

Q8 – Number of New Homes to be Planned for

The new local plan should plan for more than the minimum housing requirement proposed (928 homes per year) in order to introduce greater flexibility into the district's housing supply and ensure a properly robust supply of housing. Under the existing local plan, the bulk of the housing supply has been focussed on the delivery of Cranbrook. An 'all eggs in one basket' approach is a risky strategy as a large proportion of the commitments are then within the control of a small number of developers and some commitments will inevitably be delayed in coming forward or may not come forward at all due to issues of viability, for example. This then puts at risk the delivery of a key component of the Council's overall development strategy.

We would suggest that a range of opportunities are available to deliver a modestly increased level of housing. It is logical to continue to make provision for additional housing in the West End and around the major towns but there is also justification for taking a more proactive and flexible stance towards growth opportunities in and around villages. This would need to be carefully managed but with the correct approach appropriate developments can be delivered without harming the important attributes of the area.

Housing is becoming increasingly expensive in East Devon and issues of affordability are becoming increasingly acute. As the Issues and Options report notes, increasing the overall supply of housing will help to increase the amount of affordable housing that is provided for the district.

Q9 – Sites for Small-Scale Housing Developments

There are strong arguments for increasing the number of small-scale housing developments across the district.

The NPPF advocates small and medium sites, recognising that they can make an important contribution to meeting the housing requirements of an area and that they are often built out relatively quickly. With small-scale sites, housing is more likely to be provided in locations where it is really needed. Smaller sites are also more likely to achieve wider objectives relating to housing need and would support the vitality of rural settlements.

We would suggest that large-scale housing schemes continue to be provided for but alongside a greater range of smaller sites. The Council would then be in a stronger position to meet its housing delivery targets in the event that larger developments are delayed or do not come forward at all.

Question 12 - Preference for Location of Future Job Provision

It is acknowledged in the Issues and Options report that there are barriers to business growth across much of East Devon. Therefore, greater provision should be made in the new local plan to support economic development right across the district so that growth is not stifled or lost to locations outside of East Devon.

It has been widely acknowledged that there is a significant imbalance between supply of certain forms of employment land and demand in East Devon. Whilst provision has been made for the delivery of larger office, industrial and warehousing space in the West End, it is clear that there is a shortage of space available for small and medium sized businesses elsewhere in the district.

It is logical for the West End to continue to make an important contribution to large-scale employment provision but there needs to be more flexibility in the new local plan to allow other employment locations to come forward and ensure that all needs are catered for. The West End sites are aimed predominantly at medium to large-scale employers serving national and regional markets and are geographically remote from much of the district. Such sites fail to meet the needs of many new and growing local micro and SME businesses, which play a very important role in the local economy. As the Council's own economic development team has identified in its response to recent planning applications, these micro enterprises account for 90% of the businesses registered in East Devon, rising to 99% if SMEs are included. It is vital, therefore, that proper provision be made for them in the right locations i.e. close to their markets and transport networks.

A strategy which focuses too heavily on the West End limits opportunities for rural employment growth and for rural diversification, which should be encouraged in a rural district like East Devon. In this regard, employment growth should be dispersed by encouraging greater business development in other areas across the district, including on sites within and closely related to the district's villages. This would align with key objectives of national planning policy to support prosperous rural economies (NPPF para. 83). More support for smaller-scale enterprise right across the district, not just in the West End and main towns, would have the advantage of providing more local jobs and increasing direct and indirect spend in the rural areas.

It is noted in the current local plan that the Council sees future office developments and jobs in this class as being key to employment delivery. The provision of smaller, flexible serviced office accommodation is a known requirement for the district's towns and its rural economies. Existing rural business parks, such as Woodbury Business Park, are operating successfully and remain consistently full, suggesting a severe undersupply and a significant demand in the rural areas. This position has been acknowledged by East Devon's own economic development team in relation to various recent

planning schemes. The result of the under-supply is local and rural business growth being curtailed and businesses having to relocate and out-commute from the area because suitable premises or land cannot be found within East Devon. This problem needs to be addressed.

Provision must also be made for additional industrial and B8 floorspace across the district. Full advantage should be taken of opportunities to re-use existing buildings in the countryside and to deliver employment development in rural areas to complement the large land allocations and development in the West End, which attract a very different form of employment.

