

East Devon Local Plan 2021 to 2040 Issues and Options Consultation January 2021

Comments submitted by David Boyle

Question 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?

All objectives are supported.

Under Objective 6, there is a risk that 'meeting 21st century needs' may not be compatible with the aesthetic character of East Devon e.g. modern/futuristic designs can be an eyesore, and defining 'beautiful' is potentially controversial. The description of this objective may need to be refined to avoid unwanted outcomes.

There are other objectives listed under Task A4 of the SA and SEA Draft Scoping Report which should be considered:

Land resources - *To utilise our land resources efficiently and minimise their loss or degradation.*
Reuse of previously developed land is particularly important.

Water resources - *To utilise our water resources efficiently and minimise their loss or degradation.*

Access to services - *To provide accessible and attractive services and community facilities for all ages and interests.*

Connectivity and transport - *To connect people and businesses digitally and physically through the provision of broadband, walking, cycling, public transport, road networks and other transport infrastructure both within and beyond East Devon.*

And other possible objectives not covered in either list are:

Community regeneration - *To regenerate deprived communities, reduce inequalities and improve prosperity.*

This could be linked to the government levelling-up agenda.

Reuse, recycle and recover - *Promote sustainable development by encouraging reuse, recycle and recover wherever possible.*

Tree resources – Trees are a such a critically valuable component of climate change mitigation and adaption that a strategic approach is warranted to ensure tree planting is maximised.

Question 2 – The scope of the local plan

Tick one box only

Do you think we should?

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

A single plan is preferred for ease of reference and checking consistency. It will also facilitate updating the plan in the event that new government planning regulations are introduced.

A separate plan for Cranbrook appears to be under development, however, the final document should be merged into the local plan.

Question 3 - Neighbourhood Plans and the new 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?

NPs are key bottom-up building blocks which should be used as primary evidence to evaluate and consider in developing the new local plan.

NPs should be reviewed to identify any potential conflicts with top-down objectives and policies of the new local plan, and a methodology to resolve conflicts should be defined and agreed. Some NPs may need to be updated to align with the new local plan at an appropriate time.

Ideally, the new local plan and updated NPs would be adopted at the same time, however the logistics of parallel working probably make this impossible and there will be an unavoidable time lag before NPs can be updated.

Question 4 - Planning for health and wellbeing

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

Please tick one box only

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.

Protecting and conserving the network of public footpaths and bridleways is one aspect of health and wellbeing that should be an essential part of the local plan.

Cycleways are another important contribution to health and wellbeing.

The Feniton to Sidmouth Cycle Link promoted in the Neighbourhood Plan of Ottery St Mary and West Hill (Policy NP10 and Project 4) should be incorporated in the local plan.

Question 5 – Energy efficiency of new buildings

Tick one box only

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 in the box below

Option 3 is not a sustainable approach because, if no action is taken, then the scale of the climate change problem will increase and the residual time available to meet net-zero carbon targets will reduce to an unachievable level.

Option 1 is not viable because there is currently insufficient knowledge of how net-zero carbon will be achieved, and also monitored.

Therefore Option 2 is the only realistic option, however, all developments must be encouraged to minimise carbon emissions from now rather than waiting until a formal date for non-zero emissions is introduced.

Clarification is needed on whether or not embodied carbon is included in net-zero objectives, and also is carbon offsetting allowed? Reductions in operating carbon emissions are relatively straightforward to control and monitor whereas quantifying and reducing embodied carbon in construction materials and equipment is more difficult.

Is a separate policy needed to ensure that the Cranbrook district heating scheme is fully utilised and extended to future developments?

Net carbon for business buildings may impede economic growth, in particular if East Devon aims to achieve net zero carbon earlier than other council areas.

Question 6 – Provision of solar arrays/farms and windfarms

Tick one box only

Which option do you think we should take?

Option 1 - Identify suitable areas for renewable energy developments - Taking into account constraints we could include a policy which seeks to identify or allocate suitable areas for solar or wind farms.

Option 2 – Not identify areas but offer general support - we could provide a more general policy of support specifically for solar projects across the district without identifying any areas or specific sites.

Option 3 – Take a more restrictive approach to renewables – we could make it much harder for renewable energy development to occur, however this may make it difficult, or perhaps impossible, to achieve carbon neutrality.

Option 4 – Please tick the box if you think none of the above are appropriate

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

Land requirements for solar and wind energy farms are very large and it is essential that a strategic approach is planned to ensure that a proliferation of farms does not occur and the impact on the East Devon landscape can be controlled.

It will be essential to make an assessment of the total land area allocation that will be needed and to identify preferred sites. The identified sites must also consider provision to be extended past 2040 since there will be a continuously increasing demand if the population of East Devon continues to grow.

