

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

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

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

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

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

Your Age Range

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

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

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

Guidance notes

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

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

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

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

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

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

Data Protection

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

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

Question 1 - Local Plan Objectives

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

Do you think these are the right objectives for the new local plan, are there any further objectives that you would wish to see added or amendments made?

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

Please give details

Question 2 – The scope of the local plan

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

Which option do you think we should take?

- Option 1 - Single Plan.** Produce a single local plan covering all policy matters
- Option 2 - Multiple Plans.** Produce a plan that deals with strategic matters (the bigger stuff) first and then subsequent plans that deal with more local concerns and detailed matters later
- Option 3 - Other.** Do an alternative or neither of the above

Please provide any further comments in the box below

Question 3 - Neighbourhood Plans and the new Local Plan

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

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

Question 4 - Planning for health and wellbeing

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

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

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

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

Question 5 - Energy efficiency of new buildings

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

Do you think we should

- Option 1 - Plan for net-zero carbon from plan adoption.** This would require all new development to be net-zero carbon upon adoption of the plan. However, it would be at a cost and as a consequence we may see less affordable housing built and maybe fewer other social and community benefits from development
- Option 2 - Plan for net-zero carbon from a future date.** This would require all new development to achieve net zero carbon from a future date in the plan process. It could allow time for the development industry to adjust to the higher standards and may mean we can secure more affordable housing and community benefits from development
- Option 3 - Do neither of the above and not have a policy.** Under this option we could just wait for and apply any Government policy

Please provide any further comments

Question 6 - Provision of solar arrays/farms and windfarms

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

Which option do you think we should take?

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

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

Question 7 - Carbon saving measures

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

Do you think we have identified the appropriate carbon saving and related policy matters to be addressed in a new local plan and are there any other policy areas that you think we should be considering?

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

Please give details

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

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

Which option do you think we should take?

- Option 1 - Plan for an average of at least 928 new homes being built each year** – This would accommodate levels of house building that accord with current Government requirements. It may mean, however, that we fall a long way short of meeting all affordable housing needs.
- Option 2 - Plan for a greater number of homes, for example 1,200** – this may meet more of the affordable housing need but not all of it.
- Option 3 - Plan to build considerably more homes each year** - A figure of 1,614 homes would align with Governments previous thinking and would potentially result in all affordable housing needs being met.
- Option 4** - Select option 4 if you think none of the above are appropriate

Please provide any further comments and justification in the box below, especially if you think a different number of new homes being built each year is appropriate.

Question 9 - Sites for small scale housing developments

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

Which option do you think we should take?

- Option 1 - Allocate or identify land for around 10% of homes to be on small sites** - this approach would meet minimum government standards.
- Option 2 - Allocate or identify land for around 11% to 25% of homes to be on small sites** - this approach would be higher than Government minimum standards.
- Option 3 - Allocate or identify land for 26% to 50% of homes to be on small sites** - this approach would be substantially higher than Government minimum standards.
- Option 4** - Allocate or identify land for 51% or more of homes to be on small sites - with such a high figure this approach could fundamentally change the nature of house building in East Devon.
- Option 5 - None of the above or an alternative**

Please provide any further comments in the box below

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

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

Which option do you think we should take?

- Option 1 - We should explicitly require housing provision for people at all stages of life.** This approach could place demanding standards on developers to provide housing for all stages of people lives. It could though reduce monies available to pay for other wider community benefits from development.
- Option 2 - We should encourage but not require housing provision for people at all stages of life.** Under this approach we could encourage and support such housing but be less demanding on specific standards to be met.
- Option 3 - Not set standards for differing types of housing provision.** This approach would leave developers to determining the types of houses that should be built rather than policy seeking to require specific outcomes
- Option 4 - None of the above or an alternative**