It is important to ensure that the new local plan can deliver sufficient supply to allow for choice and flexibility in the local market, ensuring that businesses have a choice of possible properties to meet their current and future needs. This will reduce out-commuting and retain more jobs for the district.

Question 14 - Additional Economic Policy Objectives

The economic policy areas to be addressed in the new local plan are appropriate but it is crucial that the significant imbalance between the demand for and supply of employment floorspace across the district is dealt with. Indeed, the critical need for offices and employment units for small and medium sized businesses has been well-rehearsed in recent planning decisions and reports and the supply is reported to be incredibly constrained to the point of market failure.

Development opportunities are more limited in the rural areas and so economic activities that complement and are compatible with agricultural operations should be supported in principle, with all necessary technical matters being managed through the use of appropriately worded development management policies.

The new local plan policies must:

- Support the provision of new/additional office floorspace and industrial and B8 accommodation for small and medium sized enterprises across the district.
- Promote rural economic growth by allocating additional employment sites and supporting expansions of existing employment sites that are operating successfully and have reached, or are close to reaching, full capacity.

Whilst growth in rural areas will need to be carefully managed, the success of existing employment operations and the potential for their future growth must not be curtailed by overly restrictive development management policies.

Q27 – Retaining and Refining the Existing Settlement Hierarchy

The settlement hierarchy needs to be revised to increase the number of locations where some development can be accommodated, to ensure that local needs are met more adequately.

The West End will still play an important role, given the area's relationship with Exeter. The future settlement hierarchy should, however, put more emphasis on the potential of the larger and/or better served and less environmentally constrained villages across the district, such as Woodbury, to accommodate growth. The scale and form of growth can be carefully controlled through local development management policies so that it complements the character of the area and helps meet local needs.

We would also argue that some of the smaller villages and hamlets across the district could take some limited, small-scale growth, especially in those areas that fall outside of sensitive landscapes, for example, areas outside of the AONB. This would, of course, have to be controlled by carefully worded development management policies, but limited residential development in such areas would have social benefits of supporting local rural facilities. In response to the question of how local authorities should support sustainable rural communities, national Planning Practice Guidance refers to thriving rural communities in a living, working countryside being dependent, in part, on retaining local services and community facilities. Rural housing is essential to ensure viable use of these local facilities. Allowing some limited, small-scale housing growth in smaller villages and hamlets would have the social benefit of supporting the services in nearby larger villages (as is highlighted in NPPF Paragraph 68).

Q28 – Broad Distribution of Housing Development

We would suggest that the most appropriate distribution would be somewhere between Option 1 and Option 3 i.e. some reliance on the West End but with more of a focus on other locations aswell. It makes sense to maintain a focus on the West End in order to capitalise on the infrastructure investment and links to Exeter, whilst allowing for considered growth in other parts of the district.

Villages, particularly the larger villages that are better served by local facilities and are in less sensitive locations, should be allowed to accommodate some growth. Collectively, villages could make a meaningful contribution to the district's overall housing land supply. Growth of this type would also have the advantage of diversifying supply, meeting local needs, providing much needed affordable housing in rural areas and supporting rural facilities.

We would also argue that some of the smaller villages and hamlets across the district could take some limited, small-scale growth, especially in those areas that fall outside of sensitive landscapes, for example, areas outside of the AONB. Limited residential development in such areas would need to be carefully controlled but would have social benefits of supporting local rural facilities. As set out in our response to Question 27, national Planning Practice Guidance states that a thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities and rural housing is essential to ensure viable use of these local facilities.

Q29 – Future Options for the Type and Location of Development

Many differing forms of housing development should be provided for in order to deliver the housing that is needed. The new local plan needs to be flexible and support a range of options. This should include building houses on edges of the larger villages, for example Woodbury, and allowing some limited development in certain smaller villages and hamlets in less environmentally sensitive locations in order to support rural local facilities.

Policies in the new local plan must recognise opportunities to build on vacant land and/or converting or replacing existing buildings on land outside of, but well-related to, towns and villages. There is previously developed land across the district that falls outside of towns and villages but nonetheless could make a meaningful contribution to housing land supply, optimise the use of sites which currently have little beneficial use and would make tired run-down sites more attractive. Enough flexibility is needed in the new development management policies to allow such sites to be considered on their merits.