

East Devon Local Plan – 2021 to 2040 - Issues and Options consultation for the attention of the Planning Policy team

We would encourage you to complete the on-line response form – see:

<https://eastdevon.gov.uk/planning/planning-policy/emerging-local-plan/initial-consultations/>

Please only use this paper version of the questionnaire if you lack internet access. Receiving on-line submissions will help us save time and money and will mean we can be more accurate in our work.

Your Title	<input type="text"/>	First name or initial	<input type="text"/>	Surname	<input type="text"/>
Your email address		<input type="text"/>			
Your telephone number		<input type="text"/>			
Your postal address and post code		<input type="text"/>			
Organisation name (if relevant)		<input type="text"/>			
If you are an agent acting for a client please provide the name of your client		<input type="text"/>			

Your Age Range

- 0-18
- 19-25
- 26-40
- 41-55
- 56-70
- 70 plus

In what capacity are you responding to this consultation - what most closely describes you or if you are an agent what best describes, in respect of this consultation, what your client does?

- Private individual
- Environmental body
- Government department or agency
- Local authority
- Parish or town council
- Politician
- Religious body
- Cultural group or body
- Education provider
- Amenity group
- Land owner
- Developer
- Private company
- Emergency service provide
- Utility or transport provider
- Community or resident group
- Representative of commercial organisation or business
- Other – Please specify (in the box below)

Guidance notes

We have produced a local plan issues and options consultation document that we are consulting on from 18 January 2021 to midday on 15 March 2021. In the consultation document we include a series of questions. Please note that this questionnaire should be read alongside the full consultation document.

Please respond to this consultation event, on-line, if possible, see:

<https://eastdevon.gov.uk/planning/planning-policy/emerging-local-plan/initial-consultations/>

Paper copies of this completed of this questionnaire should be posted to:

Planning policy
East Devon District Council
Blackdown House, Border Road
Heathpark Industrial Estate
Honiton
EX14 1EJ

To arrive no later than 12.00 noon on Monday 15 March 2021.

Data Protection

Any personal information which you provide will be held and used by East Devon District Council for the purpose of local plan production. Your information may also be shared within East Devon District Council for the purposes of carrying out our lawful functions. Otherwise your personal information will not be disclosed to anybody outside East Devon District Council without your permission, unless there is a lawful reason to do so, for example disclosure is necessary for crime prevention or detection purposes. Your information will be held securely and will not be retained for any longer than is necessary. There are a number of rights available to you in relation to our use of your personal information, depending on the reason for processing. Further detail about our use of your personal information can be found in the relevant Privacy Notice which can be accessed at: <https://eastdevon.gov.uk/access-to-information/data-protection/privacy-notices>

Please note that responses received will not be treated as confidential and they will be published on our council web site along with your name and if relevant the name of the organisation you represent. If you are an agent your name and organisation will be published as well as those of your client. Postal or email address will not be published unless they are embedded in documentation and cannot be readily blacked out.

Question 1 - Local Plan Objectives

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?

- Yes, these are the right objectives
- No, there are further objectives or amendments I would like to add

Please give details

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.** Produce a single local plan covering all policy matters
- 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
- Option 3 - Other.** Do an alternative or neither of the above

Please provide any further comments in the box below

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 and their relationship with the 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?

Question 4 - Planning for 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?

- Absolutely essential
- Very important
- Quite important
- Of limited importance
- Not important at all

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

Question 5 - Energy efficiency 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?

Do you think we should

- 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

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.

Which option 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

Please provide any further comments on wind farms and solar arrays/panels

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?

- Yes, the appropriate carbon saving policy matters have been addressed
- No, there are other policy areas that should be considered

Please give details

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?

Which option do you think we should take?

- 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.
- 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 being met.
- Option 4** - Select option 4 if you think none of the above are appropriate

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.

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. Do you think we should?

Which option do you think we should take?

- Option 1 - Allocate or identify land for around 10% of homes to be on small sites** - this approach would meet minimum government standards.
- 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.
- 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.
- 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.
- Option 5 - None of the above or an alternative**

Please provide any further comments in the box below

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.** 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.
- 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.
- 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
- Option 4 - None of the above or an alternative**

Please provide any further comments in the box below on how we may best plan for housing for all.

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 policy areas that you think we should be addressing?

