

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	Mr	First name or initial	Dan	Surname	Yeates
Your email address					
Your telephone number					
Your postal address and post code			BS16 7DF		
Organisation name (if relevant)			Savills		
If you are an agent acting for a client please provide the name of your client			Sidbury Manor Estate		

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

no comment

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

Please refer to submitted representations

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?

Please refer to submitted representations

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

Please refer to submitted representations

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

Please refer to submitted representations

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

no comment

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

Please refer to submitted representations

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.

Please refer to submitted representations

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

Please refer to submitted representations

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.

no comment

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

no comment

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

<p>12a - Continued focus on big employment sites in the West End of the District</p>	<p><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</p>
<p>12b - Encouraging greater business development in other areas close to Exeter (for example expanding Greendale and Hill Barton Business Parks)</p>	<p><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</p>
<p>12c - Encouraging greater business development at and within the main towns of East Devon</p>	<p><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</p>
<p>12d - Encouraging business expansion and development in the villages and across the countryside of East Devon</p>	<p><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</p>
<p>12e - Encourage and enable more home working</p>	<p><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</p>
<p>If you have any comments on the above or alternative options please set these out below.</p>	
<p>no comment</p>	

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
----------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

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
------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

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
----------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

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
-------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

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

no comment

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

no comment

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.

<p>15a - Retail to dominate – support retail uses in town centres and if possible resist other uses.</p>	<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
<p>15b - Promote mixed commercial uses - support retail as well as other commercial uses such as café's and offices</p>	<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
<p>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</p>	<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
<p>15d - Support change of use to housing – allow for any shops or commercial premises to be converted to housing</p>	<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
<p>15e - Support community uses - promote more community spaces in town centres</p>	<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
<p>15f - Leisure uses – promote new gyms and sports facilities in town centres.</p>	<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

no comment

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

no comment

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.

Please refer to submitted representations

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

no comment

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.

no comment

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

Please refer to submitted representations

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

Please refer to submitted representations

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

no comment

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

Please refer to submitted representations

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

no comment

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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Supermarket	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Childcare and nursery school provision	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Primary school	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Secondary school	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Children’s play area	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sports & leisure facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Health care facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Open spaces	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Easy access to a range of jobs	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Regular bus service (5 plus per day)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Train station	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Paths for walking and cycling	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Access to full fibre broadband	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Public house	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Place of worship (e.g. a church)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
High quality road links	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Emergency services (police, fire, ambulance)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Community hall	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Youth facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Please refer to submitted representations

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

no comment

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.

Please refer to submitted representations

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

Please refer to submitted representations

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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Building one or more additional new towns	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Planning for new villages	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
large scale (over 50 home) urban expansions to existing towns	<input checked="" 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 checked="" 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 checked="" 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						
Please refer to submitted representations						

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

no comment

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

no comment

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?

no comment

15 March 2021
pla150321ltdy - Sidbury Manor Estate



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

Dan Yeates BSc (Hons) MA MRTPI

DL: +44 (0) 117 9100336
F: +44 (0) 117 9100399

Sent via email only: planningpolicy@eastdevon.gov.uk

Embassy House
Queens Avenue
Bristol BS8 1SB
T: +44 (0) 1179 100 300
savills.com

To whom it may concern,

Draft East Devon Local Plan 2021 to 2040

Representations to the Issues and Options Consultation January 2021 (Regulation 18)

This is a Regulation 18 representation on behalf of our clients, *Sidbury Manor Estate*, in respect of the Issues and Options consultation for the draft East Devon Local Plan 2021 to 2040.

Sidbury Manor Estate have an interest in land at Sidford, north of Sidmouth. The land is outlined on the enclosed Site Location Plans attached at **Appendix 1**.

Alongside these representations, the land has also been submitted through the 'call for sites' process in order to provide officers with the latest information relating to the sites.

We welcome the decision to proceed with the preparation of the Local Plan and consider this is required given the passage of time with the current development plan.

