



ISSUES AND OPTIONS CONSULTATION TO EAST DEVON DISTRICT COUNCIL

Response of behalf of Heather Glanvill

February 2021

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1.0 INTRODUCTION

- 1.1 East Devon District Council is producing a new Local Plan and are currently consulting on their Issues and Options document. This document sets out a number of issues facing the district and different options to address them. The consultation responses received will be reviewed by the Council and will form part of its evidence base for the emerging Local Plan.
- 1.2 This representation is on behalf of our client, Heather Glanvill.
- 1.3 Our client is keen to ensure that the emerging Local Plan is responsive to local circumstance and supports rather than contains development in the district to meet the social, economic, and environmental needs of East Devon's communities. Our client would be happy to release their land in Woodbury, Nr. Exeter to help meet these local development needs.
- 1.4 This submission makes detailed comments on the issues and options published, whilst also making reference to the aforementioned land as an option to help address said issues.
- 1.5 To assist the Council in their administration and consideration of the points being made, this submission is formatted and ordered around the 'Options' document.

Basis to Response

- 1.6 In accordance with paragraph 35 of the National Planning Policy Framework (NPPF) which relates to Plan Making and specifically 'Examining Local Plans', a local planning authority should submit a plan for examination which it considers to be "sound". The NPPF outlines that in order for a plan to be sound it must be;
 - **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
 - **Consistent with the national policy** - enabling the delivery of sustainable development in accordance with the policies in this Framework.
- 1.7 This response therefore examines the Issues and Options document against the above criteria for soundness, including testing the proposed policies against other relevant policies in the NPPF.

Land at Woodbury

- 1.8 As mentioned, our clients would be happy to release their land off Globe Hill, Woodbury, Exeter, Devon EX5 1JZ to help meet local development needs.
- 1.9 The land extends to approximately 2.53 acres. It is located in a sustainable location with key services within walking distance, good road and bus links, and employment opportunity located nearby in Topsham, Exeter and Exmouth.

- 1.10 The land and its suitability as a site for development has been outlined in an additional representation by Greenslade Taylor Hunt to the Council in relation to their current Call for Sites consultation which is running parallel to this consultation.

2.0 QUESTIONS AND RESPONSES

2.1 Question 1 – Local Plan Objective

In paragraph 2.1 of the Issues and Options report we set out a series of suggested objectives for the future local plan that cover issues like climate change, meeting housing needs and supporting the economy. Question 1 seeks your views on these 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?

2.1.1 Our client supports the objectives laid out in paragraph 2.1 and believe their reasoning to be “sound”, in-line with the NPPF as mentioned above. The objectives;

- Objective 1: Designing for health and wellbeing
- Objective 2: Tackling the climate change emergency
- Objective 3: Supporting jobs and the economy
- Objective 5: Promoting vibrant town centres
- Objective 6: Designing beautiful and healthy spaces and buildings
- Objective 7: Our outstanding built heritage
- Objective 8: Our outstanding natural environment
- Objective 9: Promoting sustainable transport
- Objective 10: Connections and Infrastructure

2.1.2 Nevertheless, the importance of delivering new homes to meet and ambitiously surpass the housing requirements of the District should be an objective. In doing so, the district will be able to improve affordability, providing housing to those in the greatest need, create jobs and boost the economy. This objective should of course be cognisant of viability, ensuring that policy requirements create a platform for financially viable development.

2.2 Question 2 - The Scope of the Local Plan

In paragraph 2.2 of the Issues and Options report we propose producing a single plan, but it would be possible to produce a series of plans to cover the different issues. Do you think we should?

Which Option do you think we should take?

- **Option 1 – Single Plan**
- **Option 2 - Multiple Plans** (Produce a strategic plan and then subsequent plans to deal with local concerns)
- **Option 3 – Other**

2.2.1 Paragraph 17 of the NPPF clearly outlines the importance of strategic policies within plans. It highlights the importance of local planning authorities setting out their priorities for the development and land use. Strategic policies are key to setting out a clear vision for the development of the district. This comfort for landowners and developers can be undermined somewhat when there are numerous policy documents to review, increasing the risk of confusion and missed information.

