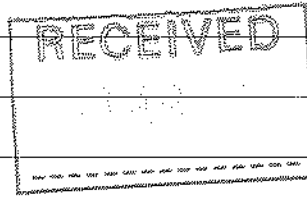


PLANNING POLICY SECTION

R F COLLINS

E. D. D. C.

LOCAL PLAN



15-3-2021

Dear sirs,

My son is sixth generation to farm at Hale. Collins family have been here since 1850, and my two grandchildren will be the seventh.

There has been a farm documented on this site since at least 1249.

I own 83 acres my wife 30 acres Cousins 70 acres.

"Public rights of way"

We have four, Path 12, 13, 14, 15. Many people now use all paths on Hale farm since Coronavirus crisis. My wife counted fortythree using path 12 easter monday 13-4-2020 in the afternoon.

NO DEVELOPMENT TO LAND EAST OF HONITON

Our family will strongly contest an easterly expansion to Honiton.

Should you require further clarification please contact me.

Yours faithfully,

Chapter 2 - Objectives, scope and background

2.1 At the outset we think it is important to set out objectives for a new local plan.

Designing for health and well-being	Objective 1	To encourage healthy lifestyles and living environments for all East Devon residents.
Tackling the climate emergency	Objective 2	To ensure all new development moves the district towards delivering net-zero carbon emissions by 2040 and that we adapt to the impacts of climate change.
Meeting future housing needs	Objective 3	To provide high quality new homes to meet people's needs.
Supporting jobs and the economy	Objective 4	To support business investment and job creation opportunities within East Devon and support a resilient economy.
Promoting vibrant town centres	Objective 5	To promote the vitality of our town centres, encourage investment, greater flexibility and a wider range of activities to increase footfall and spend.
Designing beautiful and healthy spaces and buildings	Objective 6	To promote high quality beautiful development that is designed and constructed to meet 21 st century needs.
Our outstanding built heritage	Objective 7	To conserve and enhance our outstanding built heritage.
Our outstanding natural environment	Objective 8	To protect and enhance our outstanding natural environment and support an increase in biodiversity.
Promoting sustainable transport	Objective 9	To prioritise walking, cycling and public transport and make provision for charging electric vehicles, whilst reducing reliance on fossil fuelled vehicles.
Connections and infrastructure	Objective 10	To secure infrastructure needs at an appropriate time to support new development

Question 1 - Local Plan Objectives

Do you think these are the right objectives for the new local plan, are there any further objectives that you would wish to see added or amendments made?

⑧ Please include CONSERVE protect and enhance - - - -

⑩ Infrastructure must come first, e.g. medical facilities, green spaces, schools in addition to safe transport bikes, locally and overall

① What do you mean by "beautiful development" Please set appropriate

building standards to match the local natural and built environment at approval stage to include density

The scope of the local plan

- 2.2 We consider that it is best to produce a single local plan for East Devon covering all key planning matters rather than a series of separate plans. However, an alternative option might be to first produce a strategic plan covering core issues and then to produce one or more separate plans addressing additional less strategic matters or particular concerns in greater detail.

Question 2 – The scope of the local plan

Do you think we should?	Tick one box only
Option 1 - Single Plan - Produce a single local plan covering all policy matters?	<input type="checkbox"/>
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?	<input type="checkbox"/>
Option 3 – Other - Do an alternative or neither of the above?	<input checked="" type="checkbox"/>
Please provide any further comments in the box below	
<i>It must be cohesive but built from bottom up – not top down</i>	

Question 3 - Neighbourhood Plans and the new Local Plan

How do you think we should make best use of existing neighbourhood plans to inform the new local plan that we are producing?
<i>Neighbourhood Plans are essential. How is this to be achieved in the time scale set?</i>

Evidence to inform the local plan and other tasks

- 2.12 Local plans need to be supported by evidence. In this report we refer to existing specific studies, where they exist, as well as future work we may need to undertake to inform the plan. On our web site we will include details of documents and studies that are completed or are to be produced.

