

# East Devon Local Plan

## Chapter 3. The Spatial Strategy

Audit trail local plan evolution document and consultation statement

February 2025 – Version 02 – Ref: OTE-004 and CSD-007



### Version production of this paper

Version Number	Date	Commentary
Version 01	January 2024	Version 1 of this document was in 2024.
Version 02	February 2025	Version 2 of this document forms part of the Regulation 18 Consultation statement.

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## 1 Introduction

- 1.1 This is one of a series of topic papers that will sit behind and help explain the content of and evolution of the Publication draft of the East Devon Local Plan.
- 1.2 There may be new versions of this topic paper as plan making progresses to Publication and thereafter into and through plan Examination.
- 1.3 This topic paper specifically addresses Chapter 3 of the plan – the Spatial Strategy.

## 2 The Publication draft of the Local Plan

- 2.1 This report is a redraft of an earlier report and in revised form it is specifically concerned with supporting the local plan at the Regulation 19 stage of plan making work. There are specific Government regulations<sup>1</sup> that apply to local plan making and these set out actions that need to be undertaken at different regulatory stages (this report specifically relates to Regulations 18, 19 and 20).
- 2.2 The proposed Publication draft text of the local plan is an edited and amended draft of the consultation draft plan published in November 2022<sup>2</sup>. The draft plan was consulted on under plan making Regulation 18 with further limited additional consultation under this regulation in the Spring of 2024.

## 3 Summary of redrafting of Chapter 3 of the consultation plan

- 3.1 Chapter 3 of the local plan sets out the spatial strategy for the distribution of development, alongside the district-wide housing and employment land requirement, and policies on mixed-use development and settlement boundaries.
- 3.2 Chapter 3, from the draft plan to the Regulation 19 plan, has been shortened with removal of lengthy but not needed detail from some policies. Noting that in many cases wording used replicated matters addressed through other policies in the plan. Policy requiring employment provision on housing development sites has been deleted but infrastructure delivery policies added.

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<sup>1</sup> [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(legislation.gov.uk\)](https://www.legislation.gov.uk)

<sup>2</sup> [commonplace-reg-18-final-071122.pdf \(eastdevon.gov.uk\)](https://www.eastdevon.gov.uk/commonplace-reg-18-final-071122.pdf)

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## 4 Issues and Options consultation

- 4.1 Prior to production and consultation on the draft local plan the Council consulted on a local plan Issues and Options<sup>3</sup> report from January to March 2021. This included a series of questions that responses and comments were invited on. A feedback report was published<sup>4</sup>, followed by a summary of main issues raised and Officer response.<sup>5</sup>
- 4.2 Question 27 presented options for a settlement hierarchy. Option 1 to retain the same settlement hierarchy as the current Local Plan was marginally the most popular, chosen by 149 respondents, closely followed by option 2 to have fewer villages (143 respondents), and then option 3 for a higher number of villages (142 respondents). An alternative approach was suggested by 83 respondents (14% of the total).
- 4.3 Question 28 considered options for the distribution of development, with a more West End focused approach to new housing development being most popular, with 31% of responses. This was closely followed by continuing the current pattern of development (option 1 – 27%), which would still see most new homes being built at the West End. A smaller proportion of people (16%) supported less focus on the West End and more homes at towns and villages elsewhere in the district.
- 4.4 Question 29 included a series of options for the type and location of development. Over 60% of respondents supported infilling in towns and larger villages in East Devon for future development, and over 55% of respondents supported small-scale extensions to towns. Both development options gained strong support with a small proportion (12%) opposed. A significant proportion of respondents (around 40%) were opposed to one or more additional new towns or any large-scale extensions to existing towns. Most of them shared the same concern about infrastructure. For the small proportion who supported the additional new town or large scale extensions to existing towns believed East Devon needs more affordable housing and housing for young people, also some saying developing a new town would be more sustainable than infilling in existing villages.

## 5 Draft plan consultation

- 5.1 In Draft Plan consultation, spatial strategy matters were addressed in Chapter 3. The feedback report, summarising the issues raised in the consultation can be read here (starting on page 38) [accessible-reg-18-consultation-feedback-report-spring-2023.pdf \(eastdevon.gov.uk\)](#).
- 5.2 Numerous consultation responses were made on chapter 3, from a wide range of stakeholders including statutory consultees, developers and members of the public. Further detail is contained in the tables for each policy that follow.

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<sup>3</sup> [issuesandoptionsreport-jan2021.pdf \(eastdevon.gov.uk\)](#)

<sup>4</sup> [2a. Consultation feedback report Ver 03.pdf \(eastdevon.gov.uk\)](#)

<sup>5</sup> [1f IO\\_Summary of main issues and council response.pdf \(eastdevon.gov.uk\)](#)

## 6 Further Regulation 18 consultation Spring 2024

- 6.1 Policies in the spatial strategy chapter were not included in the Further Draft Local Plan consultation.

## 7 Sustainability Appraisal feedback

- 7.1 The draft local plan was supported by a Sustainability Appraisal<sup>6</sup> (SA). This SA will be updated and refined as plan making progresses and it will be one of the documents that is submitted as part of the submission for Examination.
- 7.2 The SA noted positive effects from promoting development at existing settlements where there is a range of jobs, services and facilities; whilst also focussing development where there is good connectivity in close proximity to a much wider range of these items in the western side of East Devon and in Exeter itself.

## 8 Habitats Regulations Assessment

- 8.1 The local plan will need to be assessed under the Habitat Regulations. An assessment of policies in the draft plan has been produced, available at [east-devon-local-plan-hra-110723-2013-doc-from-footprint.pdf \(eastdevon.gov.uk\)](https://www.eastdevon.gov.uk/media/110723/2013-doc-from-footprint.pdf)

## 9 Assessment of policies in chapter 3

- 9.1 Chapter 3 of the draft plan set out a series of policies that are reviewed below.

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<sup>6</sup> [sa-of-pos-consultation-draft-lp\\_2022.pdf \(eastdevon.gov.uk\)](https://www.eastdevon.gov.uk/media/110723/2013-doc-from-footprint.pdf)

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### General issues raised on Chapter 3

Chapter 3 of the plan covers spatial strategy matters and includes a series of policies that refer to scales of development and what is planned where. A great many comments on the plan relate in a general sense to the spatial strategy and policies that would seek to implement it, and many of these are either reported on with respect to chapter 3 of the plan comments or appear elsewhere in other plan chapter reporting in this report. Key generic matters that feature on representations that are not necessarily reported on or captured elsewhere, and that are of general relevance to the spatial strategy and approach of the plan, are highlighted below.

### Issues and options consultation

Question 28 asks which broad approach to the distribution of housing development respondents favoured.

- A more West End focused approach to new housing development was most popular, with 31% of responses. This was closely followed by continuing the current pattern of development (option 1 – 27%), which would still see most new homes being built at the West End. A smaller proportion of people (16%) supported less focus on the West End and more homes at towns and villages elsewhere in the district.

Paragraphs 13.15 & 13.16 of the Issues and Options report sets out a range of option for accommodating development.

Respondents were asked to give their levels of support.

- Over 60% of respondents supported infilling in towns and larger villages in East Devon for future development, and over 55% of respondents supported small-scale extensions to towns. Both development options gained strong support with a small proportion (12%) of oppose. In the written

Officer commentary in response:

- A focus on development at the West End will direct development to a highly sustainable location with a significant level of employment opportunities, transport/public infrastructure and sustainable transport options, achieving carbon reduction.
- The benefits of meeting housing needs in the rest of East Devon will be considered alongside the constraints (principally environmental e.g. AONB) in preparing the Local Plan.
- Evidence on infrastructure issues is contained in the Infrastructure Delivery Plan, which will be reflected in the Local Plan as appropriate.

<p>comment, some respondents expressed their concern about large-scale development that would change the character of East Devon and the importance of the natural environment and AONB. Also within the district, lack of suitable necessary infrastructure to support any extra development allocation.</p> <ul style="list-style-type: none"> <li>• A significant proportion of respondents (around 40%) were opposed to one or more additional new town or any large scale extensions to the town. Most of them shared the same concern about infrastructure, and Cranbrook often mentioned as an example. For small proportion who supported the additional new town or large scale extensions to town believed East Devon need more affordable housing and housing for young people, also developing a new town would be more sustainable than infilling in the existing village. Because the existing road network and infrastructure not designed for extra development.</li> <li>• New Village had a similar number in both support and oppose, both over 30%, and no clear preferences from written comments.</li> </ul>	
<p>Draft Plan consultation</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> <li>• The Environment Agency state that the plan will need to clearly demonstrate whether there is environmental capacity to accommodate the proposed spatial strategy and distribution. It points out that paragraph 3.11 justifies the</li> </ul>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>• The environmental impacts of the spatial strategy will be evidenced through the Sustainability Appraisal and Habitats Regulations Assessment of the Local Plan. The environmental pressures upon the Clyst and Exe river catchments are noted – the Local Plan addresses</li> </ul>

<p>distribution strategy on the grounds that western parts of East Devon are closer to Exeter and ‘far less constrained’ and that 60% of new homes are at Cranbrook and the new town, both within the Clyst catchment, which drains into the Exe Estuary. This catchment is under significant environmental pressure in terms of water quality, flood risk and habitat degradation. When combined with Exeter and Mid Devon growth and a changing climate the myriad environmental pressures will be exacerbated. The spatial strategy needs to safeguard space for climate change adaptation and create bigger, better, more joined up natural networks, including open functional floodplains with blue green infrastructure. The nature recovery mapping and LNRS should be used to focus, target and justify the spatial strategy.</p> <ul style="list-style-type: none"> <li>• The Environment Agency note paragraph 3.7, which states that Cranbrook is not specifically covered by the new plan and recommend that the plan address the areas where the new plan goes beyond the requirements of the Cranbrook Plan to ensure consistency of approach.</li> <li>• Concern was expressed that the plan does not serve East Devon residents.</li> <li>• Concern expressed that fundamentally too much development is being planned for.</li> <li>• Infrastructure cannot cope.</li> <li>• Too much emphasis has been placed on mass sites, encouraging large house builders to develop uniform, unimaginative housing. Encouraging smaller developments and local builders would result in more diverse style of house</li> </ul>	<p>climate change adaptation, with several biodiversity policies, including reference to the Local Nature Recovery Strategy and Nature Recovery Network. In addition, nature recovery mapping has been referenced in the site assessment of all potential allocations. The Clyst Valley Regional Park will provide a joined up natural network.</p> <ul style="list-style-type: none"> <li>• The opposing views of either covering Cranbrook in the new Local Plan to ensure consistency of approach with the rest of the district; or not, as it will undermine the adopted Cranbrook Plan, are noted. On balance, some policies in the new Local Plan will apply to Cranbrook, to fill some potential policy voids because the Cranbrook Plan only superseded some of the current adopted Local Plan policies.</li> <li>• Evidence on infrastructure provision will be considered in the forthcoming Infrastructure Delivery Plan, which will highlight key infrastructure issues and how they should be addressed in delivering development proposed in the Local Plan. The detailed responses from statutory consultees are welcomed and will form the starting point for further discussions on this issue.</li> <li>• The district-wide housing requirement means that larger sites will be required to deliver sufficient homes. It is not seen as credible, in East Devon, to actively plan for 10% of housing to be on smaller sites. Whilst brownfield sites are encouraged, the geography of East Devon means that brownfield supply is limited relative to more urban authorities.</li> <li>• The issues raised in Planning Inspectorate appeals have been considered in the site selection process, but such decisions do not preclude allocating these sites as they were taken under a different planning policy context.</li> </ul>
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and support local workforce and economy, thus maintaining the local character that is so typical of East Devon

- Should not allocate sites where the Planning Inspectorate has already refused permission.
- National Highways state that a robust transport evidence base will be required, including two key elements: the individual and cumulative impacts of the Local Plan upon road links and junctions (M5 Junctions 29, 30, the A30 and the A35, plus nearby M5 Junction 31 and the A38 in Teignbridge); and the interactions between the strategic and local road networks.
- National Highways request joint working on transport evidence with Exeter, Teignbridge and Mid Devon districts to ensure the cumulative effects of emerging local plans are addressed.
- Sequential preference for brownfield sites should be a much higher priority/given more emphasis in the opening sections.
- Agents for Hallam Land Management Limited and Taylor Wimpey UK Limited do not consider that the new local plan should address Cranbrook (see para 3.7 of the plan). They highlight that: Policy coverage could call into question the viability of the Cranbrook Plan; Call into question the comprehensive and integrated proposals set out in the Cranbrook Plan, which could result in additional confusion and contradiction in the reading of plan policies, and thereby undermine the whole rationale that the Council employed in its desire to produce a single Cranbrook Plan; there is a risk of further delay as issues and overall viability, debated in the lengthy Cranbrook Examination, are reconsidered.

- Work on a joint transport evidence base with Exeter, Teignbridge and Mid Devon districts will consider the strategic and local road network and will inform the publication version of the Local Plan.
- The Local Plan is not proposing to “uproot” people from their natural communities and focusses development at locations that are or can be made sustainable.
- Agree that working with other local authorities is needed, but reference is not needed in the Vision.

- Agents for Hallam Land Management Limited and Taylor Wimpey UK Limited consider there are few, if any, policies within the East Devon Local Plan 2013-2031 that provide additional, significant, relevant guidance to the development of Cranbrook (so the existing local plan is not relevant to Cranbrook).
- Agents for the Stuarts (who own land at Gribble Lane in the Cranbrook expansion area) agree that the local plan should not supersede the Cranbrook Plan but its policies should be formally saved after 2031.
- The Avenues Residents Association (Exmouth) set out a case that there are downsides on focusing housing development within or very close to the major conurbations (Exeter & Exmouth). These include that it does not help people maintain roots within communities or help family generations to live close together, (to help with childcare provision). In addition, uprooting people from their natural communities does very little to reduce, and may increase, conventional travel demand.
- Working with the Highway Authority: some of East Devon’s vision and objectives can only be delivered by working closely with Devon County Council. The draft Local Plan would benefit from a commitment which echoes Exeter City Council’s Local Plan that “The ... Council is working with partners including Devon County Council as the Local Transport Authority to ensure we have consistent aspirations and approaches”.

Supplementary Regulation 18 consultation Spring 2024

Not part of the Supplementary Reg. 18 Draft consultation	
<b>Sustainability Appraisal</b>	
See sustainability appraisal table below.	
<b>Habitat Regulations Assessment</b>	
See specific policies.	
<b>Commentary on policy redrafting for the Publication Plan</b>	
Redrafting of policies has occurred in Chapter 3, with a deletion of policy on housing numbers but also two new policies on infrastructure.	

<b>Strategic Policy 1 – Spatial Strategy</b>	
Strategic Policy 1 sets out a spatial strategy for future development – in general terms how much development should go where and why.	
<b>Issues and options consultation</b>	
Question 27 presented options for a settlement hierarchy. Option 1 to retain the same settlement hierarchy as the current Local Plan was marginally the most popular, chosen by 149 respondents, closely followed by option 2 to have fewer villages (143 respondents), and then option 3 for a higher number of villages (142 respondents). An alternative approach was suggested by 83 respondents (14% of the total).	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>• “The Role and Function of Settlements” report has informed the settlement hierarchy in the Local Plan. This evidence takes into account the population, level of jobs, and community services/facilities, as key factors when determining the most sustainable locations for development.</li> <li>• A higher number of ‘villages’ are identified compared to the current Local Plan 2013-31, in recognition of national policy being more supportive of rural housing to meet local needs.</li> </ul>
<b>Draft Plan consultation</b>	
Key issues raised in consultation:	Officer commentary in response:

- Devon County Council (DCC) largely supports the spatial strategy to locate development in the most sustainable locations where new housing is close to employment, services, and facilities and can reduce the need to travel.
- DCC questions whether another new community is the best approach from a transport point of view suggesting greater emphasis on expanding existing towns.
- DCC state policy should encourage mixed-use development at Service Villages to retain vital local facilities and reduce the need to travel, particularly where there is a primary school.
- DCC state there some areas where it may not be possible to mitigate the impact of proposals without significant external funding and therefore these may be seen as unsustainable.
- DCC state development in rural areas will increase the burden on home to school transport, especially when there is no primary school.
- DCC state policy should reflect the key principles of the Education Infrastructure Plan, predominantly local schools for local children, with schools at the heart of the community.
- DCC note that The Role and Function of Settlements report suggests that Smallridge (and All Saints) does not have an hourly bus service; however, there is an hourly bus service within reasonable walking distance so DCC would like this recognised.
- Agree with directing development towards the most sustainable locations.
- Many respondents to the consultation considered that the plan was proposing too much development, reasoning that the potential changes to mandatory housing numbers, the

**General issues**

- The general support for the Draft Local Plan approach to direct development to the most sustainable locations is welcomed – this should ensure new housing is close to employment, services, and facilities, reducing the need to travel.
- The various issues raised relating to infrastructure provision (including education, health, transport) will be considered in the forthcoming Infrastructure Delivery Plan, which will highlight key infrastructure issues and how they should be addressed in delivering development proposed in the Local Plan. The detailed responses from statutory consultees are welcomed and will form the starting point for further discussions on this issue.
- The distribution of development broadly aligns with the settlement hierarchy – the main exception is Westclyst, which has a large number of completions/commitments from the adopted Local Plan 2013-31 which effectively created a new village ‘from scratch’. Issues relating to the specific scale and distribution of development are dealt with in site allocations policies later in the plan.
- Objections to a new town are dealt with in detail under Strategic Policy 8. In broad terms, the spatial strategy includes a new town as it is the most sustainable way of meeting the district-wide housing requirement.
- Whilst the strategy for “significant development” at the Principal Centre and Main Centres cannot be defined precisely, these settlements should be allocated large amounts of development consistent with them being among the most sustainable locations for growth in the district.

<p>rural/environmental qualities of East Devon, housing should only meet local needs.</p> <ul style="list-style-type: none"> <li>• New development should be built on brownfield sites first.</li> <li>• A limited number of respondents, typically from or representing the development industry, advocating higher levels of development.</li> <li>• Concern about the ability of Exeter to meet its development needs and a need was identified for East Devon to accommodate an element of Exeter development that the city cannot accommodate.</li> <li>• Oppose development of a new town – it should be noted that inclusion, or not, of a new town in the plan would most likely have a significant bearing on the overall spatial strategy of the plan.</li> <li>• Support the development of a new town, including from some members of the public.</li> <li>• The Spatial Strategy for one large new town means the plan lacks flexibility if problems arise, also meaning a small number of developers will have too much control.</li> <li>• Developer supports significant development in the West End, promoting land at Addlepool Farm for a new village.</li> <li>• Object to lots of development (a new town and more) on the western side of East Devon.</li> <li>• Support concentrating much of the development in the west of the District.</li> <li>• Concentrating large scale development in the west of the District would lead to the expansion of Exeter that would</li> </ul>	<ul style="list-style-type: none"> <li>• The strategy for development that meets “local needs” in these locations implies a lower scale of growth, reflecting the more limited range of jobs, services and facilities at these settlements.</li> </ul> <p><b>Specific settlements</b></p> <ul style="list-style-type: none"> <li>• The support for various settlements being in the appropriate tier of the settlement hierarchy is noted and welcomed.</li> <li>• There was disagreement that Budleigh Salterton is a Local Centre given the range of shops and other facilities at the settlement, with some feeling that it should be a tier above Broadclyst, Colyton, Woodbury, and Lympstone. Whilst the Council agree that Budleigh has a greater range of shops than the other Local Centres, it is not comparable to the retail offer at settlements in the tier above (Main Centres). In addition, Budleigh does not have some facilities found in other Local Centres e.g., Lympstone has a train station, Broadclyst a secondary school. Therefore, the five settlements identified as Local Centres perform a similar role and function.</li> <li>• Some suggested that Hawkchurch is not a Service Village as it only has one bus a week, the pub is a restaurant and rarely open, a tiny shop, and the village hall has very few events. Whilst the Council agree with removing the bus service as a ‘local facility’ given its infrequency, the shop has a wide range of stock and is open every day, and the pub is open every day apart from Monday (as stated on their websites). This, alongside the presence of other facilities such as the primary school, is sufficient for Hawkchurch to be classed as a Service Village.</li> <li>• Smallridge/All Saints was suggested as having sufficient facilities to be considered a Service Village with 8x buses a day, primary school, community hall, pub, sports fields, ultrafast broadband, and NCN Route 33. However, it lacks a convenience store, and the</li> </ul>
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<p>absorb areas of rural East Devon into a greater urban/city area.</p> <ul style="list-style-type: none"> <li>• Exmouth and Axminster featured prominently in comments regarding too much development, but there were challenges to levels of growth across most of East Devon.</li> <li>• The distribution of development does not align with the settlement hierarchy – some settlements that were higher up the hierarchy had lower growth levels than those lower down the hierarchy.</li> <li>• There were challenges to the specific tier of the hierarchy that some settlements fall within, including comments that some settlements with limited facilities fall in a grouping with settlements that support a far greater range.</li> <li>• Must retain the individual identity and community of villages (Woodbury PC).</li> <li>• There were many comments about infrastructure with some respondents suggesting development should be more closely aligned with infrastructure capacity.</li> <li>• Sufficient infrastructure is required to stop raw sewage being discharged into our rivers and sea, including the protected Rive Exe (Woodbury PC).</li> <li>• Devon County Council have concerns about the scale development on the western side of the District highlighting matters around the ability of infrastructure to accommodate planned development.</li> <li>• The National Health Service (NHS services across Devon) submitted a lengthy representation that examines primary care provision and the projected impacts that would be predicted to arise from development set out in the plan. The</li> </ul>	<p>suggested hourly bus service at Smallridge/All Saints is located some 600m from the edge of the settlement (taken as being the primary school/village hall), along an unlit country lane, so is not located within or adjacent to the settlement.</p> <ul style="list-style-type: none"> <li>• Colyford was suggested as a Service Village like other similarly sized settlements (e.g. Tipton, Sidbury, Branscombe), as it has a convenience store/post office, community hall, pubs, sports pitch and regular bus service. However, Colyford lacks a primary school (unlike Tipton and Sidbury) so, on balance, does not have sufficient facilities/service to function as a Service Village.</li> <li>• Woodbury Salterton was proposed as a Service Village given its proximity to transport corridors and jobs (e.g. Exeter and Greendale Business Park), but the council consider it lacks facilities such as a shop, sports playing pitch, and allotment, so is not a Service Village.</li> <li>• Uptontery was put forward as a Service Village as it ranks highly compared to many of the Service Villages with its relatively high population and jobs, working age population, ultrafast broadband, and range of local facilities (four of the Service Villages have equal to or fewer services than Uptontery). This level of population and range of facilities is noted, but Uptontery does not have any 'strategic' facilities and also lacks a shop, unlike any of the current Service Villages so, on balance, does not have sufficient facilities/service to function as a Service Village.</li> <li>• Cowley was suggested due to being well located for a pub, Garden Centre, Day Nursery, numerous facilities in Exeter, on a regular bus route, and plans for a shared-use path between Crediton and Exeter. The council only assessed settlements with a reasonable prospect of being identified as a Service Village, which did not include Cowley as it</li> </ul>
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NHS assessment shows greatest strains, GP surgeries - physical infrastructure, at overcapacity in the west of the District and some surplus capacity elsewhere. The NHS main highlight points from the more detailed analysis are:

- Currently there are 14 main GP Practices plus 12 branch surgeries who provide primary care services for the areas identified as being suitable for new developments in the consultation document released by East Devon District Council.
- 9 GP practices (35%) have more patients than they physically have capacity to manage. This picture is more complicated at granular level. 8 of the surgeries that are over capacity and situated in the west of the East Devon district whilst 15 of the surgeries that have capacity are in the north and east of the district.
- In addition, East Devon citizens that live to the west of the district utilise the GP surgeries that are physically in the Exeter City eastern boundary, namely Pinhoe surgery, Hill Barton medical practice and Topsham surgery. All three of these surgeries are over capacity.
- The NHS advise that, during the plan period, there will be an increase in the services provided to the residents of East Devon across the GP practices within East Devon District Council and some within Exeter City Council which will require investment to be able to provide additional capacity to maintain appropriate levels of care. Therefore, the Primary Care developer contribution has been calculated at £560 (This figure is likely to increase due to the rising costs of building material and is currently under review) per dwelling.

lacks nearly all 'local' facilities such as a primary school, convenience store, community hall.