2.2.2 Our clients' agree with the Council's decision to adopt one single plan that clearly demonstrates the approach to planning matters for the district. This will give clarity to landowners and developers, rather than multiple plans.

2.3 Question 3 – Neighbourhood Plans and the new Local Plan

Neighbourhood plans have been agreed for many of our neighbourhoods and more are in preparation. In paragraph 2.11 of the Issues and Options report we explain the role of neighbourhood plans and their relationship with the local plan.

Do you think we should make best use of existing neighbourhood plans to inform the new local plan that we are producing?

2.3.1 Our client supports the use of neighbourhood plans provided that they are used to positively direct new development rather than take the primary aim of stymieing and imposing greater financial burdens on development.

2.3.2 The NPPF (para 13) states that Neighbourhood Plans should support the delivery of strategic policies contained in Local Plans. The emerging Local Plan should therefore be set up to ensure that Neighbourhood Plans deliver the strategic policies and do not seek to undermine the social, economic and environmental benefits achievable through development.

2.4 Question 4 – Planning for the health and wellbeing

In Chapter 3 of the Issues and Options report we set out the health and wellbeing benefits of active lifestyles and the ways in which planning can promote this.

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

2.4.1 [TICK BOX] Very Important.

2.4.2 The land previously mentioned at Woodbury, if developed, could provide housing in a tranquil setting with access to green open space on its doorstep. The health benefits of connections to the countryside, greenery and open space have been proven. Allowing villages to grow in limited ways will allow a greater number of people to reap these mental health benefits.

2.4.3 In-line with section 3.4 of the draft document, the site could offer housing with access to community facilities (being located within walking distance), offering individual's the opportunity to integrate more walking into their daily activities and facilitate greater supportive social contact that can help with anxiety and depression, helping East Devon District Council to achieve a more healthy society as outlined in the Issues and Options Document.

2.5 Question 5 – Energy efficient of new buildings

In paragraph 4.4 of the Issues and Options report we identify ways of reducing carbon emissions from new developments, including setting higher energy efficiency standards for new buildings. Do you think we should take;

- Option 1 – Plan for net-zero carbon from plan adoption.
- Option 2 – Plan for net-zero carbon from a future date.
- Option 3 – Do neither of the above and not have a policy.

- 2.5.1 There is a careful balancing exercise to be carried out in helping to provide net-zero carbon development without hindering the delivery of new homes.
- 2.5.2 Option 1 risks halting development to the point that social and economic sustainability is hindered. Option 2 would allow the provision of new homes and jobs without sacrificing the strategic aim of carbon neutrality.
- 2.5.3 By allowing greenfield sites, especially those on the edge of sustainable villages, to be delivered, it allows for the extra expense of sustainable construction techniques and micro-generation to be incorporated. Sites with marginal viability will not be able to further this agenda. As such, we refer you to the site at Globe Hill, Woodbury.

2.6 Question 6 – Provision of solar arrays/farms and windfarms

Paragraphs 4.5 to 4.7 of the Issues and Options report deals with maximising energy from renewable sources. Question 6 seeks your views on what level of support we should give.

Do you think we should take;

- Option 1 – Identify suitable areas for renewable energy developments.
- Option 2 – Not identify areas but offer general support.
- Option 3 – Take a restrictive approach to renewables.
- Option 4 – None of these options.

- 2.6.1 Options 1 and 2 have their merits. Whilst it could assist by identifying sites for renewable energy development, those allocated sites should not prejudice the delivery of unallocated sites that would be suitable.

2.7 Question 7 – Carbon saving measures

Paragraph 4.8 of the Issues and Options report sets out seven policy objectives for helping to achieve carbon neutrality including using ‘waste heat’, and promoting community led renewable energy schemes.

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?

2.7.1 The Council has identified a number of key objectives to achieve carbon neutrality which should be supported. Point 5 is considered to be key due to the numerous overlapping benefits of having amenities in walking distance of housing sites.