- 2.13 Alongside consulting on this issues and options report we are also:

Question 4 - Planning for health and wellbeing

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

Please tick one box only

Absolutely essential <input checked="" type="checkbox"/>	Very important <input type="checkbox"/>	Quite important <input type="checkbox"/>	Of limited importance <input type="checkbox"/>	Not important at all <input type="checkbox"/>
-------------------------------------------------------------	--------------------------------------------	---------------------------------------------	---------------------------------------------------	--------------------------------------------------

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

*What is required in a policy that embodies "greenspace" within each development - and in existing built up areas
(1) no more air filling (2) wide green areas and trees (not necessarily ornamental) to provide leafy avenues.*

developments. There are also low carbon heating options such as district heating systems as installed at Cranbrook where hot water is pumped around all houses to supply heating. Local authorities currently have the ability to set energy efficiency standards for new build developments that go beyond the minimum levels set out in building regulations.

Question 5 - Energy efficiency of new buildings

Do you think we should? **Tick one box only**

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 in the box below

It does not necessarily mean less affordable housing. we need to be in the driving seat with regard to new developments: they need a reasonable "net profit" but not a 'super' profit. local authorities should take a share in the excess of profit (super profit) but is not to full answer. The community should look at it as a business would and have a watertight contract.

as hydro-electric schemes and heat pumps, drawing heat from below ground level, are not as commonly developed at a commercial scale but may come forward in the future. Land used for windfarms and solar panels, especially where taken out of agricultural use, offers real potential for creating wildlife habitats.

Question 6 – Provision of solar arrays/farms and windfarms

Which option do you think we should take?	Tick one box only
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.	<input type="checkbox"/>
Option 2 – Not identify areas but offer general support - we could provide a more general policy of support specifically for solar projects across the district without identifying any areas or specific sites.	<input type="checkbox"/>
Option 3 – Take a more restrictive approach to renewables – we could make it much harder for renewable energy development to occur, however this may make it difficult, or perhaps impossible, to achieve carbon neutrality.	<input checked="" type="checkbox"/>
Option 4 – Please tick the box if you think none of the above are appropriate	<input type="checkbox"/>
Please provide any further comments on wind farms and solar arrays/panels.	
<p><i>Hydro electric schemes? Where in East Devon? Mountainous areas - yes.</i> <i>Solar panels on land taken out of agricultural land (in lower grades) - No</i> <i>They do not create wildlife habitats - they can do the opposite.</i> <i>Wave power? Severn Estuary barrage - yes - but no where suitable in East Devon</i></p>	

Additional carbon neutrality policy objectives

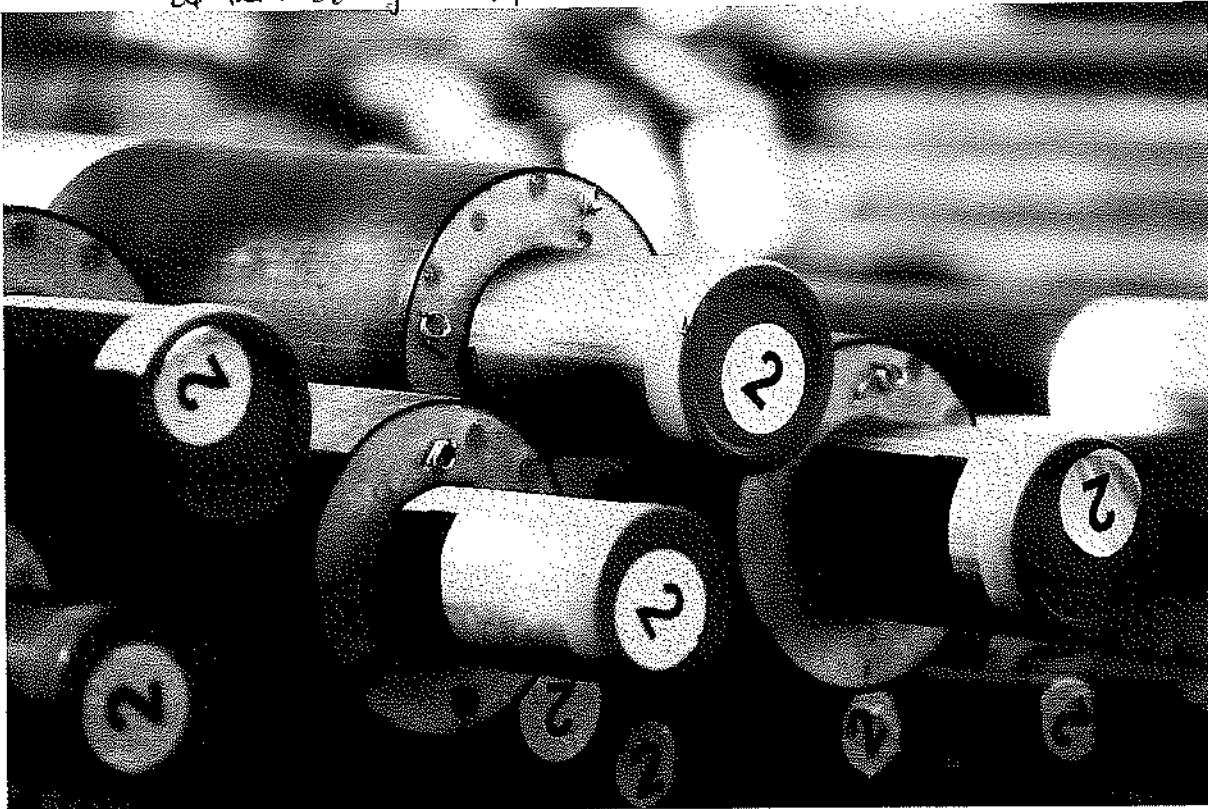
- 4.8 As we develop policy for carbon neutrality we will also look at other emerging themes and issues that we may wish to address in our plan. Key policy development may include:
- 1) Promoting District heat networks to provide heat from renewable or low carbon fuels to homes and businesses through a network of pipes carrying hot water. This type of heating currently supplies the town of Cranbrook.
 - 2) Utilising 'waste heat' generated from industrial, commercial and other sources.
 - 3) Promoting energy storage facilities and batteries in order to store greater amounts of electricity generated during the day for use in the evenings and at times when it is most needed.
 - 4) Promoting community led renewable energy schemes where residents can come together to collectively invest in smaller scale renewable energy installations in their local area, including solar, wind and hydro-electricity.
 - 5) Locating new development in locations that are close to local facilities so people can walk and cycle more and do not need to be reliant on the car.