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

Question 11 - Additional housing policy objectives

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

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

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

Please give details

Question 12 - Preference for location for future job provision

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

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

Question 13 - Differing jobs sectors in East Devon

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

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

Question 14 - Additional economic policy objectives

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

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

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

Please give details

Question 15 - Town centre uses

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

15a - Retail to dominate – support retail uses in town centres and if possible resist other uses.	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
15b - Promote mixed commercial uses - support retail as well as other commercial uses such as café's and offices	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
15c - Redefine town centres to smaller core areas – concentration on retail and commercial uses in the core and allowing much greater flexibility for other uses in peripheral areas	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
15d - Support change of use to housing – allow for any shops or commercial premises to be converted to housing	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
15e - Support community uses - promote more community spaces in town centres	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose
15f - Leisure uses – promote new gyms and sports facilities in town centres.	<input type="radio"/> Strongly support <input type="radio"/> Support <input type="radio"/> Neither oppose nor support <input type="radio"/> Oppose <input type="radio"/> Strongly oppose

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

Question 16 - Additional town centre policy objectives

Paragraph 7.6 of the Issues and Options report identifies three additional area where policies may be appropriate including the use of vacant stories over shops, resisting 'out of town' uses to support town centres and producing town centre masterplans to identify key areas for improvement.

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

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

Please give details

Question 17 - Designing beautiful spaces and buildings

Chapter 8 of the Issues and Options report explains how attractive places can be planned and Question 17 seeks to find out how important you think it is that this is done.

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

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

Please provide comments below on design matters you consider to be particularly important. We would be especially interested in your views on whether we should include design codes in our future local plan for each allocated development site or whether we should make it simpler and just have general guidance.

Question 18 - Additional design policy objectives

Paragraph 8.8 of the Issues and Options report identifies two areas with the potential for additional policy work. These are encouraging innovative designs and incorporating wildlife friendly elements into developments.

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

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

Please give details

Question 19 - The importance of conserving and enhancing heritage assets

Chapter 9 of the Issues and Options describes our heritage assets and sets out the positive impacts they can have on our quality of life and local economies.

Through a new local plan (and in the work of the council more generally) how important do you think it is that we should conserve and enhance our heritage assets?

- Absolutely essential
- Very important
- Quite important
- Not really of any importance

Please provide any further comments on heritage asset conservation and enhancement below including on any specific matters you think a new local plan should address.

Question 20 - Development in protected landscapes

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

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

- Option 1 - Place significant restrictions on development.** This approach would apply very tight constraints on development. However, it could mean more development pressure elsewhere in East Devon.
- Option 2 - Allow for development to meet local needs.** This would allow for limited development, specifically where it will meet smaller scale local social, housing or economic needs, it could still mean more development pressure elsewhere in East Devon.
- Option 3 - Allow for greater levels of development.** This approach would allow for much more development in protected landscapes, in so doing it could however reduce the need to build elsewhere.
- Option 4 - None of the above or an alternative**

Please provide any further comments in the box below

Question 21 - Net gains in biodiversity

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

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

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

Please provide any further comments in the box below

Question 22 - Additional natural environment policy objectives

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

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

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

Please give details

Question 23 - Promoting accessibility by walking and cycling

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

In order to promote walking and cycling and ensure that facilities are accessible we could adopt the possible approaches detailed below, which one would you favour?

- Option 1 - Focus new development as small clusters of growth in locations within easy walking or cycling distance of existing services and facilities** - This will limit the potential location of new development and will require existing facilities and services to have the capacity to cope with extra customers/users
- Option 2 - Focus new development on a small number of growth areas where the large scale of development will support the delivery of new accessible services and facilities** - This may require very high levels of development to support facilities, which may overwhelm a small settlement.
- Option 3 - A combination of options 1 and 2** – This will enable some growth where existing facilities and services are accessible and have capacity with the remainder focused on growth areas to be developed with new services and facilities.
- Option 4 - Do not require facilities and services to be within walking or cycling distance of new development but require them to be available within the settlement** - This option would not require access by foot or cycle to facilities and services but would require them to be available locally. It may however encourage car use.
- Option 5 - None of the above** - Perhaps you think that accessibility by walking or cycling is not a relevant concern?

