# 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 | Ms | First name or initial | Sue | Surname | Green |

| | |
|---|---|
| Your email address | |
| Your telephone number | |
| Your postal address and post code | c/o 80 Needlers End Lane, Balsall Common, Warwickshire, CV7 7AB |
| Organisation name (if relevant) | Home Builders Federation (HBF) |
| If you are an agent acting for a client please provide the name of your client | |

**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)

Trade Organisation

**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**

The HBF have no comments on the Councils 10 Objectives.

**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**

The HBF's preference is Option 1 for a Single Plan covering all policy matters. It is the HBF's opinion that the Council should not pursue Option 2 for Multiple Plans.

**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?**

The LPR should set out the strategic context for neighbourhood planning. As set out in the 2019 National Planning Policy Framework (NPPF), Neighbourhood Plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies (para 29).

**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**

The LPR should promote health and well being as set out in the Council's Objectives (1) and (6). The National Planning Practice Guidance (NPPG) confirms that a HIA can serve a useful purpose at planning application stage and consultation with the Director of Public Health as part of the process can establish whether a HIA would be a useful tool for understanding the potential impacts upon wellbeing that development proposals will have on existing health services and facilities (ID 53-004-20140306). Any requirement for a HIA should be

**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**

The Council wishes to ensure all new development moves the District towards delivering net-zero carbon emissions by 2040. The HBF's preference is Option 3, which would apply the Government's national policy approach. It is the HBF's option that neither Option 1- Plan for net-zero carbon from plan adoption, which would require all new development to be net-zero carbon upon adoption of the plan nor Option 2 - Plan for net-zero carbon from a future date, which would require all new development to achieve net zero carbon from a future date in the

**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**

The HBF have no comments on the provision of solar arrays / farms and windfarms.

**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**

The HBF have no comments on the Council's proposed carbon saving measures.

**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.**

As set out in the 2019 NPPF, strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period (para 65). The determination of the minimum number of homes needed should be informed by a Local Housing Needs (LHN) assessment using the Government's standard methodology unless exceptional circumstances justify an alternative approach (para 60). In

**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**

The Council's Housing Land Supply (HLS) should provide a sufficient supply of land to meet the housing requirement, to ensure the maintenance of a 5 Year Housing Land Supply (YHLS) and to achieve Housing Delivery Test (HDT) performance measurements.

As set out in the 2019 NPPF at least 10% of the housing requirement should be accommodated on sites no larger than one hectare or else

**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.**

All households should have access to different types of dwellings to meet their housing needs. As set out in 2019 NPPF, the housing needs for different groups should be assessed to justify any policies on the size, type and tenure of housing including a need for affordable housing (paras 61 & 62). All policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). The Council's approach to planning for housing for people at

**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**

Housing Objective 1 – encouraging more self and custom build housing.

The Council should support Self & Custom Build Housing. The NPPG sets out the key role that the Council should play in bringing forward suitable land for self & custom build housing (ID 57-025-20210508).

**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**

- ◯ Strongly support
- ◯ Support
- ◯ Neither oppose nor support
- ◯ Oppose
- ◯ Strongly oppose

**12b - Encouraging greater business development in other areas close to Exeter (for example expanding Greendale and Hill Barton Business Parks)**

- ◯ Strongly support
- ◯ Support
- ◯ Neither oppose nor support
- ◯ Oppose
- ◯ Strongly oppose

**12c - Encouraging greater business development at and within the main towns of East Devon**

- ◯ Strongly support
- ◯ Support
- ◯ Neither oppose nor support
- ◯ Oppose
- ◯ Strongly oppose

**12d - Encouraging business expansion and development in the villages and across the countryside of East Devon**

- ◯ Strongly support
- ◯ Support
- ◯ Neither oppose nor support
- ◯ Oppose
- ◯ Strongly oppose

**12e - Encourage and enable more home working**

- ◯ Strongly support
- ◯ Support
- ◯ Neither oppose nor support
- ◯ Oppose
- ◯ Strongly oppose

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

The HBF have no comment on the Council's preference for the location for future job provision.

**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**

- ◯ Strongly support
- ◯ Support
- ◯ Neither oppose nor support
- ◯ Oppose
- ◯ Strongly oppose

**13b - More high technology jobs - focussing on high technology and high skilled jobs (including in the transformational sectors).**

- ◯ Strongly support
- ◯ Support
- ◯ Neither oppose nor support
- ◯ Oppose
- ◯ Strongly oppose

**13c - Local Entrepreneurs – promoting opportunities for more home/locally based/small businesses.**

- ◯ Strongly support
- ◯ Support
- ◯ Neither oppose nor support
- ◯ Oppose
- ◯ Strongly oppose

**13d - Traditional Sectors - Focus on growth, resilience and diversification in our traditional sectors - such as agriculture, tourism and care**

- ◯ Strongly support
- ◯ Support
- ◯ Neither oppose nor support
- ◯ Oppose
- ◯ Strongly oppose

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

The HBF have no comment differing job sectors in East Devon.

**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**

The HBF have no comment on any additional economic policy objectives.