- 6) Encouraging tree planting which will help take large amounts of carbon dioxide out of the atmosphere. Also we can promote other land use changes to promote carbon removal or storage. The Committee on Climate Change⁶ recommended that overall woodland coverage in the UK should be raised from 13% to 18%.
- 7) We will also need to mitigate or adapt to the impacts of climate change, such as flooding by incorporating new environmentally sensitive drainage systems in developments. Such measures will also have wildlife benefits.

Question 7 - Carbon saving measures

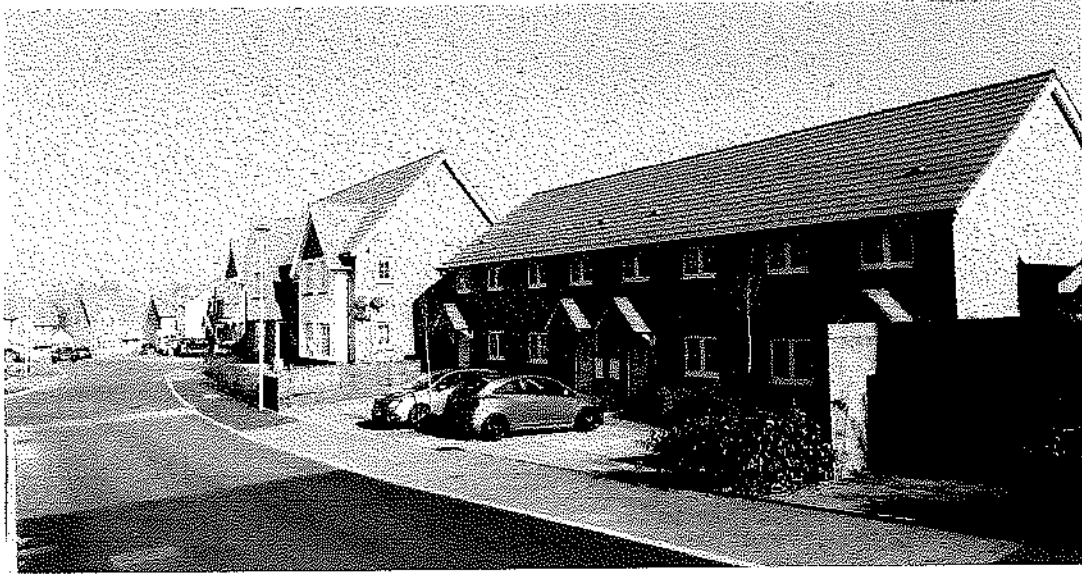
Do you think we have identified the appropriate carbon saving and related policy matters to be addressed in a new local plan and are there any other policy areas that you think we should be considering?