Please provide any further comments in the box below

Question 24 - Additional sustainable transport policy objectives

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

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

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

Please give details

Question 25 - Facilities and services that are important

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

Please score the services and facilities listed below in accordance with their Importance to where you live or would want to live?	Please tick one box only for each item			
	Essential	Very Important	Quite Important	Of little Importance
Convenience store/Post Office	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Supermarket	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Childcare and nursery school provision	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Primary school	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Secondary school	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Children’s play area	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sports & leisure facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Health care facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Open spaces	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Easy access to a range of jobs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Regular bus service (5 plus per day)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Train station	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Paths for walking and cycling	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Access to full fibre broadband	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public house	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Place of worship (e.g. a church)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
High quality road links	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Emergency services (police, fire, ambulance)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Community hall	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Youth facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

Question 26 - Additional infrastructure and service provision policy objectives

Paragraph 12.9 of the Issues and Options report identifies five other infrastructure and service policy objectives.

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

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

Please give details

Question 27 - Retaining and refining the existing settlement hierarchy

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

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

- Option 1** - Same hierarchy as current local plan: 7 Towns plus Cranbrook and the 15 Villages
- Option 2** - A hierarchy that retains the towns and Cranbrook but has a lower number of villages that may accommodate development
- Option 3** - A hierarchy that retains towns and Cranbrook but has a higher number of villages that may accommodate development
- Option 4** - Do something different in terms of a hierarchy or not have one

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

Question 28 - Broad distribution of housing development

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

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

- Option 1 - As existing.** Continue with a distribution pattern of planned new development that is in line with the current local plan – for 60% of new homes at the West End, 30% in Towns and 10% in Villages and rural areas
- Option 2 - More West End focused.** This approach would focus more of the future new house building close to Exeter, perhaps as much as 75%, with the remaining 25% being in town and villages (for example 20% in towns and 5% in villages).
- Option 3 - A less West End focused pattern.** This approach would seek to accommodate far less development close to Exeter, maybe as little as 20% of future new homes, with the bulk of new housing, 80% of provision, being dispersed across towns and villages (for example 50% in towns and 30% in villages and rural areas).
- Option 4 - An alternative to the above.** You may consider that there are different ways or approaches to look at development distribution (if so we would welcome your thoughts and comments)

Please provide any comments on the above in the space below

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

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

How do you feel about the development types and locations listed below	For each option please tick one box only					
	Strongly support	Support	Neither oppose or support	Oppose	Strongly oppose	None of the options
Infilling in towns and at larger villages	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Building one or more additional new towns	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Planning for new villages	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
large scale (over 50 home)urban expansions to existing towns	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
small scale (under 50 home) urban expansions to towns	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Building houses on the edges of East Devon villages	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Do you have any further observations on the alternative development options and approaches? Please provide comments below						

Question 30 - Establishment of a Development Corporation

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

If one or more big strategic sites for housing or mixed use development are allocated in the new East Devon local plan how important do you think the creation of a Development Corporation would be?

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

Please provide any further comments below

Question 31 - Planning for development beyond 2040

Paragraph 13.20 of the Issues and Options report considers the timeframe that the local plan should consider.

Do you consider that it would be appropriate to start to plan for development in East Devon for a date well beyond 2040 in this Local Plan?

- Yes it would be very sensible whether a new town is proposed or not
- Sensible only if a new town is proposed
- It does not really matter what end date is set
- It would be undesirable and the end date should be 2040
- None of these options

Please provide any further comments below

Question 32 - And finally...?

Are there any big planning issues that you think we have missed in this report or are there any further comments you would like to make?

East Devon Local Plan 2021-2040
Representation to Issues and Options
Consultation January – March 2021

On behalf of Gleeson Strategic Land in reference to Land at
Heathfield, Honiton

March 2021

The logo for ORIGIN3 features a large orange circle on the left, followed by the word "ORIGIN" in a grey, sans-serif font, and a large "3" in the same grey font.

