mental health, and non-communicable diseases in general.

3.6/3.7 General principle of improving both indoor and outdoor air quality, as both influence the examples of non-communicable disease given.

3.11 Perhaps turn around to - increasing active travel not only improves personal health and wellbeing, but has further crucial health benefits in reducing air pollution, demands on finite resources, including the NHS, and reduced energy demand through reduced car use, and in itself may promote further uptake of healthier means of travel.

Question 4 - Planning for health and wellbeing

Absolutely essential. We support, and consider absolutely essential, the active promotion of health and wellbeing throughout EDDC's new local plan.

Planners play a key role in designing people's lived environment to promote good health outcomes. Due regard to and under the Equality Act 2010 will need to be given, with particular reference to s.149 Public Sector Equality Duty (PSED). Well planned and designed neighbourhoods impact on day-to-day decisions and ability to carry out healthier activities. The built and natural environment has a significant role in supporting healthy lives and need to be supported by a strong Local Plan.

Please provide comments below on any health and planning matters you consider to be particularly important.

Public Health welcome the inclusion of health and wellbeing as a main objective of the local plan to ensure health and wellbeing consideration are taken into account. The plan addresses the quality of homes, balancing factors such as daylight, noise, and damp. As well as neighbourhood air quality, indoor air quality needs consideration with improvements that can be made changing to non-fossil fuel sources and in construction materials used. The need to consider enhancing active travel, such as walking and cycling, through neighbourhood design including enhanced connectivity with services and communities is welcomed (again supported by good home design, for example adequate storage). As well as guidance from Sports England, evidence reviews carried out by Public Health England (and University of the West of England) may inform approach.

Chapter 4 - Tackling the climate emergency

4.1 Climate change is one of the biggest threats to public health and wellbeing. The aimed for temperature cap should be in line with the Devon Carbon Plan at 1.5°C. This follows the Paris agreement that aims to be 'well below' 2°C and aiming for no more than 1.5°C above preindustrial temperatures.

4.2 Alongside East Devon District Council, Devon County Council has declared a climate emergency. Some flexibility is required to align with the Devon Carbon Plan once a target date is set and provisions made for transition. We would expect this to be informed by the Net Zero Task Force and evidence led carbon-plan.

Question 5 – Energy efficiency of new buildings

Preferred - Option 1. Option 1 is preferred – to plan for net-zero from adoption to meet the 2030/40/50 targets, however, this needs to consider the Public Sector Equality Duty through appropriate equality impact assessment

of provision of affordable housing development with any mitigations. Having access to affordable quality housing is a key measure to improve general health outcomes and reduce health inequalities. Option 2/3 leaving net-zero for a future date or future Government policy runs the risk of costs being displaced to homeowners at a later date, and potentially not fulfilled, with the additional risk that the more vulnerable to poor health outcomes are least able to afford any retrofit, which again needs PSED consideration. Obviously, we cannot account for all future policies, but can mitigate through good initial cost-effective design, and aim to meet outcomes set out in the Devon Carbon Plan.

4.7 We welcome the allocation of land for renewable and sustainable energy sources to tackle climate change and build local resilience. Promoting energy storage and resilience of the grid is required to protect the health of consumers, for example in adverse weather events. The planning of removing land from agricultural use needs to be balanced with local food production and not increase pressures on agricultural land than drives soil degradation or intensive animal husbandry, with potential for increased risk of antimicrobial resistance, or zoonotic disease. Consideration may also need to be given to nutritional value of foods resulting from changes in CO₂.

If creating wildlife habitats these should be the right habitat in the right place to facilitate and increase carbon capture by restoring appropriate habitats. With climate change and habitat loss consideration may need to be given to landscape design to reduce peridomestic risk in positioning of habitats and built environment.

As before with the significant level of existing housing stock, some of historic construction, then planning needs to consider appropriate retrofitting for style of house, and that those in poorer housing stock on lower incomes are not placed at further disadvantage. This may need consideration in view of the proposed changes to the planning framework.