*No: in some suggestions there is little vision or visibility.
 (a) What is the present allocation of woodland to land surfaces?
 (b) The figures of 13-18% should not be a defined objective. Let us have our own objective and encompass flood mitigation through planting areas at the head of river/stream catchment.*



District heating network pipes waiting to be installed

⁶ See: <https://www.theccc.org.uk/publication/sixth-carbon-budget/>



New affordable homes at Ottery St Mary

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

Which option do you think we should take?	Tick one box only
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.	<input type="checkbox"/>
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.	<input type="checkbox"/>
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.	<input type="checkbox"/>
Option 4 – Please tick this box if you think none of the above are appropriate	<input checked="" type="checkbox"/>
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.	
<p><i>The figure of 928 must be challenged. First we must not destroy our natural asset which is economically vital. Tourism - people come to see our natural assets. Stand up to Government.</i></p>	

Encouraging small and medium sized builders

5.5 The house building industry in England is dominated by a small number of major firms that typically build on larger sites (generally sites of 50 homes or more). In East Devon, in recent years, big development sites have supplied many of the new homes built. The Government has indicated, however, that across England they wish to see many more homes built by smaller companies.

5.6 Under Government policy the expectation is that land to accommodate at least 10% of the housing requirements should be on sites that are no larger than one hectare in size (this site size may typically accommodate around 20 to 40 homes).

5.7 Smaller builder developments can have a number of advantages over big developments. They may employ more local labour and support local businesses and supply chains. The homes built may be more likely to meet local needs and reflect local character rather than being the volume builder's national design and standards. However, local developer built homes may be more expensive to buy than mass produced homes.

Question 9 – Sites for small scale housing developments

Which option do you think we should take?	Tick one box only
Option 1 - Allocate or identify land for around 10% of homes to be on small sites – this approach would meet minimum government standards.	<input type="checkbox"/>
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.	<input type="checkbox"/>
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.	<input type="checkbox"/>
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.	<input type="checkbox"/>
Option 5 - None of the above or an alternative	<input checked="" type="checkbox"/>

Please provide any further comments in the box below.

*First: what is the actual local need?
 Secondly Prices are higher than they should be partly due to second home acquisition
 this has to be tackled so that home grown people of all income streams can remain
 third what is the position of 'buy to let', is investment: we have to get our priorities right and identify cohesive housing growth and need*

Housing for people at all stages of their life

5.8 As people go through their lives their housing needs can change. Younger people may start off with smaller homes but trade up as they have children and can afford more. As their children leave home parents may decide to downsize to smaller homes and in older age specially adapted or care homes may be appropriate. In addition people of all ages may be disabled or less mobile and have specific housing needs.

5.9 Private developers will cater, to some degree at least, to different sectors of the market. However, a criticism is sometimes made that house builders can concentrate on building 'family sized' three or four bedroomed houses, that may not

be priced at levels that all people can afford or be suitable for those with mobility problems or caring needs.

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

Which option do you think we should take?	Tick one box only
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.	<input type="checkbox"/>
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.	<input checked="" type="checkbox"/>
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.	<input type="checkbox"/>
Option 4 – None of the above or an alternative.	<input type="checkbox"/>
Please provide any further comments in the box below on how we may best plan for housing for all.	
<i>Overall balanced age provision - this leads to lively communities.</i>	

Question 11- Additional housing policy objectives

Do you think these are appropriate housing policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?
<i>6. Yes.</i>
<i>9. Yes</i>

Question 12 - Preference for location for future job provision

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.	Please tick one box only for each option				
	Strongly support	Support	Neither oppose nor support	Oppose	Strongly Oppose
Continued focus on big employment sites in the West End of the District	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Encouraging greater business development in other areas close to Exeter (for example expanding Greendale and Hill Barton Business Parks)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Encouraging greater business development at and within the main towns of East Devon	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Encouraging business expansion and development in the villages and across the countryside of East Devon	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Encourage and enable more home working	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If you have any comments on the above or alternative options please set these out below.					
<p><i>Its all about balance. We do need to recognise the changes that are happening and likely to happen. The future may be different in 3-4 years time.</i></p>					

Future types of jobs in East Devon

6.8 Whilst East Devon is home to a wide range of differing jobs, and will continue to be in the future, it is relevant to consider whether there are particular additional job types that the local plan should seek to encourage and promote.