Planning . Design . Development

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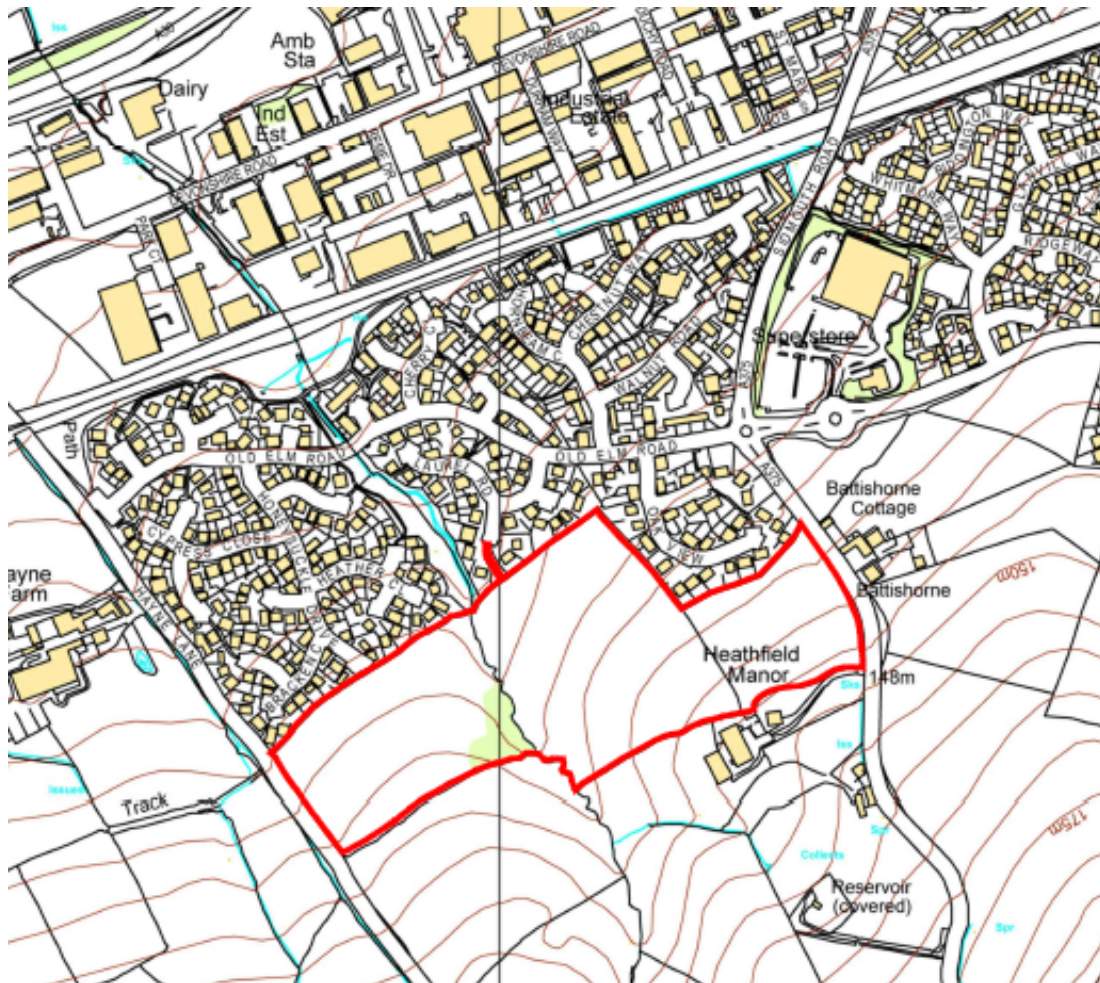
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Registered Offices: 23 Westfield Park, Redland, Bristol, BS6 6LT
T: 0117 980 4900 E: info@origin3.co.uk W: www.origin3.co.uk

1 Introduction

- 1.1 This representation to the East Devon Local Plan 2021-2040 Issues and Options consultation has been prepared by Origin3 on behalf of Gleeson Strategic Land Ltd (Gleeson). The statement has been written in respect of Land at Heathfield, Honiton.
- 1.2 Land at Heathfield is located to the south-west of Honiton as shown in Figure 1.1 below.