<p>The contributions will be used to either expand existing GP surgeries or build new surgeries.</p> <ul style="list-style-type: none"><li>• Clyst Honiton Parish Council supports the development of a new town, but wants to work with the District Council to ensure that the development is beneficial to local people and the environment.</li><li>• There is already an inability to accommodate existing population levels and new infrastructure provision should come before other development.</li><li>• Some respondents advocated more development in rural areas, and some less – there were lots of settlement specific comments captured elsewhere in this report about growth and development at settlements.</li><li>• Sites for large-scale employment provision in the West End are not aimed at smaller, local businesses, so the spatial strategy should also support rural employment growth.</li><li>• A ridiculous anti-car approach – the absence of a bus route should not make a hamlet unsuitable; a train station should not make large scale housing inevitable</li><li>• Hawkchurch is not a Service Village – one bus a week; pub is a restaurant and rarely open; tiny shop; village hall has very few events.</li><li>• Growth aspirations expressed in neighbourhood plans and by residents should fundamentally inform how much development should take place at given settlements and as such this should inform the plan strategy.</li><li>• Distribution of growth is seen as uneven – e.g. lots in Ottery and little in Budleigh Salterton. Ottery should be a Local Centre like Budleigh.</li></ul>	
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- Aylesbeare should take more development.
- Cranbrook should be completed before other development is allowed.
- Support Honiton being a Main Centre.
- Support Colyton being a Local Centre given its range of facilities.
- Limited development at Service Villages is contrary to NPPF (para 79) which states villages should grow and thrive – policy should be amended to allow moderate growth appropriate to their scale and identity.
- No definition of the terms “significant development” at Principle/Main Centres and “local needs” at Service Villages.
- Not clear why Colyford has not been identified as a service village whilst other similarly sized settlements (e.g. Tipton, Sidbury, Branscombe) have been – Colyford has a convenience store, post office, community hall, pubs, sports pitch and regular bus service.
- Woodbury Salterton should be a Service Village given its proximity to transport corridors and jobs (e.g. Exeter and Greendale Business Park).
- Upottery Parish Council (and several others) felt that Upottery should be a Service Village as it ranks highly compared to many of the 23 settlements identified e.g., relatively high population and jobs, working age population, ultrafast broadband, and a range of local facilities (four of the Service Villages have equal to or fewer services than Upottery).
- Upottery should have more affordable housing to support its services, the shop (3 miles away) is well used and accessible

<p>by car, the village is well connected by internet and has access to a main road.</p> <ul style="list-style-type: none"><li>• West Hill Parish Council support the principles of the Spatial Strategy but are concerned about the loss of countryside from a new town.</li><li>• Support West Hill being identified as a Service Village.</li><li>• Smallridge/All Saints has sufficient facilities to be considered a Service Village – 8x buses a day, primary school, community hall, pub, sports fields, ultrafast broadband, NCN Route 33 – and should therefore have some development.</li><li>• Do not agree with categorising Broadclyst, Colyton, Woodbury, and Lypstone as Local Centres, comparable to Budleigh Salterton which has a high street of shops.</li><li>• Support identification of Woodbury as a Local Centre as it has a good range of facilities and is less environmentally constrained than many other villages.</li><li>• Whimble and Feniton should be treated as other villages and have limited growth.</li><li>• The marine base at Lypstone should be developed as a new town given its good transport links.</li><li>• Overall, the Draft Plan should be more ambitious and focused, with tangible and realistic objectives that residents can understand and embrace. In its present form, it is dismal and depressing, foreseeing a future of mass building of low quality, poor services, and declining infrastructure.</li><li>• Share out loss of distinctive landscape more evenly across towns and villages – need to go further in Exmouth to get to green spaces.</li></ul>	
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- Designating Upottery as unsustainable is unjustified and will be self-fulfilling prophecy and place too great a constraint on evolution of village and frustrate investment.
- Upottery should be in Tier 4 given its range of facilities: primary school, village hall, pub (which also sells food), sports field, play area, bus stops, allotment not far away.
- Cowley is well located for The Stables pub, Bernaville Nurseries and Little Explorers Day Nursery, numerous facilities in Exeter, on a regular bus route, and plans for a shared-use path between Crediton and Exeter – this should be reflected in the Role and Function of Settlements study.
- Strategy does not support smaller communities and will not sustain unique character of East Devon.
- Hawkchurch should be excluded from Tier 4 on transport grounds, it has only one bus a week through the village. The one (temporary) shop that the village has is solely reliant on the village community volunteers and it is within the allocation and so will close in favour of developing the site.
- The East Devon AONB team state that any development in the AONB must not only be justified to meet local needs but be sensitively located and designed to respect those settings and conserve and enhance the AONB, taking a landscape character led approach and purposes of AONB designation. The intentions outlined in paragraph 3.37 (m) to farming and rural businesses are supported, but this should not be at the expense of the conservation and enhancement of the AONB and the aims and objectives of the spatial strategy.
- There needs to be a balance between rural growth and protection of the environment.

- The Otter Valley Association broadly agree with the strategic approach and the settlement hierarchy but suggest challenging the housing figures following Michael Gove’s statement.
- National Highways support plans that minimise the need to travel, minimise journey lengths, encourage sustainable travel, and promote accessibility for all.
- National Highways have concerns to what extent the strategic road network can support the level of growth proposed to the west of the district.
- National Highways prefer that policies should apply at Cranbrook if the Cranbrook Plan does not cover a particular issue to ensure it is up to date and consistent with the rest of the district.
- More clarity needed on defining what local need at a service village means and this should relate to people living in the Parish except where allocations to meet the district wide need have been made.
- The A3052 corridor where there is already a considerable amount of employment and infrastructure and good access to the strategic road network.
- A major landowner strongly supports the strategic approach and the tiered settlement hierarchy but objects to this policy until the location of the new settlement is fully resolved and the EDNA is available.
- Support the strategy but Exmouth should be the focus for new development on a par with the West End and new settlement
- Support for the principles set out in the policy.

- Barratt Homes consider that Moss Hayne Lane Pinhoe should have a bigger role in meeting housing needs, especially as it is near to Pinhoe railway station.
- Barratt David Wilson Homes support the identification of the 5 Local Centres including Lymstone that are suitable to accommodate an appropriate level of growth. Lymstone is the only Local Centre with a train station
- Wain Homes consider that Budleigh Salterton is a highly sustainable settlement with a strong range of services and facilities that functions more like a Tier 2 settlement than a Tier 3.
- Turley for Bloor Homes support the principle of Strategic Policy 1 and the fact that Sidmouth has been acknowledged as a location for growth within the draft local plan. The town has a range of services and facilities, and public transport facilities. It is therefore a sustainable location for additional growth.
- A site promoter supports the basic strategic vision set out in policy S1, but requests clarification of the term 'western side'. It suggests that the countryside policies in the 'western side' should be more flexible than elsewhere to reflect its more sustainable characteristics. It also advocates a more dispersed strategy to provide a range of deliverable sites, including smaller sites (as required by Government policy).
- Church Commissioners England note that Clyst Honiton is identified as 'open countryside' and emphasise that it is a sustainable and suitable location for development given good connectivity to the road network, Exeter Airport and Exeter.

<ul style="list-style-type: none"> <li>• Exeter Cycling Strategy state that to make this strategy a success it is important to ensure there are genuinely sustainable travel choices for travelling into Exeter. The Exeter Transport Strategy acknowledges that Exeter's roads have no more capacity for cars, it is one of the most congested cities in the country. The Local Plan must prioritise alternative travel modes to private cars for these developments in the west of the district.</li> <li>• 3West Developments Ltd supports the spatial strategy, which recognises the strategic function of Exeter. Growth in tiers 3 and 4 of the settlement hierarchy benefits from that focus on the western side of the district that links to Exeter.</li> <li>• Clyst Hydon parish council is concerned that the EDDC local plan does not provide enough detail on how infrastructure, such as education, recreation, and health care, will be supported to meet the needs of the growing population.</li> </ul>	
Further Regulation 18 consultation Spring 2024	
This policy was not included in this consultation.	
Sustainability Appraisal	
<p>Outcome of sustainability appraisal:</p> <p><b>Preferred alternative:</b> Option C - Promote significant development at one Principal Centre and six Main Centres; local development at five Local Centres; and limited development at 23 Service Villages; focus strategic development on the Western side of the district, including a new town (of around 2,000 to 8,000 dwellings) and other major development.</p>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>• Whilst the Draft SA Report notes on page 120 that the sustainability effects of Option A is the same as Strategic Policy 2, agree that appraising the final distribution in the SA would provide greater clarity.</li> </ul> <p>Action: appraise the final distribution of development in the SA Report.</p>

**Reasons for alternatives being preferred or rejected:**

- Option A is rejected due to major adverse effects on biodiversity, landscape and water resources, and less potential for new development to access jobs, services and facilities in the Western side and Exeter.
- Option B is rejected due to major adverse effects on biodiversity, landscape and water resources. Also, there is poorer access to jobs, services and facilities in the Western side and Exeter, and at the additional Service Villages themselves.
- Option C is preferred as it promotes development at existing settlements where there is a range of jobs, services, and facilities; whilst also focussing development where there is good connectivity in close proximity to a much wider range of jobs, services, and facilities in the Western side and Exeter. The scale of development proposed in the new town offers the greatest potential for a mix of uses, reducing the need to travel and providing opportunities sustainable travel links, which provides better accessibility and reduced carbon emissions.
- Option D is rejected due to major adverse effects on biodiversity and water resources. The scale of development in a new village offers less potential to create a sustainable, mixed use community compared to Option C due to the lower scale of proposed housing proposed, meaning poorer accessibility to jobs and services and greater carbon emissions.

<p>Summary of main issues raised in consultation relating to the Sustainability Appraisal:</p> <p>BDW refers to the SA P110 which assess 4 options for the distribution of the objectively assessed need for housing. Option A is the closest option to that taken forward in the Reg 18 plan. BDW agrees with conclusions about option A. However, even Option A did not consider the sustainability credentials of the distribution of residential development with the Reg 18 plan. There are distribution differences between Option A and the draft plan. So the Plan’s distribution has not been assessed. Future SAs should ensure that the sustainability credentials of the proposed distribution is properly assessed.</p>	
<p>Habitat Regulations Assessment</p>	
<p>General policy. No likely significant effect. The HRA commented:</p>	
<p>Commentary on policy redrafting for the Publication Plan</p>	
<p>Redrafted policy title:</p> <ul style="list-style-type: none"> <li>• Strategic policy SP 01 - Spatial Strategy</li> </ul>	
<ul style="list-style-type: none"> <li>• Delete “consistent with the spatial strategy” as this policy is the spatial strategy and replace with “by”.</li> </ul>	

Strategic Policy 2 – Housing distribution

<p>This policy proposes the distribution of housing across East Devon over the plan period, broken down by settlement/area in accordance with the spatial strategy. We are, however, recommending deletion of this policy It was in the draft local plan but really it is not so much a policy, but rather it is a description of where houses will be built – but see specific Designated Neighbourhood Area policy that is recommended for inclusion in the plan. Despite recommending deletion of the policy, we do succinctly comment on feedback received.</p>	
<p>Issues and options consultation</p>	
<p>See General Issues above.</p>	
<p>Draft Plan consultation</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> <li>• Devon County Council (DCC) state the demand for travel to large employment areas such as Exeter has reduced since the pandemic as more people work at home.</li> <li>• DCC question if a new community is the best way forward as it requires significant upfront costs and high trip rates until facilities are provided – given the lack of rail service in the proposed new town, a better option is to expand existing towns.</li> <li>• DCC state a new town will require significant education infrastructure, linked to other Local Plan proposals such as at Exmouth and North of Topsham.</li> <li>• DCC state there is currently no available funding stream to deliver the primary at North of Blackhorse and this should be reflected in the Local Plan.</li> </ul>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>• The change in travel patterns since the pandemic is noted, with more people working at home.</li> <li>• The expansion of existing towns instead of a new community has been considered but is not the most sustainable option given constraints around existing settlements such as the coast, National Landscape, flood risk, and rural road network.</li> <li>• Infrastructure issues are being considered in the Infrastructure Delivery Plan.</li> <li>• Traffic modelling evidence will inform whether improvements to the road network are required.</li> <li>• The housing requirement is set out in Strategic Policy 3.</li> <li>• The housing distribution uses the spatial strategy as the starting point, but the total housing numbers per settlement is also based upon the availability and assessment of individual sites – for example, the landscape and coastal constraints at Sidmouth mean it has fewer homes relative to its size, whilst some service villages have limited/nil dwellings. This is considered in more detail through Site Selection reports and settlement specific allocations.</li> </ul>

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| <ul style="list-style-type: none"><li>• DCC state that Cranbrook Education Campus is not large enough to support any development above that identified in the Cranbrook DPD.</li><li>• National Highways note the 4,170 dwellings identified at Cranbrook but feel the likely full extent of Cranbrook should be considered based upon higher numbers of homes in the planning applications, to understand the impact upon the strategic road network and infrastructure requirements.</li><li>• South Somerset District Council has no objection to overall strategy noting that most development is proposed in the west of East Devon, although it requests a reference to the proximity of Chardstock, Hawkchurch and Kilmington to Chard and considers the housing allocations at Axminster to be disproportionate and likely to increase traffic in South Somerset.</li><li>• Home Builders Federation is keen that EDDC produces a plan which can deliver against its housing requirement. So would expect the spatial distribution of sites to follow a logical hierarchy, provide an adequate development pattern and support sustainable development in all market areas</li><li>• Barratt David Wilson Homes broadly supports the identification of a hierarchy of settlements that form the basis for growth. Important that the needs of individual settlements are met alongside strategic releases of growth. BDW supports the proportionate share of growth to the Principal and Main Centres, and the greater focus of development proposed for Local</li></ul> | <ul style="list-style-type: none"><li>• The promotion of Addlepool Village for 700 dwellings, in addition to the new settlement, is noted, but a single new settlement is the most sustainable way of delivering a range of facilities, services and jobs in a single location.</li><li>• The new community estimated build-out rates equate to 3,300 dwellings by the end of the plan period – the increase to 5,000 dwellings is not considered realistic.</li><li>• The Western side of the district is the most sustainable location to focus development – this should ensure new housing is close to employment, services, and facilities, reducing the need to travel.</li><li>• Second-choice sites were not considered to be ideal but may be required as allocations in order to ensure sufficient sites are allocated – in the ‘publication’ plan sites will either be allocated or not.</li></ul> |
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Centres, Service Villages and countryside. Annual rate of housing delivery is deliverable/effective

- BDW considers that additional provision at Whimple would respond to focussing growth in the western side of East Devon
- Some respondents queried the difference between the amount of housing in Policy 2 and Policy 3 but others were clear that Policy 3 is the strategic requirement, whilst Policy 2 is about identified supply i.e. how to meet the requirement excluding windfalls.
- The supply figure falls short of the 10% uplift in policy 3 by 465 dwellings, therefore allocate additional sites.
- Consider an uplift to meet some of Exeter’s housing need.
- Grand total should equal at least 18,920 dwellings so that windfalls are not relied upon.
- Use ‘net’ figures because ‘gross’ figures artificially inflate the level of supply.
- Criteria for housing distribution is not clear.
- All the second-choice sites need to be confirmed as allocations to meet the identified housing requirement.
- Proposed housing numbers are too high and are disproportionate to the character, economy, facilities, and infrastructure in East Devon.
- There is a housing crisis so housing needs must be met.

- Investment is needed in new infrastructure (community facilities, education, sustainable transport) alongside new housing.
- Support new housing but need jobs nearby that people can access without increasing road traffic.
- The tourist industry would be severely affected due to the change in rural character.
- The Government's housing targets are no longer mandatory, so district housing numbers should be reduced.
- No indication as to how these housing numbers will be met in each settlement.
- Allocations need to be far more proportionate to the current population size of settlements to share the impacts – for example, Exmouth, Honiton and Sidmouth are much larger and should accommodate more growth; Lympstone and Woodbury have been allocated a similar number of homes to Sidmouth and more than Budleigh which is three times larger.
- Proposals are contrary to Neighbourhood Plans.
- Prioritise mid/high density dwellings in existing settlements over low density greenfield development.
- The road network cannot cope in the western part of the district – examples cited include the A376, A3052, M5 junctions 29 and 30.
- More housing should be allocated to the Local Centres and Service Villages as these are sustainable settlements, to meet district needs, to support local

services, and sites are smaller and therefore can be delivered more quickly.

- There is inconsistency in the allocations at Tier 4 with some having no development at all, and others getting 10% plus growth which is greater than Tier 1 and 2 settlements.
- No justification for the total housing requirement at each settlement.
- Do not have confidence in the Government's approach to housing delivery as need is not being met and house prices are too high for local people.
- The plan for many of the villages is fair.
- Develop brownfield sites before other land is allocated.
- Do not agree with selecting settlements with train stations – whilst an advantage, people will still mostly travel by car.
- Network Rail urge the Council to consider the impact of proposals at Cranbrook on Cranford Level Crossing – development should be refused unless there is evidence that safety will not be compromised.
- A new town of the scale proposed is not justified and would destroy the countryside, including loss of high-quality agricultural land.
- The new town will require substantial infrastructure to make it sustainable and reduce travel to Exeter, which is unlikely to be delivered in a reasonable timescale particularly given recent experience at Cranbrook.

- Developer states delivery is not likely to commence at the new town until the mid-2030s so additional sites should be allocated – developer promoting Addlepool Village for 700 dwellings, local centre, primary school, allotments, sports pitches, open space.
- The homes proposed at the new town should instead be distributed amongst existing towns to achieve faster build-out, provide access to existing services, and benefit the economy of existing towns.
- Farringdon Neighbourhood Plan has been ignored in proposing preferred Option 1.
- Level of development at the new town should be increased to 5,000 dwellings in the plan period given the availability of jobs in Exeter and western part of East Devon – this would remove the need for all the second-choice sites.
- The new town is in one of the most sustainable locations in the South West.
- New town near Exeter and keeping rural areas rural is a good idea.
- Agree that East Devon should build a new town where considerable planning can go into the infrastructure and development, providing housing, jobs, town centre, schools etc. The proposed site near to the A30 and Science Park would make sense as it is near current major road, rail and air links.
- Need to understand the issues with Cranbrook before another new town is considered, numerous social issues at Cranbrook due to its size and scale.

- Exmouth should have significantly more development as the only Tier 1 settlement with the best infrastructure and over 20% of the total population.
- Exmouth is at full capacity for housing, other areas have better access to Exeter where most employment is located.
- Housing numbers proposed at Exmouth are too high given the poor state of infrastructure (doctor's, schools, roads).
- Axminster housing numbers are too high, a 30% increase in the size of the town, in a town that already has poor infrastructure (only one GP practice) and limited jobs.
- Axminster needs a relief road if the proposed housing numbers are agreed.
- Seaton delivered 139 dwellings than required in the current Local Plan 2013-31 so new Local Plan requirement should be reduced and met within existing town boundary.
- Do not allow any building on the green wedge between Seaton and Colyford.
- An appropriate amount of housing is allocated to Sidmouth.
- No more building in Ottery St Mary until the infrastructure is improved – it is very difficult to get a GP appointment, The King's School is over-subscribed, traffic congestion.

- Development at Broadclyst will overwhelm existing services (particularly schools) and is much higher than comparable nearby villages such as Whimble or Westclyst.
- The roads in Broadclyst are not suitable for the proposed number of houses, for example traffic congestion from Broadclyst to Pinhoe.
- Development at Broadclyst is unsuitable because of adverse landscape impact.
- Budleigh Salterton proposals are too high and ignore the Neighbourhood Plan, are on grade 1 agricultural land and in the AONB.
- Do not understand why the hospital site in Budleigh is preferred.
- Too many houses are proposed at Woodbury.
- Whimble is too constrained by the road network and lack of school places and can only take limited development (no more than 10 dwellings).
- 33 dwellings would be tolerated at Whimble, spread over the period 2023 – 2040.
- Too many homes are proposed at Hawkchurch, which should not be in Tier 4 due to limited facilities and jobs and narrow, dangerous roads.
- Chardstock is unsuitable and unsustainable to accommodate an additional 30 dwellings.
- A minimum of 40 dwellings should be set for Chardstock, reflecting its sustainability and the capacity of Char\_04.