2.7.2 The aforementioned site at Woodbury would be in walking distance of key amenities and would accommodate varying house types, with green spaces and planting incorporated in line with point 6.

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

In Chapter 5 of the Issues and Options report we set out the current Government requirement for us to build at least 928 new homes a year (although this figure can change). Paragraph 5.4 explains that we would need to almost double the number of affordable homes (to 461 every year for the next 20 years) to meet current and future needs. Do you think we should?

- **Option 1 – Plan for an average of at least 928 new homes being built each year** – this would accommodate levels of house buildings that accord with Government requirements. It may mean, however, that we fall a long way short of meeting all housing needs.
- **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.
- **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 met.
- **Option 4 - none of the above options.**

2.8.1 Our client wholly supports option 3. At both a national and local level there is an undersupply of housing, and Local Authorities often seek to deliver their targets as a maximum, and many fall short of that figure. This has a knock on effect onto the affordability and suitability of housing, which in-turn has an effect on people’s standards of living, as well as inequality in wider society.

2.8.2 East Devon should set itself ambitious targets based on the figure of 1,614 dwellings which formed part of a sound plan by the Government of delivering in those areas that were capable.

2.8.3 Increasing housing supply across the district not only helps to address housing shortages, but will also act a catalyst for further economic, social and environmental growth, helping East Devon District Council to achieve more of their objectives previously mentioned. Through the construction of new housing, comes the creation of more jobs, through construction as well as increased patronage of local services.

2.8.4 As previously mentioned, our client's land at Woodbury could help to achieve such housing targets, in a sustainable manner.

2.9 Question 9 – Sites for small scale housing developments

Paragraphs 5.5 to 5.7 of the Issues and Options report sets out Government policy that at least 10% of new homes should be built on smaller sites (below 1 hectare). This provides more opportunities for smaller, local businesses and is more likely to reflect local character than mass produced homes.

Which option do you think we should take?

- Option 1 – Allocate or identify land for around 10% of homes to be on small sites.
- Option 2 - Allocate or identify land for around 11% to 25% of homes to be on small sites.
- Option 3 – Allocate or identify land for 26% to 50% of homes to be on small sites.
- Option 4 – Allocate 51% or more of homes to be on small sites/
- Option 5 – None of the above.

2.9.1 Smaller sites are often delivered more quickly than larger sites. They also offer small and medium developers to compete, strengthening the local and national economy. Smaller schemes within and on the edge of sustainable villages allows those communities to grow in a commensurate way whilst contributing to the district's wider housing ambitions.

2.9.2 As such, there should be an ambition to deliver at least 26% of the required housing through smaller sites but there does not need to be such a restrictive figure of one hectare used to identify a 'small site'. Rather, there should be general support of the benefits of smaller sites around but not explicitly at the one hectare mark.

2.9.3 The Globe Hill site at Woodbury would assist the Council in meeting the above mentioned benefits.

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

Paragraphs 5.8 and 5.9 of the Issues and Options report sets out the reasons for building a range of homes that can accommodate different circumstances. What approach should we take to encourage this, or is it not something the local plan should deal with?

Which option do you think we should take?

- Option 1 – We should explicitly require housing provision for people at all stages of life.
- Option 2 – We should encourage but not require housing provision for people at all stages of life.
- Option 3 – Not set standards for different types of housing provision.
- Option 4 – None of the above.

2.10.1 Certain sites are better suited to the provision of elderly accommodation. The market will help to identify those sites. As such, there should be support for those sites that do provide housing for

people at all stages of life. This does not need to be a restrictive policy. Accordingly, option 2 is preferred.

2.11 Question 11 – Additional housing policy objectives

Paragraph 5.10 of the Issues and Options report identifies nine additional housing policy objectives, including encouraging more self-build homes, allocating sites for retirement housing and setting minimum space standards for new homes.

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

- 2.11.1 Self-build homes/retirement schemes/community led developments have their benefits. There are however issues with allocating land for these types of development. Doing so can result in an uplift in land value and means that the viability of these schemes is put at risk. Therefore, there should be policy support for the delivery of these types of development but they should not be subject to a prescribed and restrictive policy or allocation.

