

Response to East Devon Issues & Options Local Plan consultation, March 2021

Dear Planning Policy Team,

Thank you for the opportunity to comment on the preliminary stages of the East Devon Local Plan review.

As you are aware, we consulted on strategic cross-boundary matters to develop our Duty to Cooperate Statement in 2020. The statement is published [here](#) and will be updated as our plan is progressed to the Publication stage (Reg 19).

The Duty to Cooperate Statement (Table 6.2) identifies the following issues as being of strategic importance between our authorities:

- Housing Needs and Distribution;
- Gypsy and traveller provisions and Transit sites;
- Climate Change and Flood Risk
- Protected Landscapes;
- Natural Environment; and
- Transport Network.

Each of these areas are addressed in turn below with the addition of economic development. We further support the reference to the Duty to Cooperate set out in paragraphs 2.7 – 2.8.

Housing Needs and Distribution

SSDC note the minimum local housing need requirement for East Devon. We would seek confirmation through the Duty to Cooperate that EDDC are able to meet their own housing needs within the district, and will not be approaching neighbouring authorities to accommodate any additional need.

Question 28. We have no specific comments on how the council choose to distribute housing development within the district, but consider that the strategy should be informed by the sustainability appraisal to ensure that the most sustainable option for long term growth is selected to address sustainability objectives, including the transition to net zero carbon.

Overall, it is considered that the approach to addressing housing needs and distribution will not adversely impact on the housing delivery and the role and function of settlements in South Somerset.

Economic Development

Question 12. SSDC consider that whilst the Council's focus may be on realising the potential of strategic employment sites in the 'west end' close to Exeter, there is potential for expansion in the main towns, including Axminster and Honiton. It is clear that there are important links between the eastern area of South Somerset and East Devon for employment and a flexible approach to bringing forward economic development is supported, particularly outside the 'west end' area of economic focus.

Question 15. We recognise the challenges for retail and town centre uses, which are reflected nationally. We agree that the changes to shopping patterns and the expectations people will have for high streets are changing, at a rate that has been exacerbated by the pandemic. We consider that options presented are realistic, but enabling retail to dominate may be challenging with the introduction of the new Use Class E.

Gypsy and traveller provisions and Transit sites

Paragraph 5.10 addresses additional housing policy objectives. SSDC would seek clarification that gypsy and traveller needs, for both permanent pitches and transit sites, can be met within EDDC.

Protected Landscapes

The Blackdown Hills AONB partly falls within South Somerset and East Devon - no specific issues arise from the consultation document in relation to the AONB.

Climate Change

The steps being taken by East Devon District Council to address Climate Change are welcomed. We support the approach set out in the strategic objectives for the plan in tackling the climate emergency to deliver net zero carbon emissions by 2040.

South Somerset District Council is seeking to be carbon neutral across its own operations by 2030 at the latest and ideally by 2023. It will also be working to achieve a significant reduction in emissions and improve carbon offset rates across the geography of South Somerset via direct action, supporting our communities in their ambitions and ensuring that working towards carbon neutrality is a thread that runs through all our decision-making. More information can be found in our Environment Strategy [here](#).

Question 6. In respect of the provision of solar arrays/farms and windfarms we wish to highlight that identification of suitable areas should factor in sensitivities and constraints presented by AONBs and designated heritage assets, including their settings.

Natural Environment

With regard to other natural environmental policy objectives, we recognise that a key issue raised through Duty to Cooperate discussions between East Devon and South Somerset councils, is the unfavourable condition of the River Axe SAC as a result of elevated levels of phosphates. This issue would also need to be addressed within this section of the plan aligned with appropriate mitigation strategies. We will continue to engage on this issue as our respective Local Plans develop.

Transport Network

The promotion of active travel modes is noted, together with other sustainable transport policy objectives. SSDC consider that the plan should also recognise the importance of cross-boundary bus links - such as the route between Taunton and Axminster which provides opportunities for residents in the eastern area of South Somerset (particularly Chard) to access employment and the train station at Axminster.

Other Matters

Finally, you may also be aware that two unitary proposals have been submitted to the Secretary of State for Housing, Communities and Local Government, for his consideration. This includes the One

Somerset proposal submitted by Somerset County Council, and the Stronger Somerset proposal submitted by the four district councils on 9th December. The government has been clear that it could decide to make no change, or it may select one of the two proposals for change being put forward. The case for the district’s proposal can be found [here](#). The Government are now consulting on these unitary proposals. The consultation can be found [here](#).