- Feniton should have more housing as it is well served by facilities and has sustainable connections to Exeter.
- West Hill Parish Council has concerns as the principles of the settlement hierarchy are not carried through to the number of homes to be built – for example, West Hill has nearly 10% proposed growth while Exmouth has only around 2% growth; Feniton and Whimple could double in size; several Tier 4 villages have no development.
- Support the housing provision at West Hill – Blue Cedar Homes control land north and east of Eastfield which can deliver 30 dwellings.
- Sidbury is congested and unsafe to walk and completely unsustainable.
- Clyst St Mary does not need any new houses, the roads around cannot take any more traffic.
- Question why Otterton is assigned 23 new homes when most other villages have none.
- Object to more housing at West Hill as roads are already busy, making it dangerous to walk, and facilities are already strained.
- Would like allocations at Upottery to support services and get future investment.
- No justification for second choice sites because they are needed to meet the housing targets so all should be allocated.
- Newton Poppleford and Harpford Parish Council are concerned about the impact of a new town on the

character of East Devon and the resulting increase in traffic in Newton Poppleford. The Parish Council advocates transport improvements between the new town and Exeter, additional effluent treatment works and an additional GP surgery.

- The accompanying table falls short of the Policy 3 figure by 465 dwellings so additional land is required to ensure that choice and flexibility in the supply of housing can be made in East Devon.
- There is over reliance on the provision of a new town and major settlement expansion for the delivery of a large proportion of the District's required housing and a larger number of smaller allocations, spread more evenly across the district, would represent a more resilient and robust approach.
- Given small amount of housing delivered in Musbury over past 40 years, more housing should be allocated to sustain local services and facilities.
- Should consider settlements in a group where they use the same facilities to better understand the impact on infrastructure, for example residents from West Hill, Ottery St Mary, Aylesbeare, Whimple and Feniton use the same GP practice.
- Turley for Bloor Homes support the principle of housing development within Sidmouth but consider that the settlement has the potential to deliver a greater level of housing than currently proposed. There is an urgent need for constrained land to be released (as shown in Sidmouth, Exmouth, Lympstone etc). In this context

<p>land should be brought forward in unconstrained areas, and outside of that, the most sustainable locations.</p> <ul style="list-style-type: none"> <li>• Housing delivery skewed towards West End at expense of high order sustainable settlements like Axminster.</li> <li>• Axminster could help to meet housing need in Lyme Regis.</li> <li>• Policy is confusing, including includes development provision at Cranbrook up to, but not beyond, 2031. The second new town should be considered a ‘direction of travel’ as it took 20 years at Cranbrook from allocation to occupation. The number of units proposed for the new town should be reduced from 2500 to 500 to reflect this and additional allocations made adjoining Cranbrook, together with ‘adequate’ growth at Exmouth, which too low and should be increased from 7% to 10% to meet local housing need where it arises. Additional housing is needed in small hamlets to attract younger people.</li> </ul>	
<p>Further Regulation 18 consultation Spring 2024</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> <li>• There were matters raised in feedback that related to housing numbers and distribution considerations. However we do not detail them here as they are raising matters that feature in existing feedback and have been addressed in comments received.</li> </ul>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>• No comments.</li> </ul>
<p>Sustainability Appraisal</p>	
<p>Outcome of sustainability appraisal:</p>	<p>Officer commentary in response:</p>

<p><b>Preferred alternative:</b> The broad housing distribution in Option A - Continue with pattern of housing distribution in East Devon Local Plan 2013-31 (the housing figures in Strategic Policy 2 result in a slightly different percentage breakdown – 60% in Western side, 25% at the Principal Centre and Main Centres, 15% at Local Centres, Service Villages and Countryside – the sustainability effects for this strategic option assessment would be the same as Option A).</p> <p><b>Reasons for alternatives being preferred or rejected:</b></p> <ul style="list-style-type: none"> <li>• Option A is preferred as it offers the best balance of accessing jobs, services and facilities at the Western side of East Devon and the Principal and Main Centres in an environmentally acceptable way, whilst also allowing for smaller-scale growth to meet needs in more rural areas.</li> <li>• Option B is rejected as it would limit the ability of existing settlements in East Devon to meet their own housing need, would adversely affect town centres, and would likely result in a higher loss of greenfield land.</li> <li>• Option C is rejected due to significant adverse landscape impact from development affecting AONBs, significant additional phosphates being discharged into the River Axe SAC, and limit the ability to meet housing needs in rural areas.</li> <li>• Option D is rejected due to significant adverse landscape impact from development affecting AONBs, poor access to jobs, services and facilities, resulting in increased carbon emissions due to travel requirements.</li> </ul>	<ul style="list-style-type: none"> <li>• The outcomes of the sustainability appraisal are noted.</li> </ul>
<p><b>Habitat Regulations Assessment</b></p>	
<p>The HRA advised by way of description: Urban effects alone (East Devon Heaths SAC/SPA, Exe Estuary SPA/Ramsar,</p>	<p>Officer commentary in response:</p>

<p>Sidmouth to West Bay SAC); Loss of supporting habitat/functionally linked land alone (Beer Quarry &amp; Caves SAC, East Devon Heaths SPA, Exe Estuary SPA/Ramsar); Recreation effects alone (Dawlish Warren SAC, East Devon Heaths SAC/SPA, Exe Estuary SPA/Ramsar, River Axe SAC, Sidmouth to West Bay SAC); Hydrological effects alone (Exe Estuary SPA/Ramsar, Lyme Bay and Torbay SAC, River Axe SAC, Sidmouth to West Bay SAC); Air Quality alone (East Devon Heaths SAC/SPA, Exe Estuary SPA/Ramsar, River Axe SAC, Sidmouth to West Bay SAC).</p>	<ul style="list-style-type: none"> <li>• Specific HRA matters, impacts and potential mitigation will be considered through further policy development.</li> </ul>
<p>Commentary on policy redrafting for the Publication Plan</p>	
<p>Strategic Policy 2 – Housing distribution is deleted as it is not so much a policy, but rather it is a description of where houses will be built – but see specific Designated Neighbourhood Area policy (SP03) that is recommended for inclusion in the plan.</p>	

<p>Strategic Policy 3 – Levels of future housing development</p>	
<p>Strategic Policy 3 sets out the minimum net amount of housing growth in the plan period and had split this into market housing requirement and affordable housing requirement, the latter to be met by a mix of affordable housing types. Though now in redrafting it is/was recommended the split was deleted.</p>	
<p>Issues and options consultation</p>	
<p>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</p>	

<p>reflect local character than mass produced homes. We highlighted options, however, of providing more than 10%.</p> <ul style="list-style-type: none"> <li>• Similar level of support for allocating or identifying land for around 11% to 15% of homes on small sites (25% of responses) and for around 10% homes on small sites (24% of responses). Support declined in the options with higher percentages, with least support for option for 51% or more.</li> </ul>	
<p>Draft Plan consultation</p>	
	<p><b>Officer comments</b> - We have broken comments received under broad headings and grouped them together, as set out in table form below, specifically including to separate apart community comments from those of the development industry, and others. We do not seek to comment on all matters raised noting that there were hundreds submitted. Rather we seek to pick out key themes, specifically of local plan policy relevance in representations. It should also be noted that feedback comments we make reflect on our understanding/interpretation of the current Government thinking (e.g. as set out in the NPPF consultation) rather than the previous Government statements on matters or their interpretation. There is some repetition of comments/concerns across some categories set out below. We have generally not sought to repeat feedback observations, so the whole table should be read in its entirety for a full picture.</p>
<p><b>Key issues raised in consultation:</b></p> <p>Other local Planning Authorities comments</p>	<ul style="list-style-type: none"> <li>• Whilst we do need to engage with Dorset County Council and recognise constraints at Lyme Regis, the constraints this Dorset town faces are also directly applicable in adjoining parts of East Devon - notably National Landscape designations sweep over all land areas. In</li> </ul>

- Dorset County Council is broadly supportive of the plan but there are close links between the eastern parts of East Devon and the western parts of Dorset that cannot be ignored particularly around Lyme Regis and Uplyme. Lyme Regis is very constrained. Asking for dialogue to discuss any sites around Lyme Regis that could meet the town's needs and be more suitable than sites in Dorset.
- Note: Lyme Regis Town Council broadly welcomes the proposals for Axminster (role of housing, employment, higher order facilities - serving East Devon and West Dorset)
- Exeter City Council notes the proposed development strategy for East Devon and the inclusion of continued development on the edge of Exeter. Important for the proposals within the city to be considered alongside the proposals in East Devon, on the edge of the city, to ensure development is planned for strategically, recognising cross-boundary impacts and opportunities. The City Council also specifically recognises the proposals for a new community in the vicinity of Clyst St Mary to eventually accommodate around 8,000 homes. Significant cross boundary discussions required to understand the impact of this development.
- South Somerset District Council – comments on the Local Plan relate to commuting and proximity to south Somerset, in particular Chard.
- National Highways are concerned that current development management discussions are identifying an emerging potential overprovision of housing compared to the Cranbrook Plan. So allocation growth at Cranbrook beyond 4,170 homes has not been captured within planning policy - this

past work joint work there was no substantive conclusions of better or worse sites for development falling in either planning authority area, sites assessed generally performed poorly in terms of suitability for development.

- Joint working with Exeter City Council is occurring and is very important.
- We would consider that Cranbrook development (noting highway concerns) is appropriately addressed (for most matters) through the Cranbrook Plan. Though Cranbrook growth and other proposed development is being modelled in highway impact terms with scope for mitigation being explored.

<p>development will either undermine elements of the new town allocation that are yet to come forward, or generate windfalls. Want a strategic policy approach in place for the likely full extent of Cranbrook new community, so they can interpret a collective potential impact on the Strategic Road Network and consider/secure infrastructure requirements. Transport modelling will need to consider the full extent of the 2nd new town (i.e. 8000 dwellings, not just the 2500 forecast for delivery by 2040)</p>	
<p><b>Community Comments (Town &amp; Parish Councils/Public/Interest Groups/Organisations)</b></p> <ul style="list-style-type: none"> <li>• Many local communities’ responses challenge the scale of housing growth stating it is too high, not justified, unrealistic/unachievable. Many perceive the Plan is allowing unsustainable growth at the cost to the environment and quality of living, with adverse impacts. As one respondent expressed it - “Put a stop to this building madness now”.</li> <li>• Many community concerns raised about the impact of housing growth on the environment. E.g. “Devon is being ruined by too much building”.</li> <li>• Concerns over urgent need to address Climate Emergency and need to take account of environmental and geographical constraints.</li> <li>• Concerns over impact of second homes and short term lets on house prices, housing affordability and supply available to local communities. E.g. “No point building new houses when there are no policies to prevent houses being used as second homes/kept empty for years with minor occupancy for a few weeks at a time”.</li> </ul>	<ul style="list-style-type: none"> <li>• The scale of growth, specifically housing, that we need to plan for is close to be mandated by Government. Noting new standard method housing numbers that have been consulted on – though final conclusion not reached at time of this drafting. The expectation is that these numbers will not come down. There is some limited scope to seek to plan for lower numbers but the chances of succeeding on such an approach (assuming the Council would want to) in a local plan for East Devon are regarded as being very slim. We simply do not see the evidence being so robust as to be able to achieve this outcome, notwithstanding that some adverse impacts from development could occur. It is important to stress, however, that many highlight positive impacts from development – not the least the fact that people live in homes and new housing development will provide homes for them to live in.</li> <li>• Whilst there are 2<sup>nd</sup> homes in East Devon (with limited small pockets of concentration) the scale of the challenge in East Devon is not in line with the limited cases where restrictive policies have been introduced. Furthermore, any such policy would only apply to new homes (even if it could get through examination and be adopted – which is highly</li> </ul>

<ul style="list-style-type: none"> <li>• Several respondents emphasise there is a housing crisis</li> <li>• One respondent wants less people, not more housing.</li> <li>• Concern that there is too much recent inward migration and growth without sufficient money being spent on all the much-needed facilities.</li> <li>• Comments sometimes mix up housing need, demand, supply, and policy provision requirement but this does not obscure the respondents' concerns. Comments on housing need, requirement and supply are set out as follows.</li> </ul>	<p>questionable) and many 2<sup>nd</sup> homeowners can choose to buy 2<sup>nd</sup> hand homes.</p> <ul style="list-style-type: none"> <li>• Need for facilities is noted. Whilst the Council can seek to promote delivery for most facilities the Council is not the provider body.</li> </ul>
<p><b>Housing Need</b>  <b>Communities largely want the following:</b></p> <ul style="list-style-type: none"> <li>• EDDC to challenge Government's housing target/approach to need more strongly.</li> <li>• Policy to be updated to be consistent with the Secretary of State's early December 2022 communications. They assert that NPPF has changed and the Government's housing figure has been 'scrapped'/'abandoned'/changed and the figure is now not mandatory but only advisory, so the Council can set its own figure. Other Councils have abandoned Government targets, why won't EDDC? Need to go back to the drawing board. Risk of legal challenge if plan making continues without waiting for NPPF changes and if continuing to use out of date data and assumptions.</li> <li>• Explore the impact of the Levelling Up and Regeneration Bill on housing numbers.</li> <li>• Local Authorities to be allowed to make their own judgements. This will allow a more dynamic and focussed response to the real needs in East Devon</li> </ul>	<ul style="list-style-type: none"> <li>• We do not see a basis to challenge Government housing numbers.</li> <li>• December 2022 communications (and their past policy) from the then Government now have no relevance.</li> <li>• The 5 year land supply requirements remain in place.</li> <li>• Net in-migration into East Devon is a reality that happens, and Government housing numbers (whether by default or design) are implicit in assuming in-migration will occur.</li> </ul>

<ul style="list-style-type: none"> <li>• EDDC to step back and look at housing provision in a properly strategic way. Do not impose house-build numbers where they are not needed and go against EDDC objectives</li> <li>• Factor in their assertion that the 5-year land supply requirement is being removed.</li> <li>• Only organic growth to meet local residents’ needs only and not in-migration ‘demand’. Development should not be at the expense of existing communities.</li> <li>• Some community responses consider there is no confidence in the Government’s approach to delivering houses and to claiming that the housing shortage can be dealt with by applying a supply and demand economic theory to the built environment on the basis that this will meet need and reduce prices. It has not done either. It has not resulted in local people being able to afford to buy houses - the problem has got worse.</li> </ul>	
<p><b>Community Control</b></p> <ul style="list-style-type: none"> <li>• Many communities’ responses want housing need, supply and requirement to be locally driven, where for example:             <ul style="list-style-type: none"> <li>• They quote Mr Gove on ‘community control’</li> <li>• They believe in self-determination of local citizens.</li> <li>• Communities tell EDDC what is acceptable and what is not.</li> </ul> </li> <li>• The Local Plan should not undermine the principle of localism, i.e. power should be exercised at the lowest practical level close to the people affected by the decision.</li> </ul>	<ul style="list-style-type: none"> <li>• The aspirations around local control of housing numbers is noted it is not deemed to be an approach that would successfully get through plan Examination given Government policy.</li> <li>• On assumption of wanting less housing growth - If local communities were to determine housing numbers for their local area the assumed outcome would be that numbers overall would fall a long way short of Government requirements. Experiences shows very few neighbourhood plans in East Devon explicitly plan for housing growth/development.</li> <li>• In drawing up local plan policy we have been aware of neighbourhood plans and sought to reflect on their wishes and aspirations, though this</li> </ul>

<ul style="list-style-type: none"> <li>• They want the Local Plan to “put local people at the heart of decision making” by limiting housing growth to that in made/submitted Neighbourhood Plans, and/or abiding by communities’ views in Local Plan responses.</li> <li>• A Neighbourhood Plan is the best way to determine new development sites.</li> <li>• A parish council states that Neighbourhood Plans should be respected. They dictate policy. EDDC should cease any proposed changes in light of this.</li> <li>• Other town/parish councils consider that the Local Plan's reliance on the standard method frustrates/ undermines/ ignores the role of Neighbourhood Plans and the scale of growth that has community support.</li> <li>• It is asserted that EDDC “is blatantly ignoring the electorate’s wishes and are blinkered to the destruction they are about to cause”.</li> <li>• Development should not be at the expense of existing communities.</li> <li>• Policy does not mention homes for local people.</li> <li>• No forecast in the plan to show how many of the proposed houses are expected to be bought by local people. Concern that the plan offers up large amounts of land to development to meet a national demand, not local need.</li> </ul>	<p>is not always possible, specifically not so in respect of a restrictive approach to housing development.</p> <ul style="list-style-type: none"> <li>• We would want to see development having positive benefits for communities and would seek to construct policy so as to have this outcome – for example, seeking affordable housing delivery on development schemes.</li> <li>• Whilst the plan itself does not seek to set out how many houses built will be occupied or bought by local plan, we do have evidence that shows that most new homes built are occupied by people that have moved into them from a previous address in East Devon or neighbouring areas.</li> </ul>
<p><b>Local Housing Need Assessment evidence</b></p> <ul style="list-style-type: none"> <li>• Several respondents challenge the technical part of Standard Method/LHNA evidence. For example:</li> </ul>	<ul style="list-style-type: none"> <li>• The past method for establishing housing need has now been abandoned by the current Government (assuming consultation draft proposals are carried forward. Therefore, debate about the past algorithm and its application are academic (though even noting this</li> </ul>

<ul style="list-style-type: none"> <li>• Assert that algorithms have been discredited. Concerns that standard method is based on household projections and trend migration.</li> <li>• Formula is based on decades old regional strategies that are no longer relevant.</li> <li>• Should review demographic trends (natural change (births/deaths), migration flows)</li> <li>• LHNA and housing topic paper do not take 2021 Census into account.</li> <li>• Assert that no consideration that the only growth in UK population is now a function of immigration which is due to government policy. The 2021 census has reduced the population forecast - yet the building programme neither acknowledges reduced immigration nor population growth.</li> <li>• Some challenge the concept of 'local need' as applied by the standard method. They perceive this as demand driven. Plan should focus should on need, not demand. Impossible to build to meet demand as there is a never-ending queue of people who want to move to Devon.</li> <li>• Assert that most residents consider local need to be just newly forming households in the neighbourhood and local suppressed demand.</li> <li>• Housing should be for local people.</li> <li>• Calculation of need does not take account of infrastructure and availability of facilities/ services (the existing ones are already stretched). It does not account of the Climate Emergency, or environmental/ geographical constraints. It is not sustainable. Want these matters taken into account which</li> </ul>	<p>there was scant evidence of planning authorities successfully challenging outcomes).</p> <ul style="list-style-type: none"> <li>• It is relevant to note that Council has statistical evidence on demographic change and resulting housing number outputs. This generates lower numbers than the current national standard method but given Government policy this matter is of academic relevance only.</li> <li>• We will look to update housing evidence to specifically take 2021 census data into account.</li> <li>• We have engaged with service providers in respect of planning policy, but capacity issues of providers cannot drive and determine overall housing numbers.</li> <li>• There is some possible degree of inevitability, the way national housing numbers are established, that trends of development will be perpetuated into ongoing future house building.</li> <li>• There is a reality that many middle aged and older people move into East Devon. Whether deemed desirable or not there is little or nothing the local plan can do about this. We do know, however, that new homes built are often first occupied by younger people, Cranbrook being a prime example. So, building new homes can help with accommodating younger people/households.</li> <li>• In local plan policy we have not sought to define need at local areas (e.g. for a given town) and plan for that. Rather we have taken district wide numbers and applied these across East Devon, albeit specifically within the context of a spatial strategy informed by robust evidence and detailed site assessment work.</li> </ul>
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<p>should significantly reduce the amount of housing provision in the Local Plan</p> <ul style="list-style-type: none"><li>• No sign of public involvement in assessing local needs</li><li>• One respondent asserts that during the Assessment of Need for housing, the NPPF HELAA guidance on who to involve in the HELAA work was not followed. This resulted in further problems of inadequate representations regarding health, education, transport infrastructure constraints.</li><li>• Others challenge the consequences of the standard method's concept of 'local need'.</li><li>• East Devon has 'natural decrease' in population; growth is due to large in-migration.</li><li>• Risk that this trend becomes self-perpetuating as it is built into plan targets.</li><li>• Standard method means housing a growing UK population, accommodating largely retired or retiring people wanting to relocate to East Devon. 2021 population is less balanced age-wise than 2011, with highest percentage of people aged 90+ in country. New owners remove opportunity for local families to stay in locality.</li><li>• 946 dpa need is grossly overstated based on Government's 300,000 target. If based on target per population, this would need 400,000 to 450,000 homes per year.</li><li>• East Devon is being penalised for past record of achieving targets.</li><li>• One respondent expressly criticises the Local Housing Need Assessment and how EDDC uses LHNA and Housing Topic Paper to justify Policy 3 housing requirements. Policy formulation is "smoke and mirrors". The documentation</li></ul>	
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<p>should not be presented by LPA as competent analysis of the evidence of need. It's just "sheer flummery", designed to legitimise a specific policy choice i.e. build more houses no matter what. Documentation conflates 'need' and 'demand' (the source of unsustainably high numbers in the plan) and is dedicated to obfuscating this merging of 'need' and 'want'.</p> <ul style="list-style-type: none"> <li>• Standard method rules apply at the district level, not at neighbourhood level.</li> </ul> <p><b>Meeting a range of needs</b></p> <p>Local Housing Need Assessment does not provide hard evidence of the actual housing need in settlements. Nor does LHNA take account of housing supply from commitments nor of completions including those historic before 2020, nor future windfalls.</p> <ul style="list-style-type: none"> <li>• Town Council wants retention and in-migration of young people to be encouraged to maintain balanced population.</li> <li>• Civic society asserts that Exmouth wished to see reversal on the older age demographic and instead to concentrate on work opportunities and affordable housing for young children/grandchildren. Local plan proposals at Exmouth disregards community's wishes on this matter as set out in made Neighbourhood Plan 2019</li> </ul>	
<p><b>Other Matters</b></p> <ul style="list-style-type: none"> <li>• Devon and Cornwall Police highlight the positive correlation between housing development and population growth. One exists to accommodate the other. Development impacts on police infrastructure. Development should contribute towards cost of providing essential police infrastructure.</li> </ul>	<ul style="list-style-type: none"> <li>• The police comments around contributing to infrastructure costs are noted, though this is a matter that falls beyond local plan policy.</li> <li>• We do work with Exeter City Council though specifically for housing development they plan to accommodate their own needs.</li> </ul>