6.9 A current focus for economic growth has been in areas that fall under the title of 'transformational sectors', which include:

- Smart Logistics and Transport;
- Data Analytics;
- Health Innovation;
- Knowledge Based Industries; and

- Environmental Futures.

6.10 A Transformational Sectors Action Plan for the Greater Exeter area¹³ explains more about what these titles mean. They are, however, new and emerging job sectors for which East Devon offers strengths and growth opportunities. They offer the potential for higher skilled and better paid jobs, though there will remain the need to ensure there are employment opportunities for all.

Question 13 – Differing jobs sectors in East Devon

Please tick one box only for each option					
To what degree do you support, or not, the following approaches to future jobs or differing types of jobs?	Strongly support	Support	Neither oppose nor support	Oppose	Strongly Oppose
More jobs overall – with an emphasis on attracting new/larger employers and inward investment in any or all sectors.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
More high technology jobs - focussing on high technology and high skilled jobs (including in the transformational sectors).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Local Entrepreneurs - promoting opportunities for more home/locally based/small businesses.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Traditional Sectors - Focus on growth, resilience and diversification in our traditional sectors - such as agriculture, tourism and care.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
If you have any comments on the above please set these out below.					

6.11 In considering how to best support the economy, we may also seek to develop policy in the following areas:

1. 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.
2. Which encourage an increase in local spend at and with businesses in East Devon.

¹³ <https://eastdevon.gov.uk/media/3721682/transformational-sectors-action-plan.pdf>

3. To provide facilities where people from different businesses can share working spaces or premises as well as supporting services.
4. That may allocate further or additional sites if there are shortfalls identified or review shows that existing employment sites are unlikely to be developed or built-out.
5. Considering how we may embed environmental and sustainability considerations more fully into economic development objectives and in so doing how this can support a transition to low carbon/greener economy.

Question 14 – Additional economic policy objectives

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?

Again this requires balanced and cohesive thinking.

radical approach could be to do nothing and let the market decide, although this does risk losing shopping uses in the town centre altogether.

Question 15 – Town centre uses

We set out below a number of differing potential uses and approaches to promoting town centre vitality and activity. Please indicate you're in principle levels of support for each potential option or approach.

Please tick one box only for each option

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



Sidmouth town centre during folk festival week

- 7.6 In considering town centre vitality and retail issues more generally we may also need to look at the following areas when developing policy:
1. How we might promote greater use of vacant upper storeys above ground floor shops.
 2. Whether we should seek to resist out-of-town retail, or other commercial activities, in the hope that we may see more town centre shopping and investment.
 3. Whilst it would probably be outside of the scope of local plan policy we could look to producing masterplans for town centres to identify key areas for improvement.

Question 16 – Additional town centre policy objectives

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?

- (1) Axminster is in urgent need of an INDEPENDENT TOWN PLANNER TO GIVE THE TOWN A VIBRANT BALANCED FUTURE
(2) RESIST OUT OF TOWN RETAIL

(1) above - Office space.

- 9.4 Research by Historic England²⁰ has also shown a very positive relationship between communities involved in their local heritage and their quality of life, and it is important that our heritage is conserved and enhanced, for this and future generations.
- 9.5 The maintenance (and management of change) of our heritage assets (such as important old buildings) including sensitive improvements, can help to sustain and enhance their significance. This in turn can help to maximise their contribution towards wider social, economic and environmental benefits.

Question 19 - The importance of conserving and enhancing heritage assets

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?

Please tick one box only

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.

Heritage Assets are not just buildings



View along Sidmouth seafront

²⁰ See: <https://historicengland.org.uk/research/heritage-counts/heritage-and-society/>

established landscape character assessment¹⁸ approach to consider site choices and how they might be developed. The second scale of planning relates to beautiful places and concerns the spaces between buildings like streets, squares and parks. The third scale relates to buildings. Previously our local plans have focussed on the first 'beautifully placed' scale of planning with general policies to guide the second (beautiful places) and third (beautiful buildings) elements. We are considering taking a new approach with more emphasis on how beautiful places and buildings can be planned at the outset through the local plan rather than relying on subsequent master planning or individual planning applications. This would be likely to involve the use of design codes and master planning as part of the local plan.