- Yes, these are appropriate housing policy areas to be addressed
- No, there are other major policy areas that should be addressed

Please give details

Question 12 - Preference for location for future job provision

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 your in principle levels of support for each option

12a - Continued focus on big employment sites in the West End of the District	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
12b - Encouraging greater business development in other areas close to Exeter (for example expanding Greendale and Hill Barton Business Parks)	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
12c - Encouraging greater business development at and within the main towns of East Devon	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
12d - Encouraging business expansion and development in the villages and across the countryside of East Devon	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
12e - Encourage and enable more home working	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
If you have any comments on the above or alternative options please set these out below.	

Question 13 - Differing jobs sectors 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 employers and inward investment in any or all sectors	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
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13b - More high technology jobs - focussing on high technology and high skilled jobs (including in the transformational sectors).	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
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13c - Local Entrepreneurs – promoting opportunities for more home/locally based/small businesses.	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
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13d - Traditional Sectors - Focus on growth, resilience and diversification in our traditional sectors - such as agriculture, tourism and care	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
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If you have any comments on the above or alternative options please set these out below.

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 development 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 areas that you think we should be addressing?

- Yes, these are the appropriate economic policy areas
- No, I think there are other policy areas that should be addressed

Please give details

Question 15 - Town centre uses

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.	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
15b - Promote mixed commercial uses - support retail as well as other commercial uses such as café's and offices	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
15c - 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="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
15d - Support change of use to housing – allow for any shops or commercial premises to be converted to housing	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
15e - Support community uses - promote more community spaces in town centres	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
15f - Leisure uses – promote new gyms and sports facilities in town centres.	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose

If you have any comments on the above or other distribution matters please set these out below

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

- Yes, these are appropriate policy areas
- No, there are other major policy areas that should be addressed

Please give details

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 it is that we should actively plan to create beautiful spaces and buildings?

- 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.

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 policy areas that you think we should be addressing?

- Yes, these are appropriate housing policy areas
- No, there are other major policy areas that should be addressed

Please give details

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 conserve and enhance our heritage assets?

- 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.

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.

In considering whether we should allow for development in protected landscapes do you think

- 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.
- Option 2 - Allow for development to meet local needs.** This would allow for limited development, specifically where it will meet smaller scale local social, housing or economic needs, it could still mean more development pressure elsewhere in East Devon.
- 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.
- Option 4 - None of the above or an alternative**

Please provide any further comments in the box below

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.

In order to gain biodiversity improvements which option would you prefer?

- 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**

Please provide any further comments in the box below

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?

- Yes, these are the appropriate natural environment policy issues
- No, there are other major policy areas that should be addressed

Please give details

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.

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?

- 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

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?

- Yes, these are appropriate sustainable transport policy areas
- No, there are other major policy areas that should be addressed

Please give details

Question 25 - Facilities and services that are important

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?	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)	<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.

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?

- Yes, these are appropriate policy areas to be addressed
- No, there are other major policy areas that should be addressed

Please give details

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: 7 Towns plus Cranbrook and the 15 Villages
- 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 accommodate development
- Option 4** - Do something different in terms of a hierarchy or not have one

Please provide any comments below on the potential hierarchy, especially if you do not support the listed options.

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.** 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
- 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).
- Option 3 - A less West End focused 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).
- Option 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)

Please provide any comments on the above in the space below

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

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

How do you feel about the development types and locations listed below	For each option please tick one box only					
	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 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 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 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						

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?

- Absolutely essential
- Very important
- Quite important
- Of limited importance
- Not important at all
- It would be a bad thing

Please provide any further comments below

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 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?

- 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

Please provide any further comments below

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?

15 March 2021
Our Ref: 16.9007/HP/LT

Planning Policy
East Devon District Council
Blackdown House
Border Road
Heathpark Industrial Estate
Honiton
EX14 1EJ

21 Princess Victoria St
Clifton
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BS8 4BX

T 0117 428 7970

Submitted by email: planningpolicy@eastdevon.gov.uk

Dear Sir / Madam

Re: East Devon Local Plan 2021-2040 – Issues and Options (Reg 18) Consultation

Representation by Boyer on behalf of Taylor Wimpey Strategic Land

This representation is submitted by Boyer on behalf of Taylor Wimpey Strategic Land ('TW') in response to East Devon District Council's (EDDC) current Regulation 18 consultation being carried out as part of the preparation of the Local Plan 2021 to 2040.