Question 6 – Provision of solar arrays/farms and windfarms

Preferred 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.

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

A proactive and planned approach to larger scale infrastructure development should help protect and manage key environments, whilst seeking to minimise impact of developments through appropriate land allocation. As before local communities and local planning may be engaged, though accepting there may be resistance to some larger scale wind and solar farms. However, local communities may come up with creative solutions and local knowledge on improving schemes. Other districts in Devon have sought to adopt a balanced approach to alternative energy schemes and impacts on the environment. A

balance will need to be made between equitable response to the impacts of climate change and any more local impacts around health and wellbeing.

In informing public, it would be useful to get some indication as to what allocation is required (similar to housing) and whether preference for already developed sites could be given for retrofitting. In view of equity then any increase in energy costs should be mitigated for those who may be at adverse disadvantage if a higher percentage of already constrained budgets, partly addressed in 4.8 below.

Question 7 - Carbon saving measures

Switching to non-carbon sustainable energy and improving housing, including existing housing, to be more energy efficient, together with designing local communities to reduce the need to travel by car, as identified, will go towards meeting the minimum targets required to tackle climate change and go towards improving public health .

Tree planting should be encouraged where appropriate, though this needs to be the right tree in the right place. Consideration should also be given to restoration and management of other habitats e.g., peat bogs (turbaries), some of which may offer greater carbon capture potential. This should fit with Government opportunities such as the Nature for Climate Fund. In creating habitats other functions such as future supply of (building) timber, employment, or recreational use should be considered to support health and wellbeing. Other benefits to health should be considered around sympathetic planting / land management to protect watercourses from flooding properties, reducing erosion or pollutant run off / transportation , as well as management of sensitive areas such as flood meadows.

Mitigating and adapting to climate change should consider benefits to the environment and human health beyond just thinking about carbon . Consideration also needs to be given to other climate change effects as well as more immediate health effects. The use of environmental impact assessments and health in all policies should identify issues and assist with mitigation.

Chapter 5 - Meeting housing needs

Housing is a key social determinant of public health, addressing the quality, affordability, and warmth of homes in Devon has been a key goal in relation to housing, care, and health. East Devon ratio of house price to income is higher than that for England as a whole, which may make accessing affordable quality housing difficult. The provision of good quality and affordable housing is associated with a variety of positive health outcomes and good general physical and mental wellbeing. Evidence shows that affordable housing can lead to improvement to health-related outcomes for vulnerable people, those with chronic medical conditions, and those classed as homeless.

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

Option 4 – Appraisal of up-to-date population projections need to be considered.

Please provide any further comments and justification in the box below

We would wish to reappraise local population data and projections following the influences of the most recent Pandemic and leaving the European Union before considering further. Living in good quality and affordable housing has positive health outcomes and a key social determinant of health. The influence of second homes needs to be adequately addressed in relation to sustainability and affordable housing. Mitigations need to be in place to protect affordable housing for local populations whose health and wellbeing may be affected by not being able to access affordable quality housing, particularly those who work in lower paid sectors supporting local economies, communities, and transient populations.

Question 9 – Sites for small scale housing developments

No preference, though Option 1 - Allocate or identify land for around 10% of homes to be on small sites, would satisfy minimum government standards. So long as this would not exclude local builders or communities, through Neighbourhood Plans, identify further opportunities, that fit with the core strategic principles of the local plan.

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

Option 2 perhaps offers the greater flexibility to support people at all stages, and with varying vulnerabilities or disabilities. We would strongly encourage housing provision for people at all stages of life, within the wider community – under this approach we could encourage and support such housing but be less demanding on specific standards to be met, acknowledging that there

may be differing market requirements. Although dispersed provision of some types of housing may be desirable, this will also be dependent upon other providers. The wider community benefits may also support living healthier for longer, so a balance needs to be achieved.

Please provide any further comments in the box below on how we may best plan for housing for all.