Our comments on the consultation and supporting evidence base are set out below, to assist in ensuring that the Local Plan is found sound when examined in the future.

Response to Questions

Question 2: Scope of the Local Plan

We support Option 1 (a single plan) and consider that this would be the most appropriate strategy for East Devon. The two stage development plan process often results in significant delays in the delivery of housing, and has immediate implications on the ability of an area to demonstrate a five year housing land supply.

Question 3: Neighbourhood Plans

The relationship between extant Neighbourhood Plans and an emerging Local Plan can be difficult to navigate locally; however, national policy and guidance is clear, Neighbourhood Plans are mechanisms to support the delivery of the respective local plan (paragraph 13, NPPF). In the same manner as the local plan, Neighbourhood Plans become out of date both through the passage of time, but also as a result of the changing strategic context.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

Savills (UK) Limited. Chartered Surveyors. A subsidiary of Savills plc. Registered in England No. 2605138.
Registered office: 33 Margaret Street, London, W1G 0JD



There will clearly be parts of an evidence base supporting a Neighbourhood Plan which may be relevant; but in themselves, they do not form a robust basis upon which to determine future strategic policies. The evidence base supporting the strategic policies of the Local Plan must be objective, and must consider the appropriate strategy across the entire plan area (as per paragraph 35, NPPF); it cannot attribute greater weight or importance to any single town or parish because they have a Neighbourhood Plan.

In accordance with the NPPF, the Local Plan will need to provide the framework for any new/revised Neighbourhood Plans to come forward. This will need to be balanced against the requirement to ensure that the Local Plan is found sound at Examination – specifically, that it is deliverable. In this regard, the Local Plan should ensure that it is allocating sufficient housing sites to deliver a sustained housing trajectory over the plan period, and in particular, a five year housing land supply at adoption as per paragraph 73 (NPPF).

This will be particularly important to ensure that Neighbourhood Plans themselves are encouraged to allocate sufficient land to meet local need. Some Neighbourhood Plans, such as the Sid Valley Neighbourhood Plan, whilst recently ‘made’ will soon need to be reviewed and it is therefore important that the Local Plan places the correct emphasis on such Neighbourhood Plans to proactively plan for sustainable growth.

Question 4: Planning for Health and Wellbeing

We support the recognition that new development must respond to health and wellbeing, and consider that the consultation document accurately reflects the range of elements that this covers; active lifestyles, community facilities, quality of place and the natural environment. This is reflected in the NPPF, paragraph 91, which clearly identifies the role of local plans in facilitating the delivery of health, inclusive and safe places.

A: Very Important

Question 5: Energy Efficiency of New Buildings

Given that the Government has published their response to the Future Homes Standards, we consider that the Council must follow these provisions closely.

The Future Homes Standard is a two-stage approach to reach ‘carbon ready homes’ by 2025. This is expressly referenced as a staged approach to changing the Building Regulations to reflect the need to develop supply chains, skills and construction practices. The role of developers is to achieve a 75-80% reduction in carbon emissions – with the residual reduction a society wide move towards decarbonised energy sources.

Whilst we generally support the Council’s ambition to ensure that new developments mitigate and adapt to the impacts of climate change, we would have significant concerns if local policies set the bar higher than the Future Homes Standard, and to do so earlier than the proposed timelines set out by the Government.

Any standards set above the national Building Regulations, will need to be demonstrated as feasible, viable and achievable in practice, and will need to be balanced against wider aspirations in the Local Plan, such as the delivery of affordable housing.

A: Option 2

Question 7 – Carbon Saving Measures

In regard to the wider carbon neutrality objectives, we recommend that number 5) locating new development in locations that are close to local facilities should be amended to reflect the NPPF, and the need to “*limit future car use*” (paragraph 122): with this reflecting the full range of sustainable transport options including walking, cycling and public transport (paragraph 102).

Question 8 – How Many New Homes should we plan for each year?