**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.**

- ◯ Strongly support
- ◯ Support
- ◯ Neither oppose nor support
- ◯ Oppose
- ◯ Strongly oppose

**15b - Promote mixed commercial uses - support retail as well as other commercial uses such as café's and offices**

- ◯ Strongly support
- ◯ Support
- ◯ Neither oppose nor support
- ◯ Oppose
- ◯ 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**

- ◯ Strongly support
- ◯ Support
- ◯ Neither oppose nor support
- ◯ Oppose
- ◯ Strongly oppose

**15d - Support change of use to housing – allow for any shops or commercial premises to be converted to housing**

- ◯ Strongly support
- ◯ Support
- ◯ Neither oppose nor support
- ◯ Oppose
- ◯ Strongly oppose

**15e - Support community uses - promote more community spaces in town centres**

- ◯ Strongly support
- ◯ Support
- ◯ Neither oppose nor support
- ◯ Oppose
- ◯ Strongly oppose

**15f - Leisure uses – promote new gyms and sports facilities in town centres.**

- ◯ Strongly support
- ◯ Support
- ◯ Neither oppose nor support
- ◯ Oppose
- ◯ Strongly oppose

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

The HBF have no comment on town centre uses.

## 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**

The HBF have no comment on any additional town centre policy objectives.

## 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.**

The Council's proposed policy approach to design beautiful spaces and buildings should accord with the 2019 NPPF, the latest NPPG, the National Design Guide and National Model Design Code. The Council's policy approach should provide specific local guidance rather than repeating national policy or 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 approprate housing policy areas
- ◯ No, there are other major policy areas that should be addressed

**Please give details**

The Council is referred to the HBF's answer to Question 17 above.

**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.**

The HBF have no comments on conserving and enhancing heritage assets.

## 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**

The HBF's preference is Option 3, which would allow for greater levels of development.

## 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**

It is the HBF's opinion that the Council's policy approach to biodiversity as set out in Options 1 - 3 should not deviate from the Government's proposals on biodiversity gain as set out in the Environment Bill. This legislation will require development to achieve a 10% gain for biodiversity. It is the Government's opinion that 10% strikes the right balance between the ambition for development and reversing environmental decline. 10% gain provides certainty in achieving environmental outcomes, deliverability of development and costs for

## 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**

The Council is referred to the HBF's answer to Question 21 above.

## 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**

The HBF's preference is Option 3, which is a combination of Option 1 to focus new development as small clusters of growth in locations within easy walking or cycling distance of existing services & facilities and Option 2 to focus new development on a small number of growth areas where the large scale of development will support the delivery of new accessible services & facilities.

**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**

Sustainable Transport Objective 11 - considering the need for electric charging for vehicles and Objective 13 – requiring electric charging for bicycles.

The HBF recognise that electric vehicles will be part of the solution to transitioning to a low carbon future. The Department of Transport

**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 | ☐ | ☐ | ☐ | ☐ |
| 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 | ☐ | ☐ | ☐ | ☐ |

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

The HBF have no comment on facilities and services.

**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**

The HBF agree with the Council's Infrastructure & Service Provision Objective 10 that infrastructure needs should be secured at an appropriate time to support new development.

**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.**

Over recent years most development has occurred on the western side of the District. Under the adopted Local Plan for the period from 2013 to 2031, approximately 59% of all new homes will be built in the "West End" close to the city of Exeter at the new town of Cranbrook & other large sites at North of Blackhorse & Pinhoe and 41% elsewhere in East Devon at towns of Axminster, Budleigh Salterton, Exmouth, Honiton, Ottery St Mary, Seaton & Sidmouth and 15 villages of Beer, Broadclyst, Clyst St Mary, Colyton, East Budleigh, Feniton, Kilmington,

**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**

A continuation of the broad distribution pattern of the adopted Local Plan distributes 60% of new homes at the West End, 30% in Towns and 10% in Villages and rural areas (Option 1). The HBF's preference is a more even distribution pattern across the District, which is less extreme than the proposals set out under Option 2 – More West End focused or Option 3 – A less West End focused.

**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?

| | **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 | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |
| Building one or more additional new towns | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |
| Planning for new villages | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |
| large scale (over 50 home)urban expansions to existing towns | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |
| small scale (under 50 home) urban expansions to towns | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |
| Building houses on the edges of East Devon villages | ☐ | ☐ | ☐ | ☐ | ☐ | ☐ |

Do you have any further observations on the alternative development options and approaches? Please provide comments below

Future options for the type and location of development should be a combination of infilling in towns and at larger villages, expanding the new town of Cranbrook, large & small scale urban expansions to existing towns and building on the edges of villages.

There should be a short and long-term supply of sites on brownfield and greenfield land. Housing delivery is optimised by the widest possible range of housing site sizes and market locations, which provides suitable land buying opportunities for small, medium and large housebuilding companies. The widest mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather

**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**

The HBF have no comments on the establishment of a Development Corporation to deliver one or more big strategic sites for housing or mixed-use development.