<ul style="list-style-type: none"> <li>• One respondent is concerned that the Local Plan is being driven by Exeter City Council ambitions for economic growth. Rather than finding a solution to their land problems EDDC should concentrate on meeting the needs of East Devon constituents.</li> </ul>	
<p><b>Housing Requirement</b></p> <ul style="list-style-type: none"> <li>• Many want a significant reduction in the housing requirement, mostly unquantified but with a strong desire that the target is based only or largely on local communities' need (although one proposes that the housing target be lowered by 20%)</li> <li>• Numerous community comments asserting that Government policy change means that EDDC can set its own requirement target at a much lower level and should take into account what should be protected in each area.</li> <li>• Houses are being built to meet short/medium-term targets. Little or no accountability taken for resulting transport, road maintenance, employment, and teenage children. Targets just get forced through, creating more problems than are solved.</li> <li>• Should start by looking at health, education and transport infrastructure and then determine how many people this can support (not just increase housing and hope that infrastructure will cope or that development will fund the infrastructure)</li> <li>• There should be no more house building until infrastructure problems are resolved.</li> <li>• Why do we need so many new homes when they are unaffordable for local people?</li> </ul>	<ul style="list-style-type: none"> <li>• Housing 'requirement' is set by national Government.</li> <li>• Infrastructure availability cannot be a determinant of minimum housing numbers (though it could potentially be grounds to plan for more).</li> <li>• There are very limited grounds to prevent development happening on social/community infrastructure capacity constraint grounds. Though for physical infrastructure, such as road capacity, there is more scope for this to be taken into account through planning, but development can often provide the means to overcome such constraints.</li> <li>• There is a case made that by building more homes, a greater supply, prices should come down. Though we have not sought to test actual quantifiable outcomes.</li> <li>• Landowners need to demonstrate availability of land (their land) in order to have confidence about development actually occurring. We will need to demonstrate to an Inspector that we have confidence in new homes actually being built.</li> <li>• Plans have to be kept under review and replaced. Noting amongst other matters that we need to respond to changing Government policy.</li> </ul>

<ul style="list-style-type: none"> <li>• Housing targets should be reduced except whether there is a clear local need for affordable housing.</li> <li>• Strategic planning is being led by landowners - not a healthy model for development. Instead, it should be resident-focused.</li> <li>• The adopted local plan makes housing provision and has many years to run. No need for a new plan and new housing requirement and allocations at this time.</li> <li>• Questions why we need so many new houses when Cranbrook is not yet finished and still growing and so many new builds all over the countryside.</li> <li>• Where is the evidence justifying this requirement? Is it based on ONS statistics?</li> <li>• Building 20,000 dwellings over 20 years in a district that has just 72,000 dwellings is too much. Queries whether other rural LPAs are planning to grow by 25%.</li> <li>• Poor presentation of housing numbers. Should be in tabular format with more detailed analysis. Show how target is set and the contingencies shortfalls in getting to target</li> </ul>	
<p><b>Housing Supply</b></p> <ul style="list-style-type: none"> <li>• A range of community responses on the scale and delivery of supply, and supply sources Comments on specific allocations are summarised in this report under the relevant policies.</li> </ul> <p><b>Allocations:</b></p> <ul style="list-style-type: none"> <li>• Many comments on proposed site allocations, and some on omission sites</li> <li>• As a result of assertions that Government policy change means that EDDC can set its own target, many community</li> </ul>	<ul style="list-style-type: none"> <li>• Noted that for some comments in this section of the report detailed information is provided in other council work.</li> <li>• Whilst community aspirations (those wanting less development) are noted there are Government requirements to accommodate.</li> <li>• In plan drafting we have sought to balance ‘bottom-up’ aspirations and ‘top-down’ requirements.</li> <li>• The new town is seen as an essential component of meeting housing numbers. There will be further housing requirements in the future and the new town provides for long term, post this local plan development.</li> </ul>

respondents conclude that this means less housing supply is needed and so the Local Plan should reduce the amount of allocations.

- Size of developments proposed in the Local Plan are on a completely different (large) scale and go way beyond what locals want.
- Many advocate for using a ‘bottom-up’ approach to write a community-led Plan. It is a much better method than top-down, often developer-led, approach in strategic planning.
- Many comments on the 2nd new town, saying that it is not needed and wanting if deleted or reduced (this would reduce identified housing supply)
- Further concern – as well as 2500 completions to 2040, the 2nd new town is committing the district to a further 5500 – 7500 dwellings post 2040. What is the need for this?
- Alternatively, one respondent suggests reducing the plan target by 20% and increasing delivery at the 2nd New Town to 5000 in the plan period. This enables deletion of all second-choice sites and 20% of preferred sites (many are in unsuitable locations)
- Several community responses want to change how EDDC identifies supply to meet requirement. They perceive that starting from Housing and Economic Land Availability Assessment (HELAA) call for sites is driven by landowner/ developer interests and not in the interest on local community needs. Some want EEDC to “close the door to developers”. Some assert that plan making has lost the trust of local people.

By planning now for a larger new town, it provides the scope to secure forms of development and infrastructure delivery that meets longer and bigger term needs.

- We are planning for upper levels of development at the new town that we regard as credible.
- The HELAA is a critical process to inform plan making, set out in Government policy. It’s important to recognise that the HELAA is a technical assessment process and it does not determine policy – rather it provides evidence to inform policy choices.

<ul style="list-style-type: none"> <li>• Some comments on the HELAA (and SA/SEA) evidence refers to errors, omissions, lack of consistency with plan objectives and in application of assessment criteria.</li> <li>• Some want the HELAA process to include residents</li> </ul>	
<p><b>Supply total/Deliverability/Supply Headroom:</b></p> <ul style="list-style-type: none"> <li>• EDDC has oversupplied the number of new dwellings, and this should be taken into consideration against future numbers.</li> <li>• Purpose of Cranbrook was to take the pressure off building houses in other areas. This is enough; no need for second new town to deliver housing supply.</li> <li>• Relying on a 2nd new town risks housing delivery delays due to long lead in times, and vulnerability to infrastructure delays. Instead deliver faster housing growth e.g. distribute 2,500 dwellings more widely amongst East Devon towns; and have more smaller sites.</li> <li>• Residents Association asserts that the 30,000 dwellings identified by HELAA, means we don't need 2,500 dwellings from a 2nd new town.</li> <li>• Alternative view, increase delivery in 2nd new town to 5,000 in the plan period, thereby reducing the pressure to allocate elsewhere.</li> <li>• Unclear why the supply 'headroom' is 10%. How is this figure justified? One comment is that the headroom is non-essential.</li> </ul>	<ul style="list-style-type: none"> <li>• Our past housing supply has been measured against past requirements. We would not see past over-supply occurring and the matter is somewhat academic as a new plan has a new start and responds to Government requirements set out at that point in time.</li> <li>• There would be substantive challenges in accommodating housing if we did not plan for the second new town. Our site assessment work does not show that credible additional sites for development exist.</li> <li>• We have set out in policy upper credible build rate limits of new town development.</li> <li>• The 10% headroom provides flexibility over future delivery noting that not all sites will be developed. Government policy does not define an actual percentage number that should or must be used but 10% is deemed to be reasonable.</li> </ul>
<p><b>5-year housing land supply</b></p> <ul style="list-style-type: none"> <li>• Parish councils raise the issue of deliverability. Housing supply figures must be realistic and achievable. Setting</li> </ul>	<ul style="list-style-type: none"> <li>• We do need to have a five-year land supply; Government policy is clear on this. Through ongoing work, for example a stepped trajectory, we will set out how this can be achieved.</li> </ul>

<p>unrealistic targets leads to uncertainty and failure to meet the 5-year land supply requirement.</p> <ul style="list-style-type: none"> <li>• One Parish Council is concerned that the housing trajectory being proposed might not be met, and so not have a 5-year supply in place. Inspectors look critically at the likelihood of the trajectory being flawed in this way. So probably a good idea to have a secondary set of potential allocations.</li> </ul>	
<p><b>Density</b></p> <ul style="list-style-type: none"> <li>• Impact of density on supply. But contradiction between building at high density and taking account of the areas' existing character and densities e.g. on edge of villages.</li> <li>• Some want greater use made of other sites within the Built Up Area Boundaries, with greater intensification by increasing densities, including on garden land/windfalls</li> <li>• Some assert that developers focus on e.g. 3 and 4 bed dwellings with gardens, and don't want to deliver denser 'town' housing.</li> <li>• Alternatively, one respondent wants reduced densities on some sites e.g. those that already have a significant density of mature trees/hedges. Should apply Arcadian principles with a maximum of 8 dwellings/hectare.</li> <li>• One respondent prefers building tower blocks within city areas instead of countless more estates and towns with many 2 and 3 bedroom houses.</li> </ul>	<ul style="list-style-type: none"> <li>• We recognise that building at higher densities can secure more homes on less land, but this needs to be balanced against adverse impacts that can arise and also occupiers' desires and expectations and market realities around what can be built and what sort of markets for purchase/occupancy exist.</li> <li>• Our evidence shows that larger scale developers in particular, on most sites, typically provide for a range of dwelling sizes, these can be tailored towards provision of smaller rather than larger scale homes.</li> </ul>
<p><b>Brownfield/Greenfield land</b></p> <ul style="list-style-type: none"> <li>• Brownfield sites should be delivered first, and no greenfield sites developed before the brownfield sites are delivered.</li> </ul>	<ul style="list-style-type: none"> <li>• Whilst typically wanting to favour and support brownfield development (but noting some brownfield sites/areas are not appropriate for development) there is a reality that there are limitations on brownfield availability in East Devon. We do not have the past industrial legacy of some parts of the England, or past now redundant major infrastructure</li> </ul>

<ul style="list-style-type: none"> <li>• Planning ever more housing on greenfield sites is seen as the line of least resistance to accommodating lucrative building development.</li> <li>• Most allocation are greenfield; a consequence of the Call for sites approach, and the site selection process.</li> <li>• Don't use greenfield sites/AONB to fuel the housing market.</li> <li>• No greenfield land should be used – must preserve land for food production.</li> <li>• CPRE analysis of brownfield reports in the SW highlights brownfield capacity. Must be plenty of brownfield sites in the district that developers should be encouraged to use.</li> <li>• What is the evidence of brownfield land and availability? Insufficient work has been undertaken to explore potential redevelopment of the town centres, e.g. land owned by EDDC including many car parks. Wants a comprehensive study/report.</li> <li>• Make a bigger provision for windfalls. Brownfield site opportunities not fully explored. EDDC owns several suitable sites that have not been put forward EDDC should be more proactive and stimulate redevelopment of underused or brownfield sites.</li> <li>• At some settlements (e.g. Exmouth, Honiton, Seaton) numerous community responses want to 'prioritise' use of brownfield land as a starting point, or only use brownfield land e.g.             <ul style="list-style-type: none"> <li>• Redeveloping or refurbishing disused offices/shops/other buildings /structures for housing, repurposing older, larger houses into flats; developing unused town centre spaces; use</li> </ul> </li> </ul>	<p>schemes, for brown filed land to be a substantive part of our future development land supply.</p> <ul style="list-style-type: none"> <li>• It is recognised that Greenfield sites will frequently be easier and cheaper to development than (problematic) brownfield sites. However, lower developer costs provide scope to secure more affordable housing and other positive planning outcomes, that trickier and more expensive to develop brown field sites.</li> <li>• We note concerns around building on greenfield sites and loss of land for food production, but this needs to be balanced against ensuring we can build levels of housing to address Government house building targets.</li> <li>• We have evidence of brownfield land development potential through a urban capacity study.</li> <li>• Projected windfall completions are based on interrogation of past records. We have applied a robust methodology to establish numbers.</li> <li>• We would not, in principle, stand in the way of suggested possible redevelopment sites. But typically, these are privately owned and we as a Council have limited scope to 'force' such developments through. Noting that in many cases they could be expensive with non/limited financial viability and there frequently can be technical limits to overcome, such as flooding (noting technical challenges and constraints around flooding matters).</li> <li>• Whilst East Devon District Council is not the planning authority of Exeter, and cannot determine city council policy, we do note that the city council are being very proactive in respect of policy of regeneration and brownfield development and are meeting their housing needs.</li> </ul>
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<p>some carparks. E.g. old post office and old pub at Beacon Hill Exmouth</p> <ul style="list-style-type: none"> <li>• Redevelop the Magnolia Centre. Add storeys on top of existing buildings.</li> <li>• Redevelop Exmouth town centre. “Risk of flooding town centre is nonsense, - there is a flood defence scheme”. Flats were approved and built e.g. on the Q club site.</li> <li>• Cost of redeveloping brownfield sites and impact on viability should not be the main determining factor on land use.</li> <li>• Should develop the many brownfield sites in Exeter, not a greenfield 2nd new town site</li> </ul>	
<p><b>Other matters</b></p> <ul style="list-style-type: none"> <li>• No need for so much new housing supply. There are hundreds of unsold new properties and hundreds of aged properties in this area that need to be occupied.</li> <li>• Bring empty homes back in to use as much needed housing.</li> <li>• Consider Liverpool's £1 house sale for disused and decaying housing stock.</li> <li>• Opportunities for modern methods of construction. Is East Devon looking to other cities and countries, for example, who are seeking to achieve similar objectives? Housing constructed off site vastly reduces construction waste, is just one example. East Devon has a chance to really take on board existing solutions and take action.</li> <li>• Look at alternative housing solutions e.g. green pods for emergency housing.</li> <li>• Devon Wildlife Trust wants policy to include specific reference to the environment with specific minimum targets for greenspace and green corridors.</li> </ul>	<ul style="list-style-type: none"> <li>• We do not see evidence of hundreds of unsold new properties in East Devon. There is a commercial reality that developers do not build houses unless they have some confidence of sales, and they monitor sale patterns to inform their future build rates and levels.</li> <li>• East Devon District Council encourages reuse of empty properties, but we have no evidence of there being a substantive number of vacancies that could have significant impacts on total supply levels meeting Government requirements.</li> <li>• The £1 houses initiatives were applied at a point in time, some years ago, in some big cities with Government funding and support. It would not be a credible initiative for East Devon District Council to seek to follow.</li> <li>• Private developers may choose to use modern methods of construction, but it is not seen as a development type that we insist on through planning policy.</li> <li>• Whilst some may wish to bring forward alternative housing solutions it is not seen that the local plan can require or really facilitate delivery.</li> </ul>

	<p>Any such initiatives will need to be subject to a planning application and this will be determined in accordance with plan policies.</p> <ul style="list-style-type: none"> <li>• Environment policies in the plan provide for greenspace, we would wish to avoid duplication of references.</li> </ul>
<p><b>Developers/landowners comments</b></p> <ul style="list-style-type: none"> <li>• There is a range of developer /landowner comments.</li> <li>• Strong support for a minimum housing requirement</li> <li>• The Council has correctly applied the Standard Method, using latest affordability ratio.</li> <li>• The Standard Method of calculating housing need is a starting point and a minimum. Need to consider evidence about growth and unmet need for other authority areas.</li> <li>• Importance of delivering dwellings to meet need and growth.</li> <li>• Importance of maintaining housing supply and supply flexibility.</li> <li>• Challenges to supply components and supply forecast – need more evidence on the viability and deliverability of the supply categories, including allocations.</li> <li>• Several respondents conclude that additional land needs to be allocated to meet requirement and flexibility, justifying their sites being added to the list of allocations.</li> <li>• A few respondents refer to a housing crisis.</li> </ul>	<ul style="list-style-type: none"> <li>• Housing numbers in the plan will be and should be to accord with Government policy expressed as minimums.</li> <li>• We do not, however, see evidence or need to plan to exceed standard method numbers. Housing evidence based on demographic projections establishes housing needs that are somewhat below standard method outputs.</li> <li>• It is recognised through the plan that housing development is needed and appropriate.</li> <li>• Inclusion of an ‘additional’ buffer provides flexibility.</li> <li>• The plan will be informed by robust viability assessment.</li> <li>• Appropriate land to meet needs will be allocated in the plan.</li> <li>•</li> </ul>
<p><b>More specific comments as follows:</b> <b>Housing Need</b></p> <ul style="list-style-type: none"> <li>• Some developers say that despite the rhetoric and opinion about Government pronouncements and possible consequences for housing delivery, in terms of requirements there has been very little change. No change to the Standard</li> </ul>	<ul style="list-style-type: none"> <li>• We will be working to the new standard method and its outputs - noting qualifiers in consultation around planning for up to 200 less than actual outputs subject to plan progression by defined dates.</li> <li>• We are not seeking to argue that exceptional circumstances exist in East Devon that warrant levels below standard method outputs.</li> </ul>

<p>Method. Government remains committed to delivering 300,000 homes pa by mid 2020s.</p> <ul style="list-style-type: none"><li>• LPAs must plan to meet housing needs. Policy housing requirements must have some relationship with that need. Where they deviate, this must be justified but only in exceptional circumstances. EDDC should focus on meeting needs and not be distracted by possible changes to NPPF.</li><li>• Several developers’ responses support the use of the Standard Method to assess local housing need. Support conclusions and evidence in the LHNA 2022 (about technical demographic data) and Interim Housing Topic paper concludes there is no evidence that exceptional circumstances apply in East Devon at this time to justify calculation of minimum local housing need in any other way than the Standard Method. No justification for an alternative assessment of need. Should resist calls for a lower Local Housing Need figure. No grounds for seeking lower local housing needs figure.</li><li>• The 946 dwellings pa should be ‘fixed’ as the starting point for the Local Plan</li><li>• If the affordability ratio worsens between now and plan adoption, then the local housing need figure should be revised accordingly.</li><li>• PPG suggests need higher than Standard Method could be appropriate – Local Plan needs to consider implications of: Growth strategies (notably the balance between jobs and homes); and housing affordability. For the latter</li></ul>	<ul style="list-style-type: none"><li>• We will need to review any changes to standard method outputs (or other arrangements) and respond accordingly.</li><li>• We would not see it as credible to seek to meet all affordable housing needs through or as a proportion of plan policy for market delivery. To do so would generate non-credible overall housing numbers to seek to deliver.</li><li>• Economic growth projections informing the plan are in line with housing requirement outputs.</li><li>• The plan is informed by an EDNA and assessment has been undertaken of new homes/ workers Vs job growth projections. They align.</li></ul>
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<ul style="list-style-type: none"> <li>• Topic paper confirms that the local housing need figure has been updated to 946 p.a. using the most recently published affordability ratio.</li> <li>• PPG – use of Standard method starts to address affordability.</li> <li>• Average completions 931 p.a. is broadly comparable with standard method rate. But affordability ratio is worsening. So need more than 946 p.a. to improve affordability</li> <li>• Draft plan wouldn't deliver affordable housing to meet Policy target.</li> <li>• Some respondents are concerned that the Council has not considered establishing an alternative level of housing need, beyond a standard method, because the assessment of housing need has not considered growth strategies (i.e. economic growth).</li> <li>• Plan has not been informed by an Economic Development Needs Assessment.</li> <li>• Need to assess if evidence on economic growth and ability to house the workforce to support forecast number of jobs means that local housing need figure and requirement should be higher than the Standard Method need figure. Plan should not progress until the EDNA is integrated with the LHNA evidence and this assessment is available to inform strategy and policy.</li> </ul>	
<p><b>Needs of other areas:</b></p> <ul style="list-style-type: none"> <li>• Some respondents are concerned that the Council has not considered establishing an alternative level of housing need, beyond a standard method, because the assessment of housing need has not been informed by strategic cross boundary matters (housing).</li> </ul>	<ul style="list-style-type: none"> <li>• We do not have robust evidence from other local authorities about ability to meet their needs and appropriateness of East Devon to accommodate a proportion of their numbers. Adjoining Devon authorities are planning to meet their needs (albeit a new Mid Devon local plan is somewhat off). In particular we work very closely with Exeter City Council and the city are planning to meet their needs and</li> </ul>

<ul style="list-style-type: none"> <li>• EDDC should fully explore the circumstances in line with PPG.</li> <li>• One agent for several landowners asserts EDDC is failing in its Duty to Cooperate, to responsibly/sustainably identify/allocate appropriate land for development.</li> <li>• Exeter City Council position that it can meet all its development needs within the city is undeliverable and unviable as it proposes to build around 8,000 homes on high performing brownfield employment land when it is already 2,000 houses shy (pro rata) of an at least housing requirement of 12,000 in the current plan period.</li> <li>• Chronic housing supply shortage in Exeter and East Devon. EDDC has not considered the needs of other Councils and whether other LPAs can meet their development needs. East Devon will likely have to accommodate a significant proportion of Exeter City’s development “needs” because either housing will displace employment land or land will be required for Exeter’s housing needs in other districts, including in the “West End” of East Devon. Must engage with ECC - ensure development is delivered in the most sustainable locations around East Devon.</li> <li>• Another queries the extent of land available to deliver homes in Exeter City, the statements made in urban capacity assessments, and whether this is realistic. EDDC needs to consider an uplift in housing numbers to accommodate some of Exeter’s need, or at least have a contingency in place to react if that becomes clearer over time – i.e. potentially identify reserve sites to deal with this.</li> </ul>	<p>have not indicated to us that they see a need for any of their housing to be accommodated in East Devon.</p> <ul style="list-style-type: none"> <li>• To our north-easter boundary Somerset council have no set out a position of seeking us to accommodate any of their needs. Dorset Council has suggested that some localised Lyme Regis need could potentially be accommodated in East Devon, at/around Uplyme. But this Dorset element is localised and localised and small scale and is unsubstantiated by robust evidence. Past joint working with West Dorset council concluded on lack of suitable development sites across both sides of the county boundary. There is I reason why this conclusion will have changed and it is not seen as work that needs revisiting.</li> <li>• Torbay council have sought help from other Devon authorities in meeting their need, but they have no backed up their position of not being able to meet their need with robust technical evidence, specifically including comparative assessment of their constraints compared to those of others. Such assessment, if done, we believe would likely show that whilst Torbay does have constraints, they are far from unique. They have National Landscape land and Habitat Regulation restricted sites, but these considerations also apply across much of East Devon and to accommodate East Devon housing requirement we are needing to allocate substantial levels of land in National Landscape areas and establish complex and expensive habitat mitigation programmes. Furthermore, Torbay is someway from East Devon and Torbay Council has not established any kind of logic for why ‘Torbay people’ if they cannot be accommodated in Torbay should reasonably or appropriately be housed a distance away in East Devon. We would struggle to see how such a logic could be argued to exist.</li> </ul>
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<ul style="list-style-type: none"> <li>• To what extent does the 18,176 need figure consider Exeter overspill (i.e. extent to which Exeter, constrained by key environmental considerations (e.g. flood plains) is unable to meet its own housing needs; does this plan seek to meet any of that need</li> <li>• Some developers reserve their position to look at requirement target at Reg 19 stage. New evidence will come forward to change the assessment of local housing need. E.g. new affordability ratios in March 2023. Neighbouring local plans may provide evidence of unmet need that could be delivered in East Devon.</li> </ul>	
<p><b>Housing Requirement</b></p> <ul style="list-style-type: none"> <li>• The Local Plan should deliver against its requirement.</li> <li>• Most developers’ responses support the use of net minimum requirements. Important that the Plan continues to express housing requirements as a minimum.</li> <li>• Some reserve comment on the scale of requirement pending sufficient evidence to comment meaningfully.</li> <li>• Some developers have concerns about the plan-making timetable. Anticipate delay in plan-making process Some want to extend the plan period to 2041 or 2042 i.e. providing 15 years from adoption. Amend policy to cover the period to 2042.</li> <li>• Some support the scale of net housing requirement set out in policy. Unless evidence justifies using an alternative method, then local housing need is 946 dpa.</li> <li>• Need to fix the LHN figure as the starting point so that plan making can progress. Policy imperative is to deliver sufficient housing.</li> </ul>	<ul style="list-style-type: none"> <li>• The local plan will meet requirements.</li> <li>• Housing figures will be expressed as minimums.</li> <li>• The intent is the plan will now run to 2042.</li> <li>• The plan provides for growth that in technical demographic assessment terms exceeds actual need.</li> <li>• Economic growth proposals in the plan are fully reasoned and align with housing provision.</li> <li>• With neighbouring authorities meeting their housing needs it is appropriate for them to set out how they will address their affordable housing requirements.</li> <li>• The council will prepare statements of common ground.</li> <li>• The sustainability appraisal has/will test higher housing growth numbers.</li> <li>• The local plan will factor in 2020 to 2024 need and completions.</li> </ul>