We would expect developments to supplement requirements under the most recent Strategic Housing Market Assessment and demographics of the East Devon area. With new development the longevity of residence may alter the demographics if families remain within areas as they age, and 'empty nesters' remain in their existing homes (home, not just a house). At present there is a very young profile for the emerging towns such as Cranbrook, though it is expected that the mix will eventually reflect other similar towns, such as Cullompton. As people's needs change throughout the life course then design should consider reasonable adaptability to cater for families with very young children, through to those who are infirm, for example. Encouraging a mix of housing, capable of basic adaptations, with additional adapted or specialist housing, should provide flexibility with a changing population to remain within the community should they wish, which will facilitate contact with local family members and carers. Good quality housing should support longevity and quality of life through adequate provision of suitable size and types of housing that provide safe and secure accommodation. This would fit with the additional housing policy objectives where communities may determine local housing needs using neighbourhood planning.

Question 11–Additional housing policy objectives

Agree generally with these principles, including local communities to develop a sense of place in being involved with local housing needs, and enabling better home/work balance to accommodate changing life circumstances, reduce cost of congestion, and meet climate change targets through provision of broadband and homeworking/local work hubs. Work hub policy should dovetail with High Street regeneration where existing vacant units and infrastructure may be utilised.

Chapter 6 – Supporting jobs and the economy

Question 12 - Preference for location for future job provision

Generally, support options that balance public health and sustainability, as one should support the other.

Support - Continued focus on big employment sites in the West End of the District which facilitate sustainable and active travel options from main existing and proposed residential areas.

Support - Encouraging greater business development in other areas close to Exeter (for example expanding Greendale and Hill Barton Business Parks) especially if part of a strategy to link with local education to ensure people can enter and maintain employment within the local area.

Support - Encouraging greater business development at and within the main towns of East Devon to support local populations access quality employment without need to travel greater distances to support family life and sustainability.

Support - Encouraging business expansion and development in the villages and across the countryside of East Devon local populations access quality employment without need to travel greater distances to support family life and sustainability and maintain the social mix and viability without adversely affecting the environs.

Support - Encourage and enable more home working to support a more balanced work and family life, contribute to sustainable travel options whilst reducing congestion for those who need to road network e.g., for agricultural purposes, or transporting goods and services.

If you have any comments on the above or alternative options, please set these out below.

Access to quality employment is a key social determinant. Whilst considering homeworking options the design and build of community should encourage social cohesion to reduce potential for social isolation. As identified specific attention will be given to localities high on the Vulnerability Index. Exmouth is the main area identified within East Devon, closely followed by Axminster and Honiton, each has areas of higher deprivation that may need additional support in providing local employment facilitating active travel and good work/life balance.

Question 13 – Differing jobs sectors in East Devon

Neither oppose nor support more jobs overall – with an emphasis on attracting new/larger employers and inward investment in any or all sectors. Jobs should support existing and projected population without creating artificial incentives that may remove jobs from other areas or create further instability or unsustainable employment. Quality adequately paid employment goes towards supporting social determinants of health.

Support - More high technology jobs - focussing on high technology and high skilled jobs (including in the transformational sectors), so long as these are supported by adequate learning and support opportunities for skills to be retained. This type of work may offer more permanent higher paid employment over a lifetime and help retain a local skilled workforce.

Strongly support - Local Entrepreneurs - promoting opportunities for more home/locally based/small businesses.

Support Traditional Sectors - Focus on growth, resilience, and diversification in our traditional sectors - such as agriculture, tourism, and care. With view of the interim carbon plan and sustainability in response to climate change then emphasis should be on resilience and diversification to increase quality employment within these sectors with buffering against seasonality, or other events, through combined opportunities with other sectors.

Question 14 – Additional economic policy objectives

Generally, support and welcome initiatives such as shared workspaces that can provide more affordable premises/overheads, as well as provide support through social networks.

Chapter 7 – Promoting vibrant town centres

Question 15 – Town centre uses

Support Retail to dominate – support retail uses in town centres and if possible, resist other uses. The vibrancy of the town centre needs to be maintained through viability of businesses by facilitating adequate footfall and encouraging active travel by not dispersing developments.