**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**

If a new town is proposed, the Council should be planning for development beyond 2040. The Government's consultation on Draft Revisions to the NPPF (ending on 27th March 2021) proposes that "where larger-scale development such as new settlements form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery" (para 22).

## 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?**

At this time, there are no further comments that the HBF would like to make. It is hoped that these responses are of assistance to the Council in preparing the next stages of the LPR. As plan preparation progresses, the HBF look forward to submitting further representations at later consultation stages, in the meantime, if any further information or assistance is required please contact the undersigned.

SENT BY EMAIL ONLY TO
planningpolicy@eastdevon.gov.uk

15 March 2021

**EAST DEVON LOCAL PLAN REVIEW (LPR) – ISSUES & OPTIONS CONSULTATION**

**Question 1 - Local Plan Objectives.**

The HBF have no comments on the Councils 10 Objectives, which are (1) Designing for health & wellbeing, (2) Tackling the climate emergency, (3) Meeting future housing needs, (4) Supporting jobs & the economy, (5) Promoting vibrant town centres, (6) Designing beautiful & healthy spaces & buildings, (7) Our outstanding built heritage, (8) Our outstanding natural environment, (9) Promoting sustainable transport and (10) Connections & infrastructure.

**Question 2 – The scope of the local plan.**

The HBF's preference is **Option 1** for a Single Plan covering all policy matters. It is the HBF's opinion that the Council should not pursue **Option 2** for Multiple Plans.

**Question 3 - Neighbourhood Plans and the new Local Plan.**

The LPR should set out the strategic context for neighbourhood planning. As set out in the 2019 National Planning Policy Framework (NPPF), Neighbourhood Plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies (para 29).

**Question 4 - Planning for health and wellbeing.**

The LPR should promote health and well being as set out in the Council's Objectives (1) and (6). The National Planning Practice Guidance (NPPG) confirms that a HIA can serve a useful purpose at planning application stage and consultation with the Director of Public Health as part of the process can establish whether a HIA would be a useful tool for understanding the potential impacts upon wellbeing that development proposals will have on existing health services and facilities (ID 53-004-20140306). Any requirement for a HIA should be based on a proportionate level of detail in relation the scale and type of development proposed. The requirement for HIA without any specific evidence that an individual scheme is likely to have a significant impact upon the health and wellbeing of the local population is not justified by reference to the NPPG. Only if a significant adverse impact on health and wellbeing is identified should a HIA be required, which sets out measures to mitigate the impact.

The use of best practice guidance like Building for a Healthy Life should remain voluntary rather than becoming a mandatory policy requirement, the Council

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could signpost such guidance in supporting text. Any referencing in policy wording to guidance contained in a Supplementary Planning Document (SPD) should not convey development plan status onto a document, which has not been subject to the same process of preparation, consultation and examination contrary to the Town and Country Planning (Local Planning) (England) Regulations 2012 (Regulations).

**Question 5 – Energy efficiency of new buildings.**

The Council wishes to ensure all new development moves the District towards delivering net-zero carbon emissions by 2040. The HBF's preference is **Option 3**, which would apply the Government's national policy approach. It is the HBF's option that neither **Option 1**- Plan for net-zero carbon from plan adoption, which would require all new development to be net-zero carbon upon adoption of the plan nor **Option 2** - Plan for net-zero carbon from a future date, which would require all new development to achieve net zero carbon from a future date in the plan process should be applied.

The 2019 NPPF confirms that Local Plans should avoid unnecessary duplication (para 16f). The Government's Planning for the Future White Paper also states that a simpler planning process improves certainty. In this context, the Council is referred to the Government's proposed changes to the Building Regulations Part L (Conservation of Fuel & Power) and Part F (Ventilation). It is the HBF's opinion that the Council should not be setting different targets or policies outside of Building Regulations.

Today's new homes are already very energy efficient with lower heating bills for residents in comparison to older existing homes. Energy performance data has shown that around 8 out of 10 new build dwellings have an A or B energy efficiency rating, compared to just 3% of existing properties. An HBF report published in November 2019 found that, as a result, the average new build buyer in England and Wales saves £442.32 every year on heating costs compared to owners of existing dwellings.

As set out in The Future Homes Standard consultation (ended on 7th February 2020), the Government intends to future proof new homes with low carbon heating and world-leading levels of energy efficiency by uplifting standards for Part L (Conservation of Fuel & Power) and changing Part F (Ventilation) of the Building Regulations. The HBF recognise and support the need to move to The Future Homes Standard but there are difficulties and risks to housing delivery given the immaturity of the supply chain for the production / installation of heat pumps and the additional load that would be placed on local electricity networks in combination with Government proposals for the installation of electric vehicle charging points (EVCP) in new homes.

The Government Response to The Future Homes Standard : 2019 Consultation on changes to Part L (conservation of fuel and power) and Part F (ventilation) of the Building Regulations for new dwellings dated January 2021 provides an implementation roadmap, the Government's aim is for the interim Part L (Conservation of fuel and power), Part F (Ventilation) & Overheating

Regulations to be regulated for in late 2021 and to come into effect in 2022. The 2021 interim uplift will deliver homes that are expected to produce 31% less CO2 emissions compared to current standards. To ensure as many homes as possible are built in line with new energy efficiency standards, transitional arrangements will apply to individual homes rather than an entire development and the transitional period will be one year. This approach will support successful implementation of the 2021 interim uplift and the wider implementation timeline for the Future Homes Standard from 2025.