The identification of an appropriate housing requirement must be undertaken in accordance with national policy and guidance, and must be supported by a robust evidence base. We note that reference is made to an ORS Report both within the consultation document and within the Sustainability Appraisal, but we have not been able to find this on the Authority’s website, and the link within the footnotes of the consultation document does not work. We assume the Authority therefore decided not to publish this evidence base at this time, which is a concern given the document is asking for people to comment on the proposed housing requirement.

We support the recognition that the Local Housing Need represents the starting point; with the NPPF and PPG confirming that it should be used to identify the ‘minimum annual housing need figure’.

It is then necessary to consider whether there is a need for the housing requirement to be higher to account for local circumstances; such as economic projections, previous rates of delivery and the need to deliver affordable housing to meet demonstrable local needs (see PPG 2a-010-20201216 and 2a-024-20190220).

We therefore support the recognition within the consultation document that an increase in the overall housing requirement will assist in the delivery of additional affordable homes. This must be considered, and fully evidenced as the Local Plan moves forward.

In addition, it will be necessary to consider economic projections, and the wider economic considerations in East Devon, in respect of the need to ensure a working age population. This should take account of any policy interventions identified within Chapter 6 (Economy), and economic recovery plans drafted in response to the current covid-19 pandemic.

The PPG questions the appropriateness of a housing target which is lower than previous levels of delivery (PPG: 2a-010-20201216); which is the case for East Devon, where housing delivery has been above the LHN figure in four of the last seven years. A housing target which seeks a reduction in housing delivery cannot be considered to be “significantly boosting” the supply of homes; contrary to the Government’s objective set out in paragraph 60, NPPF.

Finally, in accordance with the NPPF (paragraph 35) and in discharging the Duty to Cooperate, consideration must be given to the requirement to support Exeter in meeting any of its own unmet housing needs.

Overall, we strongly encourage the Council to adopt an approach which takes the Standard Method as the starting point, establishes whether, there are grounds to increase this figure, in accordance with the NPPF or PPG, and then objectively assesses the uplift which should be applied. We therefore support Option 2 in response to Question 8.

A: Option 2

Question 9 – Sites for Small Scale Housing Developments

The NPPF requires at least 10% of a housing requirement to be on sites no longer than 1 hectare – with this within the development plan and brownfield register (paragraph 69).

We support the delivery of these sites and consider they have an important role in delivering development within rural locations to meet local housing needs. The land at Sidford, for example, is well placed to deliver development, including affordable housing, to meet local needs.

We therefore suggest that the Local Plan identifies a 10% target in line with the NPPF, but also places a greater emphasis and encouragement on Neighbourhood Plans to be proactive and plan for additional growth in these areas.

A: Option 1

Question 17 – Designing Beautiful Spaces and Buildings

We support the recognition that high quality new development needs to respond to a range of scales, and that there is a role for the Local Plan to support this. We note that subsequent to the Local Plan's publication, the Government have released a consultation on the revised NPPF, and associated with this a National Model Design Code; these are both relevant to how the Local Plan progresses.

A: Very Important

Question 20 – Development in Protected Landscapes

It is not clear from the text whether this applies to designated national protected landscapes, or also to local landscape designations. There is a clear distinction between these, and protection must be proportionate to the status and importance of the respective landscape.

However, we strongly consider that development in or adjacent to protected landscapes may be necessary in order to achieve sustainable development and support local need within communities across the District, not just those outside of AONBs. This is the case for Sidford, where most of the land north of Sidmouth falls within the AONB placing a significant policy barrier to development to meet local need within the community. Indeed, the only way to address the local housing need is to deliver small scale residential development which is well designed and sensitive to the landscape designation within which it sits. We consider that there is an opportunity at Sidford to do this.

For this reason, we support Option 2.

A: Option 2

Question 21 – Net Gain in Biodiversity

The approach to net biodiversity gain is being set out a national level to ensure a standardised approach is taken across England. This pertains both to the scale of net biodiversity gain required (at 10%), but also the

mechanism through which it should be delivered, i.e. onsite, offsite, and then a strategic financial contributions. Our understanding is that there will be no flexibility for the Local Plan to set out an alternative approach to this proposed legislative requirement.