2.12 Question 12 – Preference for location for future jobs

Paragraphs 6.4 to 6.7 of the Issues and Options report explains why much recent employment development has occurred near to Exeter and where future job growth would best be located. We set out below a number of differing potential areas in East Devon that could accommodate future job growth and development. Please indicate yours in principle levels of support for each option.

- 12a – Continue to focus on big employment sites in the West of England District
- 12b – Encouraging greater business development in other area close to Exeter
- 12c – Encouraging greater development at and within the main towns of East Devon
- 12d – Encouraging business expansion and development in the villages and across the countryside of East Devon
- 12e – Encouraging and enable more home working

- 2.12.1 [Tick box not applicable].

- 2.12.2 The need for job creation and housing in sustainable villages is the best way of encouraging their self-containment, thus fostering economic hubs and reducing the need for travel by private car. Policy should ensure that the key villages and towns located within the East Devon countryside continue to be vibrant communities in which to live. Locating employment within or near to key towns and villages supports existing local business and services, increasing local patronage, whilst also creating demand for local enterprises.

- 2.12.3 The benefits of home working should also be recognised. Since the Covid-19 pandemic and lockdowns in England, the prevalence of home-working has considerably increased. As such, villages with some key amenities are likely to benefit from reduced commuting, and a re-focus on supporting local amenities. These villages will therefore foster environments of more local services to start up and, with support of home-working, these are the places to focus housing growth. Woodbury is one such village that would benefit from increased housing growth. We direct you to our site at Globe Hill.

2.12.4 12a – Disagree; 12b – neither agree nor disagree; 12c –Support; 12d – Strongly support; 12e – Strongly agree.

2.13 Question 13 – Differing jobs section in East Devon

Paragraphs 6.8 to 6.10 of the Issues and Options report discuss what sort of jobs the local plan should encourage, including the opportunities to attract new and emerging sectors with highly skilled jobs. To what degree do you support, or not, the following approaches to future jobs or differing types of jobs?

- 13a – More jobs overall – with an emphasis on attracting new/larger employees and inward investment in any or all sectors.
- 13b - More high technology jobs – focussing on high technology high skilled jobs.
- 13c – Local Entrepreneurs – promoting opportunities for more home/locally based/small businesses.
- 13d – Traditional Sectors – Focus on growth, resilience and diversification in our traditional sectors – such as agriculture, tourism and care.

2.13.1 Tick as applicable – From ‘strongly support’ to ‘strongly oppose’.

2.13.2 No response. Irrelevant.

2.14 Question 14 – Additional economic policy objectives

Paragraph 6.11 of the Issues and Options report identifies six areas where policies could be developed to help support the economy. These include promoting jobs close to where people live, encouraging people to patronise local businesses, supporting shared workspaces, allocating additional employment sites and links between economic developments and developing a greener economy.

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

2.14.1 By allowing housing in those settlements with some local amenities, it will increase patronage and self-containment. As above, with increased levels of home-working expected in the long-term, supporting homeworking and local shared workspaces and new housing in villages and towns will encourage a greener economy.

2.15 Question 15 – Town centre uses

A Chapter 7 of the Issues and Options report considers options for the roles of our town centres. Question 15 seeks your views on these options. We set out below a number of differing potential uses and approaches to promoting town centre vitality and activity. Please indicate your in principle levels of support for each potential option or approach.

- 15a – Retail to dominate – support retail uses in town centres and if possible resist other uses.
- 15b – Promote mixed commercial uses – support retail as well as other commercial uses such as cafes and offices
- 15c – Redefine town centres to smaller core areas
- 15d – Support change of uses – promote more community spaces in town centres.
- 15f – Leisure uses – promote new gyms and sports facilities in town centres.