The Future Homes Standard will ensure that new homes will produce at least 75% lower CO2 emissions than one built to current energy efficiency requirements. By delivering carbon reductions through the fabric and building services in a home rather than relying on wider carbon offsetting, the Future Homes Standard will ensure new homes have a smaller carbon footprint than any previous Government policy. In addition, this footprint will continue to reduce over time as the electricity grid decarbonises.

The HBF support moving towards greater energy efficiency via a nationally consistent set of standards and timetable, which is universally understood and technically implementable. The Government Response to The Future Homes Standard consultation confirms that the Planning and Energy Act 2008 will not be amended, therefore the Council will retain powers to set local energy efficiency standards for new homes. The HBF acknowledges that the Council may stipulate energy performance standards that exceed the Building Regulations but consider that the Council should comply with the Government's intention of setting standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of individual Council's specifying their own policy approach to energy efficiency, which would undermine economies of scale for product manufacturers, suppliers and developers. The higher levels of energy efficiency standards for new homes proposed in the 2021 Part L uplift and Future Homes Standard means that the Council should not need to set local energy efficiency standards in order to achieve the shared net zero goal.

Furthermore, the Council's policy approach should not compromise the viability of development. The Council's updated viability assessment should include additional costs for 2021 Part L uplift. The Government's estimated cost is £4,847 per dwelling.

**Question 6 – Provision of solar arrays / farms and windfarms.**

The HBF have no comments on the provision of solar arrays / farms and windfarms.

**Question 7 - Carbon saving measures.**

The HBF have no comments on the Council's proposed carbon saving measures.

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

As set out in the 2019 NPPF, strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period (para 65). The determination of the minimum number of homes needed should be informed by a Local Housing Needs (LHN) assessment using the Government's standard methodology unless exceptional circumstances justify an alternative approach (para 60). In East Devon, there are no exceptional circumstances to justify an alternative approach.

The NPPG sets out the standard methodology for calculating the LHN figure using demographic data (based on 2014 MHCLG Sub National Household Projections (SNHP)) and an affordability adjustment (based on the latest ONS affordability ratios) (ID 2a-004-20190220). Using the standard methodology, the minimum LHN for East Devon is 928 dwellings per annum (**Option 1**). This calculation is based on 2014 SNHP, 2020 as the current year and 2019 affordability ratio of 10.47. As set out in the NPPG, the LHN is calculated at the start of the plan-making process but this number should be kept under review and when appropriate revised until the Local Plan is submitted for examination (ID 2a-008-20190220). The minimum LHN for the District may change as inputs are variable, which should be borne in mind by the Council.

The NPPG clearly states that the standard methodology is the minimum starting point in determining the number of homes needed. It does not produce a housing requirement figure (ID 2a-010-20190220). The NPPG explains that "*circumstances*" may exist to justify a figure higher than the minimum LHN (ID 2a-010-20190220). The "*circumstances*" for increasing the minimum LHN are listed in the NPPG including, but not limited to, situations where increases in housing need are likely to exceed past trends because of growth strategies, strategic infrastructure improvements, agreeing to meet unmet need from neighbouring authorities or previous levels of housing delivery / assessments of need, which are significantly greater than the outcome from the standard methodology (ID 2a-010-20190220). The NPPG indicates that if previous housing delivery has exceeded the minimum LHN, the Council should consider whether this level of delivery is indicative of greater housing need (ID 2a-010-20190220). It is noted that the latest Housing Delivery Test (HDT) Results identify housing completions of 1,065 dwellings in 2019/20, which exceeds the minimum LHN of 928 dwellings per annum and the adopted Local Plan housing requirement of 950 dwellings per annum. The Council should consider if there are "*circumstances*" to justify a housing requirement above the minimum LHN.

The 2019 NPPF seeks to achieve sustainable development by pursuing economic, social and environmental objectives in mutually supportive ways (para 8). The Council should be seeking to support the long-term sustainability of the District by achieving a sustainable balance between employment and housing growth. A lack of labour should not become a constraint on realising the economic growth potential of East Devon. The Council should also recognise economic benefits of housing development in supporting local

communities as highlighted by the HBF's latest publication Building Communities – Making Place A Home (Autumn 2020). The Housing Calculator (available on the HBF website) based on The Economic Footprint of House Building (July 2018) commissioned by the HBF estimates for every additional house built in East Devon, the benefits for the local community include creation of 3 jobs (direct & indirect employment), financial contributions of £27,754 towards affordable housing, £806 towards education, £297 towards open space / leisure, £1,129 extra in Council tax and £26,339 spent in local shops.