Figure 1.1: Location Plan



- 1.3 Land at Heathfield is located within the East Devon Area of Outstanding Natural Beauty (AONB). Other than the AONB, the site is relatively unconstrained and is located within walking and cycling distance of services and facilities in Honiton.
- 1.4 Honiton is identified in the current East Devon Local Plan (adopted 2016), as a centrally located town which is a focus for shopping, employment, and services for the surrounding rural area. The town

benefits from a train station on the Exeter to Waterloo line, as well as the main A30 East-West road link to the north of the town.

1.5 Gleeson Strategic Land have previously submitted two planning applications for residential of around 150 homes on the site (references 13/2430/MOUT and 15/1027/MOUT). Both applications were refused on the basis of impact on the AONB.

1.6 East Devon Council are preparing a new East Devon Local Plan 2021-2040, and are undertaking the first stage of consultation between January to March 2021 on Issues and Options.

1.7 The Council have structured the chapters in the Issues and Options consultation document to respond to their 10 key objectives for the new Local Plan, which comprise:

- Objective 1: Designing for health and well-being.
- Objective 2: Tackling the climate emergency.
- Objective 3: Meeting future housing needs.
- Objective 4: Supporting jobs and the economy.
- Objective 5: Promoting vibrant town centres.
- Objective 6: Designing beautiful and healthy spaces and buildings.
- Objective 7: Outstanding built heritage.
- Objective 8: Outstanding natural environment.
- Objective 9: Promoting sustainable transport.
- Objective 10: Connections and infrastructure.

1.8 This representation is prepared to respond to the Issues and Options consultation document and is structured as follows to address the relevant chapters of the document:

- Section 2: Meeting Housing Needs
- Section 3: Protected Landscapes
- Section 4: Promoting Sustainable Transport
- Section 5: Infrastructure and Facilities
- Section 6: Distribution of Development
- Section 7: Conclusion

2 Meeting Housing Needs

- 2.1** Chapter 5 of the Issues and Options consultation document sets out the Council's objective to: *'provide high quality new homes to meet people's needs'*.
- 2.2** The Council identifies that house prices have increased dramatically whilst availability of affordable housing has declined, and access to good housing for everyone has become an increasing concern.
- 2.3** This chapter sets out that the Government advised in December 2020 that a minimum of 928 homes should be built in East Devon each year (subject to annual review). This is lower than the adopted East Devon Local Plan annual requirement for an average of 950 new homes to be built each year. The minimum requirement is also considerably lower than the figure of 1,614 homes per year that the previous Government proposal in autumn 2020 generated.
- 2.4** Taking these figures into account the Council is considering the following 4 options for setting a minimum housing requirement in East Devon:

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

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

- 2.5** The Council state that a recent housing study indicates that to meet all current and future affordable housing needs there would be a requirement for an extra 461 homes each year from 2020 to 2040. This is almost double the level of affordable homes that have been built in recent years. The Council identify that while new affordable homes are typically built as developer contributions on market housing schemes, financial viability considerations often places limits on amounts that can be secured and frequently sites provide 20% or less affordable homes.
- 2.6** The current East Devon Local Plan (adopted 2016) Strategy 34 sets out district wide affordable housing provision targets, which comprise 25% in settlements including Honiton, and 50% to all

other areas excluding those that fall under the 'exceptions' policy. Strategy 34 sets out that the thresholds at which this policy applies will be the minimum thresholds set out in Government policy of guidance.

2.7 The NPPF (February 2019), sets out that affordable housing should not be sought for residential developments that are not major developments (10 or more homes, or a site of 0.5 hectares or more), other than in designated rural areas.

2.8 Taking into account the affordable housing need for 461 new homes each year, we consider that **Option 3 is the most appropriate approach to housing requirement in East Devon. Option 3 would enable 1,614 homes to be built each year which would contribute towards providing affordable homes.** This approach would support the Council's objective of providing high quality homes to meet people's needs.