Furthermore, it is recognised that whilst there is a strong preference is for biodiversity enhancements to be delivered on-site, in certain instances this will not be possible and that offsite and/or strategic enhancement schemes will be required to achieve this objective. We therefore consider that in practical terms Option 4 is the only realistic solution.

A: Option 4

Question 23 – Accessible walking and cycling

We consider that the appropriate strategy for East Devon will be a mix of the two options – with settlements and individual sites differing across the plan area. There is a clear role for development to support existing services and facilities, and to deliver new provision if proposals come forward at a scale to support these.

The NPPF is clear that accessibility to services and facilities pertains to all sustainable travel modes – walking, cycling and public transport, and it will also be relevant that the respective acceptable distances will also vary depending on the nature and quality of any routes. This walking distance (as a strict 800m) is not in itself an appropriate measure of sustainability.

A: Option 3

Question 25 – Facilities and Services that are Important

The services and facilities which are important to communities will vary between each community both in respect to the size of the settlement, but also their demographic. There is clearly a range in terms of what is required for communities of differing sizes, and will reflect the wider accessibility of other services and facilities within key towns, or surrounding villages.

The importance of local services and facilities has changed over the last few years, and these changes have been emphasised by the current covid pandemic. The move towards remote working, structural changes in the retail sector and changing approaches to mobility were already taking place across society, and this have become more pronounced. Notably this includes the role of digitalising services and facilities – a significant proportion of households now undertake internet shopping both for essentials and otherwise, whilst relying on small local top-up shops. Further, the ability to undertake a virtual GP appointment, have an online sight test, internet banking, post office services etc are all changing the way services and facilities are delivered, and their accessibility to residents. Whilst clearly there will be some services and facilities which will continue to form a central part of any community – the need for others to be within a community itself are now outdated.

We therefore consider that the work undertaken to assess the District's most sustainable settlements should be further progressed as part of the Local Plan Review in light of this.

Question 27 – Retaining and Refining the Existing Settlement Hierarchy

We support option 1 and the retention of the existing hierarchy.

A: *Option 1*

Question 28 – Broad Distribution of Housing Development

The distribution of development across East Devon is likely to be a mix of the various approaches identified, and will need to be flexible to respond to the various opportunities to deliver sustainable development across the plan area. The distribution must be based upon accessibility (and thus addressing climate change); maximising opportunities where there is an ability to via sustainable travel modes, including bus and cycle networks.

A: *Option 4*

Question 29 - Future Options for the Type and Location of Development

We consider that the future housing strategy for East Devon is likely to be a mix of all the options identified.

Any allowance identified for brownfield and infill development must be based upon a robust assessment of both previous rates of delivery, and also future potential given the supply of brownfield sites is ever declining within towns and villages.

There are clearly sustainable towns and villages within East Devon which are able to support growth.

We do not consider it helpful to set a threshold based approach to the scale of development to be directed to a settlement at a particular level of the settlement hierarchy at this time, as per our comments above, the scale of development directed to each settlement is likely to vary depending upon its individual sustainability and the availability of suitable land for development.

Land at Sidford

Sidbury Manor Estate has control over three areas of land at Sidford, and we have set these out in turn below.

Land west of Two Bridges Road, Sidford

The land west of Two Bridges Road relates well to the existing urban edge, lying adjacent to existing residential dwellings on Lower Brook Meadow and Brook Close.

The land is generally flat, with trees located along the site boundaries along with hedgerow.

Vehicular access can be achieved into the site via Two Bridges Road, although more direct pedestrian and cycle connections could be achieved via Lower Brook Meadow to the south.

The site falls within an Area of Outstanding Natural Beauty as well as the Blackdowns National Character Area, however it falls within flood zone 1 so is not at risk of flooding.