2.15.1 No response. Irrelevant.

2.16 Question 16 – Additional town centre policy objectives

Paragraph 7.6 of the Issues and Options report identifies three additional area where policies may be appropriate including the use of vacant stories over shops, resisting ‘out of town’ uses to support town centres and producing town centre masterplans to identify key areas for improvement. Do you think these are appropriate retail and town centre policy area to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

2.16.1 No response. Irrelevant.

2.17 Question 17 – Designing beautiful spaces and buildings

Chapter 8 of the Issues and Options report explains how attractive places can be planned and Question 17 seeks to find out how important you think it is that this is done. How important do you think we should actively plan to create beautiful spaces and buildings?

2.17.1 Our client is in support of the proposed policy to ensure that attractive places are built. To build attractive places can often mean building well in attractive locations, such as the aforementioned site at Globe Hill, Woodbury.

2.17.2 The site offers the Council the opportunity to deliver high quality homes that complement the local rural character of the site. The site, and proposed scheme, would allow for development in a sustainable settlement pattern that sits comfortably in the landscape, in line with point 8.5 and 8.4 of the objectives laid out in the Issues and Options Document. The development would benefit the local area, supporting Woodbury as an attractive area to live and work, thus helping to achieve points contained in Chapter 8, as well as some of the wider strategic objections previously mentioned.

2.18 Question 18 – Additional design policy objectives

Paragraph 8.8 of the Issues and Options report identifies two areas with the potential for additional policy work. These are encouraging innovative designs and incorporating wildlife friendly elements into developments. Do you think these are appropriate design policy areas to be addressed in a new local plan and are there any other major areas that you think we should be addressing?

- 2.18.1 Innovative design and wildlife friendly elements are encouraged. The Council are encouraged to be open minded about innovative design in new development and only look to refuse schemes that are objectively harmful. Schemes that encourage biodiversity enhancements, whether built or landscaped, should be supported.

2.19 Question 19 – The importance of conserving and enhancing heritage assets

Chapter 9 of the Issues and Options describes our heritage assets and sets out the positive impacts they can have on our quality of life and local economies. Through a new local plan (and in the work of the council more generally) how important do you think it is that we should enhance and enhance heritage assets?

- 2.19.1 As laid out in the NPPF (para. 184), plans should set out a positive strategy for the conservation and enjoyment of the historic environment. Policies should reflect the great weight that should be afforded to the conservation of these assets. However, policies should also be focused on the delivery of new development that is respectful to heritage assets rather than discouraging development that may be considered to be within the setting of an asset. By encouraging respectful development in the locality of heritage assets, they will be enjoyed more, increasing education of their importance, and thus their long-term conservation.

2.20 Question 20 – Development in protected landscapes

Paragraphs 10.3 & 10.4 of the Issues and Options report sets out the importance of protecting our protected landscapes and the potential limitations this may place on how much and where development should be placed. Question 20 seeks views on the levels of restriction you favour.

- Option 1 – Place significant restrictions on development.
- Option 2 – Allow for development to meet local needs.
- Option 3 – Allow for greater levels of development.
- Option 4 – None of the above or alternative.

- 2.20.1 Our client supports the protection and enhancement of East Devon's outstanding natural environment. Option 2 is therefore selected to allow villages within a landscape designation to provide limited development to meet local needs. Sustainable villages outside of any landscape designation should be allowed to grow to help meet the wider needs of the district.

2.21 Question 21 – Net gains in biodiversity

Paragraphs 10.5 to 10.7 of the Issues and Options report explains the new approach of quantifying the potential impact of development on biodiversity to inform planning decisions and ensure that there is a 'net gain'. Question 21 seeks views on the approach you would favour to gain biodiversity improvements.

- Option 1 – On site provision.
- Option 2 – Secure the habitats locally.
- Option 3 – Pay a cash tariff towards a strategic delivery scheme.
- Option 4 – A combination of the above.
- Option 5 – None of the above or an alternative.

- 2.21.1 There should be flexibility within the Plan policies to allow for on-site provision, local habitat provision, or strategic schemes. Some sites will be able to deliver biodiversity gains within the scheme and should not therefore have to provide habitats elsewhere or contributions for strategic sites. Those sites that cannot or do not wish to provide on-site provision can have the opportunity to provide gains elsewhere. As such option 4 would allow for the biodiversity ambitions of the Council to be met without prejudicing the delivery of sustainable development sites.