The consultation is framed around 32 questions. We have provided responses to a number of these questions, as appropriate, within this letter. To summarise our main points in respect of the consultation document:

- Housebuilding has a huge range of social and economic benefits. East Devon's strong housing market presents an opportunity to plan for a level of new development above the Government's minimum, to the benefit of affordable housing delivery and market housing affordability. Furthermore, the standard method figure is lower than annual delivery in Exeter, so adopting this as the requirement would not significantly boost the supply of homes as required by the NPPF.
- In accordance with paragraph 72 of the NPPF, large scale development will be a fundamental part of a deliverable Local Plan which potentially provides for 20,000+ homes over the period 2020-2040.
- Development at the West End may form an important part of the Plan's strategy, but the urban sprawl of Exeter cannot be continually relied upon in a sustainable way. The main towns should be the focus for growth. The Districts development needs ultimately lie in the towns' communities and the rural hinterlands which they functionally serve.
- The West End would be more suitable in planning to meet unmet needs of Exeter, but the consultation document does not suggest that this is required.
- East Devon is very constrained in terms of its sensitive landscape. The opportunity for development at the main towns on land which is not designated as AONB should be explored in the first instance.



This representation is submitted in tandem with a response to the Housing and Economic Land Availability Assessment (HELAA) 'Call for Sites', in which we are promoting 28ha of Land East of Honiton for residential-led development.

Given the housing need in East Devon and the content of the Issues and Options consultation documents, we believe an extension to the existing settlement of Honiton represents a valuable opportunity to contribute to the District's development needs. Honiton is identified as a main town so is an established urban location with the associated day-to-day facilities/services, while the land is also located outside of any nationally important landscape designations.

Our response to the Issues and Options consultation questions are provided in the table below. We have not provided answers to every question.

	Question	Multiple Choice Answer	Comments
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?	Yes	
2	The scope of the local plan: Do you think we should: Option 1 – Single Plan – Produce a single local plan covering all policy 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? Option 3 – Other - Do an alternative or neither of the above?	Option 1	We support the Council's intention to produce a single Local Plan.
5	Energy efficiency of new buildings: Do you think we should? 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	The development industry needs to be engaged on the issues and a consistent approach is needed so that it can properly plan for it and account for increased build costs.

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	<p>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.</p> <p>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.</p>		
8	<p>How many new homes should we plan for each year: Which option do you think we should take?</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Option 4 – Please tick this box if you think none of the above are appropriate.</p>	Option 2	<p>Market conditions in East Devon are relatively strong and the authority has demonstrated that delivery can keep up with requirements – the 2020 Housing Delivery Test score is 122% and the last 3 year period has seen an average of 956 dwellings delivered each year.</p> <p>The NPPF aims to boost significantly the supply of homes and planning for a reduced housing requirement in East Devon would contradict this. Furthermore, paragraph 20 of the NPPF requires strategic policies to make sufficient provision for both market and affordable housing. A housing requirement that seeks to contribute to an aspirational but achievable level of affordable housing need is therefore appropriate. Delivery of market housing also assists in controlling the affordability of the housing market as a whole.</p> <p>Option 2 seeks to plan for a greater number of homes than the Local Housing Need (LHN), which we support. The deliverability of the requirement is crucial and a 30% increase over the LHN figure is therefore considered appropriate, resulting in an annual requirement of 1,200+ homes.</p> <p>We would support a higher number than this if it is achievable.</p>
9	<p>Sites for small scale housing developments. Which option do you think we should take?</p> <p>Option 1 - Allocate or identify land for around</p>	Option 1	<p>As noted at paragraph 5.7 of the consultation paper, small sites can have a number of advantages and this is reflected in the Government policy of a minimum of 10% of the</p>

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	<p>10% of homes to be on small sites – this approach would meet minimum government standards.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Option 5 - None of the above or an alternative</p>		<p>housing requirement. However, an over-reliance on small sites would pose a number of disadvantages, which is why we consider the 10% minimum should be used as a starting point.</p> <p>For example, smaller sites are not generally capable of providing significant infrastructure improvements that may be required to facilitate the necessary quantum of development in coming forward. Furthermore, market housing built on small sites is not usually as affordable (in terms of market affordability) as that delivered as part of a larger development. Affordability of open market housing is a severe issue that faces the population of East Devon; this is evidenced through the ONS published data on house price to workplace-based earnings¹. Table 5c of that dataset demonstrates that East Devon’s median affordability ratio (median house price to median workplace earnings) was 10.47 in 2019. I.e. average house prices are over 10 times the average annual income. This compares to a figure of 7.83 to England as a whole and 8.79 for the south west region. This emphasises the need for a strong supply of larger sites with typically more reasonably-priced small-medium sized properties. Affordability is not purely a locational factor as supply influences the growth of house prices. Paragraph 72 of the NPPF states that <i>“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.”</i> Clearly, large sites have a significant role to play in the</p>