The NPPG states that total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments. As set out in the NPPG, an increase in the total housing figures may be considered where it could help deliver affordable housing (ID 2a-024-20190220). The NPPG also sets out that households whose needs are not met by the market, who are eligible for one or more of the types of affordable housing set out in the definition of affordable housing in Annex 2 of the 2019 NPPF, should be considered in need of affordable housing (ID 67-005-20190722). The Council should calculate its affordable housing need as defined by the NPPG, this figure may be significant in comparison to the minimum LHN. The HBF acknowledge that the Council may not be able to meet all affordable housing needs but a housing requirement above the minimum LHN will make a greater contribution to delivering more affordable housing.

As set out in the 2019 NPPF, the LPR should be positively prepared and provide a strategy, which as a minimum seeks to meet its own LHNs in full and is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated (para 35a). Until the summer of 2020, the Council was working on the Greater Exeter Spatial Plan (GESP) with neighbouring authorities. As set out in the 2019 NPPF, the Council is under a Duty to Co-operate with other Local Planning Authorities (LPA) and prescribed bodies on strategic matters that cross administrative boundaries (para 24). To maximise the effectiveness of plan-making and fully meet the legal requirements of the Duty to Co-operate, the Council's engagement should be constructive, active and on-going. This collaboration should identify the relevant strategic matters to be addressed (para 25). Effective and on-going joint working is integral to the production of a positively prepared and justified strategy (para 26). The Council should demonstrate such working by the preparation and maintenance of one or more Statements of Common Ground (SoCG) identifying the cross-boundary matters to be addressed and the progress of co-operation in addressing these matters. The Council should confirm in a SoCG that housing needs of Greater Exeter will be met.

As set out in the NPPG, the Government is committed to ensuring that more homes are built and supports ambitious Councils wanting to plan for growth (ID 2a-010-20190220). The NPPG states that a higher figure "*can be considered sound*" providing it "*adequately reflects current and future demographic trends and market signals*". However, the NPPG does not set any limitations on a higher figure, which is a matter of judgement. The Government's objective of significantly boosting the supply of homes set out in the 2019 NPPF remains

(para 59). A housing requirement above the minimum LHN would support economic growth, deliver more affordable homes and contribute to any arising unmet housing needs from neighbouring authorities. The HBF support a housing requirement above LHN as set out in **Options 2 & 3**.

**Question 9 – Sites for small scale housing developments**.

The Council's Housing Land Supply (HLS) should provide a sufficient supply of land to meet the housing requirement, to ensure the maintenance of a 5 Year Housing Land Supply (YHLS) and to achieve Housing Delivery Test (HDT) performance measurements.

As set out in the 2019 NPPF at least 10% of the housing requirement should be accommodated on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 68a). The Council should confirm that this national policy requirement will be achieved as set out in **Option 1**.

The widest possible range of housing sites by both size and market locations should be sought to provide suitable land for small local, medium regional and large national housebuilding companies (**Options 2, 3 & 4**). A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings to meet their housing needs. Housing delivery is maximised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.

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

All households should have access to different types of dwellings to meet their housing needs. As set out in 2019 NPPF, the housing needs for different groups should be assessed to justify any policies on the size, type and tenure of housing including a need for affordable housing (paras 61 & 62). All policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). The Council's approach to planning for housing for people at all stages of their life should accord with meeting the needs of an ageing population set out in the NPPG (ID 63-001-20190626 to 63-019-20190626).

The HBF's preference is **Option 3** of not setting standards for differing types of housing provision. Market signals are important in determining the size and type of housing needed. A prescriptive policy approach setting out specific policy requirements for the types and sizes of housing is inappropriate. Any requirements as proposed in **Options 1 & 2** should be supported by robust evidence of need and viability testing.

When planning for an acceptable mix of dwellings types to meet people's housing needs, the Council should focus on ensuring that there are appropriate sites allocated to meet the needs of specifically identified groups of households

without seeking overly prescriptive housing mixes on individual sites. The LPR should ensure that suitable sites are available for a wide range of different types of development across a wide choice of appropriate locations. Under **Option 4** as an alternative policy approach, the Council should consider allocating sites specifically for older persons and other specialist housing. Any proposed site allocations should satisfy specific site criteria such as the proximity of sites public transport, local amenities, health services and town centres.

**Question 11 – Additional housing policy objectives.**

**Housing Objective 1 – encouraging more self and custom build housing.**

The Council should support Self & Custom Build Housing. The NPPG sets out the key role that the Council should play in bringing forward suitable land for self & custom build housing (ID 57-025-20210508).

**Housing Objective 2 – requiring a proportion of homes on all larger development sites to be custom or self build.**

The provision of self & custom build serviced plots on larger housing development sites adds to the complexity and logistics of developing such sites and slower delivery. It is unlikely that the provision of self & custom build plots on new housing developments can be co-ordinated with the development of the wider site. At any one time, there are often multiple contractors and large machinery operating on-site, from both a practical and health & safety perspective, it is difficult to envisage the development of single plots by individuals operating alongside this construction activity. Any differential between the lead-in times / build out rates of self & custom build plots and the development of the wider site means unfinished plots next to completed and occupied dwellings resulting in consumer dissatisfaction, construction work outside of specified working hours, building materials stored outside of designated compound areas, etc.