2.22 Question 22 – Additional natural environment policy objectives

Paragraph 10.8 of the Issues and Options report identifies 10 additional themes for the natural environment that may benefit from policies in the local plan.

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?

- 2.22.1 Rather than setting a prescriptive policy which could be used to refuse otherwise acceptable development, support should be given to schemes that meet the natural environment policy suggestions.
- 2.22.2 The site at Globe Hill, Woodbury could meet green space standards and in doing so it would be in-keeping with its edge of village location. Future residents would therefore benefit from a green environment as compared to more dense, urban developments.

2.23 Question 23 – Promoting accessibility by walking and cycling

Chapter 11 of the Issues and Options report sets out the issues for promoting sustainable transport. Question 23 seeks your views on how important you think it is that new development is sited so that it is within walking distance of services and facilities.

- Option 1 – Focus new development as small clusters of growth in location within easy walking distance of existing services and facilities.
- 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.
- Option 3 – a combination of options 1 and 2.
- 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.
- Option 5 – none of the above.

2.23.1 As covered earlier in this consultation response, there are a myriad of benefits of allowing smaller-scale development. As such, we object strongly to option 2.

2.23.2 Sites within around 800 metres of village amenities should be considered, for the most part, as being walkable. Such sites should form the basis for the district's housing delivery. Accordingly, support should be given to option 1.

2.23.3 The land at Woodbury offers a genuinely sustainable development option for the council, within easy walking distance of an array of services and amenities in the village. Furthermore, there is a local school and some employment opportunities within walking distance.

2.24 Question 24 – Additional sustainable transport policy objectives

Paragraph 11.7 of the Issues and Options report identifies 13 key issues that may need to be considered around the theme of sustainable transport. 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?

2.24.1 It is felt that all of the major policy areas have been addressed regarding sustainable transport.

2.24.2 Our client supports the themes laid out within paragraph 11.7. As mentioned, the land at Globe Hill, Woodbury offers a genuinely sustainable development option. The land is located within 800 metres of the key services and amenities offered in the village, in line with point 6. The site could offer ample space for car parking, as well as providing electric car charging points in line with point 11.

Chapter 12 of the Issues and Options report deals with infrastructure requirements and asks what facilities are important to people to help us prioritise what may be needed and where. Please score the services and facilities listed below in accordance with their importance to where you live or would want to live.

Please score the services and facilities listed below in accordance with their importance to where you live or would want to live?	Our client's position
Convenience store/Post office	Essential
Supermarket	Of little importance
Childcare and nursey school provision	Quite Important
Primary school	Essential
Secondary school	Of little importance
Children's play area	Essential
Sports & leisure facilities	Essential
Health care facilities	Essential
Open spaces	Essential
Easy access to a range of jobs	Of little importance
Regular bus service (5 plus per day)	Essential
Train station	Of little importance
Paths for walking or cycling	Essential
Access to full fibre broadband	Quite important
Public house	Essential
Place of worship	Essential
High quality road links	Quite important
Emergency services	Of little importance
Community hall	Essential
Youth facilities	Of little importance

2.26 Question 26 – Additional infrastructure and service provision policy objectives

Paragraph 12.9 of the Issues and Options report identifies five other infrastructure and service 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?

- 2.26.1 By being ambitious with its housing delivery targets, the Council will be able to secure Community Infrastructure Levy charges and financial contributions (where the threshold is met) to go towards local services. The increased number of houses will foster healthier economic conditions and will allow the Council to collect money through business rates, Council Tax, and new homes bonuses. The alternative is to continue to deliver the minimum acceptable number and to struggle to apportion the necessary funds across community projects and infrastructure, whilst potentially sacrificing the viability of development.
- 2.26.2 By increasing the housing target and allowing for growth in those areas where the market wants to deliver, the likelihood of securing full contributions and affordable housing (on and/or off site) and increased. Urban locations and brownfield sites, in comparison to edge of village locations, will do little to bridge the gap in funds for infrastructure delivery.
- 2.26.3 Point 5 states that the Council are interested in the facilities that are needed in villages and rural areas. It suggests, and rightly so, that increase housing provision could be the answer to improving sustainability by establishing, maintaining, and/or furthering the critical mass required for new services to thrive.
- 2.26.4 Further public engagement with communities would assist in identifying what infrastructural needs exist in their villages.