Support - Promote mixed commercial uses - support retail as well as other commercial uses such as cafés and offices.

Oppose - 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. We would expect development to support the active travel and reducing unnecessary travel that should be supported by a larger core.

Support, with reservations - Support change of use to housing – allow for any shops or commercial premises to be converted to housing. As with the above converting to housing should only be carried out where this does not impinge on the viability of the town centre for a range of businesses. Additionally, any conversion should provide housing that supports good physical and mental health.

Strongly support - Support community uses - promote more community spaces in town centres. Social cohesion is important in relation to good mental health, and having in town centre should improve access via alternative transport and integrate with other trips.

Support - Leisure uses – promote new gyms and sports facilities in town centres. As well as maintaining health supports social cohesion and physical agility.

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

Support a vibrant mixed use town centre where multiple activities may be achieved in a single trip. High Streets provide a space for developing social, environmental, and economic capital. Having a key hub should aim to support the community and reduce social isolation, whilst supporting small businesses and social enterprises to create a supportive economy for all. We would expect evidence and guidance around 'Healthy High Streets' to inform decisions in coproduction with local communities and agencies, including Public Health Devon. Where premises are converted to dwellings these need to provide appropriate accommodation that supports good health. Consideration should be given as to whether appropriate reassignment of retail to residential may support affordable housing provision, whilst providing easy access to employment and services.

Question 16 – Additional town centre policy objectives

Planning should aim to provide a choice for those without access to a car, including those restricted by age, disability, and income, to access all amenities. Those who cannot access job, shops, leisure, and education, will be put a further disadvantage with direct influence on social determinants of health. This would fit with general principles of increasing active and sustainable travel.

Chapter 8 - Designing beautiful and healthy spaces and buildings

Question 17 – Designing beautiful spaces and buildings

It is absolutely essential that built environment is sustainable as we tackle the climate change emergency, which is essential for human health. The 'spirit of place' not only supports more sustainable living, but also physical and mental health through promoting active travel and community connectivity. Comfortable and attractive homes, beautiful buildings, good use of windows to provide natural light, proportions, and space should support good health and wellbeing.

It is particularly important that people can chose to live within a community for good mental and physical wellbeing. Design codes should set out the need to meet the challenges of climate changes, whilst making homes that support wellbeing, e.g., not compromising natural light and views by overly reducing window size, or reducing air flow and fresh air intake, in meeting thermal regulation. Design codes may set out general principles in relation to climate

and wellbeing, whilst facilitating the creativity of local architects and builders to develop aesthetics to increase heterogeneity.

Question 18 – Additional design policy objectives

As part of this plan EDDC with partners should seek to use and inform the National Design Guide, this is not only to fulfil designing beautiful space and buildings but also to ensure that homes and buildings are ‘functional, healthy, and sustainable’. It is essential that the public space is inclusive.

Chapter 9 – Our outstanding built heritage

Question 19 - The importance of conserving and enhancing heritage assets

It is very important to conserve and enhance heritage assets as part of the fabric of places people live.

As stated, local heritage contributes to quality of life through a variety of mechanisms such as aesthetic enjoyment, continued intellectual development, and community activities, which forms part of the Connect 5 approach to Health and Wellbeing. This has been stated as very important, as there may need to be balance achieved with healthy and sustainable living environments that may result in some compromises in maintaining the asset of local culture, history, and character.

Chapter 10 – Our outstanding natural environment

Question 20 - Development in protected landscapes

Preferred option is Option 2 – Allow for development to meet local needs - This would allow for limited development, specifically where it will meet smaller scale local housing, for local sustainable community or economic needs, though it could still mean more development pressure elsewhere in East Devon.

Please provide any further comments in the box below

Where a development can support a local community in retaining local housing for local working populations and economic needs then this should be considered for the health and wellbeing of the community, especially where the need would be displaced elsewhere and require increased travel into the area. Conversely development should not encourage developments that serve increased long distance commuting populations. This needs to be balanced with wider climate change and environmental impacts that may in turn contribute to further impacts on climate and human health.