- 8.6 Master planning sets out the principles for a development concentrating on the high level structure for a site, such as how people will get in and out of it, the main routes through it, and the landscape features, although it can show in some detail how development will be implemented.
- 8.7 A design code is a set of illustrated design requirements for a site. They can include graphic and written components and should build upon a design vision set out in a masterplan or similar document¹⁹.

Question 17 – Designing beautiful spaces and buildings

How important do you think it is that we should actively plan to create beautiful spaces and buildings?

Please tick one box only

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.

*Prepare design codes in line with Neighbourhood Plans
Setting out local aspirations*

- 8.8 In considering design considerations we will also look to the following areas where we may develop policy:

¹⁸ <https://eastdevon.gov.uk/planning/planning-policy/environment-and-green-infrastructure/landscape/the-2019-landscape-character-assessment/>

¹⁹ <https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary>

pays money to mitigate impacts that would otherwise occur through increased user pressure on the Exe Estuary and the East Devon Pebble bed Heaths.

Question 20 - Development in protected landscapes

In considering whether we should allow for development in protected landscapes do you think:	Tick one box only
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.	<input type="checkbox"/>
Option 2 - Allow for development to meet local needs - This would allow for limited development, specifically where it will meet smaller scale local housing, community or economic needs, though it could still mean more development pressure elsewhere in East Devon.	<input checked="" type="checkbox"/>
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.	<input type="checkbox"/>
Option 4 - None of the above or an alternative	<input type="checkbox"/>
Please provide any further comments in the box below.	
<p>(i) Where is the mention of a National Path - Glover seems to support the East Devon/West Dorset concept</p> <p>(ii) No need for more development pressure if you challenge govt targets for reasons of protecting our natural, <u>economic</u>, asset</p>	

Enhancing biodiversity

10.5 In the past development has often had adverse impacts on biodiversity (the amount and diversity of plant and animal life) and it is rare for the net result to be a biodiversity gain. However things are now changing with the Government setting out that in the future development should now lead to a net increase in biodiversity²⁴ of at least 10%.

10.6 As biodiversity is such a complex matter and difficult to quantify, the Government have introduced a standardised 'biodiversity unit' calculation which is based on habitat-types and considers the extent of the area, distinctiveness (value to wildlife) and condition. The calculation will enable habitat on a site prior to development to be compared to proposed new habitat. The calculation takes account of risk factors such as technical difficulty to create, length of time to establish, location and distance from the development site. It does not take account of individual species of plants or animals but the current legal and policy protection given to designated

²⁴ <https://www.gov.uk/government/publications/environment-bill-2020>

1. Support designation of open spaces (for example green wedges) between settlements and local landscape protection areas.
2. Policies in the plan for wildlife friendly spaces that respond to the impacts of a changing climate.
3. Potential for expansion of the Clyst Valley Regional Park.
4. Placing greater emphasis on landscape character assessment and evaluation of landscape impacts when determining planning applications. This may require us to develop new designations for some areas or define zones of high, medium and low sensitivity.
5. Offer increased protection from development of land that may have some biodiversity importance including lower grade agricultural land and previously developed land.
6. Set minimum standards for the amount and quality of green space in development sites.
7. Encourage new and existing green spaces to be more wild and nature friendly and less manicured and carefully managed.
8. Extend the 'Local Green Space' designations in many of the Neighbourhood Plans to cover all of the towns and villages in the District.
9. With increasing coastal erosion we will need to plan for areas that are potentially going to be lost to the sea. These are called coastal change management areas and in them we will need to consider what types of development may be acceptable and also whether and where we need to relocate existing uses.
10. Look more closely at controls over large scale farm buildings and the adverse landscape impacts they can have.

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?

2. Nature will do this: it does not need man.

9. Think long term. Would any development that is likely to be eroded suitable for planning permission

* Current environmental surveys are totally inadequate and in many cases

Misguided: (e.g. transporting slow worms away from their immediate area)

Environmental surveys must cover all plants and animals: desk research is helpful but a survey in winter is likely to be useless.

It's need to be enforced: where permission is granted the conditions for replacement must be enforced – something barely happening at present

Question 23 – Promoting access to 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?

Tick one box only

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.

Other sustainable transport policy objectives

11.7 As we develop policy for sustainable transport we will also look at other emerging themes and issues that we may wish to address in our plan. Key issues identified so far include:

1. To look more fully at bus routes and accessibility when planning for new development and consider ways we can promote public transport quality and use.
2. Providing and promoting high quality walking and cycling networks and support cycle parking.