¹<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>

	Question	Multiple Choice Answer	Comments
			delivery of sufficient levels of housing in East Devon and, while the role of small sites should be acknowledged, it should not be over-emphasised or over-relied upon.
10	<p>Planning for housing for people at all stages of their life: Which option do you think we should take?</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Option 4 – None of the above or an alternative.</p>	Option 2	<p>There is no ‘one size fits all’ approach that can be rigidly applied across development sites (or across all developments above a certain size). Flexibility needs to be built into the policy to ensure sites are deliverable throughout the plan period in response to fluctuating market conditions and varying local demographics. Notwithstanding the above, and to supplement our response to Question 9, this issue is one of the benefits that a sufficient number of large sites can bring – the ability to accommodate a variety of house types, tenures and sizes to meet the needs of a range of people.</p> <p>We would encourage the Council to recognise that the development sector generally specialises between residential developers and ‘later living’ / care developers. Requiring all developments of a certain scale to include an element of specialist older persons accommodation would impact on the deliverability of the Plan.</p>
11	<p>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?</p>	Yes	<p>Comments are provided on a number of the ‘additional housing policy objectives’ below.</p> <p>1/2 – The local authority is required to keep a register of interest for self and custom-build properties. This should be used to inform the level of self/custom build homes to be planned for. However, requiring a proportion of units on large sites may not necessarily be the best solution to meet people’s aspirations and we would encourage the Council to allocate smaller sites with a large proportion of self/custom build units.</p> <p>4 – We would support the planning of specific sites and areas for retirement housing</p>

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			<p>developments (see our response to Question 10).</p> <p>6 – Policies including minimum space standards should only be included where justified (footnote 46 of the NPPF). The ability of developers to provide smaller properties is an important element of ensuring that market housing is accessible to young people and first-time buyers.</p> <p>8 – Standards for the density of development need to be carefully considered as there are competing outcomes. For example, the character of an area may be predominantly low density, however there may be a significant housing need and limited land availability, meaning high density development could be in the public interest.</p> <p>9 – Not everyone requires space for home working and this is a design consideration that may best be left to the market.</p>
12	<p>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 (Strongly support / Support / Neutral / Oppose / Strongly Oppose).</p> <p>Continued focus on big employment sites in the West End of the District</p> <p>Encouraging greater business development in other areas close to Exeter (for example expanding Greendale and Hill Barton Business Parks)</p> <p>Encouraging greater business development at and within the main towns of East Devon</p> <p>Encouraging business expansion and development in the villages and across the countryside of East Devon</p> <p>Encourage and enable more home working</p>	<p>Neutral;</p> <p>Neutral;</p> <p>Strongly support;</p> <p>Neutral;</p> <p>Support.</p>	<p>This question relates to job growth and development, rather than housing. However, the two cannot be considered in isolation of one another and a comprehensive spatial strategy considers how the two relate to one another.</p> <p>We consider that the main towns of East Devon should accommodate substantial growth to supplement the already extensive level of development that is taking place in the 'West End' and close to Exeter.</p> <p>These main towns not only support the economic hub of Exeter, but in themselves provide employment opportunities and services for a wider rural hinterland.</p> <p>Sustainable, dynamic market towns will help boost the economy of East Devon and the development of new housing and commercial development is crucial to achieving this.</p>

