

Feedback report on consultation on the draft East Devon Local Plan (Regulation 18) that was consulted on from 7 November 2022 to 15 January 2023



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Chapters 7 to 10

Pages 325-411

July 2023

Chapter 7 - Tackling the climate emergency and responding to climate change

General matters raised in respect of this chapter included

- The Environment Agency consider that the plan contains many good statements, objectives and policy interventions regarding climate change and the natural environment. However, it could be bolder and more ambitious and requires a completed evidence base in several areas to ensure it helps to deliver sustainable and resilient development. This includes: preventing deterioration and restoring the water environment; ensure new development and existing communities are adapted to and resilient to the challenges of climate change and achieving biodiversity net gain informed by the local nature recovery strategy.
- Devon County Council welcome the focus on climate change but would like more reference to and alignment with the Devon Carbon Plan.
- This section is particularly welcome. Policy 34 regarding Embodied Carbon is welcome as it will hopefully lead to the reduction in the number of properties being demolished simply to build a grander replacement.
- Exeter City Council support the emphasis in the plan on tackling the climate emergency and responding to climate change. They advise development of brownfield sites first should be a key element of the spatial strategy to help tackle the climate emergency, this approach is the Exeter plan.
- Exeter City Council welcome an emphasis on new and innovative forms of planning and delivery to ensure new developments, in particular any new settlements, are carbon neutral.
- Sidmouth Cycling Campaign state Figure 8, in this chapter, presents “The Energy Hierarchy” which forms the basis for interventions that developers will need to prioritise to ensure the net-zero target is met. The first and most important item on the hierarchy is “Development location: Minimise need to travel and provide access to sustainable transport”. We agree with this approach; however, there is no further reference to development location or transport in the remainder of this chapter, or how the developer will demonstrate their interventions towards net-zero.
- Exeter Cycling Campaign wish to see a section on how transportation (both public and private) will be decarbonised. Granted, transport is a Devon County competence, but the way development is designed greatly shapes the transportation choices people make.
- It is no longer acceptable to merely accept that ‘people will drive’. We need to be moving away from the ‘predict and provide’ model to a ‘decide and provide’ model for transport

(and housing) design. With transport the most carbon-polluting sector the Local Plan would benefit from bolder measures that will nudge and enable different travel habits.

- We suggest that this chapter should include paragraphs after Figure 8 detailing how the items on “The Energy Hierarchy” will be addressed. For instance, Strategic Policy 1 directs development to sustainable locations and Chapter 11 prioritises sustainable travel.
- The Exeter Transport Strategy 2020-2030 is cited in the evidence base. The Local Plan would be improved by having greater alignment with this strategy. For instance, the Local Plan needs more detail in how to deliver one of the Transport Strategy’s key proposal: Park and Ride/Change: “Park & Ride sites on all key corridors will provide a realistic sustainable travel option for those trips from rural areas into the city that can’t feasibly be served by traditional public transport services”. All P&R planning should seek to ensure that P&R sites don’t actually induce additional driving. Under Policy 66 the Local Plan states that some sites/routes will be protected but these appear to be Exeter’s P&R sites, will ED identify additional ones.
- In preparing development plans, local planning authorities (LPA) have a duty to safeguard the operation of National Grid’s infrastructure to enable NGED to supply electricity in the most efficient and cost-effective manner. In the majority of cases this will involve retention of the existing infrastructure in situ, including overhead power lines and pylons.
- Where diversion and/or undergrounding of overhead lines is deemed necessary to enable the development of a proposed allocation, lower voltage lines (up to 33kV) supported by wooden poles can normally be undergrounded or diverted without significant concern. However, where land allocations affect lines supported by steel lattice towers, particularly 132kV, the LPA are advised to engage with NGED at the earliest opportunity in the plan-making process to confirm:
 - a) whether the lines can be accommodated within the development site; or
 - b) the viability and feasibility of diverting and/or undergrounding overhead lines.
 - This includes, where relevant, ensuring the agreement of third-party landowners to the provision of new infrastructure on their land and subsequent agreement between the LPA and NGED to appropriate wording within the allocation policy. In allocating land affected by high voltage power lines, the LPA should take into account the additional costs involved in their diversion and/or undergrounding and the potential impact on timescales for delivery of the development. NGED does not object to the allocation of land upon which its infrastructure is present, subject to the following steps being taken by the LPA in preparing the Local Plan:
 - 1. Priority should be given to retention of overhead lines wherever possible, with design principles included within the allocation policy to safeguard the retained lines

and incorporate sensitively into the development, whilst achieving high standards of design and an efficient use of land.