Where plots are not sold, the Council's policy approach should be clear as to when these revert back to the original developer. It is important that plots should not be left empty to the detriment of neighbouring properties or the whole development. The timescale for reversion of these plots to the original housebuilder should be as short as possible because the consequential delay in developing those plots presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site. There are even greater logistical problems created if the original housebuilder has completed the development and is forced to return to site to build out plots, which have not been sold to self & custom builders.

As well as on-site practicalities any adverse impacts on viability should be tested. The inclusion of self & custom build plots will have a fundamental bearing on the development economics of the scheme. Site externals, site overheads, and enabling infrastructure costs are fixed and borne by the site developer. The developer will also have borne up front site promotion costs, including planning and acquisition costs. It is unlikely that these costs will be

recouped because the plot price a self & custom builder is able to pay is constrained by much higher build costs for self-build. Profit obtainable if the house was built and sold on the open market by the site developer is foregone. There are also worst-case scenarios of unsold plots remaining undeveloped and disruption if unsold plots are built by the site developer out of sequence from the build programme of the wider site or a return to site after completion of the wider site. These additional costs should be included in the Council's updated viability assessment.

**Housing Objective 4 – planning specific sites and areas for retirement housing developments.**

The Council is referred to the HBF's answer to **Question 10** under **Option 4** above.

**Housing Objective 6 - setting minimum floor space or room size standards for new homes that must be met in new developments.**

If the Council wishes to apply the optional Nationally Described Space Standards (NDSS) to new homes, then this should only be done in accordance with the 2019 NPPF (para 127f & Footnote 46). Footnote 46 states that "*policies may also make use of the NDSS where the need for an internal space standard can be justified*". As set out in the 2019 NPPF, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). The NPPG sets out that *"where a need for internal space standards is identified, the authority should provide justification for requiring internal space policies. Authorities should take account of the following areas need, viability and timing"* (ID 56-020-20150327). Before adopting the NDSS, the Council should provide a local assessment evidencing the case for East Devon.

The NDSS should only be introduced on a "need to have" rather than a "nice to have" basis. Need is generally defined as "*requiring something because it is essential or very important rather than just desirable".* The identification of a need for the NDSS should identify the harm caused or may be caused in the future. If it had been the Government's intention that generic statements simply stating in some cases the NDSS had not been met justified adoption of the NDSS then the standard would have been incorporated as mandatory in Building Regulations, which is not the case.

There is a direct relationship between unit size, cost per square metre, selling price per metre and affordability. The Council's policy approach should not compromise the viability of development. The Council's updated viability assessment should test NDSS compliant house typologies.

The Council should recognise that customers have different budgets and aspirations. The introduction of the NDSS for new homes may lead to customers purchasing larger homes in floorspace but with bedrooms less suited

to their housing needs. This may lead to the unintended consequences of potentially increasing overcrowding and reducing the quality of their living environment. Non-NDSS compliant dwellings may be required to ensure that those on lower incomes can afford a property, which meets their bedroom requirements. An inflexible policy approach to NDSS for new homes will impact on affordability and effect customer choice for affordable homeownership products such as First Homes.

The Council should also assess impact on affordability. Housing in East Devon is expensive and unaffordable for a significant proportion of the resident population. The 2019 median house price to workplace earnings ratio is 10.47, which is significantly higher than in the South West at 8.79 and in England at 7.83. Worsening affordability may have an adverse impact on meeting demand for First Homes and other affordable homeownership products, which may affect delivery rates of sites included in the housing trajectory. The delivery rates on many sites will be determined by market affordability at relevant price points of dwellings and maximising absorption rates. An adverse impact on the affordability may translate into reduced or slower delivery rates.

If the proposed requirement for NDSS is carried forward, then the Council should put forward proposals for transitional arrangements. The land deals underpinning residential sites may have been secured prior to any proposed introduction of the NDSS. These sites should be allowed to move through the planning system before any proposed policy requirements are enforced. The NDSS should not be applied to any reserved matters applications or any outline or detailed approval prior to a specified date.

**Housing Objective 8 - setting standards for the density of development.**

A blanket approach to the intensification of housing densities everywhere would be inappropriate as a range of differing densities will be needed to ensure development is in keeping with the character of the surrounding area and to provide sufficient variety in house typologies to create balanced communities with the right types of new homes to meet the housing needs of different groups. The setting of residential density standards should be undertaken in accordance with the 2019 NPPF (para 123), whereby in the circumstances of an existing or anticipated shortage of land for meeting identified housing needs then a minimum net density in suitable locations such as town centres and those benefiting from good public transport connections may be appropriate.

**Housing Objective 9 - ensuring adequate space to accommodate home working and suitable broadband connectivity.**

It is the HBF's opinion that the Council should not impose new electronic communications requirements beyond the provision of infrastructure as set out in statutory Building Regulations. In the March 2020 Budget, the Government confirmed future legislation to ensure that new build homes are built with gigabit-capable broadband. The Government will amend Part R "Physical Infrastructure for High-Speed Electronic Communications Networks" of the Building Regulations to place obligations on housing developers to work with

network operators to install gigabit broadband, where this can be done within a commercial cost cap. The Department for Culture, Media and Sport (DCMS) has outlined its intentions on the practical workings of this policy, which will apply to all to new builds. Any type of technology may be used, which is able to provide speeds of over 1000 Mbps. All new build developments will be equipped with the physical infrastructure to support gigabit-capable connections from more than one network operator.