2.27 Question 27 – Retaining and refining the existing settlement hierarchy

Chapter 13 of the Issues and Options report considers strategic options for the distribution of new development expressed in terms of a settlement hierarchy. Question 27 seeks your views on what your preferred pattern of development would be.

- Which of the following options do you prefer for a potential settlement hierarchy?
- Option 1 – Same hierarchy as current local plan.
- Option 2 – A hierarchy that retains the towns and Cranbrook but has a lower number of villages that may accommodate development.
- Option 3 – A hierarchy that retains towns and Cranbrook but has a higher number of villages that may be accommodated.
- Option 4 - Do something different in terms of a hierarchy or do not have one.

- 2.27.1 Of the available options, number 3 is preferred. This will allow development to be delivered in Cranbrook and towns but also recognises the importance of villages, such as Woodbury, which are of a suitable size to accommodate a commensurate level of growth and sustain existing and new services and amenities.

2.27.2 There is a serious risk that by ignoring the benefits of small scale growth for housing affordability will worsen and displace younger generations from their homes. Conversely, taking a more proactive approach to the growth of villages, including development on their peripheries, will allow rural communities to thrive and evolve, whilst also boosting district-wide housing delivery figures.

2.28 Question 28 – Broad distribution of housing development

Paragraphs 13.12 to 13.14 of the Issues and Options report considers the strategic spatial options for accommodating housing growth. Question 28 asks which broad approach to the distribution of housing development you favour.

Which broad approach to the distribution of housing development would you favour in a new local plan;

- Option 1 – As existing.
- Option 2 – More West End focused.
- Option 3 – A less West End focused pattern.
- Option 4 – An alternative to the above.

2.28.1 Option 4 is preferable as the other options do not recognise the intrinsic benefits of delivering growth across the district through small scale developments in villages and small towns. As per our answer to question 27, the distribution of development should allow a commensurate level of growth for those sites that are well-related within and on the periphery of sustainable settlements.

2.28.2 This approach de-risks the delivery of focusing housing on fewer, larger sites that could prejudice the Council’s Local Plan if they were to stall. Conversely, the risk should be spread widely, allowing existing communities to diversify and grow.

2.29 Question 29 – Future options for the type and Location of development

2.29.1 Paragraphs 13.15 & 13.16 of the Issues and Options report sets out a range of options for accommodating development. Which do you prefer?

How do you feel about the development types and locations listed below;	Our client’s position
Infilling in towns and at larger villages	Strongly support.
Building one or more additional new towns	Strongly oppose.
Planning for new villages	Strongly oppose.
Large Scale (over 50 homes) urban expansions to towns	Strongly oppose.
Small scale (under 50 homes) urban expansions to towns	Strongly oppose.
Building houses on the edges of East Devon Villages	Strongly support.

2.30 Question 30 – Establishment of a Development Corporation

Paragraphs 13.17 to 13.19 of the Issues and Options report explain the role that a development corporation could plan in delivering very large scale developments. Question 30 asks for view on how important you consider this would be. 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?

2.30.1 Not answered. Irrelevant.

2.31 Question 31 – Planning for development beyond 2040

Paragraph 13.20 of the Issues and Options report considers the timeframe that the local plan should consider. Do you think that it would be appropriate to start to plan for development in East Devon for a date well beyond 2040 in this Local Plan?

2.31.1 The Local Plan should look ambitiously at its development aspirations for the next 25 years. There will be Local Plan Reviews in the interim which will allow any new information to be taken into consideration at that time. However, only looking to plan over a short term will not allow the District to be ambitious with its aims.

2.32 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?

2.32.1 The Council should look to allocate land wherever possible using the concurrent Call for Sites consultation. This will provide greater certainty to landowners and developers, and will therefore help the district to meet its aspirations without unnecessary delay.