The city of Exeter does not have land for renewable energy schemes, other than waste to energy. Does this mean that East Devon and other neighbouring local councils must deliver an allocation for Exeter? If yes, then this is potentially very contentious and could double the land requirement?

Question 7 - Carbon saving measures

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?

The impact of agricultural activities on climate change and related carbon mitigation and adaptation measures need to be thoroughly assessed and incorporated in the local plan.

As a start, trees and hedgerows need to be protected and planting of new trees and hedgerows should be encouraged.

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

Tick one box only

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 Government's previous thinking and would potentially result in all affordable housing needs being met.

Option 4 – Please tick this box 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.

Prior to the 2013-2031 Local Plan, historic housing growth in East Devon was about 500 houses per year (0.8%). This was increased in the local plan to 911 per year (1.5%) - 16,393 houses in 18 years - to accommodate an allocation for Exeter and was the main driver for a new town at Cranbrook.

500 houses per year is the natural growth level based on historic demand and any higher growth should be objectively evidenced by consideration of:

- Growth to meet natural increase of existing population (this was a negative value when the current local plan was developed)
- Growth to accommodate decrease in household occupancy related to single parent families and demographic age profile changes
- Growth for net inward migration
- Growth for Exeter overspill
- Growth for affordable housing

If government targets dictate that 928 houses per year (Option 1) is a minimum, then so be it since this maintains the current growth level, but anything higher should be strongly resisted.

It is concerning that higher growth levels are presented as the only solution to the issue of affordable housing provision. A new approach to how affordable housing is provided and funded needs to be assessed. It should not rely on funding contributions from commercial housing development.

Question 9 – Sites for small scale housing developments

Tick one box only

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.

Option 1 is selected because the viability of more than 10% small sites is uncertain. If there is evidence that more than 10% sites will come forward, then Option 2 is preferred.

More than 25% (Options 3 and 4) could support over-development of some sites and is not preferred.

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

Tick one box only

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.

Good planning should aim to define needs and make best endeavours to deliver housing to meet those needs. Therefore ‘encourage and support’ (Option 2) and ‘no standards’ (Option 3) are not acceptable approaches since they are certain to fail to meet some or all needs. A strategic framework approach to housing needs is a fundamental requirement.

Question 11– 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?

All objectives are supported.

Under space standards for floors and rooms, garden space should be added because of its importance to health and wellbeing, biodiversity and climate change mitigation and adaption.

It is notable that affordable housing targets are not mentioned although this was a major issue in developing the current local plan. It would be informative to know what performance to date has been achieved compared to the plan targets in order to better understand what might need to be changed to improve performance in future years.

Question 12 - Preference for location for future job provision

Please tick one box only for each option

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	Neither oppose nor support	Oppose	Strongly Oppose
Continued focus on big employment sites in the West End of the District	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Encouraging greater business development in other areas close to Exeter (for example expanding Greendale and Hill Barton Business Parks)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Encouraging greater business development at and within the main towns of East Devon	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Encouraging business expansion and development in the villages and across the countryside of East Devon	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Encourage and enable more home working	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

If you have any comments on the above or alternative options please set these out below.

In order to protect and conserve the landscape character of most of East Devon, it is essential that big employment is focused at or near existing areas of big employment rather than opening new areas.

Business development in main towns needs to be assessed on an individual basis for each town rather than applying a blanket approach.

Business development in villages and across the countryside is generally opposed except in agricultural and tourism sectors.

Question 13 - Differing jobs sectors in East Devon

Please tick one box only for each option

To what degree do you support, or not, the following approaches to future jobs or differing types of jobs?

	Strongly support	Support	Neither oppose nor support	Oppose	Strongly Oppose
More jobs overall – with an emphasis on attracting new/larger employers and inward investment in any or all sectors.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

More high technology jobs - focussing on high technology and high skilled jobs (including in the transformational sectors).

Local Entrepreneurs - promoting opportunities for more home/locally based/small businesses.

Traditional Sectors - Focus on growth, resilience and diversification in our traditional sectors - such as agriculture, tourism and care.

If you have any comments on the above please set these out below.

The scale of development for housing and jobs needs to be linked in order to achieve a sustainable plan.

Question 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?

All policy areas are supported.

Question 15 – Town centre uses

Please tick one box only for each option

We set out below a number of differing potential uses and approaches to promoting town centre vitality and activity. Please indicate you're in principle levels of support for each potential option or approach.

Strongly support Support Neither oppose nor support Oppose Strongly Oppose

Retail to dominate – support retail uses in town centres and if possible resist other uses.

Promote mixed commercial uses - support retail as well as other commercial uses such as café's and offices,

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.