3. Focus development in the most accessible locations where most journeys can be made by walking, cycling and public transport.
4. Protect existing valued services and facilities from being lost to other uses.
5. Require large scale development to provide a mix of uses on site and/or show how a range of different uses can be easily accessed from the development by walking, cycling and public transport.
6. Set walking distances from new homes to a range of identified services (including bus stops) – generally 800m is a comfortable walking distance.³¹
7. Set targets for new development relating to the proportion of people who will walk, cycle and use public transport.
8. Identify and protect sites and routes which could be critical to widen transport choice.
9. Provide for large scale transport facilities such as public transport projects and roadside services.
10. Recognise the importance of Exeter airport with the expectation of a specific policy for the airport and its future.
- ✓ 11. Consider levels of car parking in new development and the need for electric charging for vehicles, specifically given the proposed ban on the sale of new petrol and diesel cars from 2030.
12. Recognise the importance of providing adequate overnight lorry parking facilities.
13. Require cycle racks and electric charging for bicycles.

Question 24 - Additional sustainable transport policy objectives

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?

*A reliable and user friendly frequency for rural bus. – possibly combined with road delivery and supplies purchased online!
Capture funds from Govt for rural transport – Current*

³¹ Active Design, Sport England, 2015: <https://www.sportengland.org/how-we-can-help/facilities-and-planning/design-and-cost-guidance/active-design>

Question 25 – Facilities and services that are important

Please score the services and facilities listed below in accordance with their Importance to where you live or would want to live?	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 ³⁷)	<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.

Every one of these is essential/very important relative to where the respondent lives

³⁷ Five bus services per day is defined as a category by Devon County Council at Travel Devon: <https://www.traveldevon.info/bus/interactive-bus-map/>

Other infrastructure and service provision policy objectives

- 12.9 As we develop policies around infrastructure and service provision we will also look at other emerging themes and issues that we may wish to address in our plan. Key issues identified so far include:
1. How we prioritise the money available for infrastructure particularly between facilities such as sports pitches and play areas needed by the local community and other needs such as affordable housing.
 2. How do we balance the government requirement to ensure that developments are viable and deliverable with the need to deliver the infrastructure needed to support them.
 3. How do we access more government funding to bridge the gap between the funding that is available from developments to fund infrastructure and the cost of delivering what is needed.
 4. How do we engage with our communities to ensure that the infrastructure that is delivered is designed to meet their needs.
 5. We are interested in the facilities that are needed in villages and rural areas, such as shops, schools and meeting places and approaches we may take to sustain these into the future, including whether additional housing or other development initiatives may support service provision.

Question 26 – Additional infrastructure and service provision policy objectives

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

This question should not need to be asked - All should be addressed with the utmost vigour

- 2. **Seven Towns of** – Axminster, Budleigh Salterton, Exmouth, Honiton, Ottery St Mary, Seaton, and Sidmouth.
- 3. **15 Villages that provide a range of facilities and services** - to meet some of the basic needs of their residents and nearby rural areas: Beer, Broadclyst, Clyst St Mary, Colyton, East Budleigh, Feniton, Kilmington, Lypstone, Musbury, Newton Poppleford, Sidbury, Uplyme, West Hill, Whimple, Woodbury. (Colyton is actually a town but on account of its small size and facilities we put it into a 'village' category).

13.10 The council is producing evidence to inform which settlements should go into which tiers and feedback from this report will help with our ongoing work.

Where villages might sit in a new hierarchy

13.11 The seven main towns of East Devon plus Cranbrook would appear a logical grouping, all have at least a reasonably wide range of facilities and services. The distinction between the 15 larger Villages with Built-up Area Boundaries in our current local/village plan and other villages is less clear cut. It may be that some other villages, on account of the services they provide, should be added to the list of locations that may be appropriate to accommodate development.