2.9 Chapter 5 also sets out 5 options for the allocation of small scale housing developments:

Question 9 – Sites for small scale housing developments

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

2.10 While we recognise that smaller sites can contribute towards housing need in specific locations, there is a risk that if the Council proposes to allocate the majority of housing requirement on smaller development sites that affordable housing requirements will not be met, because these sites may not meet the affordable housing threshold of 10 or more homes. Even smaller sites that provide more than 10 homes may not be able to deliver affordable housing due to financial viability considerations. As the Council has set out in Chapter 5, currently viability is an issue in East Devon and frequently sites deliver 20% or less affordable housing.

2.11 The piecemeal development of smaller sites also poses issues for funding and/or bringing forwards infrastructure improvements that may be required. In comparison, major development on larger sites

can provide policy compliant affordable housing and can bring forwards infrastructure in a comprehensive approach to development.

2.12 We therefore consider that Option 1 is the most appropriate approach to small scale housing developments to ensure that affordable housing requirements are met, and to ensure that a comprehensive approach to development and infrastructure is undertaken. Land at Heathfield in particular offers the opportunity to develop around 150 homes on one site in a sustainable location, provide the policy requirements of 25% affordable housing, and provide infrastructure improvements if required.

3 Protected Landscapes

- 3.1 Chapter 10 sets out the Council's objective to: *'protect and enhance our outstanding natural environment and support an increase in biodiversity'*.
- 3.2 The chapter identifies that around two-thirds of East Devon falls within Areas of Outstanding Natural Beauty (AONB). There are two AONBs, the East Devon AONB and the Blackdown Hills AONB.
- 3.3 The Council notes that while AONBs are of national and local importance, the AONBs in East Devon place limitations on the amount and locations for development. This is because the National Planning Policy Framework (NPPF) states that AONBs are not normally appropriate for large scale development schemes.
- 3.4 The options below to approaching development in protected landscapes demonstrate that the Council recognises that a review of AONB may be required to enable development to come forward to meet housing requirements.

Question 20 - Development in protected landscapes

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

- 3.5 We support Option 3 above, which proposes to allow for greater levels of development in protected landscapes. We consider that there are settlements such as Honiton, in which development is limited by AONB designations but in many other respects are less constrained than settlements outside of the AONB, which are constrained by flood risk or lack of sustainable transport options, and are located away from key services and facilities.
- 3.6 If the AONB is not reviewed then any future growth in Honiton would be restricted to growth only along the east-west axis, due to the AONB designation along the southern edge and AONB designation and flood risk constraints along the northern edge of the town. The consequence would

be that any proposed development to the east and west of the town would be located far away from the town's facilities and services and would be dependent on car journeys. This would be unsustainable and would not support the Council's objective of tackling the climate emergency, or the National Planning Policy Framework's emphasis on achieving sustainable development and promoting healthy and safe communities.

3.7 We therefore propose that the Council review the AONB boundary to the south of Honiton, specifically in respect of the Land at Heathfield. This site offers the opportunity to provide development in a sustainable location close to services and facilities, on a site that aside from the current AONB designation is relatively unconstrained. By not allowing development in the AONB around main settlements such as Honiton, the Council is not meeting the needs of those settlements and is stopping settlements like Honiton from growing sustainably.

4 Promoting Sustainable Transport

- 4.1** Chapter 11 sets out the Council's objective to: *'prioritise walking, cycling and public transport and make provision for charging electric vehicles, whilst reducing reliance on fossil fuelled vehicles.'*
- 4.2** The Council recognise that promoting sustainable transport in new development can have multiple benefits including reducing traffic congestion, reducing carbon dioxide emissions, improving air quality, and improving both physical and mental health.
- 4.3** East Devon has relatively low levels of walking, cycling and public transport, in part due to the rural nature of much of the district. Four settlements benefit from bespoke bus services that travel, including Honiton. There are nine train stations including a train station in Honiton.
- 4.4** The Chapter sets out 5 options for promoting access to facilities:

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?