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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?	Yes	We support objective 2 at paragraph 6.11 of the consultation paper. The spatial strategy should focus on the most sustainable main towns for housing growth, given the economic support this provides communities and businesses within East Devon. Focussing on the West End too heavily will support the regional hub of Exeter more so than East Devon.
17	<p>Designing beautiful spaces and buildings: How important do you think it is that we should actively plan to create beautiful spaces and buildings (Absolutely essential / Very important / Quite important / Not importance at all)?</p> <p>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.</p>	Very important	<p>Good design or 'building beautiful' is a very important part of planning and development. However, planning is a balancing act with many competing objectives, one of which is the cost of development and the viability of schemes. We do not consider development viability to be justification for poor or sub-standard design, but the Council should avoid overly-aspirational design requirements which are uneconomic to build.</p> <p>The changes to the NPPF proposed as part of the current Government consultation include a requirement for planning authorities to use appropriate tools, such as masterplans and design codes, to ensure quality places are created. We therefore do not have any objection to the use of design codes and masterplans alongside allocations. However, it may not be feasible to include design codes for every Local Plan allocation as part of the Plan itself, so the approach may have to be considered on an area-wide or settlement-wide basis.</p> <p>We would strongly oppose any requirement for a masterplan or design code to be adopted as a supplementary planning document as a pre-requisite to the submission of a planning application. This burden on local authorities has a tendency slow down the delivery of allocated sites to the detriment of communities where housing need is paramount.</p>
20	Development in protected landscapes: In considering whether we should allow for	Option 2	We need to make the most of developing the land which is available outside of protected

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	<p>development in protected landscapes do you think:</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Option 4 – None of the above or an alternative</p>		<p>landscapes, such as AONBs, wherever possible. However, planning involves the balancing of various issues and development in or adjacent to protected landscapes may be necessary in order to achieve sustainable development and support communities across the District, not just those physically distanced from AONBs.</p>
21	<p>Net gains in biodiversity: In order to gain biodiversity improvements which option would you prefer:</p> <p>Option 1 – On-site provision - this would see new habitats created on site as part of the development, however they are likely to be small and would sit alongside housing.</p> <p>Option 2 – Secure the habitats locally - This would require a legal agreement with a landowner near to the development to deliver and maintain it.</p> <p>Option 3 – Pay a cash tariff towards a strategic delivery scheme - This would require a developer to make a cash payment (to the Local Authority or other organisation) towards a central fund so that a large area of strategic habitat can be provided to offset the impacts of a number of developments.</p> <p>Option 4 – A combination of the above</p> <p>Option 5 – None of the above or an alternative</p>	Option 4	<p>Each development site will face its own unique constraints in terms of its size, infrastructure provision and other development costs. A flexible solution is therefore the best way forward, as onsite provision may be preferable and possible in some instances, whereas an exclusively 'onsite only' policy may prohibit available and suitable land from coming forward for development.</p> <p>This would limit the extent of offsite strategic schemes the local authority would be burdened with implementing, whilst ensuring development can come forward.</p>

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23	<p>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?</p> <p>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</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Option 5 – None of the above - Perhaps you think that accessibility by walking or cycling is not a relevant concern?</p>	Option 3	<p>In order to ensure delivery of housing throughout the plan period (paragraph 67 of the NPPF) to meet local needs, a range of sites should be allocated in the Plan. However, given the Plan’s likely housing requirement, we would highlight paragraph 72 of the NPPF, which states <i>“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns...”</i></p> <p>The criteria supporting this policy objective then states that such development should <i>“support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access.”</i> The population and housing growth forecasted will inevitably lead to the requirement for new infrastructure and facilities, and large scale development in towns is an effective way to achieve this, given it can either be provided onsite or make significant financial contributions towards it on a strategic scale.</p> <p>We could not support Option 1 as this neglects the need to plan infrastructure in line with growth.</p> <p>Paragraph 11.5 of the consultation paper indicates a possible long-term threat to public transport to public transport viability due to Covid-19. However, we consider that this trend of less use has to be viewed as temporary and public transport should still be a fundamental component of a Local Plan’s strategy. Town’s with train stations and established bus services should be a focus for development, as this is sustainable and helps to ensure the long-term viability of these services.</p>
24	Additional sustainable transport policy objectives: Do you think these are appropriate	Yes	We broadly support the other sustainable transport policy objectives listed at paragraph