Question 27 - Retaining and refining the existing settlement hierarchy

Which of the following options do you prefer for a potential settlement hierarchy?	Tick one box only
Option 1: Same hierarchy as current Local Plan: 7 Towns plus Cranbrook and the 15 Villages	<input type="checkbox"/>
Option 2: A hierarchy that retains the towns and Cranbrook but has a lower number of villages that may accommodate development	<input type="checkbox"/>
Option 3: A hierarchy that retains the towns and Cranbrook but has a higher number of villages that may accommodate development	<input type="checkbox"/>
Option 4: Do something different in terms of a hierarchy or not have one	<input type="checkbox"/>
Please provide any comments below on the potential hierarchy, especially if you do not support the listed options.	
<i>We come back to fundamentals: the numbers of houses required are greatly in excess of what East Devon needs and should have.</i>	

Developing a spatial strategy: Distribution of development

13.12 The total amount of development required in East Devon is still to be finalised so we can't yet identify actual precise amounts. Nevertheless, it is important to think about the overall strategy for distributing development, and the various options that should be considered when doing so. Government planning guidance is clear that options

Question 28 – Broad distribution of housing development

Which broad approach to the distribution of housing development would you favour in a new local plan?	Tick one box only
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.	<input type="checkbox"/>
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).	<input checked="" type="checkbox"/>
Options 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 (for example 50% in towns and 30% in villages and rural areas).	<input type="checkbox"/>
Options 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).	<input type="checkbox"/>
Please provide any comments on the above in the space below.	

Potential forms of development

13.15 In line with developing an over-arching strategy for the distribution of development we also need to think about the specific types of development that could be appropriate in East Devon. In the table below we set out some differing options with brief commentary on each. In reality it is likely that many differing forms of development will be needed, and probably will be desirable, but it is helpful to set out options and from this we can further develop our thinking on where priorities may be set.

13.19 Typically a development corporation would draw on Government or other public sector loans or may have money raising powers of its own. The Government have endorsed, in principle, the creation of new development corporations and if one were created in East Devon it would be hoped that it would help secure additional Government grants and funding. Development Corporations can also lead to better arrangements for the long term management of community assets such as open spaces and reduce the burden often left by developers on future residents.

Question 30 - Establishment of a Development Corporation

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?

Please tick one box only

Absolutely essential	Very important	Quite important	Of limited importance	Not important at all	It would be a bad thing
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Please provide any further comments below.

It removes decisions from local people

Plan Period

13.20 At the present time we envisage that the local plan could have an end date of 2040, however, this remains to be determined. If large scale developments are made in the plan, especially another new town or other big strategic developments, it might be desirable to plan for a longer period or to refer to development beyond a 2040 end date. This approach would give clarity to the community and the development industry about where large scale strategic growth would be accommodated in the future and help us to plan how we deliver the infrastructure to support development in that area in the future.

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

For each option please tick one box only						
How do you feel about the development types and locations listed below	Strongly support	Support	Neither oppose or support	Oppose	Strongly oppose	None of the options
Infilling in towns and at larger villages	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" 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 checked="" 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						
<p><i>All existing communities must only accommodate manageable growth to ensure absorption by the community. To double the size of a town in a shortish timescale is a recipe for creating tension and not a cohesive and vibrant community.</i></p>						

Potential for a Local Development Corporation in East Devon

13.17 This report highlights potential for new large scale developments in East Devon, potentially including an additional new town. Ensuring timely delivery of services and facilities and addressing up front infrastructure costs can be especially challenging for such development. One option for encouraging better quality growth with services and facilities being provided alongside new housing would be the establishment of a local development corporation.

13.18 Development corporations are public sector bodies that take an active involvement in supporting and promoting development and delivering services and facilities. They can act as "Master Developer" acquiring land and commissioning building work and 'parcelling-up' and selling land onto other developers. Development Corporations have existed in various forms in England since the mid 20th century and where created they have typically secured high quality development and the timely delivery infrastructure.

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?

Please tick one box only

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
<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide any further comments below.

Chapter 14 - What happens next

- 14.1 This issues and options report forms just the first step in helping us produce our new local plan. In the Spring of 2021 we plan to assess the feedback we receive and this will be used to help inform our thinking on the plan strategy and preferred policy approaches.
- 14.2 In the draft plan we will set out what we consider to be the most favourable policies and in supporting documentation, specifically in a Sustainability Appraisal report, we will also report on other options and approaches that we have considered.
- 14.3 We will consult on the draft plan, in order to ensure we are heading in the right directions, and taking comments into account we will seek to produce a final plan that will be submitted for examination by a Planning Inspector.
- 14.4 We will ensure that we keep everyone that has expressed an interest in the plan informed of its progress and the key steps that are being taken. Though of course if you no longer retain an interest please advise us and we can remove you from contacts lists.

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?

Approving planning - for people to concrete front gardens for car parking / access to electric charging points will change the character of a road overnight