- 2. Early engagement with NGED to establish whether its infrastructure can be accommodated within the development or whether diversion/undergrounding is feasible;
 - 3. Where diversion/undergrounding is required, ongoing dialogue with NGED to agree a potential route prior to adoption of the Local Plan, as outlined above.
 - 4. For strategic allocations and sites significantly affected by overhead lines (e.g. with 5 or more pylons on site), NGED recommends early masterplanning and the preparation of Supplementary Planning Documents to demonstrate site capacity and establish principles for the retention/diversion or undergrounding of overhead lines, with the agreement of NGED.
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- Devon Wildlife Trust consider that policies 29, 30, 31, 32, 37 and 38 should be reworded to include reference to the requirement for enhancement of our natural environment.
 - Should consider impact of helicopters on coastal erosion – make houses vibrate.
 - Plan needs to set out current thinking about where coastal defences will and will not be placed.
 - Not enough emphasis on flood mitigation – current drainage and sewage systems are unable to cope
 - How will extreme events be causing surface flooding be dealt with?
 - Otter Valley Association commend the use of an energy hierarchy and the policies on renewable energy and zero carbon. The aim to be carbon neutral by 2040 is ambitious. Whilst solar farms are the most energy efficient, use of all new roofs for solar power should be a requirement. Also retrofitting large industrial and employment buildings would help to protect the best agricultural land needed for food production.
 - National Farmers union has a target for the agricultural vision for the farming industry to be Net Zero by 2040, which aligns with the target for East Devon. The farming industry has a key role to play in delivering this aspiration.
 - Lyme Regis Town Council support the commitments to carbon neutrality, and renewables but think more should be done about the impact of transport in general and visitor transport in particular. The Town Council suggest that developer contributions could be made towards mitigation measures.
 - Hawkchurch PC -
- As drafted the policies on renewable energy do not correctly reflect the balance given in the National Planning Policy Framework (NPPF) or in the supplementary planning guidance on renewable and low carbon energy. They do not give sufficient weight to the adverse impacts, give no weight to cumulative impacts (which is contrary to the guidance) and do not reflect the need to take into account the views of local communities likely to be affected by them. In addition, they do not reflect the need to identify opportunities for co-location of

supplies and consumers. We are seriously concerned that the wording of the energy storage policy does not take into account the national guidance.

- We have noted that other local authorities have used the criteria that renewable developments 'do not have an overshadowing or overbearing effect on nearby habitations' and in the case of solar development that the 'noise, glint and glare is mitigated adequately'. We would welcome inclusion of such terminology in policies 29 -32 as this would help protect the beauty of East Devon and prevent adverse impacts on both communities and wildlife.

- Hawkchurch is particularly experienced in relation to energy installations with numerous solar farms. We now face multiple applications for large scale industrial storage facilities, which are likely to be Lithium-ion battery storage. This is primarily due to the location of the National Grid Substation which is due to expand its connections. When surveyed 85% of households said they regard Lithium-ion battery storage as unsafe. Furthermore 85% of households also felt that such installations were industrial in nature and should only be permitted with strong controls on safety and impact – including the cumulative impact over time and coupled with solar farm development.

- We recognise the need for energy storage but believe EDDC should be considering the district good from locally generated or stored electricity versus supporting the national interest (e.g. storing energy which will ultimately be used elsewhere in the country). By encouraging storage, and where possible generation, to be co-located with heavy consumers (be it industry, residential, hospital etc) it would make certain that the benefit is within the district.

- While we recognise that the local plan is primarily concerned with planning controls, the energy and climate change strategy take no account of the need to improve the condition of homes. A significant number of respondents to our survey said that they would have solar panels if they were affordable. Some are trying to get solar panels but there is a shortage of suppliers and there appears to be a lack of interest in small scale deployments. It would be helpful if the strategy could cover these aspects and enable real changes to residents.
- Barratt Homes note that the evidence base for the policy is more than 2 years old and suggest that a policy that goes beyond the Building Regulations is not necessary or justified.