Question 21 – Net gains in biodiversity

Option 4 – A combination of the above

Please provide any further comments in the box below

A combination of approaches appropriate to the given site and situation, so long as safeguards are maintained, including legal protection of irreplaceable habitats, avoidance of adverse impacts on wildlife, and considering the unique nature and environment of a site in relation to the identity of East Devon and its communities. Particular attention should be given to protecting unique and fragile carbon sinks that support local ecosystems, as well as the unique character of an area valued by communities.

Question 22 – Additional natural environment policy objectives

With initiatives such as Clyst Valley Regional Park there are several learning opportunities to expand into further policy developments to respond to the impacts of climate change and the needs for human health and wellbeing. Where possible 'green wedges' may link with 'green envelopes' to create green corridors connecting built environment with surrounding areas and satellite developments. In relation to large scale farm buildings consideration will need to be given to the changes in practice to meet climate change and also in relation to other public health issues such as reducing antimicrobial resistance, for example reduction in intensive practices as part of ongoing mitigation.

Chapter 11 – Promoting sustainable transport

Question 23 – Promoting access to facilities

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.

Please provide any further comments in the box below.

Even with the move towards electric vehicles there are still positive aspects to pursue around supporting active and healthy lifestyles for populations and individuals, as well as concerns around ongoing particulate pollution, additional energy resources, as well as the human and economic costs of road traffic congestion and collisions. The 'new normal' is not replacing like with like.

Question 24 - Additional sustainable transport policy objectives

Consideration should be given to improving accessibility in line with Government safe system principles to make walking routes attractive to users. 800 meters is not that far to fitter individuals, but with Devon hedges and narrow lanes may not be attractive with traffic conditions, particularly for young families, or those less firm. Specific reference should be made to the NPPF para. 110 with regards addressing the needs of people with disabilities and reduced mobility, as well as the County Road Safety Team.

Developments at the Science Park have demonstrated how old lanes may be utilised as cycle/walking routes, with green corridors, and purpose-built roads. Consideration needs to be given to access to existing properties on older infrastructure, as well as how 'transport as service' initiatives could integrate different modes, particularly for those where options may be more limited for part of the journey. Siting of park and ride could be co-located, as with some other cities, with other facilities such as shopping hubs on primary route corridor nodes to support access to services that support health.

Chapter 12 – Infrastructure and facilities

12.5 'park and change' site location needs to be discussed with County Transport Planners. Where people are travelling into Exeter, having completed a larger part of the journey incentive to change mode may be diminished, whereas nodes may be placed at strategic locations town/shopping as collectors for more rural areas may allow better integration with active travel options.

12.6 Although it is recognised the ongoing problems in obtaining effective digital communications, to maintain many business functions and access remote services, such as health advice, during pandemic, normal life, and in response to climate change continue to support the need for effective digital access. Digital services, including those providing health and public health advice or assistance are a key way of lowering impact of these services on the environment, whilst also providing opportunities for improved service.

Question 25 – Facilities and services that are important

Question 26 – Additional infrastructure and service provision policy objectives

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

We would expect sufficient range of accessible services to meet local requirement to fulfil the determinants of health and wellbeing in neighbourhoods in a way that is equitable and not create significant additional impacts and considers the hierarchy under Question 27.

Chapter 13 - Developing a strategy for the distribution of development

Question 27 - Retaining and refining the existing settlement hierarchy

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

Please provide any comments below on the potential hierarchy, especially if you do not support the listed options.

Development should be focused around areas where population, employment, access, and mobility may be balanced with existing route corridors and larger population centres, as part of the strategy to protect our natural environment and promoting sustainable transport. However, this needs to be balanced with employment to not create out-commuting more likely, against developing housing in areas that have fewer employment opportunities and creating unsustainable communities that may then develop longer term economic and health problems.