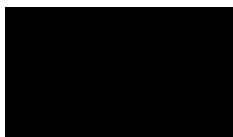
	Question	Multiple Choice Answer	Comments
	sustainable transport policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?		11.7 of the consultation paper. However we would also highlight the links between this policy area and physical activity / active travel (for both commuting and leisure purposes). Access to the countryside and support/enhancement of the existing public rights of way network, as required at paragraph 98 of the NPPF, are important planning objectives that can be contributed to by the location and design of development. People's desire to access the countryside and green spaces has been exacerbated by the Covid-19 pandemic and is crucial for both physical and mental health.
25	<p>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 (Essential / Very Important / Quite Important / Of little Importance)?</p> <p>Convenience store/Post Office Supermarket Childcare and nursery school provision Primary school Secondary school Children's play area Sports & leisure facilities Health care facilities Open spaces Easy access to a range of jobs Regular bus service (5 plus per day) Train station Paths for walking and cycling Access to full fibre broadband Public house Place of worship (e.g. a church) High quality road links Emergency services (police, fire, ambulance) Community hall Youth facilities</p>	<p>Quite Of little Quite Very Quite Very Quite Quite Essential Very Very Very Very Quite Of little Very Quite Quite</p>	<p>The growth of online shopping and the dominant mode of transport used to access supermarkets being the car, have together reduced the importance of being proximate to a supermarket. Local convenience stores do however remain important assets, to be protected and planned for.</p> <p>The Covid-19 pandemic has resulted in people travelling less, but long-term this may reverse or result in people travelling further, less often.</p> <p>Access to public transport and the highway network therefore remain important considerations.</p> <p>It is important to recognise the role strategic-scale development has in providing or contributing towards these facilities and the benefits that can also have to existing communities.</p>

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27	<p>Retaining and refining the existing settlement hierarchy: Which of the following options do you prefer for a potential settlement hierarchy?</p> <p>Option 1: Same hierarchy as current Local Plan: 7 Towns plus Cranbrook and the 15 Villages</p> <p>Option 2: A hierarchy that retains the towns and Cranbrook but has a lower number of villages that may accommodate development</p> <p>Option 3: A hierarchy that retains the towns and Cranbrook but has a higher number of villages that may accommodate development</p> <p>Option 4: Do something different in terms of a hierarchy or not have one</p>	Option 1	<p>The key issue is that the towns retain their prominent position in the settlement hierarchy. These main towns not only support the economic hub of Exeter, but in themselves provide employment opportunities and services for a wider rural hinterland. Sustainable, dynamic market towns will help boost the economy of East Devon and the development of new housing and commercial development is crucial to achieving this.</p>
28	<p>Broad distribution of housing development: Which broad approach to the distribution of housing development would you favour in a new local plan?</p> <p>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.</p> <p>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).</p> <p>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).</p>	Option 4	<p>The distribution of development across East Devon is likely to be a mix of the various approaches identified, and will need to be flexible to respond to the various opportunities to deliver sustainable development across the plan area. The distribution must be based upon accessibility (and thus addressing climate change); maximising opportunities where there is an ability to travel of strategic employment areas via sustainable travel modes, including bus and rail.</p> <p>The respective housing requirements for any individual settlement must relate both to its individual sustainability and accessibility, but also the availability of suitable and deliverable housing sites. Thus there may be instances where one community will be identified to support additional growth above another of a similar existing size, due to its enhanced accessibility and the opportunities within the settlement itself to bring forward development proposals.</p>

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	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).		
29	<p>Future options for the type and location of development: How do you feel about the development types and locations listed below (Strongly support / Support / Neutral / Oppose / Strongly Oppose).</p> <p>Infilling in towns and at larger villages</p> <p>Building one or more additional new towns</p> <p>Planning for new villages</p> <p>Large scale (over 50 home) urban expansions to existing towns</p> <p>Small scale (under 50 home) urban expansions to towns</p> <p>Building houses on the edges of East Devon villages</p>	<p>Strongly support;</p> <p>Neither oppose or support;</p> <p>Neither oppose or support;</p> <p>Strongly support;</p> <p>Strongly support;</p> <p>Strongly support.</p>	<p>In order to ensure a deliverable and sound Local Plan, a range of housing sites (in terms of their size and location) should be allocated / provided for. For example, focussing purely on large scale development will have issues with deliverability, whereas too much of a focus on small sites will face difficulties in providing the requisite infrastructure.</p> <p>Paragraph 72 of the NPPF states that <i>“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities.”</i> Clearly, large sites have a significant role to play in the delivery of sufficient levels of housing in East Devon. The main towns are the most sustainable locations for such development. The Council may decide that new settlements have a role to play in meeting the District’s needs, but given they need to ‘start from scratch’ with infrastructure provision, they can often take a long time to come forward.</p> <p>Opportunities for sustainable urban extensions to existing main towns should therefore be fully explored before new settlements are considered.</p>

We look forward to engaging with the Council in advancing our promotion of the Land East of Honiton through the remainder of the Local Plan process. We would appreciate the opportunity to discuss the site’s potential with officers and I can be contacted using the below details.

Yours sincerely



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