Policy 27 - Climate Emergency

- The Environment Agency advise that this policy focuses on reducing emissions but does not include any provisions requiring adaptation/resilience to those changes. Adapting and becoming resilient to the many impacts of climate change is just as important as reducing carbon emissions and is an area where local planning authorities have more control. Resilience to climate change is about more than just adapting to increased flood

risks. For example, it should include providing space for nature to adapt. Within the East Devon local plan this should include space for the Exe Estuary SPA/RAMSAR, and Axe SAC. The River Otter is also particularly unstable, with threats to the built environment including at Cadhay, Ottery St Mary, Tipton St John, Harpford, Newton Poppleford, with these processes liable to increase as a result of climate change.

- South West Water recommend additional criteria to minimise water consumption.
- Devon County Council (DCC) recommend incorporating the need to reduce emissions by 50% by 2030 from 2010 levels, and to add bullet points relating to 20-minute neighbourhoods and the principle of One Planet Development.
- DCC note one of the best ways to help the climate emergency is to reduce the need to travel – query whether a new community helps with this given no facilities from day one.
- Vital that all development should be of the highest energy efficiency.
- Newton Poppleford and Harpford Parish Council think that all schemes should meet this policy.
- Clyst Honiton Parish Council agrees with the direction, but believes that all development policies must reflect the need to achieve net zero carbon emissions by 2040. Development proposals agreed in the 2020s will not usually come to fruition for 5 years, so there is not much time to make a difference. District Heat Networks must be powered by green energy, not fossil fuels.
- The Local Plan falls short of its aim of delivering “a suite of ambitious and implementable policies which addresses the severity of the [climate] crisis that we are all facing”. We believe the Local Plan would benefit from bolder and more explicit measures to enable low/no carbon transport and nudge citizens away from single-occupancy private vehicles.
- Home Builders Federation generally supports EDDC in seeking to become carbon neutral, delivering net zero development and maximising opportunities for renewable energy.
- Home Builders Federation considers it is not appropriate for EDDC to set its own standards. It adds to the complexity of policy, regulations and standards that housebuilders already must comply with. It undermines economies of scale for product manufacturers/ suppliers/developers if Councils’ policies are not standardised. Policy exceeds Level 4 of the Code for Sustainable Homes and conflicts with March 2015 Written Ministerial Statement and PPG. Difference between national and local requirements has been held to be unsound
- Housing Association planning consortium agrees with policy. But EDDC should be wary of the ways the policy could impact on development viability which may restrict the provision of affordable housing in East Devon
- Agents for Bloor Homes support net zero ambitions but advise that whilst the development industry is moving at pace to net zero, huge advances in supply chains and technologies are required to deliver net zero buildings. It is important that these

challenges are recognised in draft Policy and the targets outlined are not introduced immediately on plan adoption but phased in over a suitable timeframe.

- Recommend the words “where there are no unacceptable impacts” are replaced with a more permissive policy which supports renewable energy unless there is “significant and demonstrable harm” to the stated environmental considerations.
- Proposed new motorway service on the M5 north of Exeter would be consistent with this policy.
- Unclear what “maximising” means and how this can be secured and balanced alongside other policy considerations – more appropriate to use the term “optimise”.
- Greenslade Taylor Hunt, for a client, advise - whilst the principle of moving to a low carbon or carbon neutral society is supported, it should not be at the expense of compromising development viability, or go beyond the already stringent requirements of the Building Regulations. Policy 27 should be amended to clarify that carbon neutral development should be an aspiration and not an absolute requirement.
- Sidmouth Arboretum -
 - Currently, many organisations are planting new trees, woodlands and hedgerows to offset carbon emissions. Providing, transporting and actually planting these whips has a carbon cost and these plantations will not have grown enough to move into positive sequestration for a number of years. Retaining a mature tree will contribute to carbon sequestration immediately and a healthy mature tree will sequester more carbon than many whips.
 - Policy 27 stresses the importance of retaining existing buildings. It would strengthen the policy if it had a fourth action, retaining existing mature trees and hedgerows where possible.
- Council's passive approach to addressing the climate emergency is disappointing. Council should take urgent action, such as requiring insulation for all full-time residences and increasing taxes on second homes and Airbnbs. EDDC should also involve local people in managing energy supplies.

Policy 28 - NetZero Carbon Development

- The Environment Agency welcomes this policy and are pleased to see a requirement for new homes to be future proofed to avoid temperature discomfort as a result of rising temperatures. That is just one way in which new homes (and new development more generally) need to be designed differently to be resilient to climate change and help to achieve net zero carbon emissions. Achieving the ambition for Net Zero will require new development to incorporate things like grey water reuse, onsite energy generation, efficient insulation, green roofs, garden water storage, SuDS which are beneficial for natural conservation and water quality.