It is considered that the site is suitable for development, and could be delivered in a sensitive manner given the AONB designation. Land is also available to accommodate local infrastructure alongside the residential

dwellings, including the potential for public open space, highway improvements / new sections of footpath, children's play / recreation space, and community facilities.

The site can also help to deliver the first section of a new shared pedestrian and cycle link between Sidford and Sidbury, for which there has been a long aspiration. The first section of this route from Sidford could be delivered ensuring that the access to the start of the footpath / cycle link is delivered alongside a new access into the land west of Two Bridges Road in a manner which is well designed and safe for all users.

Land east of Two Bridges Road

The land east of Two Bridges Road is considered suitable as for employment development given that it forms part of an existing allocation (Strategy 26 - Development at Sidmouth, Site 041A) within the adopted Local Plan. The land forms part of a 'Phase 2' following the development of land immediately to the south which falls within the same allocation.

The site is therefore well positioned to accommodate employment floorspace to meet local need.

The land is generally flat and vehicular access can be achieved into the site via Two Bridges Road. Indeed the site would benefit from the same access and connectivity, and indeed sustainability credentials as the land allocated immediately to the south.

Whilst the site falls within an Area of Outstanding Natural Beauty it is considered that an employment development could be delivered in a sensitive manner in this location.

We will therefore be supporting the continued inclusion of this site as an allocation in the new Local Plan.

Land east of Burscombe Lane

The land east of Burscombe Lane also relates well to the existing urban edge, lying adjacent to existing residential dwellings in the north of Sidmouth.

The land is generally flat, with trees located along the site boundaries along with hedgerow.

The site also falls within an Area of Outstanding Natural Beauty as well as the Blackdowns National Character Area, however it falls within flood zone 1 so is not at risk of flooding.

It is considered that the site is suitable for development, and could be delivered in a sensitive manner given the AONB designation. Land is also available to accommodate local infrastructure alongside the residential dwellings, including the potential for public open space, highway improvements / new sections of footpath, children's play / recreation space, and community facilities.

Overall, we consider that the land outlined above is well placed to accommodate a mix of residential and employment development to meet local needs, and can represent sustainable options for growth. We therefore consider they are well placed to be considered as draft allocations in the next stage of the plan once the Council starts to identify potential site options.

Conclusion

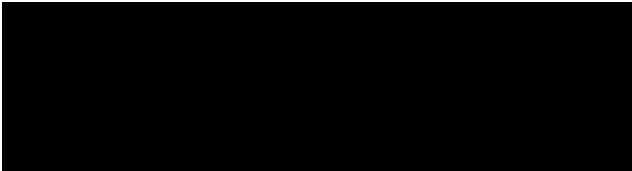
We welcome the Council’s decision to progress with the Local Plan despite the national uncertainty in terms of plan-making, and recognise that it is currently at an early stage.

We consider that the next consultation will require the evidence base to have progressed significantly, to ensure that all parties are able to make informed comments on the Local Plan, and to demonstrate the evidence based approach in its formulation.

We consider that the land outlined at Sidford and north of Sidmouth offers a good opportunity to assist in delivering sustainable development to meet local housing and employment needs.

Should you have any queries regarding the above please do not hesitate to contact me.