Support change of use to housing – allow for any shops or commercial premises to be converted to housing.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Support community uses - promote more community spaces in town centres.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Leisure uses – promote new gyms and sports facilities in town centres.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Change of use to housing is opposed unless there is strong evidence that commercial use is no longer viable. However, conversion of upper floors to residential use would be supported unless it impacts on the viability of commercial use of lower floors.

Question 16 – Additional town centre policy objectives

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?

All policy areas are supported.

A master plan for each town centre would be a valuable addition to the Neighbourhood Plans with an aim to consolidate proposals of town councils and EDDC into one plan, and with the added benefit of specialist knowledge and expertise which EDDC can input.

Question 17 – Designing beautiful spaces and buildings

How important do you think it is that we should actively plan to create beautiful spaces and buildings?

Please tick one box only

Absolutely essential	Very important	Quite important	Of limited importance	Not important at all
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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.

‘Very important’ is selected rather than ‘absolutely essential’ because it is recognised that not all buildings can be made beautiful.

Prescriptive design codes are not supported and a general guidance approach is preferred because design is a combination of subjective and objective inputs.

It is important that trees are incorporated wherever possible due their importance for biodiversity and climate change mitigation and adaption.

The policy should aim to ensure that developments like at Barton Orchard, Tipton St John (11/2172/MFUL) can never be repeated. The design concept is monstrously inappropriate and unsympathetic to a small village setting and AONB designated land. And promised landscaping of neighbouring public amenity land has not been implemented.

Question 18 – Additional design policy objectives

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?

Solar panels and wind turbines are often aesthetically detrimental to the built and natural environments, in particular when they are retrofitted to existing buildings. A proliferation of these items could fundamentally change the aesthetic character of East Devon and the local plan should aim to limit the potential damage.

Question 19 - The importance of conserving and enhancing heritage assets

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?

Please tick one box only

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.

Heritage assets define the character of East Devon (and indeed any area) and it is inconceivable that a local plan would allow significant changes. It is recognised that some changes may be warranted, however, the process and evidence to justify any change proposals should be very rigorous.

Question 20 - Development in protected landscapes

Tick one box only

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

housing, community or economic needs, though 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.

Limited development in protected areas should be allowed where no other options are available and a local need is rigorously demonstrated. The size of development should be strictly limited to 'small' scale.

Question 21 – Net gains in biodiversity

Tick one box only

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

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.

Option 2 – Secure the habitats locally - This would require a legal agreement with a landowner near to the development to deliver and maintain it.

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.

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.

The policy should aim to maximise the benefits to biodiversity by taking into account what already exists and distributing the available funding between on-site, local and strategic improvements.

Some level of on-site improvements to biodiversity will be appropriate to all or most developments.

Local improvements will be appropriate only when sufficient biodiversity cannot be achieved by on-site improvements and/or there is an identified need for a particular local improvement.

It is important that at least part of all biodiversity levies is directed to a central fund so that large scale biodiversity projects can be implemented.

Question 22 – Additional natural environment policy objectives

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?

All policy issues are supported.

An additional policy area is tree planting because of the critical role of trees to biodiversity and climate change mitigation and adaption. Objectives and targets for tree planting should be formulated to ensure that the tree stock East Devon grows at least in line with population growth and ideally at a higher rate to contribute to net-zero carbon measures.

Question 23 – 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?

Tick one box only

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.

The age profile of East Devon dictates that access by public transport is more important than walking and cycling and therefore it is anomalous that this question is focused on walking and cycling. Accessibility by public transport should be the primary consideration and walking and cycling are secondary.

Accessibility by walking and cycling should be an essential component of all developments but they should not determine where a development is located.

Therefore Option 5 is selected by default.

Development in a small number of growth areas (Option 2) is supported except that large development should not be allowed in small settlements.

Question 24 - Additional sustainable transport policy objectives

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?

All policy objectives are supported.

Under point 11 relating to electric charging points, their provision will become essential to the sustainability of everyday life in East Devon and it is imperative that a strategic plan is developed to map out how and when good accessibility to charging points will be achieved for the whole community.

Question 25 – 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?

Please tick one box only for each item

	Essential	Very Important	Quite Important	Of little Importance
Convenience store/Post Office	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Supermarket	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Childcare and nursery school provision	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Primary school	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Secondary school	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Children's play area	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sports & leisure facilities	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Health care facilities	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Open spaces	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Easy access to a range of jobs	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Regular bus service (5 plus per day ³⁷)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Train station	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Paths for walking and cycling	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Access to full fibre broadband	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public house	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Place of worship (e.g. a church)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
High quality road links	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Youth facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

If you have any other comments or would identify other facilities please set these out below.