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?

- 4.5** We support the approach set out in Option 1, which would focus new development in locations within easy walking and cycling distance of existing services and facilities. Honiton is a settlement with a range of services and facilities, and with bus routes and a train station that link to the wider

district and beyond. Sites including the Land at Heathfield in Honiton would support Option 1 by enabling growth within walking and cycling distance of these existing services and facilities.

5 Infrastructure and Facilities

- 5.1** Chapter 12 sets out the Council's objective to: *'secure infrastructure needs at an appropriate time to support new development.'*
- 5.2** The Council recognise that the delivery of infrastructure such as transport, flood risk measures, utilities connections, and habitat mitigation, alongside housing and economic development is vital in creating sustainable communities. Infrastructure can be funded and delivered in a variety of ways including through Section 106 agreements, the Community Infrastructure Levy, national or local government grants, and organisations that have statutory powers.
- 5.3** **As noted in Section 3 above, we consider that focusing new development on larger sites rather than the piecemeal development of small sites is beneficial to secure any necessary infrastructure improvements.**
- 5.4** Transport is identified as one of the most important infrastructure issues when considering new development. The Council has identified that there are projects in the pipeline to improve transport connections and support development across East Devon, and recognise that additional projects are likely to be needed.
- 5.5** **We consider that sustainable transport should be a focus for the Council, to support their objective of tackling the climate emergency.** This could include improvements to encourage travel by train rather than roads to support development in sustainable settlements such as Honiton.
- 5.6** The Council set out that when planning for future development it is necessary to have an understanding of the services and facilities that are important to people and the area they live in.

Taking into account the need to plan for sustainable development, we consider that the focus for development should be on towns including Honiton, which benefit from a range of services and facilities, rather than on smaller, less sustainable villages. All of the services and facilities set out in Chapter 12 are of importance to new development, particularly train stations which provide sustainable travel to other settlements. Honiton in particular benefits a range of services and facilities including schools, employment, superstores, local shops, health care facilities, and a train station providing wider links on the Exeter to Waterloo line.

6 Distribution of Development

- 6.1** Chapter 13 reviews the recent pattern of development in East Devon, and considers how future development should be distributed.
- 6.2** The Council identifies that over recent years much of the development in East Devon has occurred on the western side of the District close to Exeter referred to as the 'West End'. This concentration of development reflects that Exeter is a vibrant city that supports many jobs. The current Local Plan (adopted 2016) distributes around 59% of new homes in the West End, and 41% elsewhere in East Devon. There are also large amounts of employment land being developed in the West End.
- 6.3** Outside of the West End the towns of Axminster and Exmouth have seen significant levels of new housing growth. Other towns have less projected future growth although Ottery St Mary has accommodated high levels of development in recent years.
- 6.4** The current Local Plan (adopted 2016) sets out the following settlement hierarchy:
- West End – comprising developing the new town of Cranbrook and other large sites at North of Blackhorse and Pinhoe.
 - Seven Towns of – Axminster, Budleigh Salterton, Exmouth, Honiton, Ottery St Mary, Seaton, and Sidmouth.
 - 15 Villages that provide a range of facilities and services – to meet some of the basic needs of their residents and nearby rural areas: Beer, Broadclyst, Clyst St Mary, Colyton, East Budleigh, Feniton, Kilmington, Lypstone, Musbury, Newton Poppleford, Sidbury, Uplyme, West Hill, Whimble, Woodbury.
- 6.5** The Council are reviewing the hierarchy for development in East Devon and propose the following four options for refining the hierarchy:

Question 27 - Retaining and refining the existing settlement hierarchy

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 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

- 6.6 We consider that Option 2 is the most appropriate approach to settlement hierarchy in East Devon. This Option looks to retain the seven towns and Cranbrook as focus points for development, but has a lower level of villages that may accommodate development. This approach would focus the development of new homes in towns which benefit from more services and facilities than villages, and which would therefore be more sustainable locations for development. This would support the Council’s wider objectives to tackle the climate emergency and promote sustainable transport.
- 6.7 Chapter 13 also considers how development should be distributed throughout the hierarchy and sets out the following four options:

Question 28 – Broad distribution of housing development

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).