**Question 12 - Preference for location for future job provision.**

The HBF have no comment on the Council's preference for the location for future job provision.

**Question 13 – Differing jobs sectors in East Devon.**

The HBF have no comment differing job sectors in East Devon.

**Question 14 – Additional economic policy objectives.**

The HBF have no comment on any additional economic policy objectives.

**Question 15 – Town centre uses.**

The HBF have no comment on town centre uses.

**Question 16 – Additional town centre policy objectives.**

The HBF have no comment on any additional town centre policy objectives.

**Question 17 – Designing beautiful spaces and buildings**.

The Council's proposed policy approach to design beautiful spaces and buildings should accord with the 2019 NPPF, the latest NPPG, the National Design Guide and National Model Design Code. The Council's policy approach should provide specific local guidance rather than repeating national policy or guidance.

The use of best practice guidance like Building for a Healthy Life should remain voluntary rather than becoming a mandatory policy requirement, which could be signposted in supporting text. Any referencing in policy wording to design guidance contained in a Supplementary Planning Document (SPD) should not convey development plan status onto a document which has not been subject to the same process of preparation, consultation and examination contrary to the Town and Country Planning (Local Planning) (England) Regulations 2012 (Regulations).

**Question 18 – Additional design policy objectives.**

The Council is referred to the HBF's answer to Question 17 above.

**Question 19 - The importance of conserving and enhancing heritage assets.**

The HBF have no comments on conserving and enhancing heritage assets.

**Question 20 - Development in protected landscapes**.

The HBF's preference is **Option 3**, which would allow for greater levels of development.

**Question 21 – Net gains in biodiversity**.

It is the HBF's opinion that the Council's policy approach to biodiversity as set out in **Options 1 - 3** should not deviate from the Government's proposals on biodiversity gain as set out in the Environment Bill. This legislation will require development to achieve a 10% gain for biodiversity. It is the Government's opinion that 10% strikes the right balance between the ambition for development and reversing environmental decline. 10% gain provides certainty in achieving environmental outcomes, deliverability of development and costs for developers. 10% will be a mandatory national requirement, but it is not a cap on the voluntary aspirations of developers who want to do more. The mandatory requirement offers developers a level playing field nationally and reduced risks of unexpected costs and delays.

The Environment Bill will make provision for local decision makers to agree biodiversity net gain plans with developers. Where offsite compensation is required, Councils will be able to review developers plans to deliver compensation through local habitat creation projects. Where suitable local projects are not available, there will be the option for investment in nationally strategic habitats. The Government will make provision for statutory biodiversity units in the Environment Bill, which will be purchasable at a set standard cost. This approach will allow Councils, landowners and organisations to set up habitat compensation schemes locally, where they wish to do so, where this is not the case, the Government will provide a last-resort supply of biodiversity units. The Government's proposals for statutory biodiversity units will provide a recourse for developers and Councils, where local habitat compensation schemes are not available, therefore preventing delays to development.

The Council's policy approach should also reflect the Government's proposals for a transition period of two years as set out in the Environment Bill. The Government proposes to work with stakeholders on the specifics of this transition period, including accounting for sites with outline planning permission, in order to provide clear and timely guidance on understanding what will be required and when.

There are significant additional costs associated with biodiversity gain, which should be fully accounted for in the Council's updated viability assessment. The Government has confirmed that more work needs to be undertaken to address viability concerns raised by the housebuilding industry in order that net gain

does not prevent, delay or reduce housing delivery. The DEFRA Biodiversity Net Gain & Local Nature Recovery Strategies : Impact Assessment Table 14 : Net Gain Delivery Costs (Residential) sets out regional costs (based on 2017 prices) in South West of £18,470 per hectare of development based on a central estimate but there are significant increases in costs to £63,610 per hectare for off-site delivery under Scenario C. There may also be an impact on gross / net site acreage ratio, which should be considered in the Council's updated viability assessment.

**Question 22 – Additional natural environment policy objectives**

The Council is referred to the HBF's answer to Question 21 above.

**Question 23 – Promoting access to facilities**.

The HBF's preference is **Option 3**, which is a combination of **Option 1** to focus new development as small clusters of growth in locations within easy walking or cycling distance of existing services & facilities and **Option 2** to focus new development on a small number of growth areas where the large scale of development will support the delivery of new accessible services & facilities.