Yours sincerely,



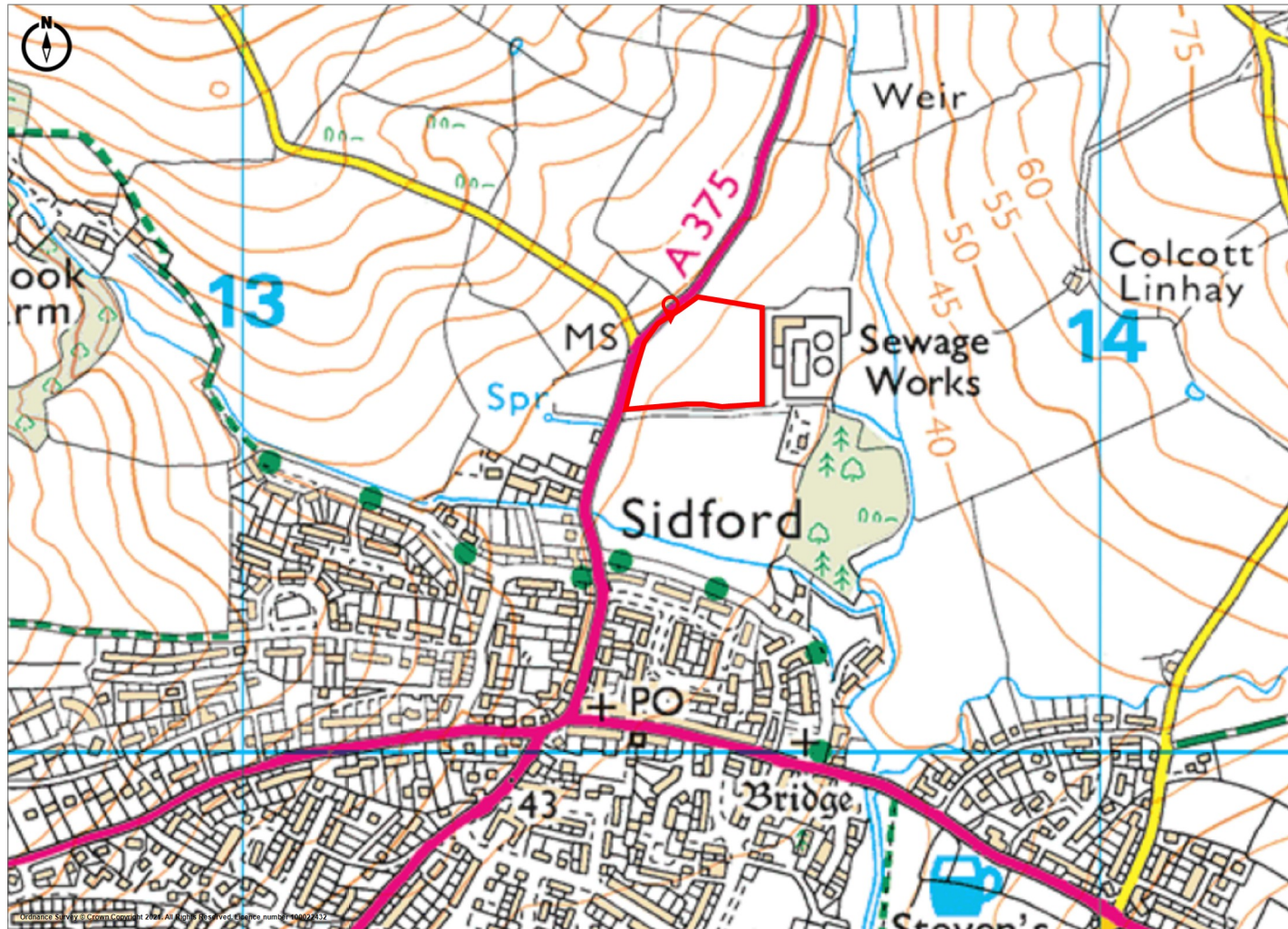
Dan Yeates BSc (Hons) MA MRTPI
Associate Director

Land west of Two Bridges Road, Sidford



Ordnance Survey © Crown Copyright 2017. All rights reserved. Licence number 100022432. Plotted Scale - 1:5003