Question 28 – Broad distribution of housing development

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. Or

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).

Please provide any comments on the above in the space below.

The preferred option needs to fit with the Climate Emergency and need to healthy communities. Option 1 or 2 would appear to enable access and mobility to be developed with existing infrastructure, whilst Option 3 may create a significant increase in outcommuting, and other journeys. However, there will be changing employment landscape with green jobs, as well as potential reaction to the Pandemic that may push rural house prices up and reduce housing stock for local employment, though perhaps in short-term.

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

Support Infilling in towns and at larger villages where potential to reuse or redevelop areas, whilst supporting walkability to employment, services, and amenities, and enhancing sustainability of the town, including supporting local business.

Neither oppose or support building one or more additional new towns, however, this must be in line with future population projections, and adjusted as planning progresses. Towns need to be located so do not create substantial out-commuting or potentially isolate populations from suitable employment or health services.

Oppose Planning for new villages which may have limited services and facilities and be unsustainable as a community, as well as creating car dependency. The exception may be where there is a need to supply a local labour market emerging with new green economies.

Support - large scale (over 50 home) urban expansions to existing towns, where this supports the sustainability of that town in relation to environment, health, and economy, and negates need for new town development away from employment and other service centres. As previously we need to ensure the provision of adequate and sustainable infrastructure is coordinated with the development.

Support - small scale (under 50 home) urban expansions to towns, where this supports the sustainability of that town in relation to environment, health, and economy. This is also in line with proposed changes to planning and used to support local builders and allied trades. Design statement may consider whether local materials may be used, where this is a more sustainable option. This should be sustainable within the existing infrastructure and capacity, unless there is specific uplift agreed and funded.

Oppose - Building houses on the edges of East Devon villages, where this impinges on sensitive countryside and creates car dependency through artificial expansion. However, where expansion is required to supply local labour market emerging with new green economies and makes a sustainable village that can support better service provision, then may be exceptions.

Do you have any further observations on the alternative development options and approaches?

Consideration needs to be given as to why some expansions are needed and whether additional measures e.g., around second homes may be needed so as to not fuel further inequity and place pressures on new housing stock with a cycle of housing being developed and then becoming unobtainable to populations vital for services.

Question 30 - Establishment of a Development Corporation

If this is the best method to ensure a strategic approach to development to fulfil this local plan, then essential. Whether having a Development Corporation improves health and is more efficient over other mechanisms would require further evidence. If a Development Corporation is formed, then Public Health should be a key partner within this body.

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 this Local Plan?

Yes, it would be very sensible whether a new town is proposed or not.

Please provide any further comments below.

As we seek to move rapidly on the Climate Change emergency whilst supporting human health, we need to make allocations for land suitable for carbon sequestration, green energy production, changes to agriculture, for both the shorter-term goal of 2030, and the current longer-term 2050 target. Consideration will also need to be given to land that will be threatened by sea level rise, changes in CO₂ etc., and any displacement that may occur.

Question 32 – And finally?

Perhaps some expansion around the importance of and planning for appropriate accommodation for gypsies and travellers; it is not just recognising this, but planning to fulfil requirements to support access to health facilities and other key services. This would again need to take the Public Sector Equality Duty into consideration, which including advancing equal opportunities.

We will continue to work in partnership with planners and others in informing and utilising the evidence base around the built and natural environments on public health and how this may inform health improvement, promotion, and protection. This would include not only identifying risks and where interventions may be required using high level data, but engagement as to how to implement policies that benefit all segments of the population with particular emphasis on how this is experienced by those at greater disadvantage.

Local planning policy can be a lengthy process; however, a review is timely, and will need to work at pace to align with the Climate Emergency plans to move towards carbon neutrality, and beyond. In tackling climate change and planning for adaptations and mitigations meaningful engagement is required with local communities, especially with the more vulnerable such that any changes to not create or add to existing inequalities.

Appendix – Main documents referred to:

The response will draw on existing Public Health Guidance, with specific references where appropriate. Main guidance used in compiling this response was:

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