<ul style="list-style-type: none"> <li>• Plan should provide for growth, not just for need.</li> <li>• Some want a higher net requirement to support economic growth.</li> <li>• Some want a higher net requirement to deliver additional affordable housing or to meet unmet need e.g. from Torbay/Exeter/Mid Devon/Teignbridge/Dorset (specifically Lyme Regis)</li> <li>• Need for Duty to Cooperate collaboration on cross boundary strategic housing issues – where is the evidence of ongoing collaboration?</li> <li>• Statements of Common ground on Duty to Cooperate and Strategic Cross boundary issues (housing) should be agreed prior to submitting the plan for examination.</li> <li>• One house builder wants the sustainability appraisal to test options for 5%, 10%, 15% uplift of requirement above housing need figure. These options are deliverable and there is housing land available to achieve this.</li> <li>• One respondent concludes that a requirement in excess of 1000 dpa is appropriate (taking account of 2018 based household projections)</li> <li>• Supply shortfall (138) in current (adopted) local plan since the start of that plan period should be taken forward and added to the housing requirement for the emerging plan.</li> </ul>	
<p><b>Housing Supply</b></p> <ul style="list-style-type: none"> <li>• A range of developer responses on the scale and delivery of supply, and supply sources Comments on specific allocations are summarised in this report under the relevant policies.</li> </ul>	<ul style="list-style-type: none"> <li>• The plan provides for district wide growth.</li> <li>• The plan aligns housing allocations and jobs – notably with development concentrations on the western side of the district.</li> <li>• A 10% headroom provision is planned to be built into the plan. This provides flexibility over possible non-delivery.</li> </ul>

- Must plan to provide comprehensively for housing requirements across the district.
- Important to consider how the scale and location of housing from the supply sources (notably the allocations) benefits the economy e.g. build housing where the jobs are, to provide a local labour force/reduce commuting.
- Essential to provide headroom and flexibility to provide greater certainty that housing requirements will be met, and ensure choice and variety
- Some developers conclude that identified supply meets the requirement based on the standard method but is short of the housing requirement plus 10% headroom, so policy 3 is unsound at present. More sites need to be allocated.
- Some developers challenge the anticipated housing supply delivery and want more allocations to provide greater certainty of achieving the target. They query:
  - Sites' suitability, availability and achievability/viability
  - Sites' delivery. Need to compensate for longer lead in times/slower build rates by delivering additional sites earlier and achieving policy headroom.
- Concerns about the plan-making timetable. Anticipate delay in plan-making process.
- Some want to extend the plan period to 2041 or 2042 i.e. providing 15 years from adoption. Amend policy to cover the period to 2042 and identify additional housing land.
- Shortfall of 753 homes when comparing Policy 3 requirement (18,920) with Policy 2 distribution (18,167). Shortfall should be planned for

- Whilst early site delivery is appropriate this does not mean that more sites/housing should be allocated.
- Housing numbers in the plan will align across policies.

<ul style="list-style-type: none"> <li>• Mismatch between policies 2 and 3 needs to be corrected; use net figures.</li> <li>• Some comments on the HELAA (and SA/SEA) evidence refer to errors, omissions.</li> </ul>	
<p><b>Specific comments/concerns about the following:</b></p> <ul style="list-style-type: none"> <li>• Delivery and Housing Trajectories</li> <li>• Lack of a detailed Local Plan housing delivery trajectory to 2040 and related evidence. This information is of fundamental importance to the plan. Review spatial strategy when evidence is available.</li> <li>• Others reserve their position on the trajectory.</li> <li>• Current monitoring demonstrates that delivering over 1000 pa is achievable.</li> <li>• Plan’s policies not yet tested for viability. Some sites may not be viable.</li> <li>• Supply of a large number of new homes can often be best achieved through planning for larger scale development e.g. new settlements or significant extensions to towns and villages.</li> <li>• There is a role for landowners who own significant holdings in a single ownership to deliver meaningful contributions toward housing delivery.</li> <li>• This is an area with a successful track record of strategic sites i.e. Cranbrook.</li> <li>• Alternative view - Questions over ability to maintain a steady supply of completions annually across the plan period.</li> <li>• Anticipated that new town will have lengthy lead in times – evidenced e.g. by Letwin Review; Lichfields, Buchanan</li> </ul>	<ul style="list-style-type: none"> <li>• The plan will be backed up by robust assessment and evidence on development trajectories.</li> <li>• High delivery rates are challenging, including in respect of matters outside of Council control, such as developers wanting to build and their being market demand. But the plan seeks to set out how the homes can be built.</li> <li>• Viability assessment work is ongoing. There is no reason to consider that some sites will be non-viable but appreciate that in some cases there may be costs that mean, for example, policy requirement affordable housing levels cannot be secured.</li> <li>• The plan provides for a second new town as well as a range of site of differing sizes.</li> <li>• The lead in time for the new town has been factored into housing work. There should not be the need for a separate DPD so production will not hinder the start of delivery.</li> <li>• New town delivery projections are regarded as robust.</li> <li>• The new town allocation will have land in multiple ownerships and this will promote/encourage multiple developer outlets.</li> <li>• Balance between western side of the district VS elsewhere is positive and good. Noting constraints going eastward but opportunities, infrastructure, draw of Exeter and market demand to the west.</li> <li>• The airport is properly taken into account in policy development.</li> </ul>

- Plan is overly ambitious on the delivery of Cranbrook and the 2nd new town.
- Would expect new town to be guided by a separate Development Plan Document, which could not be submitted for EIP until after the new Local Plan is adopted so need to add the time this takes to reach adoption to be factored into site's trajectory. Unlikely to commence housing delivery until mid-2030s.
- The principle of a second new town should be considered a 'direction of travel' and the delivery forecast should be reduced from 2500 down to 500 (maximum)
- One respondent asserts a build out rate of 160 dpa in the 2ns new town would be ambitious, and only deliver 960 to 1120 dwellings. A more conservative build rate of 50 dpa would only deliver 300 to 350. The 1380 to 2200 dwellings shortfall should be provided by other sites in more deliverable locations elsewhere in the district.
- Another respondent also challenges the Plan's reliance on a new town delivering dwellings from 2030. Very long lead in times for new town development. 300 p.a delivery rate in the new town is unrealistically high. At 60 dpa/outlet, it needs 5 outlets delivering at any one time (unlikely given present ownerships). Delay in the plan's adoption will delay planning applications' submission post-adoption. Considerable timescale and lag due to evidence required for applications. Also, a new settlement takes time to mature to deliver a volume of dwellings (i.e. considerable gearing up). I.e. less dwellings delivered in plan period.

<ul style="list-style-type: none"> <li>• Lack of trajectory evidence means it is not possible to ascertain e.g. whether the 2500 dwellings can be delivered in the new town by 2040.</li> <li>• Could extend new settlement to other land ownerships – to increase outlets.</li> <li>• Need more outlets, multi-phasing, plus more sites delivering housing in East Devon.</li> <li>• Alternative view by a site developer for the 2nd new town. The number of dwellings that can be delivered in the new town in the plan period could be higher than 2500. Need to discuss delivery trajectory with the LPA.</li> <li>• Reliance on 7250 dwellings in allocations (including Cranbrook) out of the total of 11811 dwellings in allocations in the West End of the district. Risk of stalling delivery and land supply issues if infrastructure delivery issues arise.</li> <li>• Need to consider constraints evidence – Need to take the presence of the Exeter Airport properly into account, not just noise but safeguarding.</li> <li>• Embrace the Lichfield evidence approach i.e. Enhance/speed up delivery by using higher amounts of affordable housing, (i.e. 35% affordable housing at new town).</li> <li>• Concerns about the combined impact of onerous policy requirements. Need for more flexibility for residential development so as to not render development unviable and undeliverable.</li> </ul>	
<p><b>Allocations</b></p> <ul style="list-style-type: none"> <li>• Concerns about the combined impact of onerous policy requirements. Need for more flexibility for residential</li> </ul>	<ul style="list-style-type: none"> <li>• The plan will be tested, all policies in combination, through viability assessment.</li> </ul>

<p>development so as to not render development unviable and undeliverable as all sites are needed if the requirement is to be met. As a result, they may not have commented on sites.</p> <ul style="list-style-type: none"> <li>• Housing land supply also relies on delivery of Cranbrook DPD Expansion Area allocations, and other supply sources.</li> <li>• Some landowners queried why historic SHLAA sites (submitted pre-2017) were not assessed in the latest SHLAA process.</li> <li>• A number of emerging policies contain requirements that will have financial implications on development. To ensure that the allocations proposed within the Plan are deliverable propositions and therefore are effective, the financial implications of these policy requirements should be considered in a detailed viability assessment (references Policies 28, 40 to 44; 55, 62, 67, 68, 72, 86, 87, 97, 107/108).</li> </ul>	<ul style="list-style-type: none"> <li>• We deemed it appropriate to draw a line under old SHLAAs and start again but resubmissions were allowed and did occur.</li> <li>•</li> <li>•</li> </ul>
<p><b>Commitments</b></p> <ul style="list-style-type: none"> <li>• Plan relies on this housing supply source to be delivered in the plan period to achieve requirement targets 23% of supply is from extant permissions – some sites will stall/permissions lapse.</li> <li>• Some dwellings that have been counted as ‘commitments’ have now expired e.g. 17/0893/MOUT at Musbury</li> <li>• EDDC needs to provide an analysis of previous lapse rates and delivery performance compared to previous plan trajectories.</li> </ul> <p><b>Windfalls</b></p> <ul style="list-style-type: none"> <li>• Need certainty about delivering the housing target. Do not rely on windfalls to reach a 18,920 requirement. This is not robust as windfall sites are not identified. Without windfalls</li> </ul>	<ul style="list-style-type: none"> <li>• We have a planned 10% headroom for non-implementation possibilities.</li> <li>• We have robust evidence around delivery.</li> <li>• We count neighbourhood plan allocations as allocations.</li> <li>• Double counting is avoided in assessment work.</li> </ul>

<p>forecast supply would be 753 short of requirement and 2,663 dwellings short of requirement plus 10% headroom. Need to identify more land for housing.</p> <ul style="list-style-type: none"> <li>• Need compelling evidence for including windfalls in supply.</li> <li>• Should not include Neighbourhood Plan allocations as windfalls (because they are allocations)</li> <li>• Potential for double counting windfall provision – need to continue avoiding double counting for future plan making stages.</li> <li>• Unclear whether windfalls have been included in the 8% oversupply.</li> </ul>	
<p><b>5-Year land supply</b></p> <ul style="list-style-type: none"> <li>• Important to demonstrate a 5-year land supply at point of plan adoption.</li> <li>• Securing a 5-year land supply is critical to the Local Plan’s success.</li> <li>• Evidence needed to demonstrate delivery housing prospects (i.e. the district trajectory and details of commitments’ and allocations’ site trajectories)</li> <li>• Cranbrook and the New town are 56% of the allocations, but are unlikely to come forward or be wholly complete in first 5 years of local plan adoption.</li> <li>• To ensure a healthy supply of housing sites can be maintained it would be sensible to allocate a number of smaller sites to maintain delivery numbers in the early years of the plan before housing at any 2nd new town becomes available.</li> </ul>	<ul style="list-style-type: none"> <li>• We will show a 5 year supply at adoption.</li> <li>• We would look towards a stepped trajectory in the plan.</li> <li>• The plan allocates smaller sites and bigger sites.</li> </ul>

<ul style="list-style-type: none"> <li>• Over-reliance on delivery at Cranbrook contributed to the Council currently being unable to demonstrate a 5-year housing land supply.</li> <li>• The current 'shortfall' in the 5-year housing land supply and 'undersupply' for the current plan period needs to be addressed by EDDC and the shortfall rectified by allocating sites in the emerging Local Plan.</li> </ul>	
<p><b>Headroom</b></p> <ul style="list-style-type: none"> <li>• Several developers support the principle of a headroom (flexibility allowance) of about 10%, as positive and a sensible, positive and pragmatic response to housing delivery uncertainty.</li> <li>• Some consider 10% headroom should be a minimum.</li> <li>• A 10% supply headroom is not sufficient to ensure consistent delivery throughout the plan period because the plan relies on housing supply from the new town. Want 20% headroom, and for the delivery forecast for the new town to be reduced.</li> <li>• Want a higher percentage headroom of 15 to 20% specified in policy to provide more flexibility, asserting the plan relies on strategic sites (such as the 2nd new town) with higher risks, and has historic housing supply issues - including not have a 5-year land supply now. The additional supply should be identified through site allocations in the plan.</li> <li>• Draft plan only identifies sites that might achieve an 8% headroom. Want additional sites allocated so headroom increases from 8% to 10%.</li> <li>• One developer asserts that the 1521 dwellings comprising the 8% supply headroom is unallocated. No evidence that the</li> </ul>	<ul style="list-style-type: none"> <li>• 10% headroom is to be planned for. This level is seen as appropriate. A higher headroom is not justified in East Devon where a buoyant housing market exists and delivery occurs, including on some trickier sites.</li> <li>• It is recognised that the 2<sup>nd</sup> new community present challenges, but considerable work is ongoing on master planning and implementation measures to ensure timely delivery. A benefit of anew towns is that they can attract substantial public sector funding and support, for example as happened in early days of Cranbrook delivery and drawing on Cranbrook experience this can secure accelerated and higher housing delivery rate.</li> </ul>

<p>unallocated dwellings will be allocated. If a headroom is provided the additional homes should be allocated.</p>	
<p><b>Small/medium sized sites</b></p> <ul style="list-style-type: none"> <li>• Continuing role for non-strategic sites to ensure housing supply continuity, particularly early in the plan period.</li> <li>• Strategy of smaller sites in shorter term and larger strategic sites in longer term is the key to delivering the housing requirement.</li> <li>• Plan should define ‘small and medium sized sites’.</li> <li>• •Small and medium sites are important. Can be built out more quickly and benefit the local economy, support rural vitality, have less impact e.g. on environment/resources.</li> <li>• Small sites can face difficulties in providing requisite infrastructure.</li> <li>• Has 10% of supply from small/medium sized sites been achieved? Some developers want more e.g. 15% or 20% of supply delivered on small and medium sized sites to provide choice, and more opportunities for SME builders.</li> <li>• Want more small sized developments and smaller builders, not the national ‘giants’.</li> <li>• SME builders/smaller sites support delivery of high-quality local homes.</li> </ul>	<ul style="list-style-type: none"> <li>• The plan provides for small and medium sized sites, though an explicit policy definition of what they amount to is not appropriate, alongside larger sites.</li> <li>• Environmental and other constraints do, however, limit scope for smaller site allocations.</li> <li>•</li> </ul>
<p><b>Monitoring</b></p> <ul style="list-style-type: none"> <li>• Need to update supply information with latest monitoring.</li> <li>• Potentially more supply in Cranbrook Expansion Areas- latest planning applications</li> <li>• Important to have plan targets and to monitor housing delivery. EDDC needs to provide more details as to how the</li> </ul>	<ul style="list-style-type: none"> <li>• Monitoring records are kept up to date.</li> <li>• Noted that development at Cranbrook is ongoing and it forms an important part of supply.</li> <li>•</li> </ul>

<p>plan will actually be monitored, and identifies when, why and how actions will be taken to address any issues identified.</p>	
<p><b>Brownfield/Greenfield Land</b></p> <ul style="list-style-type: none"> <li>• Most developers support the use of greenfield land.</li> <li>• Greenfield site e.g. on the edge of a town can be more environmentally friendly. It allows more space to bring up a family, ability to work from home, avoid using a vehicle every day</li> <li>• Town centre brownfield sites may not be suitable for families as they can be small dwellings, over developed, with little/no gardens and no parking. Hundreds of town centre flats may help hit targets but would only help a part of the population.</li> <li>• Some challenge ‘maximising’ use of brownfield land. They prefer ‘optimising’ its use.</li> <li>• Support for balancing the maximising of housing delivery on brownfield land with the need to maintain housing supply and deliver spatial strategy/vision and objectives.</li> </ul>	<ul style="list-style-type: none"> <li>• It is recognised that allocating greenfield land is essential to provide for housing growth.</li> <li>• It is recognised that differing types of sites will provide differing types of housing that are attractive to different market sectors.</li> <li>• We would not seek to explicitly seek to distinguish between terms of ‘maximising’ and ‘optimising’ brownfield land. In reality, in differing circumstances one or other could be most appropriate.</li> </ul>
<p><b>MARKET HOUSING AND AFFORDABLE HOUSING REQUIREMENTS</b></p> <ul style="list-style-type: none"> <li>• Range of community views on the amount of market housing and affordable housing requirements.</li> <li>• Although supporting affordable housing provision, community responses raise concerns about the affordable housing definition, and the reliance on development to deliver. Most affordable housing isn’t affordable. Rising interest rates makes the problem worse (this point, and related issues, are captured in comments on Policies 39 and 40)</li> <li>• Some community support for the affordable housing requirement, to support young families who bring life to the</li> </ul>	<ul style="list-style-type: none"> <li>• We do have to work with Government definition of affordable housing but note a clear shift nationally towards social rent provision.</li> <li>• We would want to secure high percentage affordable housing levels.</li> <li>• It would not be possible to plan for affordable housing delivery only.</li> <li>• We would typically want all size threshold qualifying sites to deliver some affordable housing.</li> <li>• We do not see it as reasonably possible for the plan to set out policy and deliver all of the affordable housing needs of East Devon.</li> <li>• Affordable housing policy will be tested alongside other policies through viability assessment.</li> </ul>

<p>community, not create a retirement ghetto for the rich retired and affluent incomers.</p> <ul style="list-style-type: none"> <li>• East Devon affordability ratio is very high (nearly 11 times incomes)</li> <li>• Some want all new housing delivered to 2040 to be affordable housing; and include sites allocated in Neighbourhood plans for affordable housing.</li> <li>• Should select sites for allocations that are suitable for delivering affordable housing.</li> <li>• Policy wouldn't deliver even for half of the dwelling requirement as affordable. Of the 18,000 homes supposedly "solving" the housing crisis in which people cannot afford their own home, only 4,000 are affordable. The rest are for profit.</li> <li>• Plan has an affordable housing requirement of 4,070 dwellings. But current evidence indicates realistic prospects of delivering 3,551 dwellings in the plan period (shortfall of 519 dws). Possibility that some of the 3,551 affordable homes won't come forward.</li> <li>• One town Council considers the affordable housing requirement should be at least 25% (and more should be social housing). Some want the vast majority to be affordable.</li> <li>• Some community respondents want a higher proportion of affordable housing. E.g. 40% Concerns about staff recruitment due to lack of affordable housing.</li> <li>• Designate site specifically for social housing or for private rent that can be afforded.</li> <li>• Want restrictions to stop landlords buying up affordable homes to rent out at high rates Considers that social housing targets are redundant - inability to influence the number of</li> </ul>	<ul style="list-style-type: none"> <li>• The plan cannot control who buys properties and if and how they may rent them out.</li> <li>• The plan includes exceptions policy as a means to deliver affordable housing.</li> <li>• Exeter will meet its housing needs and appropriately take into account affordable provision.</li> <li>• Whilst affordable housing delivery is very important it is not the only draw on developer contributions and need to be seen alongside and balanced against other asks.</li> </ul>
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social/affordable dwellings delivered by development (lack of funding/legislation)

- Some consider that the proportion of market and affordable housing is about right.
- Are there alternatives to delivering affordable housing through planning obligations, that will achieve affordable housing requirement and reduce market housing requirement?
- Some concerns that the market housing requirement is far too high – it will draw in people from other areas and increase out commuting to Exeter.

**Range of developer views**

- Affordable housing target will help to ensure effective monitoring of affordable housing delivery and that sites for affordable housing development continue to come forward.
- Most effective way to deliver affordable housing is to plan for adequate housing growth where affordable housing forms a specific percentage, secured through planning obligations. Reducing overall housing requirement would impact negatively on the amount of affordable housing delivery to 2040.
- Council’s evidence base is a robust and strong justification to plan for higher levels of housing growth if the increasing affordability concerns are to be addressed.
- Shortfall of forecast supply against affordable housing requirement. Should increase the affordable housing supply by allocating more sites, and not by requiring a higher percentage of affordable housing.