Duty to Cooperate

SSDC previously responded to a request for comments on cross-boundary strategic matters in December 2020. With regard to the email received on 19th January specifically in relation to the substantive matters to be addressed through the Duty to Cooperate, we have the following comments:

Strategic matter	Specific issue to be considered through local plan	SSDC response
Housing	Distribution of housing growth – potential to accommodate growth needs from elsewhere in East Devon or East Devon needs going into other local authority areas.	We have indicated in our Duty to Cooperate Statement (October 2020) that this is a matter which is a strategic cross-boundary strategic matter between SSDC and East Devon District Council.
	Gypsy and traveller – providing adequate gypsy and traveller sites to address identified needs (static and transit).	We have indicated in our Duty to Cooperate Statement (October 2020) that this is a matter which is a strategic cross-boundary strategic matter between SSDC and East Devon District Council.
Employment	Provision of land to support employment aspirations of Heart of the South West Local Enterprise partnership or other bodies,	We consider that this is unlikely to be a strategic cross-boundary matter between SSDC and EDDC, however SSDC reserves comment as the East Devon Local Plan progresses.
Retail	Any major retail development in other areas that would be likely to adversely affect our town centres or developments in East Devon affecting other locations.	We consider that this is unlikely to be a strategic cross-boundary matter between SSDC and EDDC, however SSDC reserves comment as the East Devon Local Plan progresses.
Leisure	Proposals for sporting venues serving wider area than an East Devon need.	We consider that this is unlikely to be a strategic cross-boundary matter between SSDC and EDDC, however SSDC reserves comment as the East Devon Local Plan progresses.

Strategic matter	Specific issue to be considered through local plan	SSDC response
Other commercial development	None currently identified	No comment
Transport	<p>Impact of planned growth levels on transport infrastructure in other areas including:</p> <p>Provision of a passing loop on Exeter – Waterloo railway line to facilitate half hourly services between Axminster and Exeter.</p> <p>Transport links between Exeter and East Devon.</p> <p>Capacity limits at Junctions 29 and 30 of the M5 motorway or on other major roads.</p>	<p>We have indicated in our Duty to Cooperate Statement (October 2020) that this is a matter which is a strategic cross-boundary strategic matter between SSDC and East Devon District Council (see comments in relation to the Local Plan Issues & Options above).</p>
Tele-communications	None currently identified.	No comment
Security	None currently identified.	No comment
Waste management	Impact of planned growth levels on waste management capacity.	No comment
Water supply	Impact of planned growth levels on water supply capacity in other local authority areas.	No issues identified.
Wastewater	Impact of planned growth levels on wastewater capacity and pollutants that might arise in other local authority areas.	<p>We have indicated in our Duty to Cooperate Statement (October 2020) that this is a matter which is a strategic cross-boundary strategic matter between SSDC and East Devon District Council.</p> <p>We would reiterate our wish to be involved in ongoing discussion around the River Axe phosphates issue with any potential future need for joint approaches to secure relevant and appropriate mitigation. From a South Somerset perspective this could impact on development on the southern side of Chard and southward to the boundary with East Devon. We are currently</p>

Strategic matter	Specific issue to be considered through local plan	SSDC response
		working jointly with the Somerset local planning authorities to address phosphates affecting the Somerset Levels and Moors Ramsar Site – the catchment of which covers a significant area of our district.
Flood risk	Impact of development on levels of flood risk in other local authority areas.	No issues identified.
Coastal change management	Potential for co-ordinated approach with neighbouring coastal authorities.	No comment
Minerals	Safeguarding known deposits.	No comment
Energy (including heat)	Expansion of existing district heating network and potential for new networks linking to adjoining areas.	We have indicated in our Duty to Cooperate Statement (October 2020) that the mitigation of the effects of Climate Change is a matter which is a strategic cross-boundary strategic matter between SSDC and East Devon District Council. This would include low carbon and renewable energy infrastructure (see comments in relation to the Local Plan Issues & Options above regarding the provision of solar arrays/farms and windfarms).
Community facilities	Any need for shared facilities across boundaries.	No issues identified.
Health	Impact of growth levels on health capacity in neighbouring areas.	No issues identified.
Education	Impact of growth levels on capacity of education establishments in neighbouring areas.	No issues identified.
Cultural infrastructure	None currently identified.	No comment
Natural environment	Ensuring that the cumulative impacts of growth levels do not damage European wildlife designations.	See comments on phosphate mitigation in relation to wastewater above.
	Ensuring a consistent approach to nutrient levels in the River Axe.	See comments on phosphate mitigation in relation to wastewater above.

Strategic matter	Specific issue to be considered through local plan	SSDC response
	Ensuring identification and delivery of mitigation measures.	See comments on phosphate mitigation in relation to wastewater above.
Built environment	None currently identified.	No comment
Historic environment	None currently identified.	No comment
Landscape	Ensuring a consistent approach to the conservation and enhancement of protected landscapes and their setting.	We have indicated in our Duty to Cooperate Statement (October 2020) that this is a matter which is a strategic cross-boundary strategic matter between SSDC and East Devon District Council, as the Blackdown Hills AONB falls within our districts.
Green infrastructure	Delivery of the Clyst Valley Regional Park.	No issues identified.
Climate change mitigation and adaptation	Potential for co-ordinated approach with neighbouring areas.	We have indicated in our Duty to Cooperate Statement (October 2020) that this is a matter which is a strategic cross-boundary strategic matter between SSDC and East Devon District Council. Both councils have recognised a climate and ecological emergency and have proactively worked towards addressing our transition to net zero (see comments in relation to the Local Plan Issues and Options above).

We look forward to continuing to work with you on cross-boundary strategic planning matters and preparing a statement of common ground as our respective Local Plan reviews progress.

Kind regards,

Tessa Saunders

Strategic Planning Specialist

planningpolicy@southsomerset.gov.uk