**Question 24 - Additional sustainable transport policy objectives.**

**Sustainable Transport Objective 11 - considering the need for electric charging for vehicles and Objective 13 – requiring electric charging for bicycles.**

The HBF recognise that electric vehicles will be part of the solution to transitioning to a low carbon future. The Department of Transport consultation on Electric Vehicle Charging in Residential & Non-Residential Buildings (ended on 7th October 2019) set out the Government's preferred option to introduce a new requirement for Electric Vehicle Charging Points (EVCP) under Part S of the Building Regulations. The inclusion of EVCP requirements within the Building Regulations will introduce a standardised consistent approach to EVCPs in new buildings across the country. The requirements proposed apply to car parking spaces in or adjacent to buildings and the intention is for there to be one charge point per dwelling rather than per parking space. It is proposed that charging points must be at least Mode 3 or equivalent with a minimum power rating output of 7kW fitted with a universal socket to charge all types of electric vehicle currently on the market. It is the HBF's opinion that the Council's policy approach is unnecessary because of the Government's proposals to change Building Regulations.

However, if the Council's policy approach is retained, the HBF consider that the physical installation of active EVCPs is unnecessary. The evolution of automotive technology is moving quickly therefore a passive cable and duct approach is a more sensible and future proofed solution, which negates the potential for obsolete technology being experienced by householders. A passive cable and duct approach means that the householder can later arrange

to install a physical EVCP suitable for their vehicle and in line with the latest technologies.

The supply from the power grid is already constrained in many areas across the country. The HBF and its Members have serious concerns about the capacity of the existing electrical network in the UK. Major network reinforcement will be required across the power network to facilitate the introduction of EVCPs and the move from gas to electric heating as proposed under the Future Homes Standard. These costs can be substantial and can drastically affect the viability of developments. If developers are funding the potential future reinforcement of the National Grid network at significant cost, this will have a significant impact on their businesses and potentially jeopardise future housing delivery. The Council's policy approach should not compromise the viability of development. The Department for Transport - Electric Vehicle Charging in Residential & Non-Residential Buildings consultation estimated an installation cost of approximately £976 per EVCP plus any costs for upgrading local electricity networks, which under the Government's proposal automatically levies a capped figure of £3,600 on developers. These additional costs should be included in the Council's updated viability assessment.

**Question 25 – Facilities and services.**

The HBF have no comment on facilities and services.

**Question 26 – Additional infrastructure and service provision policy objectives**.

The HBF agree with the Council's **Infrastructure & Service Provision Objective 10** that infrastructure needs should be secured at an appropriate time to support new development.

**Question 27 - Retaining and refining the existing settlement hierarchy.**

Over recent years most development has occurred on the western side of the District. Under the adopted Local Plan for the period from 2013 to 2031, approximately 59% of all new homes will be built in the "West End" close to the city of Exeter at the new town of Cranbrook & other large sites at North of Blackhorse & Pinhoe and 41% elsewhere in East Devon at towns of Axminster, Budleigh Salterton, Exmouth, Honiton, Ottery St Mary, Seaton & Sidmouth and 15 villages of Beer, Broadclyst, Clyst St Mary, Colyton, East Budleigh, Feniton, Kilmington, Lympstone, Musbury, Newton Poppleford, Sidbury, Uplyme, West Hill, Whimple & Woodbury.

The HBF's preference is **Option 3**, which is a hierarchy that retains the 7 towns and Cranbrook but also has a higher number of villages that may accommodate development. As set out in the 2019 NPPF "*to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services*" (para 78).

**Question 28 – Broad distribution of housing development.**

A continuation of the broad distribution pattern of the adopted Local Plan distributes 60% of new homes at the West End, 30% in Towns and 10% in Villages and rural areas (**Option 1**). The HBF's preference is a more even distribution pattern across the District, which is less extreme than the proposals set out under **Option 2** – More West End focused or **Option 3** – A less West End focused.

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

Future options for the type and location of development should be a combination of infilling in towns and at larger villages, expanding the new town of Cranbrook, large & small scale urban expansions to existing towns and building on the edges of villages.

There should be a short and long-term supply of sites on brownfield and greenfield land. Housing delivery is optimised by the widest possible range of housing site sizes and market locations, which provides suitable land buying opportunities for small, medium and large housebuilding companies. The widest mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides competition in the land market. A diversified portfolio of housing sites also offers the widest possible range of products to households to access different types of dwellings to meet their housing needs.

As set out in the 2019 NPPF at least 10% of the housing requirement should be accommodated on sites no larger than one hectare or else demonstrate strong reasons for not achieving this target (para 68a). The Council should confirm that this national policy requirement will be achieved.

**Question 30 - Establishment of a Development Corporation.**

The HBF have no comments on the establishment of a Development Corporation to deliver one or more big strategic sites for housing or mixed-use development.

**Question 31 – Planning for development beyond 2040**.

If a new town is proposed, the Council should be planning for development beyond 2040. The Government's consultation on Draft Revisions to the NPPF (ending on 27th March 2021) proposes that "*where larger-scale development such as new settlements form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery*" (para 22).

**Question 32 – And finally ……. ?**

At this time, there are no further comments that the HBF would like to make. It is hoped that these responses are of assistance to the Council in preparing the next stages of the LPR. As plan preparation progresses, the HBF look forward to submitting further representations at later consultation stages, in the meantime, if any further information or assistance is required please contact the undersigned.

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