<ul style="list-style-type: none"> <li>• Need to evaluate Policy 40 assumptions (35% and 15%) against overall plan viability Impact of settlement hierarchy – restricting housing supply drives up property values and rental costs as insufficient open market housing and affordable housing delivered.</li> <li>• An agent for several landowners highlights the acute and worsening shortage of affordable housing in Exeter. The East Devon Local plan must prioritise securing appropriate, viable levels of affordable housing within the plan period in the context of Exeter’s chronic undersupply and the issue faced across the sub-region.</li> </ul> <p><b>Registered Provider views</b></p> <ul style="list-style-type: none"> <li>• Imperative that efforts are made to deliver as much affordable housing as possible.</li> <li>• Reassured that the affordable housing target figure is set as a minimum requirement.</li> <li>• Important that the affordable housing threshold is kept under review to maximise opportunity to deliver. Threshold should be as high as viably possible to meet District’s needs. Affordable housing is important in tackling wider economic issues, including suitable housing for the working population.</li> </ul>	
<p><b>DESIGNATED NEIGHBOURHOOD AREAS – HOUSING REQUIREMENTS (DNA-HR)</b></p> <ul style="list-style-type: none"> <li>• Some support for strategic policy to set housing requirements for designated neighbourhood areas.</li> </ul>	<p><b>DESIGNATED NEIGHBOURHOOD AREAS – HOUSING REQUIREMENTS – Officer commentary in response:</b></p> <ul style="list-style-type: none"> <li>• The comments received at the Issues and Options Stage and this main Regulation 18 consultation were considered in detail in the preparation for the further Regulation 18 consultation (May/June 2024) on this topic. The responses, alongside other evidence, informed the preparation of the Technical Report, “Method options for calculating housing</li> </ul>

<ul style="list-style-type: none"> <li>• Some support for the intention to consult on a methodology to justify housing requirements for designated neighbourhood areas.</li> <li>• Some respondents reserve right to comment when method/data is available.</li> <li>• Community concerns that Local Plan allocations have already prejudged 'local' requirements, and instead requirements should be based on local residents' needs.</li> <li>• Should re-evaluate how many dwellings of what type and target market are needed then work alongside Neighbourhood Plans to encourage small pockets of organic growth with appropriate dwellings.</li> <li>• One Parish Council wants EDDC to contact the Town and Parish Council to ask if and how many new dwellings would benefit their communities.</li> <li>• Lack of requests for housing provision requirement figures from Neighbourhood Planning Groups indicates that local residents do not want more houses.</li> <li>• One respondent wants the figures to be realistic to avoid speculative development in unsuitable locations.</li> </ul> <p>Methodology for determining DNA housing requirement should:</p> <ul style="list-style-type: none"> <li>• Focus on whether the growth can be accommodated.</li> <li>• Not be absolute (i.e. only "up to" a specified number).</li> <li>• Include the figures in Strategic Policy 2 (i.e. completions, commitments, local plan allocations, second choice sites).</li> <li>• If an additional allowance for windfalls is included this should take account of heritage assets, landscape designations,</li> </ul>	<p>requirements for Designated Neighbourhood Areas in East Devon" (March 2024). The work to prepare this technical evidence report and the conclusions and recommendations arising fed into reports taken to EDDC's Strategic Planning Committee on 13 February 2024 and 12 March 2024. These meetings agreed the Technical Report as the basis for the method for setting DNAHR figures which was then consulted on at the Further Regulation 18 consultation (see further below).</p> <p>With reference to the work above in respect of the points raised here, Officers would additionally comment as follows:</p> <ul style="list-style-type: none"> <li>• To be NPPF-compliant, DNA-HR must be set in strategic policy.</li> <li>• No set method is prescribed by Government and therefore a consultation on method options was deemed necessary.</li> <li>• The LP must make provision for the minimum district housing requirement (and district level Local Housing Needs Assessment) to be found sound and is distributing the growth working to an agreed proposed spatial strategy (including settlement hierarchy) necessarily related to the most sustainable settlements and appropriate strategic locations for growth rather than Neighbourhood Areas specifically. Accordingly, some of East Devon's DNA's include named settlements with planned growth and others do not. Related to this, the agreed site selection process/methodology takes account of the spatial strategy as well as a range of local circumstances, constraints etc, including consideration of heritage, landscape, ecology and other matters such as flooding. Infrastructure provision is considered through the Infrastructure Delivery Plan, which highlights key infrastructure issues and how they should be addressed in delivering development proposed in the Local Plan across the district.</li> </ul>
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<p>biodiversity, flooding and agricultural land quality, infrastructure capacity and local issues.</p> <ul style="list-style-type: none"> <li>• Lympstone residents were advised that adoption of a Neighbourhood Plan would prevent unwanted and unsustainable development in the village. The Plan is being ignored by EDDC. Other comments elsewhere raise similar concerns.</li> <li>• Emerging Clyst Honiton Neighbourhood Development Order, accompanying the Neighbourhood Plan (now at Reg 14 stage) would provide permission for about 50 dwellings, that would contribute to the windfall numbers within supply.</li> <li>• Church Commissioners England state that neighbourhood area housing requirements should accommodate sites within emerging Neighbourhood Plans and should not unduly restrict sustainable sites coming forward over the plan period.</li> <li>• One developer supports strategic policy identifying housing requirement figures for Designated Neighbourhood Areas. This is positive. But figures should be expressed as minimum, to accord with NPPF.</li> </ul> <p>Consistency between Policy SP2 and Policy SP3</p> <ul style="list-style-type: none"> <li>• Some respondents queried the difference between the amount of housing in Policy 3 and Policy 2, but others were clear that Policy 3 is about the strategic requirement and Policy 2 is about identified supply i.e. how to meet the requirement excluding windfalls. But:</li> <li>• Policy SP3 and Table 1 in the Topic paper express supply in net terms. To avoid confusion, policy SP2 should also be expressed in net figures, as gross figures artificially inflate supply, and would fail to meet housing requirements.</li> </ul>	<ul style="list-style-type: none"> <li>• The existing suite of neighbourhood plans have been considered as work on the Local Plan has been undertaken. However, by necessity the Local Plan is considering growth beyond the plan period of these plans (which extend to no longer than 2031, aligned to the adopted LP) and to meet district-wide needs. Neighbourhood Plans (both made, emerging and future new/reviewed) can/will continue to influence development through non-strategic and locally specific policy.</li> <li>• Allocations in made (and very advanced – ‘recommended to referendum’) NPs will be included in the DNA-HR figures using the proposed method. EDDC does not propose to rely on future allocations in NPs (with one agreed exception) due to limited track record and evidence of appetite from communities to make allocations through NPs, and also to avoid burdening NP groups, but NPs will be free to propose allocations should they wish to do so, in addition to the DNA-HR figure which Officers confirm will be expressed in policy as a minimum.</li> </ul>
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<ul style="list-style-type: none"> <li>• Need change to policy SP2 so that second choice allocations are confirmed as full allocations (i.e. no distinction between allocation sites).</li> </ul> <p>Note: Under Policy 2 some developers advocate the use of a robust methodology to determine the housing requirement for each town and village in the settlement. It should be noted that Settlements are not the same as Designated Neighbourhood Areas.</p> <p>Detailed technical analysis Submissions from developers include to refer to detailed technical analyses related to housing need, supply, and mix and the translation into Local Plan policy housing provision requirements. This is too detailed for this Feedback Report analysis but will be collated, grouped and analysed in the forthcoming updated Housing Topic Paper on housing need, supply, requirement and affordable housing.</p>	
<p>Omissions from policy</p> <ul style="list-style-type: none"> <li>• Sidmouth Town Council want the Local Plan to introduce controls on the use of second and holiday homes. Should not wait for a problem to escalate before taking action.</li> <li>• One respondent wants a “no second home’ clause to apply to the seaside towns.</li> <li>• EDDC should adopt a policy to levy higher Council Tax for holiday lets or second homes to address the issue of housing not being available or affordable to local people</li> </ul>	<ul style="list-style-type: none"> <li>• Controls on 2<sup>nd</sup> or holiday homes from new developments are not seen as credibly justified.</li> <li>• Council tax matters are beyond the local plan and policies.</li> </ul>
<p>Further Regulation 18 consultation Spring 2024</p>	

### **DESIGNATED NEIGHBOURHOOD AREA HOUSING REQUIREMENTS**

Key issues raised in consultation:

- The responses to the question about setting housing requirement figures for Designated Neighbourhood Areas in the new Local Plan revealed a diverse range of opinions and concerns. Overall, more respondents expressed preferences for Option 1 (excluding windfalls) than Option 2 (including windfalls).
- Few alternative methodologies were explicitly proposed - one specific call was made for an apportionment method (rather than supply-side) to be used – either using a simple apportionment method based on broad percentage growth figures for settlement tiers, or a more complex method based on matters referred to in the NPPF as being relevant considerations including spatial strategy, population and areas of assets of particular importance.
- There was a desire from communities for a more nuanced approach to housing requirements, and a notable emphasis on ensuring that any method chosen takes into account the specific circumstances and constraints of individual areas.
- The responses to the question about Designated Neighbourhood Area Housing Requirements reveal significant concerns among respondents regarding the scale, location, and impact of proposed housing developments in East Devon. Many respondents expressed worries about infrastructure capacity, preservation of local character, environmental protection and the need for affordable housing.

### **DESIGNATED NEIGHBOURHOOD AREA HOUSING REQUIREMENTS -**

General points of principle:

- Range of views and points carefully considered and overall, on balance, Officers consider this supports the use of the Preferred Method Option (Supply-side approach excluding windfall allowance) for calculating the DNA-HR. Apportionment methods were already appraised as part of the Technical Evidence work that accompanied the consultation and the reasons for discounting them remain valid.
- The DNA-HR figures do not in themselves propose a level of growth – they are derived from that in the various supply categories over the plan period (completions, commitments, Local Plan allocations and allocations in other DPDs, including made NPs and the Cranbrook DPD). The consideration of specific local circumstances and constraints have therefore been undertaken through the work and processes that have fed into those – including the development management process, the formulation of a spatial strategy/settlement hierarchy and the site assessment work – and they are a way of factually representing supply by the geographic unit of Designated Neighbourhood Area (where these exist).
- The scale and location of housing is related to the overall housing requirement the Local Plan must provide for at the district level, the spatial strategy, and the consideration of the allocation of specific sites and the process used, all of which is considered specifically elsewhere in this paper and other relevant Topic Papers in relation to comments made. In addition, issues relating to infrastructure provision will be considered in the Infrastructure Delivery Plan.
- Support is continuing to be given through the Council’s dedicated Neighbourhood Planning Officer to the relationship between existing

<p>There were also broader issues and criticisms related to the housing allocation process and calls for greater consideration to be given of local needs and existing neighbourhood plans.</p> <ul style="list-style-type: none"> <li>• Numerous responses from the development industry welcoming, and stressing the importance of, the proposed inclusion of wording in policy to make it clear that the figures are minimums and not upper limits. Similarly, general overall support for the proposal not to rely on neighbourhood plans making allocations to deliver the minimum District housing requirement but for these to be a source of additional supply. However, some concerns expressed that NPs would be disincentivised from making allocations as a result.</li> <li>• Many calls for ensuring robust monitoring and prompt action, including clarity on what this would be, to address under-delivery, including if neighbourhood plans fail to deliver housing sites allocated in their plans.</li> <li>• Specific suggestions for consideration in determining the details of the final approach and numbers to be incorporated into the Publication Plan included:             <ol style="list-style-type: none"> <li>a. Several reports of possible errors/discrepancies in the figures at this draft stage.</li> <li>b. Suggestion to consider including an uplift/headroom figure beyond the allocations, which could help with achieving windfall predictions and encourage neighbourhood plans to allocate.</li> <li>c. Request for the table of DNAHR figures to be more than a table of housing supply components and to include a</li> </ol> </li> </ul>	<p>NPs and the emerging LP, including whether and when it might be appropriate to trigger a NP review.</p> <ul style="list-style-type: none"> <li>• EDDC proposed in the material for this consultation that the policy would be expected to make clear that the DNA-HR figures are minimums.</li> <li>• The consultation responses have not suggested that the Council should reconsider the LP doing the ‘heavy lifting’ and seek to rely on NPs to allocate towards meeting the minimum district housing requirement. Officers understand and to some extent share concerns that this could disincentivise NPs from making allocations but this is effectively the same approach that was applied under the adopted Local Plan and some communities have still included allocations to meet specific identified local needs in their neighbourhood plans and with the extended 5 year protection in the paragraph 14 of the NPPF (introduced Dec 2023 revision), there is perhaps further incentive and role for NPs in making provision for housing. There are also other areas where NPs can add local specificity to the Local Plan policies and proposals.</li> <li>• Monitoring of DNA-HR will be included in the Council’s Annual Housing Monitoring Update. Risk of under-delivery is being managed by the Local Plan doing the ‘heavy lifting’ in making allocations to meet the district housing requirement, with the addition of a supply headroom. The DNA-HR figure does not rely on housing allocations in future NPs and the number of homes dependent on allocations in existing and advanced emerging NPs is very small and any risk of shortfall will be managed through the headroom.</li> </ul> <p>Specific detailed suggestions (a to f):</p>
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<p>column for the residual requirement to be planned for in each neighbourhood plan, even though this may be zero.</p> <ul style="list-style-type: none"><li>d. Request for reconsideration of how Cranbrook expansion figures are presented in order to show them as a commitment for Cranbrook – and not individual DNAs.</li><li>e. Geographic anomalies – several queries, citing examples, as to whether it is an accurate representation to include housing numbers in one DNA where an allocation relates directly to expansion of settlements in an adjoining DNA/parish.</li><li>f. Clarification sought as to whether provision in made NP policy for specific numbers of dwellings e.g. self-build units over the plan period but without specific site allocations are / should be included within the figures.</li></ul>	<ul style="list-style-type: none"><li>a. All reports of errors/discrepancies are being checked as part of the work to update the DNA-HR figures for the Regulation 19 plan.</li><li>b. As set out in the Technical Report, by using the preferred method, “DNA HR figures are supply based, so through the scale of local plan allocations include an element of supply headroom to provide appropriate flexibility to manage risk and help ensure district housing requirement can be achieved.” A flat rate % uplift across all DNA-HR figures is not considered justified and would fail to reflect the spatial strategy and local circumstances, which the DNA-HR should do to accord with Government guidance. A windfall allowance is included in the district figures and NPs can include allocations in addition to the DNA-HR minimum figures, and are encouraged to do so, where supported by appropriate evidence.</li><li>c. The DNA-HR summary table (and more detailed breakdowns provided in Appendix G of the Technical Report) as part of the Further Reg 18 consultation did include a column for the requirement to be planned for in each neighbourhood plan, called ‘Future NP provision’ and all the entries were zero at that time. Agree it could be made clearer, what (if any) requirement is for future NPs to make provision for in the Reg 19 plan.</li><li>d. The housing figures related to the Cranbrook expansion areas were shown in both the Regulation 18 draft Strategic Policy 2 and further Regulation 18 draft Strategic Policy 3 as they relate to both, but in different ways, which is considered justified. In the DNA-HR specific policy context the Cranbrook commitment is presented apportioned by individual DNA, whereas Strategic Policy 2 presented the figures by the settlement of Cranbrook. On balance it is considered to be in greater conformity with Government policy to retain rather than exclude the Cranbrook expansion housing figures from the individual DNA-HR</li></ul>
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	<p>figures in order to ‘reflect the overall strategy for the pattern and scale development and any relevant allocations’ and similarly with Government guidance that it will have ‘established the scale of housing expected to take place in the neighbourhood area’. This will be monitored and reported on as part of the Annual Housing Monitoring Update and the policy justification will clarify that there is no obligation on NPs to address any shortfall arising. The parish councils (qualifying body’s) for the relevant DNAs, could consider whether the boundary of their NA remains appropriate in including part of the Cranbrook expansion areas and apply to alter the NA boundary as seen fit.</p> <p>e. Similar to situation above, it is acknowledged that there are a limited range of other instances where planned housing development in one DNA is more related to a settlement predominantly located in another DNA, e.g. in respect of the growth of Exmouth extending into the adjoining Lympstone DNA. However, until such time as DNA boundaries may be reviewed and amended, it is considered appropriate to continue to include all housing in the relevant supply categories that falls within the boundaries of each individual DNA in the DNA-HR figure to give a complete picture of planned growth. Where sites straddle 2 or more DNAs, the numbers are apportioned accordingly, and an explanatory note included in the detailed data sheets available for each Neighbourhood Area. Again, this will be monitored and reported on as part of the Annual Housing Monitoring Update and the policy justification will clarify that there is no obligation on NPs to address any shortfall arising.</p> <p>f. Where made NP policy supports a particular type and number of dwellings over the plan period but without a specific site allocation, allowance is not made for this in the DNA-HR figures using the preferred method option (Option 1), but would indirectly be allowed for if</p>
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	<p>a windfall allowance was added (Method Option 2). This particular circumstance would appear to be relevant to 3 made NPs currently (out of 27). This has been carefully considered but on balance it is not considered appropriate for the LP to rely on this as a source of supply, because of the uncertainty regarding delivery and the fact the policies relate primarily to supporting developments of single dwellings. This can be justified as the DNA-HR figure is a minimum. The reasons for rejecting Method Option 2 remain valid and are not outweighed by these limited occurrences. In any case, including a windfall allowance for the DNA-HR would need to be done on the basis of an agreed methodology (options for this were set out in the Technical Report at further Reg 18 consultation stage) and applied to all DNAs, and would not therefore be tailored to individual NP policies. It is suggested however that delivery under these types of policies should be monitored in NP monitoring undertaken by the LPA.</p>
<p>Sustainability Appraisal</p>	
<p>Key issues raised in consultation:</p> <p><b>Designated Neighbourhood Area housing</b>  <b>Preferred alternative:</b> Option A. All housing supply forecast for the period 1 April 2020 to 31 March 2040 <u>excluding</u> an allowance for future windfalls.</p> <p><b>Reasons for alternatives being preferred or rejected:</b></p> <ul style="list-style-type: none"> <li>Option A. All housing supply forecast for the period 1 April 2020 to 31 March 2040 <u>excluding</u> an allowance for future windfalls is preferred as it provides more certainty by being simpler and easier to understand. It avoids difficult technical</li> </ul>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>Agree that a 10% increase on the standard methodology is a reasonable alternative. But must also consider the level of ‘headroom’ being provided in the policy – this may also be 10%.</li> </ul> <p>Action: appraise a 10% increase on the standard methodology as a reasonable alternative in the SA.</p>

<p>issues associated with justifying and apportioning a basic windfall projection rate to the DNAs and removes the potential for assertions of ‘spurious accuracy’, particularly in smaller DNAs where windfall numbers are low.</p> <ul style="list-style-type: none"> <li>Option B. All housing supply forecast for the period 1 April 2020 to 31 March 2040 <u>including</u> an allowance for future windfalls is rejected as there is uncertainty on the number, location, mix and timing of such sites. It is technically difficult to accurately forecast windfall sites at such a small geographic level and may lead to overlaps with other sources of housing supply as future neighbourhood plan allocations may be located on windfall sites.</li> </ul> <p>Summary of main issues raised in consultation relating to the Sustainability Appraisal: BDW refers to the SA consideration of two options for the level future housing growth (i.e. Policy 3 requirement). The first based on 18920 (standard method need rate); the second adding a 20% uplift to need. BDW considers that 20% uplift is an unreasonable alternative, based on the assessment work available. But BDW considers that the SA should have assessed a number of options including uplifts to the requirement of 5%, 10% and 15%. They are deliverable. These are reasonable alternatives that should be considered in future iterations of the SA.</p>	
<p>Habitat Regulations Assessment</p>	
<ul style="list-style-type: none"> <li>The HRA work reports by way of potential risks - Urban effects alone (East Devon Heaths SAC/SPA, Exe Estuary</li> </ul>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>Concerns are noted and will need to be addressed through and in response to future HRA work.</li> </ul>

<p>SPA/Ramsar, Sidmouth to West Bay SAC); Loss of supporting habitat/functionally linked land alone (Beer Quarry &amp; Caves SAC, East Devon Heaths SPA, Exe Estuary PA/Ramsar); Recreation effects alone (Dawlish Warren SAC, East Devon Heaths SAC/SPA, Exe Estuary SPA/Ramsar, River Axe SAC, Sidmouth to West Bay SAC); Hydrological effects alone (Exe Estuary SPA/Ramsar, Lyme Bay and Torbay SAC, River Axe SAC, Sidmouth to West Bay SAC); Air Quality alone (East Devon Heaths SAC/SPA, Exe Estuary SPA/Ramsar, River Axe SAC, Sidmouth to West Bay SAC).</p>	
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Commentary on policy redrafting for the Publication Plan

- Redrafted Reg-19 policy:
- Strategic policy SP 02 – Levels of future housing development
  - Strategic policy SP 03 - Housing requirement by Designated Neighbourhood Area

Regulation 18 Strategic Policy SP 03 – Levels of future housing development (now Policy Reference SP 02 in the Publication Plan) has been redrafted to make it considerably shorter and simpler and to explicitly concentrate on matters that are of policy relevance in respect of determination of planning applications. It addresses overall housing numbers and avoids matters that are addressed through other policies in the plan. For clarity and to reduce length and complexity, the setting of Designated Neighbourhood Area Housing Requirement has been separated into a new standalone dedicated strategic policy. This is the new policy SP 03: Housing Requirement by Designated Neighbourhood Area. This makes it clear that the figures are minimums and what the housing requirement is, if any, to be met by future NPs. The supporting text explains how this will be monitored and applied, including in relation to any shortfall.

