

A NEW LOCAL PLAN FOR EAST DEVON CONSULTATION RESPONSE

Strategic Planning

East Devon District Council had made the decision to withdraw from joint working with Exeter, Teignbridge and Mid Devon on the Greater Exeter Strategic Plan and the Local Plan process ought to address this.

Following the demise of the Regional Development Agency and the Devon Structure Plan, responsibility for strategic development was left with individual local planning authorities' Local Plans. When East Devon District Council presented its current draft Local Plan for inspection, the Planning Inspector halted the process and insisted that strategic development took account of the wider Exeter area including Mid Devon and Teignbridge as well as the Exeter City Council area. As a result, the four authorities developed planning requirements which were then taken into account in determining housing allocations for each authority. The allocation then for East Devon was 17,100 homes and the Local Plan was currently based on that number. The current issues and options report did not appear to address the lack of a strategic approach across the Exeter economic area – which it should.

Availability of Land for Development

In developing a local planning strategy, one of the key issues was the availability of land for development. In local planning, this was traditionally carried out through a Strategic Housing Land Availability Assessment (SHLAA), i.e. the local planning authority asking landowners what land was available and then assessing each submitted parcel as to whether it was available and whether development was possible. This process was being repeated alongside this recent Local Plan consultation with a call for sites.

The Committee considered this site-led approach as problematic for the following reasons:

Whilst the consultation sought views on a range of sustainability-related issues, essentially, because of the site-led approach, these were secondary. The development of the new Local Plan was starting from land put forward for development and then seeking to bring forward measures through individual policies which might mitigate sustainability issues which arose from development at these sites. The approach should be sustainability-led, not site led.

Sustainability-Led Development

The wider Exeter economic area had reached a point in its development when key infrastructure was already at a near breaking point and a “more of the same” development approach would simply exacerbate problems in addition to those which already existed. Development at many of the sites proposed would be unsustainable, would generate more traffic, more commuting, more pollution, more congestion and

so on, resulting in additional demands for more road infrastructure to move vehicles more efficiently – a downward spiral which needed to be halted.

The Committee felt that the following two aspects would make the locality more sustainable:

- a) New development brought forward in such a way as to minimise commuting to shops, schools and work. There was a need for different and quite radical thinking to focus the creation of all new strategic development within new communities which would be self-sustaining rather than simply adding to existing communities or, worse, building new enclaves which were too small to sustain themselves and generated more commuting to schools, shops and employment and hence would place yet more pressure on already overstretched infrastructure.
- b) Exploring ways to create new links between existing communities particularly in the provision of good public transport which was efficient, regular, inexpensive and attractive to users and by prioritising public transport over private transport as well as retrofitting buildings so that they were better equipped to contribute to the fight against climate change.

The vision should be towards a sustainable, accessible and networked city region of linked but distinct communities and the existence of a carbon-neutral and productive economy. The current approach would not deliver that vision.

Devon had seen the start of the creation of two new settlements – the first since the Middle Ages. Both had been beset by issues principally because of the private sector led approach to development and the impacts of legal agreements which were out of date and, in some cases, not fit for purpose. Any new community in this locality needed to be led by the public sector with a strong development corporation at the helm. Whilst the private sector had a role and could deliver on-site infrastructure, it could not address the wider infrastructure needs of the region.

Neighbourhood Plans

Cranbrook did not have a Neighbourhood Plan. Such a plan would be ineffective because development at Cranbrook was driven by strategic policies which would over-ride a Neighbourhood Plan and render it an ineffective document in planning terms. Equally, with the exception of the small development at South Whimble Farm, Cranbrook was zero rated for the Community Infrastructure Levy with infrastructure delivery being direct through Section 106 agreements.

Neighbourhood Plans were time consuming and expensive to develop. They offered hope and expectation to communities that their towns and villages and the local environment would be conserved and protected. However, Neighbourhood Plans were required to comply with the Local Plan and therefore any changes to the Local Plan would impact on the veracity of the Neighbourhood Plan – in some cases rendering local Neighbourhood Plan policies obsolete and effectively requiring the Neighbourhood Plan to be revisited and remade.

The Local Plan covered how the region would develop over the next 20 years, how it would meet the demands of sustainability, employment, schools, transport and climate change and how lives would be lived far into the future. The current Local Plan had been set to remain valid until 2031 but already in 2021 the process of review had commenced with an expectation that the new Plan would be finalised by 2024 – resulting in uncertainty and concern for local communities. The Committee questioned the value of Neighbourhood Planning when the Local Plan was being reviewed so frequently and how the review process could provide some comfort to local communities that their Neighbourhood Plan policies would not be completely overturned.

Estate Rent Charges

The Committee noted that Teignbridge District Council encouraged through its Local Plan town and parish councils to assume responsibility for public open space delivered in the future, instead of installing estate rent charges. This approach was supported and recommended for implementation in East Devon.

Beauty of Design

Government was currently consulting on its National Planning Policy Framework (NPPF) and, in particular, the beauty of design. The latter did not appear to feature in the issues and options report, despite there being numerous examples locally where planning might benefit from that approach, e.g. unprotected verges.