Land east of Two Bridges Road, Sidford



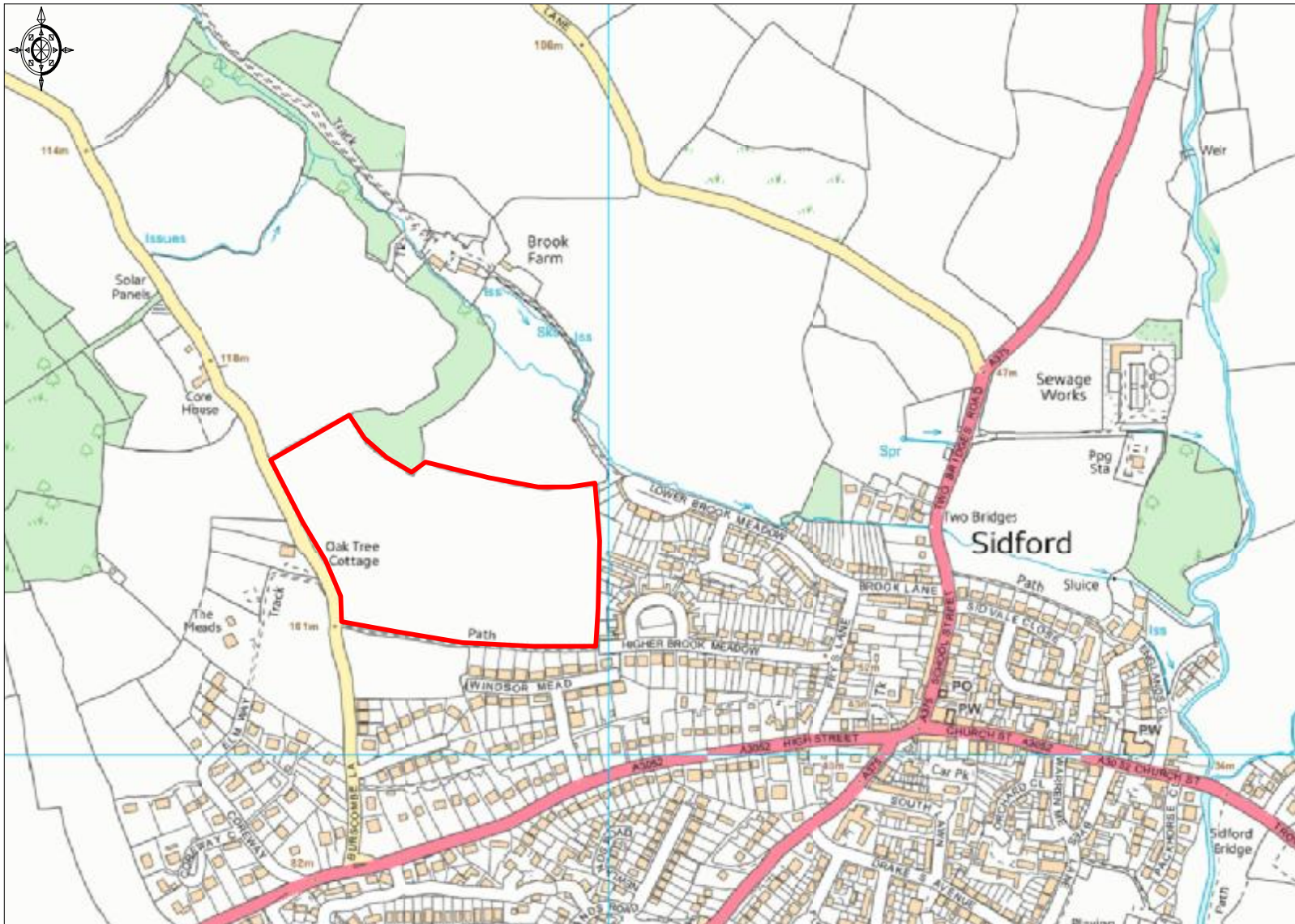
Ordnance Survey Crown Copyright 2021. All rights reserved. Licence number 100022432.

Promap

Ordnance Survey Crown Copyright 2021. All rights reserved.
Licence number 100022432.

● LANDMARK INFORMATION Plotted Scale - 1:8000. Paper Size – A4

Land east of Burscombe Lane, Sidford



Ordnance Survey © Crown Copyright 2017. All rights reserved. Licence number 100022432. Plotted Scale - 1:7505