<b>Strategic Policy 4 – Employment Provision and Distribution Strategy</b>	
Strategy 4 states that the West End and the tier 1-4 settlements will be the primary focus for new industrial, warehousing, offices, distribution development and other B Class Use employment development.	
<b>Issues and options consultation</b>	
See General Issues above.	
<b>Draft Plan consultation</b>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> <li>• Devon County Council note that environment and social issues should balance the economic vision to enable sustainable development.</li> <li>• Exeter City Council advises that the City of Exeter has significant economic and employment growth potential, but it cannot all be accommodated within the city, given the constrained supply of employment land, and little scope for new potential employment sites. Some of the future economic growth stimulated by the City of Exeter will need to be accommodated in its hinterland in adjoining local authority areas, where they are functionally part of the city. Noting growth in key transformational sectors such as</li> </ul>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>• The vision has been aligned to the Economic Development Strategy rather than the previous stand-alone vision that predated the strategy.</li> <li>• Cross boundary partnership work is ongoing with Exeter City Council. They have not identified a quantum of employment land that cannot be accommodated within the City.</li> <li>• Specific policies address the location of employment and need to avoid harm to acknowledged interests, this policy is strategic and sets the overall strategy for distribution of development rather than matters of detail.</li> </ul>

<p>data analytics, environmental futures, health innovation and digital communications</p> <ul style="list-style-type: none"><li>• The East Devon AONB team suggest a definition of ‘appropriate land’ is needed. In rural areas it might be seen to be socially helpful to encourage diversification, but that may be at the expense of essential character of the AONB. Any proposals brought forward should be considered against the landscape character and natural beauty of the AONB in that location.</li><li>• Employment land should be allocated on the basis of evidence of demand and whether the sorts of jobs will help the economy and not just provide entry-level jobs.</li><li>• This development of employment locations must be accompanied by provision of active and public travel so that the private car is not baked in as the only means of travel to these employment sites.</li><li>• Some new businesses good for local employment but in rural Devon often better in clusters.</li><li>• Super appeal (at Feniton) showed little likelihood of increasing local employment and there are vacant units.</li><li>• Already too much employment land in Sid Valley.</li><li>• SidCOC - We [would] expect to see a coherent framework for recovery and growth beyond allocating slabs of bare employment land. Try as we might, we cannot find anywhere in the Local Plan anything which resembles ‘a positive strategy for the future development of town centres’. It simply does not exist.</li><li>• SidVA - We question the evidence base for these proposed Policies under [Policy] No 4 as the Council advise the ‘Economic Development Needs Analysis’ (EDNA) will not be available until an unspecified date in 2023. By the Council’s own admission the</li></ul>	<ul style="list-style-type: none"><li>• Most of the other points made are addressed through the EDNA (which wasn’t complete at the time of this consultation), through the site specific assessment work and through the methodology that was applied to site selection eg reducing reliance on private cars by selecting sites that were close to tiered settlements to promote settlement containment or adjoining existing employment sites to enable business expansion and including employment land within larger mixed use sites.</li><li>• The text that supports the policy is still very detailed but it has been simplified and shortened.</li></ul>
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<p>'Scale of Development' will be determined by the EDNA. The Council later say in para.3.54 their existing 'evidence is now out of date'. We consider that these Draft Local Plan proposals, are uninformed &amp; unsound without an Evidence Base through the 'EDNA'.</p> <ul style="list-style-type: none"><li>• Use of existing sites should be prioritised. Existing sites should be improved- greening them, providing better facilities, maintaining 100% occupancy - allowing pop-ups if necessary.</li><li>• Employment sites should not be lost to/secondary to housing</li><li>• Focus should be on green jobs e.g. insulation, renewables and natural environment</li><li>• Need clarity as to the role of the Enterprise Zone</li><li>• Local Plan should be more focussed on the local economy, not just housing. Needs an economic strategy</li><li>• Economic growth should determine housing numbers not the other way around</li><li>• Need to ensure that economic growth reduces consumerism and is genuinely sustainable and life improving</li><li>• Reliance on less well paid seasonal and tourism jobs should be reduced. Lower paid, essential jobs- such as carers- should be valued and paid more</li><li>• Young people need better quality jobs, don't just promote B uses. Consult young people and provide sustainable, high tech, long term jobs in emerging industries</li><li>• Does the plan intend to draw trade from elsewhere e.g. north of England.</li><li>• Need to emphasise the importance of adequate wifi for small businesses especially in rural areas.</li></ul>	
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<ul style="list-style-type: none"><li>• Small sites within housing developments e.g. in Exmouth is impractical</li><li>• Plan doesn't recognise shortfall for existing communities, need better services and infrastructure and a realistic plan to ensure employers will actually take up the sites</li><li>• This strategy is being used to justify the new town which is only needed to meet Exeter's shortfall</li><li>• None of the proposed businesses will produce anything for export out of the area, eg farm produce. Incentives are needed: this will include transport to the main network outwards from towns.</li><li>• The Science Park could be developed for high tech clean industry</li><li>• New town should not include/justify expansion of Hill Barton</li><li>• Affordable housing is key to recruiting in the construction, health care and hospitality industries.</li><li>• The increase in industrial areas in such a small area of Devon is unreasonable. Most people travel to Exeter for work as small employers do not pay as well, in an area of already shamefully low pay.</li><li>• More training centres for skilled jobs that are needed, e.g. nursing, engineering before jobs can be 'created' in today's economic climate</li><li>• Strategy needs to recognise that working patterns are changing and more work from home so less land is needed</li><li>• More good quality employment is needed, however to reduce car use this must be more local and bus services need to improve.</li></ul>	
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<ul style="list-style-type: none"><li>• Jurassic Centre in Seaton cost £2M could be a super community training hub and conference centre perhaps a key focus on hospitality, care skills, leisure and tourism etc.</li><li>• National employment market is changing as we export less. This plan can't predict what will happen.</li><li>• Support the approach to meet the district's employment land requirements by focusing development on the western side of the District</li><li>• The Draft Local Plan proposals, are uninformed &amp; unsound without an Evidence Base through the 'EDNA'.</li><li>• This proposed Employment Land policy makes no mention of employment from Retailing, Hospitality, Tourism and the increasing trend to remote/ home working.</li><li>• Support the requirement to link housing development to increases in employment land.</li><li>• Support resisting loss of employment land and the strategic policy to achieve this. This approach should be further strengthened by a policy that limits housing development if additional employment land is not developed in parallel.</li><li>• Support joint working with Exeter, Mid-Devon, and Teignbridge Councils and provision of extra employment land sufficient to accommodate the additional jobs required and site to be suitable and minimise commuting.</li><li>• Many of the jobs created through the West end development end up creating jobs for Exeter residents, not East Devon.</li><li>• Manufacturing industries should be encouraged to come to the area. Trust Marsh Barton will be redeveloped now it has a railway station.</li></ul>	
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<ul style="list-style-type: none"><li>• Greater emphasis should be placed on providing job opportunities in locations that are easily accessible by existing residents to prevent the out-migration of workers to Exeter eg from Exmouth.</li><li>• How do you define high quality, high value jobs?</li><li>• Tier 3 &amp; 4 villages need space for Workshops, office hubs, craft manufacture, micro business, professional workplaces, web-design, architects, legal, planning Consultants.</li><li>• There needs to be a choice of appropriate land in sufficient quantity and of the right quality.</li><li>• R &amp; D and light industrial are crucial to the East Devon economy, and to the Airport. They should be properly planned for with clear policy provided in terms of quantum and location.</li><li>• Improved infrastructure is essential</li><li>• New development should be of a scale that it won't adversely impact on existing settlement character</li><li>• Amenity of existing residents should not be impacted by new employment development</li><li>• No green space/wildlife should be destroyed to make way for new employment</li><li>• Not on good quality agricultural land.</li><li>• Towns need more small business units, suitable for sole traders/crafts/start ups (one made reference to Seaton)</li><li>• East Devon lacks the skills to drive/support economic growth</li><li>• Thriving town centres should be a priority, but it barely gets a mention, as should encouraging tourism.</li><li>• This is a sensible strategy, not to forget small scale / community commercial projects in appropriate rural village locations</li></ul>	
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<ul style="list-style-type: none"><li>• Object to further development at Hawkchurch, the infrastructure isn't sufficient</li><li>• Chardstock isn't suitable for further development, it should be considered countryside.</li><li>• When employment proposals are quantified, need transport evidence to consider the impact upon the strategic road network.</li><li>• Policy needs to make clear that not all employment sites are shown on the proposals map but policy will apply to all sites.</li><li>• Newton Poppleford and Harpford Parish Council would prefer to see a combination of residential, retail and employment provision.</li><li>• Rather than individual housing estates, retail parks and industrial estates mixed use developments are needed to avoid the necessity for residents to drive to work or shop.</li><li>• Economic Development Needs Assessment not available at time of consultation.</li><li>• Plan cannot progress until EDNA results integrated with LHNA evidence.</li><li>• More clarity is needed on what is meant by "a net increase" and "sufficient new employment floorspace".</li><li>• There is a shortage of sites available for small and medium sized businesses across the district, outside the West End.</li><li>• No reference to the needs of the wider sub-region, specifically Exeter nor the impact of ECC' new Local Plan policies relating to the redevelopment of existing employment sites or the lack of reliance on greenfield allocations for residential, employment and mixed use development. More emphasis needs to be given</li></ul>	
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<p>to the needs of the sub-region as opposed to East Devon as a single entity.</p> <ul style="list-style-type: none"> <li>• Fundamentally disagree with a strict adherence to the ‘predict and provide’ model, support an alternative explicitly pro-growth strategy designed to work from the bottom up to allocate a wide range of suitable and sustainably located employment land</li> <li>• Support existing employment areas as the primary location for new employment, Greendale Business Park is a perfect example of an existing employment area which is in a highly sought-after location and capable of expansion within environmental limits.</li> <li>• Object to concentration of jobs in tier 1-4 settlements- increasing the number of jobs at a settlement does not necessarily mean that more residents of the settlement will work in that employment. There is a risk that such a strategy will in fact be counter-productive, spreading a number of jobs to settlements which then attract employees to travel at great distance often by private car- better to expand existing employment sites in the west end eg Greendale Barton</li> <li>• 3West Developments Ltd supports the draft Plan's aspiration to provide the right land and premises in the right location. However, the company objects to the mismatch between this aspiration and the lack of an evidence base for the Economic Strategy. The company believes that the strategy should not proceed until the evidence base is complete.</li> </ul>	
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> <li>• This consultation included specific employment sites for allocation but did not consult on the strategic policy.</li> </ul>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>• Responses have informed policy making but did not directly relate to this policy</li> </ul>

Sustainability Appraisal	
<p>Outcome of sustainability appraisal:  <b>Reasonable alternatives:</b></p> <ul style="list-style-type: none"> <li>• Option A. Continued focus on big employment sites in the West End of the District.</li> <li>• Option B. Encouraging greater business development in other areas close to Exeter (for example expanding Greendale and Hill Barton Business Parks).</li> <li>• Option C. Encouraging greater business development at and within the main towns of East Devon.</li> <li>• Option D. Encouraging business expansion and development in the villages and across the countryside of East Devon.</li> <li>• Option E. Encourage and enable more home working.</li> </ul> <p><b>Preferred alternative:</b> Overall, Option E has the most sustainability benefits, followed by Option A which performs slightly better than the others. However, there is not a single preferred alternative, as the options are not mutually exclusive. The range of positive effects means that a combination of the five options will be required to support economic growth, consistent with national policy.</p> <p><b>Reasons for alternatives being preferred or rejected:</b> All options (A-E) are preferred as they are not mutually exclusive, and each is required to deliver national and local policy objectives to support economic growth. Therefore, aspects of all options are within Policy 4.</p>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>• All options are reflected in the Policy with the exception of not fully accommodating Option B, as business development has not been allocated at Hill Barton or Greendale Barton, although sites close to Exeter have been allocated. The options are not mutually exclusive, and all are required to deliver national and local policy objectives to support economic growth.</li> </ul>
Habitat Regulations Assessment	
<p>Key issues raised in consultation:</p>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>• No comments at this stage.</li> </ul>

<ul style="list-style-type: none"> <li>No potential risks were identified. In commentary the HRA of the draft plan advises: Policy categorizes potential industrial development by industry, such as office space, industrial units and storage space. No quantum or specific locations identified and awaiting results of Economic Development Needs Assessment.</li> </ul>	
<p>Commentary on policy redrafting for the Publication Plan</p>	
<p>Redrafted Reg-19 policy:</p> <ul style="list-style-type: none"> <li>Strategic policy SP 04 – Employment Provision and Distribution Strategy</li> </ul>	
<p>The Policy has been redrafted so that it reflects the findings of the EDNA and the Economic Development Strategy and is clearer and more concise. A table identifying the allocations, uses permitted, minimum job numbers and site sizes has been added to the reasoned justification (informed by the 2015 Homes England job density guide) and the text has been amended to ensure that it reflects and complies with the Council’s new Economic Development Strategy.</p>	

<p>Strategic Policy 5 – Mixed use developments incorporating housing, employment and community facilities</p>
<p>Strategic Policy 5 of the plan seeks to accommodate and support mixed use development through securing employment and social/community facilities on qualifying residential development sites, size thresholds are defined in plan policy. However, whilst we do respond to comments about this policy, below, it is planned to be deleted from the plan.</p>

Issues and options consultation	
See General Issues above.	
Draft Plan consultation	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> <li>• Devon County Council support mixed use development sites to reduce the need to travel, with delivery in parallel to reduce travel from the outset.</li> <li>• Clyst Honiton Parish Council is concerned that the policy of mixed development could be abused by developers. They believe that the plan should be clear about what type of employment is desired and where it should go. They are also concerned that developer profit could take precedence over what is right. The policy of mixed development is good in principle, but it can be difficult to enforce.</li> <li>• Views were expressed that it is positive to secure facilities alongside housing.</li> <li>• It was suggested thresholds were set too high and concern that schemes will come in, by design, to fall below thresholds. There was also a question raised around the justification for the specific thresholds.</li> <li>• There was a view that the policy approach is not practical for smaller sites at villages – with one respondent advocating provision of green space instead.</li> <li>• Clarity what sought over what ‘exceptional’ reference in policy means? There was also a call for clarity over what “off-site” means.</li> </ul>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>• In principle it is seen as a good thing to secure jobs alongside housing and mixed-use sites can play an important role.</li> <li>• Policy implementation challenges are however recognised.</li> <li>• It is regraded that as it was drafted the thresholds were low and to stack up they would probably have needed to be higher.</li> <li>• On smaller site it is recognised that policy would face particular implementation challenges and may adversely impact on housing deliverability and potentially attractions of some housing developments.</li> <li>• We could have tightened up reference to ‘off-site’.</li> <li>• Whilst there may not be a match between people living in houses and working in any units secured this is not the key point. Of relevance is the proximity issue so opportunities arise and also it would be a way to secure jobs close to where other people live away from the site but (hopefully) close by.</li> <li>• Possible bad neighbour uses could be prevented through planning conditions as well a site layout, though this would typically most relevant on large sites.</li> <li>• The policy lacked evidence around need for jobs in any given location. However, there is an over-riding desire to secure jobs close to housing that is more important than quantified needs.</li> <li>• It would have made the policy less flexible if the type of jobs, or indeed target market for staff, were set out in policy.</li> </ul>

- Poundbury was cited as a positive example where employment is accommodated alongside housing.
- Concern was expressed that there will be no match between people living in the houses and jobs secured.
- Concern was raised about bad neighbour employment uses resulting with heavy traffic on unsuitable roads, noise, risk of industrial accidents, pollution and nuisance.
- Policy was considered flawed as it does not address the issue of jobs needed in any given location and there should be more work on looking at spatial needs and demands for employment space.
- A response highlighted that any jobs created should serve local needs and there was a call for examples of the types of jobs that may result. There were responses that did not opposing policy but highlighting concerns around inappropriate uses therefore seeking clarity on job types to be allowed.
- There was a view that it would not be practical on many sites, could leave to viability concerns and the appropriate approach is to seek to locate homes close to where jobs are located.
- It was highlighted that with home working many houses accommodate employment now already – this was flagged as a reason for not supporting policy.
- There should be further policy (or expansion of this policy) to cover vibrant regeneration of towns and town centres to provide mixed uses in close proximity.
- Para 3.73 “This ratio is the same as 0.4 hectares for 10 jobs and 0.1 hectares for 25 jobs.” Presumably a typo: should be 100 jobs not 10.

- Viability concerns are noted, and especially so in respect to what the policy may mean or require in practice.
- The point about the rise in home working is noted.
- Town centre mixed use development would not be opposed under plan policy.
- Typo concerns noted.
- Whilst the policy may promote more development, with some land ‘loss’ securing jobs close to homes would offer wider social and other environmental benefits, for example less travel (noting National Highways comment).
- As new housing sites are at existing settlements the employment element will also be at settlements, so would not be scatter gun in nature/location. Though the issue of ‘surplus’ land is noted and this is likely to be especially relevant if there are substantial levels of available employment land in specific locations.
- We would wish to avoid rural employment development unless its of a nature that is related to rural activities, and we have policy to provide for this.
- One concern we would have had about the policy is non-delivery if the employment element and this eventually reverting to housing. This could be very challenging to prevent on smaller development sites.
- Viability concerns are noted and there would likely be cost impacts associated with policy implementation, these costs would depend on the final nature of expectations under plan policy, for example would it be a need for provision of serviced land or alternatively the build out of actual units. The former cheaper, but less likely to deliver actual jobs, the latter more expensive but assuming implemented more likely top secure jobs. Viability concerns would impact on ability to secure other

- Concern was expressed that policy will lead to more development and loss of green fields.
- Policy should support and allow for a diversity of jobs (not just IT based).
- National Highways endorse mixed-use development and assume transport evidence will be prepared to show the potential impact of allocations on the local road network and the strategic road network.
- Whilst it is appreciated that the intention of the policy is to secure sustainable patterns of development with more mixed use developments, its current approach is too rigid in its application. There appears to be no rationale for changing the approach in adopted local plan.
- To identify the amount and type of employment land needed, build upon the existing evidence, monitoring the effectiveness of the adopted policy, and provide up to date evidence of employment need. The most recently available Employment Land Review for the year ending 31 March 2021 was published in Spring 2022. It indicates that 103.45 ha of employment land is currently available, based on the ratio of 1ha for each 250 homes embedded in the adopted policy, sufficient employment land is currently available for more than 25,750 homes.
- EDNA should consider surplus employment land before establishing requirements for the new plan period under Policy 4. As currently worded, Policy 5 is reliant on all residential developments to provide a proportion of employment land, with a preference of that provision being on site to form mixed uses. The draft policy represents a 'scattergun approach' to employment provision, especially as

benefits form development, for example higher affordable housing delivery.

it applies to all residential development with a threshold of 25 homes.

- Objective to balance housing growth with employment is supported but policy is arbitrary and may be a disincentive to housing developers, as well as not delivering the type of employment that is actually needed. It would be better to allow rural employment schemes to come forward independently where there is evidence of need.
- This policy implies that sustainable patterns of development are only achievable through the development of mixed use schemes, providing both employment, housing and on-site social/community facilities. This premise does not accord with the NPPF and cannot therefore be considered sound.
- There is no up-to-date evidence to support the requirement for 0.4ha per 100 dwellings so the policy is not justified and therefore unsound.
- There was concern that employment provision will not be delivered and would become extra housing development.
- Agents for Bloor Homes raise concerns about the policy that they summarise as - Overall, it is considered that the Council needs to apply a more discerning and considered approach to allocating housing and employment land. As drafted, the policy is unclear and unjustified, with requirements that could prevent deliverable housing sites coming forward. This is of particular concern when there is a national housing crisis, and the Council needs to ensure sufficient homes can be delivered to meet the LHN requirement.
- A site promoter criticises the use of thresholds on residential led sites that will either prevent site delivery or reduce affordable housing provision due to the cost of providing

<p>employment where there is weak demand. If there are specific sites that perform well in terms of both residential and employment use criteria, then they should be specifically allocated as mixed-use sites.</p> <ul style="list-style-type: none"> <li>• For clients Greenslade Taylor Hunt consider that it is not appropriate that employment land should be provided at a set ratio in relation to housing development, or that residential developments should provide financial contributions to the delivery of employment premises elsewhere. Linking residential development with employment provision in this way will discourage residential development as it undermines scheme viability. They favour employment site allocations.</li> <li>• Barratt David Wilson Homes wants the policy to be more flexible and have better regard for existing and underutilised employment land. No rationale for changing the approach in the adopted policy (latter is more consistent with Government policy)</li> <li>• Without EDNA alternative sites can't be assessed</li> <li>• Without EDNA it isn't known whether sufficient sites are available to meet need, further sites should be allocated.</li> <li>• The mechanism for determining the number of off-site contributions needs to be detailed. The impact on viability of developments also needs to be considered here, and priorities for contributions where they can render developments unviable also needs consideration.</li> </ul>	
Supplementary Regulation 18 consultation Spring 2024	
Key issues raised in consultation:	Officer commentary in response:

<ul style="list-style-type: none"> <li>No issues identified.</li> </ul>	<ul style="list-style-type: none"> <li>No comments.</li> </ul>
<p><b>Sustainability Appraisal</b></p>	
<p>Outcomes of suitability appraisal:</p> <p><b>Reasonable alternatives:</b></p> <ul style="list-style-type: none"> <li>Option A. Include policy requiring mixed use development at certain thresholds.</li> <li>Option B. Do not include policy requiring mixed use development at certain thresholds</li> </ul> <p><b>Preferred alternative:</b> Option A. Include policy requiring mixed use development at certain thresholds.</p> <p><b>Reasons for alternatives being preferred or rejected:</b></p> <ul style="list-style-type: none"> <li>Option A is preferred as it provides greater certainty that employment land and community facilities will be delivered alongside new housing, with resultant benefits on minimised carbon emissions associated with travel, and access to jobs and facilities and services.</li> <li>Option B is rejected as it would cause negative uncertainty as to whether employment land and community facilities alongside housing, leading to increased carbon emissions from travel, and poorer access to jobs and facilities for new residents.</li> </ul>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>Insert item</li> <li>Insert item</li> </ul>
<p><b>Habitat Regulations Assessment</b></p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> <li>No specific concerns highlighted.</li> </ul>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>No comments.</li> </ul>

Commentary on policy redrafting for the Publication Plan	
Redrafted Reg-19 policy:	
<ul style="list-style-type: none"> <li>• Strategic policy SP 05 – Mixed use developments incorporating housing, employment, and community facilities</li> </ul>	
<p>It is recommended that this policy is deleted from the plan. Whilst the aspirations of policy are good, delivering homes and jobs close one another is typically going to be desirable, it is a matter of concern that schemes might not be delivered in practice and policy may slow down housing delivery. It is also of concern that policy may have viability implications that could impact adversely on other benefits of development, such as affordable housing delivery. It should be noted that whilst recommending this policy is dropped it is proposed that a number of selected housing allocations sites will include a requirement for employment provision as part of the development. These are typically larger sites and those in locations which are poorly or less well served with employment land.</p>	

Strategic Policy 6 – Development inside Settlement Boundaries	
This policy supports development inside settlement boundaries in principle, subject to other local plan policies and neighbourhood plan policies.	
Issues and options consultation	
See General Issues above.	
Draft Plan consultation	
Key issues raised in consultation:	Officer commentary in response:

**There were some representations in favour of the policy, with comments including:**

- Sympathetic growth on outskirts is acceptable.
- Sensible pragmatic approach, but development should not happen on amenity land unless compensated for nearby a proper investment made in infrastructure.
- Settlement boundaries should be updated to ensure they are logical and robust.
- Support in principle.
- Sound approach.
- Good policy but would support some development outside boundaries too for younger or older local people to avoid long commutes.
- Good policy in theory but need to control developments not in interests of local people.
- Should use acceptable boundaries to prevent sprawl and coalescence.