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).

- 6.8 The Council note that the total housing requirement is still to be finalised and therefore the distribution can’t yet identify specific amounts. However, the overall strategy for distributing development is considered.
- 6.9 The existing principle of focussing development in the West End, close to Exeter, could be carried forward to a new Local Plan. Alternative approaches could see development elsewhere in East Devon, but there is emphasis on minimising the need to travel, for example for employment. This would allow for housing needs to be met throughout East Devon, including for affordable housing.
- 6.10 We consider that Option 3 of providing a less West End focused pattern of development would be the most suitable approach to support local housing need across the district, including affordable housing need. This Option would enable development to be located in towns throughout the district which to respond to local housing need, and to support the future sustainability of these towns.

6.11 Chapter 13 also considers the types and locations for development below:

Question 29 - Future options for the type and location of development						
How do you feel about the development types and locations listed below	For each option please tick one box only					
	Strongly support	Support	Neither oppose or support	Oppose	Strongly oppose	None of the options
Infilling in towns and at larger villages	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Building one or more additional new towns	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Planning for new villages	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
large scale (over 50 home) urban expansions to existing towns	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
small scale (under 50 home) urban expansions to towns	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Building houses on the edges of East Devon villages	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

6.12 We support development in large scale (over 50 homes) urban extensions to towns. This approach enables development to come forward in a coordinated, comprehensive approach which contributes towards affordable housing need and infrastructure requirements.

6.13 This Council envisage that the Local Plan could have an end date of 2040, but are still reviewing this as set out below.

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
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

6.14 We consider that it would be sensible to plan for development beyond 2040 whether a new town is proposed or not. A longer term plan would enable the Council to consider the vision for both the wider district and individual settlements in the future. This will also enable the Council to undertake an AONB review to ensure that there is land available for towns including Honiton to meet local housing need both now and in the future.

7 Conclusion

- 7.1** In conclusion, taking into account the affordable housing need for 461 new homes each year we consider that the most appropriate approach to housing requirement in East Devon is to enable the development of 1,614 homes to be built each year. This would contribute towards providing affordable homes and would support the Council's objective of providing high quality homes to meet people's needs.
- 7.2** We consider that the Council should be focusing development in sustainable locations including Honiton, on sites such as Land at Heathfield which are within walking and cycling distance of services and facilities including schools, employment, superstores, local shops, health care facilities, and benefiting from public transport links to the wider district including bus routes and a train station.
- 7.3** To enable development in sustainable locations including Honiton, we consider that the boundaries of Areas of Outstanding Natural Beauty (AONBs) should be reviewed, or allocations made within the AONBs. In particular, the AONB to the south of Honiton should be reviewed to enable the sustainable development of Land at Heathfield. Reviewing AONB boundaries would enable development to be distributed more evenly in towns throughout the district rather than focusing only on the West End, which is constraining development in East Devon's main settlements. A more even distribution would enable local housing needs to be met, including local affordable housing need.
- 7.4** Reviewing the AONB would also enable development to be located on sites that are relatively unconstrained by other considerations such as flood risk or heritage, such as Land at Heathfield. The AONB review would also enable development to be located in sustainable locations such as Honiton which benefit from a range of services and facilities, which would contribute towards the Council's objective of tackling the climate emergency.

The focus for residential development should also be on larger sites rather than small sites to ensure that development contributes to the Council's affordable housing requirement. Development on larger sites also enables a more coordinated and comprehensive approach to providing any necessary infrastructure to support new residential development.



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Planning . Design . Development

23 Westfield Park, Redland, Bristol, BS6 6LT

0117 980 4900 | info@origin3.co.uk | www.origin3.co.uk