No further comments.

Question 26 – Additional infrastructure and service provision 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?

All policy objectives are supported.

It is frustrating that infrastructure always lags development and causes increased pressure on the existing capacity of services. Even Cranbrook has suffered even though, as a new town, it would be expected to attract advance funding for infrastructure.

The whole development planning system needs to devise a solution to address this lag problem. If government is driving growth in East Devon above historic 'normal' levels, then it has an obligation to properly fund infrastructure.

Question 27 - Retaining and refining the existing settlement hierarchy

Which of the following options do you prefer for a potential settlement hierarchy?

Tick one box only

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 the 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.

An alternative hierarchy comprising 4 groupings is preferred: Cranbrook, West End (excluding Cranbrook), the 8 Towns (including Colyton) and the 14 Villages.

Cranbrook has particular planning needs because it is a new town under development and future planning should not be compromised by linking it to other developments.

The West End has particular planning needs because it is an extension of Exeter.

Colyton has more of a town character than a village despite its relatively small size and its range of shops far exceeds any village.

There are no obvious candidate villages to add to the 14 group except possibly Dunkeswell due to its relatively large size, although I have no knowledge of its facilities.

Question 28 – Broad distribution of housing development

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

Tick one box only

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). ✓

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).

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).

Please provide any comments on the above in the space below.

Option 2 is preferred because it is compatible with the housing needs of Exeter and a focus of jobs growth in the West End. Plus Cranbrook was planned to relieve pressure for housing in other parts of East Devon.

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

For each option please tick one box only

How do you feel about the development types and locations listed below	Strongly support	Support	Neither oppose or support	Oppose	Strongly oppose	None of the options
Infilling in towns and at larger villages	<input checked="" 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 checked="" type="checkbox"/>	<input type="checkbox"/>
Planning for new villages	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
large scale (over 50 home) urban expansions to existing towns	<input type="checkbox"/>	<input checked="" 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 checked="" 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

In all smaller villages, development is supported as infill. Edge development is also supported provided its scale is proportionate to the size of village and AONB is protected.

A second new town is strongly opposed because it is premature to consider this type of development until Cranbrook is fully developed, and extensions to Cranbrook are considered.

Any local initiative for a new town would be interpreted by government as a sign that EDDC is willing to continue a policy of higher housing growth than is wanted by the local community.

Question 30 - Establishment of a Development Corporation

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?

Please tick one box only

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.

A Development Corporation should be considered only if EDDC does not have capacity or capability to deliver the local plan. This will be influenced by what experience has been gained from Cranbrook?

There is great risk that a successful DC could provide evidence to support a larger scale of development in East Devon than is wanted.

On the other hand, from my experience with Merseyside Development Corporation (1981-90) as an infrastructure service provider with North West Water (now United Utilities), it is highly likely that the amount of government funding directed to East Devon could be increased by DC involvement. Conversely, a heavyweight DC may not fit well with an East Devon approach and it risks some loss of control and/or imposed policies which could impair the overall objectives of a 'local' plan.

Question 31 – Planning for development beyond 2040

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?

Please tick one box only

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.

There is limited value in extending the planning horizon beyond 2040 since there is too much uncertainty about future levels of housing and economic growth. It is preferable to wait until any major issues emerge and then consider what changes to the plan may be required. This approach is supported by the review of the current local plan after only 5 years since adoption.

However, there is one key issue that does warrant assessment now because of its importance to long term planning for East Devon. This issue is Cranbrook and if and how it should be expanded after its current planned capacity is achieved.

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?

Three issues are offered for consideration:

- 1) The future of the agricultural sector needs to be considered in response to many media reports that the impact of Brexit could have significant adverse impact on economic viability and or changes in agricultural practices. This could lead to change of use being sought for large areas of land.
- 2) The importance of forward planning to facilitate a huge switch to electric vehicles is reiterated because of its impact on everyone's daily life. Two key points are:
 - All new developments should have charging points;
 - A strategy to provide a network of charging points throughout East Devon is needed to ensure lack of facilities is not an impediment to switching.

3) The frequency and impact of surface water flooding are forecast to worsen due to climate change and planning policy will need to apply increasing control to reduce flooding incidents. A particular problem is sustainable drainage systems which have a finite capacity and are overloaded in extreme rainfall events. Therefore, a key issue for planning policy is what frequency of flooding events is acceptable?

Current planning policy appears to provide an inadequate level of control. This is evidenced by experience at the Barton Orchard, Tipton St John development which was previously mentioned in Question 17. Neighbouring properties have suffered repeated inundation by surface water and mud whereas none occurred prior to the development.

This ends my submission.