**There were also criticisms of the policy including the following comments:**

- Not happy that peoples back gardens that were outside the BUAB are now within the new Settlement Boundaries and will have a presumption that development will be allowed, and I think this will cause gardens to be 'filled' in creating congestion in villages where previously there was greenery.
- The proposed Settlement Boundary change around Bystock Village does not result in any increase in housing Supply (HELAA Methodology) in the Emerging Local Plan.

- The settlement boundaries have been drawn in accordance with a methodology to ensure a robust approach and to allow some growth where possible and appropriate.
- A criteria based policy was considered but rejected as it was considered that settlement boundaries provided more certainty for local residents and developers/landowners.
- An approach that did not facilitate some development would be incompatible with national planning guidance and the local plan strategy.
- Community needs and aspirations can be met through neighbourhood planning and there is unlikely to be a conflict between the settlement boundary and allocations being made in neighbourhood plans for a scale of development that is compatible with the local plan strategy.
- Responses to site specific comments are included in the settlement boundaries evidence paper.

Given that there is no increase in supply there should be a compelling policy reason to move the existing boundary. No such imperative exists; indeed the proposal creates a direct policy conflict between the Local Plan and Neighbourhood Plan. There is no point in creating policy conflict without planning gain and thus the proposal should be dropped.

- The proposed Settlement Boundary change around Bystock Village creates an explicit Policy conflict between the Emerging Local Plan and the made Exmouth Neighbourhood Plan (ENP Strategy EN1). The inclusion of Bystock Village within the Settlement Boundary would result in the Emerging Local Plan allowing development in an area where the ENP specifically opposes development. This is contrary to the EDDC methodology on defining Settlement Boundaries published in April 2022. Refusing development in Bystock Village is a position recently supported by both EDDC and the Planning Inspectorate.
- No adjustments should be made to allow development.
- No more building – protect private land and green fields.
- Excess development will impact on services and infrastructure.
- No boundaries should be changed to allow development – just allows building on land that would otherwise be protected.
- Green spaces like Littleham Valley should be protected.
- ‘Second best’ sites in Whimble should not be included in settlement boundary.

- Should not simplify process for developers at expense of consulting and considering local communities on planning applications.
- Separation between Whimble and Cranbrook needs to be maintained.
- Settlement boundaries should be updated to ensure they are logical and robust.
- Removes green space and bio-diversity from within settlement boundaries.
- Not in favour of extending boundaries of already large towns.
- Not acceptable.
- Boundary makes no sense – services have been measured inaccurately.
- Enables a developer free for all.
- Need to define ‘modest adjustments’ to prevent village distinctiveness.
- Wrong to include a policy that is diametrically opposed to all the others.
- Several respondents commented that there is insufficient infrastructure for new development.
- No alternative to this policy, but it fails due to officers and committee being inconsistent.
- Disregards neighbourhood plan that was voted for.
- Unhappy with whole idea and will spoil East Devon.
- Meaningless bureaucracy that is confusing and can be changed at any time.
- Policy inconsistent with NPPF and unsound.

- Concern about loss of beauty and communities.
- Settlement boundaries out-of-date and decisions should be made on criteria relating to access to jobs, design and other matters, similar to South Somerset policy.
- Settlement boundaries not flexible enough to adapt to community needs and aspirations over lifetime of plan.
- Settlement boundaries can erode character of settlement.
- Policy is unclear or unnecessary – difficult to comment without clarity on potential impact.
- Some concern that wording of policy would allow too much variation.
- Many respondents felt that neighbourhood plans should not be disregarded.
- Deviations to the plan should be debated to avoid fraud.
- Several respondents were confused about the boundary and the relationship with neighbourhood plans and felt that boundaries should not be drawn by EDDC.
- Some respondents found it difficult to comment because they did not want to see outward expansion of settlements or building on green spaces within settlements.
- Support for high density development.
- Several respondents wished to encourage brownfield redevelopment.
- Building outside settlement boundary should be last choice and for local residents only.
- Policy is wrong because encourages urbanisation of small villages with limited infrastructure. Recent development in

<p>Clyst St. George has increased light pollution because occupants of modern estates expect street lighting.</p> <ul style="list-style-type: none"><li>• Existing boundaries should be retained and accept that substantial development will happen beyond them that will result in them being redrawn.</li><li>• Need a green belt to stop building creep.</li><li>• Doesn't make sense to define boundaries and then say they can't be relied on.</li><li>• National Highways support the principle of development within settlement boundaries to minimise the need to travel, minimise journey lengths, encourage sustainable travel, and promote accessibility for all.</li><li>• Developer is concerned that policy restricts Neighbourhood Plans from allocating sites outside the settlement boundary.</li></ul> <p><b>Broadclyst</b></p> <ul style="list-style-type: none"><li>• Increasing boundary by 50% will change character of village.</li></ul> <p><b>Chardstock</b></p> <ul style="list-style-type: none"><li>• No settlement boundary in Chardstock Neighbourhood Plan due to lack of suitable infrastructure for additional development – Inspector's decision should be considered.</li></ul> <p><b>Clyst Honiton Parish Council</b></p> <ul style="list-style-type: none"><li>• Clyst Honiton Parish Council agrees with the principle of the policy, but is concerned that it is being used to convert commercial land to housing, which is not in line with the Neighbourhood Plan.</li></ul> <p><b>East Budleigh</b></p>	
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- East Budleigh with Bicton Parish Council request a higher definition map and the policy wording ‘having regard’ replaced with ‘subject to’. The Parish Council request amendments to the settlement boundary and very helpfully show these on a map.
- Changing boundary to include some outlying properties makes sense.
- Settlement boundary should not include Temple Hill House because it is a listed building separated from the main core of the village by an open space. There is no footway along Yettington Road, significant height differences and highway safety issues.
- Whole of property within current boundary but proposed cuts garage in two.
- Support for extending settlement boundary to the northwest and south as clear continuation of built form and highly accessible, but request that extension also includes residential curtilage of ‘Ashfield’ to the northeast.

**Exmouth**

- Exmouth Town Council agree.
- Current boundary should be kept as to build outside would be detrimental to AONB, local community and tourism.
- Proposed boundaries are not sound or legally compliant because they do not follow national guidance and contradict the neighbourhood plan.
- Changes to the boundary around Bystock Village conflict with the methodology- B2 and B3, as they include areas specifically protected by a made NP and areas where the

buildings are not well related to the built form of the settlement- and do not add to the land supply

**Feniton**

- Development at Burlands would be beneficial.

**Hawkchurch**

- Boundary change would allow inappropriate development and a large industrial site.
- Allocation includes village shop which is run by volunteers. This would be lost.

**Lympstone**

- Boundary too large.

**Newton Poppleford**

- Newton Poppleford and Harpford Parish Council do not support proposed changes to the settlement boundary for Newton Poppleford because they do not feel that it has been consulted on and has not been democratically approved. The Parish Council consider the additional areas included to be generally unsuitable for development because they are in the floodplain, AONB or good agricultural land.
- Concern that including areas to east of Back Lane would encourage inappropriate development in the AONB.
- Concern about the expanded settlement boundary and impact on flooding, ecology, agricultural land and views.

**West Hill**

<ul style="list-style-type: none"> <li>• West Hill Parish Council objects as changes do not comply with the methodology, the boundary is significantly different to the Villages Plan with no rationale for these changes – specific examples are given in their consultation response.</li> <li>• Some developers suggest the southern part of West Hill, south of the proposed settlement boundary, has a built-up character comparable to areas inside so the area up to Oak Road should be included in the settlement boundary – see SPC 08.02.22 resolution to draw boundaries more loosely.</li> <li>• The hilly nature and lack of pavement and street lighting in West Hill mean that the settlement boundary should be reduced and revert back to the Villages Plan BUAB.</li> <li>• Concern about lack of community consultation and that boundary extended to unsustainable areas</li> </ul> <p><b>Honiton</b></p> <ul style="list-style-type: none"> <li>• Concern about development towards Gittisham and impact on Honiton high street.</li> <li>• Gittisham Parish Council objects to the extension of the Honiton BUAB to include this proposed allocation. The council believes that it is inappropriate and irresponsible to show a settlement boundary at this time, when it is acknowledged that only a small proportion of the area may be required (if at all).</li> </ul>	
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<ul style="list-style-type: none"> <li>• This policy was not included in the consultation</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>

<b>Sustainability Appraisal</b>	
<p>Outcome of sustainability appraisal:  <b>Reasonable alternatives:</b></p> <ul style="list-style-type: none"> <li>• Option A. Include policy for development inside settlement boundaries.</li> <li>• Option B. Do not identify settlement boundaries.</li> </ul> <p><b>Preferred alternative:</b> Option A. Include policy for development inside settlement boundaries.</p> <p><b>Reasons for alternatives being preferred or rejected:</b></p> <ul style="list-style-type: none"> <li>• Option A is preferred as it directs development within settlement boundaries, leading to positive effects on biodiversity, landscape, carbon emissions, land resources, access to services. It will also benefit town centres, the economy and connectivity.</li> <li>• Option B is rejected as it will likely lead to more development in countryside locations, where there will be negative impacts upon biodiversity, the landscape, and land resources, with poorer access to jobs, facilities and services, resulting in increased carbon emissions.</li> </ul>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>• Appraisal comments are noted.</li> </ul>
<b>Habitat Regulations Assessment</b>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> <li>• No specific concerns noted.</li> </ul>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>• No comments.</li> </ul>
<b>Commentary on policy redrafting for the Publication Plan</b>	
<p>Redrafted Reg-19 policy:</p> <ul style="list-style-type: none"> <li>• Strategic policy SP 06 – Development inside Settlement Boundaries</li> </ul>	

Within the settlement boundaries defined on the Policies map development will be supported in principle. This does not mean that all development will be acceptable within settlement boundaries: proposals will be considered on their own merits having regard to other policies in this plan and any made neighbourhood plan.

This is a strategic policy and significant changes to the boundaries defined through neighbourhood planning would be incompatible with it. However, neighbourhood plans that propose modest adjustments to the settlement boundaries to increase the opportunities for additional development are likely to be compatible with this policy.

Minor re-drafting to final sentence to replace “may be” with “are likely to be” to provide greater certainty for the neighbourhood plan process.

### Strategic Policy 7 – Development beyond Settlement Boundaries

This policy restricts development outside of the defined boundaries except in certain circumstances.

#### Issues and options consultation

See General Issues above.

#### Draft Plan consultation

Key issues raised in consultation:

A number of respondents thought the policy made sense and generally agreed with it, with comments including:

- Newton Poppleford and Harpford Parish Council agrees with the outcome of the HELAA process as it relates to this parish and is encouraged by references to the importance of Neighbourhood Plans.
- The East Devon AONB Team support the limitation on development and the reference to not harming the distinctive landscape, amenity and environmental qualities.

Officer commentary in response:

- Points of support for the policy wording are noted.
- A criteria based policy was considered but rejected as it was considered that settlement boundaries provided more certainty for local residents and developers/landowners.

- Devon Wildlife Trust that this policy should be strengthened by the inclusion of an additional sentence stating 'Development beyond Settlement Boundaries must deliver a minimum 25% biodiversity net gain.
- Clyst Honiton Parish Council agreed with the policy, but believes that it should be revised to require reference to Exception Sites, in order to avoid potential conflicts between policies.
- Totally agree with policy wording.
- Development should be kept within settlement boundaries.
- Support as long as boundaries not redrawn without public consultation.
- Policy good if developers not allowed to override it.
- Policy is good but must be enforced – too much unauthorised development in East Devon countryside.
- Exmouth Town Council agree with policy.

**There were some more negative comments including:**

- Some development adjoining settlement boundaries may be appropriate.
- Policy too vague – development should not be allowed unless explicitly mandated by local people.
- Unsound and inconsistent with national policy.
- Policy unjustified when considered against reasonable alternatives.
- Criteria based policy should be used not settlement boundaries.
- Too subjective.

- A site promoter suggests a more flexible approach in the west of the District particularly around the defined settlement boundaries.
- Greenslade Taylor Hunt, for clients, states - settlement boundaries are an outdated and unhelpful mechanism by which to judge the sustainability credentials of a development proposal. The emphasis should not be on whether a proposed development is positioned on the correct side of an arbitrary line, as this approach simply prevents any genuine consideration of whether it does (or does not) represent a sustainable form of development.

**Other comments included:**

- Policy should encourage green development, solar panels, rainwater harvesting, eco-friendly sewage treatment plants if not possible to connect to main drains.
- Policy should allow small-scale development outside settlement boundaries to provide opportunities for housing delivery on smaller sites.
- Development beyond settlement boundaries needs to be restricted or not allowed and should be in accordance with neighbourhood plan.
- Development outside of the allocated area would impede traffic flow on single track lanes and compromise the compact nature of the settlement.
- Development beyond settlement boundaries will harm distinctive landscape and environment.
- Keep tight policy wording to stop urban sprawl.
- Policy states that Council will ignore settlement boundaries when they wish.

- Contradiction in policy as development inevitably harms the landscape.
- Sites outside existing settlement boundaries should not be allocated, especially if contrary to neighbourhood plan.
- Whimple Parish Council repeat comments made on Policy 6.
- Landscape, amenity and environmental quality must have highest protection.
- Growth should be allowed outside boundaries as only alternative is to increase density and housing growth must be expected for next 80 years – not reasonable for this to be accommodated in 20 century boundaries.
- Give priority to imaginative developments at higher density to avoid urban sprawl.
- Moderate development necessary on edge of villages as existing boundaries need no space for further housing.
- Development outside boundary should be very exceptional and have local support.
- Greenfield development outside of settlement boundaries should only be considered once all sites within it have been fully utilised.
- Do not agree if way of justifying a new town.
- Don't want uncontrolled rural development but should allow opportunities to grow naturally.
- Not true – distinctive landscape character of Farringdon would be harmed.
- Query whether includes floodplain.
- Suggest rewording so development only allowed if 'explicitly' in local or neighbourhood plan.
- Policy incompatible with plans.

- A couple of respondents thought that Farringdon plan had disregarded.
- Communities have their own identities and any change should be determined by them.
- Neighbourhood Plans have been ignored in some places.
- The Sid Vale Association support no development beyond the settlement boundary but consider 'will not generally be supported' to be too vague and that absolutely no development should be allowed because it would be detrimental to the AONB.
- A few representors considered that the policy should be more flexible to allow small scale sites on previously developed land or where they are sustainable but too small to consider for allocation. Alternatively, settlement boundaries should be defined more loosely to allow smaller sites to come forward.
- Not all sites outside of settlement boundaries should be treated the same because a site near a village close to Exeter could be more sustainable than one inside a settlement boundary in a more remote village.
- Building on farmland is unacceptable for many reasons.
- Randon sprawl outside of settlements should not be encouraged.
- Too much development would harm rural nature of village.
- Why is the plan ignoring this policy by proposing development?
- Public transport has not been taken into account and schools and health provision cannot cope with existing unfinished new town.
- Some existing rural buildings should be used to support young agricultural people

- Don't want to lose green spaces.
- Why aren't all areas equal? Should consider everything except where an AONB will be affected.
- Boundaries should be drawn in consultation with parish councils and local knowledge respected if proposals to break them.
- You don't listen to the people – no to the destruction of Devon.
- Second choice sites outside boundary should not be supported?
- Boundaries important as long as sufficient supply within them.
- Policy should extend to small market towns.
- Brownfield first.
- Developers will find ways around this policy.
- Villages should be kept as villages.
- Stick to agreed neighbourhood plans
- Policy contradicts new settlement proposals.
- Any development should take account of availability of services.
- Villages have always provided local services.
- Proposed developments at Exmouth all outside the Built-up Area Boundary.
- Proposed sites in Broadclyst are beyond settlement boundaries.
- Support the strategy, which would preclude significant development in the Sid Valley.
- Uptontery should not be classed as 'countryside'.

<ul style="list-style-type: none"> <li>• Appropriate and sensitive development must not be stifled by overly restrictive policies that do not allow for windfall development.</li> </ul>	
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<ul style="list-style-type: none"> <li>• This policy was not considered in this consultation.</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
<p>Sustainability Appraisal</p>	
<p>Outcome of sustainability appraisal:  <b>Reasonable alternatives:</b></p> <ul style="list-style-type: none"> <li>• Option A. Include Strategic Policy – Development beyond Settlement Boundaries.</li> <li>• Option B. Do not include policy for development beyond settlement boundaries.</li> </ul> <p><b>Preferred alternative:</b> Option A. Include Strategic Policy – Development beyond Settlement Boundaries.</p> <p><b>Reasons for alternatives being preferred or rejected:</b></p> <ul style="list-style-type: none"> <li>• Option A is preferred as it limits development outside settlement boundaries, with positive effects on access to services and environmental objectives, particularly as the policy makes clear development will only be permitted where it does not harm environmental qualities. Limiting</li> <li>• Option B is rejected as due to likely negative albeit uncertain environmental effects from development beyond settlement boundaries, in countryside locations.</li> </ul>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>• Appraisal outcomes are noted.</li> </ul>
<p>Habitat Regulations Assessment</p>	

<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> <li>• No specific concerns noted.</li> </ul>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>• No comments.</li> </ul>
<p>Commentary on policy redrafting for the Publication Plan</p>	
<p>Redrafted Reg-19 policy:</p> <ul style="list-style-type: none"> <li>• Strategic policy SP 07 – Development beyond Settlement Boundaries</li> </ul> <p>In locations outside of the defined settlement boundaries development will not be permitted unless it is in accordance with a specific Local or Neighbourhood Plan policy that explicitly permits such development.</p>	
<p>Minor change to remove final section which previously read “and where it would not harm the distinctive landscape, amenity and environmental qualities of the area within which it is located”. This wording has been removed because it is superfluous and could conflict with other plan policies.</p>	

<p>Policy omissions from Chapter 3</p>	
<p>Insert summary commentary here about what the policy seeks to do and why. What’s its logic for inclusion in the plan.</p>	
<p>Issues and options consultation</p>	
<p>See General issues above.</p>	
<p>Draft Plan consultation</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> <li>• There should be further policy to cover vibrant regeneration of towns and town centres to provide mixed uses in close proximity.</li> <li>• The obvious predicament of town centres needs to be addressed head-on. Each town centre should have an individually tailored set of proposals (or Masterplan ) to take them through the Plan period. This should have happened years ago, as is pretty much standard practice</li> </ul>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>• Chapter 9 addresses issues relating to supporting the economy and town centres.</li> <li>• Evidence contained in the Infrastructure Delivery Plan will inform infrastructure requirements as a result of development proposed in the Local Plan.</li> <li>• Natural environment issues are addressed in chapters 12 and 13. The Draft Local Plan contains one strategic policy on the natural</li> </ul>

in other authorities. These individual town plans should comprise a mix of specific proposals and general policies pertaining to that town and should be core sections within an East Devon Local Plan, as they are everywhere else.

- There should be a policy requiring the cumulative impact of proposed developments on key local infrastructure to be considered (Woodbury Parish Council).
- Devon Wildlife Trust advise that the Local Plan should include a strategic policy on environment. Environment is one of the three main themes of the Local Plan and the omission of a strategic policy on this theme is at odds with the thrust of the stated aims of EDDC. They also advise that it is essential that the County Ecologist, or person with similar knowledge and skills, comment on the entirety of this document to ensure that the importance of nature is woven into every section. This is required to ensure that the vision for a 'Greener East Devon' becomes a reality. A 'nature everywhere' approach should be reflected within every policy.
- Devon Wildlife Trust consider that Strategic Policies 3, 4 and 5 are missing reference to the environment. The benefits that nature brings to health and wellbeing are well recognised and specific targets should be included within these policies to ensure that these benefits are realised within every development.
- Agents for Bourne Leisure consider that given the importance of Devon Cliffs Holiday Park to the East Devon visitor economy, and its size relative to a number of settlements in the district, there is a real opportunity with

environment, so consider whether other policies should be considered as "strategic".

- Whilst the importance of Devon Cliffs holiday park to the economy is noted, it is located in a National Landscape which is a constraint to its future growth.

<p>the emerging plan for the East Devon District Council to proactively ensure the future of the holiday park is protected so that visitors keep on returning to East Devon while providing Haven with a positive and clear framework for investment. Such a framework would sensibly include Devon Cliffs being given its own designated boundary and specific policy within the Plan and its proposals map.</p> <ul style="list-style-type: none"> <li>• The Circular Economy, also included in the Vision Group for Sidmouth submission of March 2021, is being adopted with enthusiasm by other authorities, but the emerging East Devon Local Plan fails to provide any mention this key idea, which would help to advance the net-zero-carbon economy promoted in the plan.</li> </ul>	
<p>Supplementary Regulation 18 consultation Spring 2024</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> <li>• No comments</li> </ul>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>• No comments</li> </ul>
<p>Sustainability Appraisal</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> <li>• No comments</li> </ul>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>• No comments</li> </ul>
<p>Habitat Regulations Assessment</p>	
<p>Key issues raised in consultation:</p> <ul style="list-style-type: none"> <li>• No comments</li> </ul>	<p>Officer commentary in response:</p> <ul style="list-style-type: none"> <li>• No comments</li> </ul>
<p>Commentary on policy redrafting for the Publication Plan</p>	
<ul style="list-style-type: none"> <li>• Consider including a generic policy on infrastructure provision.</li> </ul>	

- Consider whether other natural environment policies should be considered as “strategic”.

## 10 Conclusion

- 10.1 This paper provides an assessment of policy matters that have informed redrafting the spatial strategy chapter of the local plan.