- South West Water believe a similar policy should be included to require an assessment of annual projected water use to demonstrate the water reducing measures.
- Devon County Council (DCC) support calculation of whole-life cycle carbon emissions but should go further to expect developers to reduce embodied carbon emissions (we highlight Mid Devon's current work on this) - cross-refer to Strategic Policy 34.
- DCC state there is little reference to retrofitting existing housing stock to ensure it can reduce carbon impact.
- Newton Poppleford and Harpford Parish Council consider that this policy should be implemented as an integral part of new development. New developments should also create their own energy to avoid the need to install more wind and solar farms.
- Clyst Honiton Parish Council believes that the policy is not strong enough. It does not sound like a requirement, but rather a suggestion. The policy needs to be made more specific and enforceable.
- Whilst the Council may need to apply innovative and ambitious measures in order to reach its carbon neutral goal, the policy and supported text as worded is in excess of national standards and places a burden on residential development to achieve this. Given that the carbon neutral target is at the end of the plan period, a cascade approach could help developers with a period of transition to more stringent requirements.
- In terms of energy performance and monitoring, the Council should work with developers on a mutually agreeable approach. The current suggestion of energy performance data on 10% of dwellings would be extremely difficult to implement, especially once dwellings are occupied and no longer under the control of the developer. Therefore, it may be more appropriate for the Council to work with volunteering residents in gathering data.
- The scope of the desired deliverables should not undermine the deliverability of viable development. The wording of draft SP28 presents the identified requirements (carbon statement and Whole Life Cycle Carbon Assessment) as all having to be satisfied/addressed as a prerequisite for major development to be supported. The detail to be expected in these statements should be proportionate to the form of a future planning application.
- Home Builders Federation has concerns that EDDC is setting its own standards above those set nationally. Adds to development cost and complexity, which may lead to issues for house builders. May have viability implications. How will the policy be monitored? Much of the responsibility for emissions is outside the homebuilding industry's control. How will the policy interact with other policies on energy efficiency or resilience to heat, as well as viability and deliverability.
- Home Builders Federation -Policy should not apply to all developments, and should recognise scale of development in relation to the policy's requirements

- Housing Association planning consortium agrees with policy. But EDDC should be wary of the ways the policy could impact on development viability which may restrict the provision of affordable housing in East Devon
- Bloor Homes support policy objectives but raise concerns around issues of detail, they specifically advise that policy should follow the Government definition of net zero
- Barratt David Wilson Homes assert there is a clear disconnect between Policy 28 and Government's forthcoming Building Regulations and policy. Policy 28 needs to be subject to Viability assessment.
- Barratt David Wilson Homes – queries whether policy serve a clear purpose regarding consideration of temperature discomfort as this is controlled by Building Regulations
- Barratt David Wilson Homes question whether it is possible to implement the requirement for the in-use performance of a building to be as close to its design intent as possible. BDW have already queried the implementation of a similar policy at Cranbrook eg how a developer can compel a homeowner to provide the information. How the LPA will process/manage the information. And implications for homeowners if remedial action is needed. BDW consider that the Building Regulations process is sufficient
- Agents for Bourne Leisure challenge advise that to require all development to deliver in advance of 2040 is not consistent with national policy. Amongst other matters they advise that the term 'commercial' referenced in the draft policy is not defined in the plan, but the context in which it is used in the plan suggests that it does not cover tourist accommodation and facilities. This is helpful as it would not be possible to provide carbon statements or Whole Life Cycle Carbon Assessments for caravans. For the avoidance of doubt, it would be helpful for the emerging plan to clarify that such assessments will only be required where it is feasible to do so.
- CG Fry supports principle, but objects to mandatory provisions and seeks to include viability considerations in policy.
- Site promoter query need for policy when better considered through the building regulations. More clarity is required about whole life cycle carbon assessments and concern about lack of viability testing.
- A developer is concerned that the evidence base is already more than two years old and was prepared for GESP rather than East Devon specifically.
- Developer has concerns that the policy goes beyond existing Building Regulations standards and the Future Homes Standard.
- Recommend the words "where there are no unacceptable impacts" are replaced with a more permissive policy which supports renewable energy unless there is "significant and demonstrable harm" to the stated environmental considerations.
- Proposed new motorway service on the M5 north of Exeter would be consistent with this policy.

- Include a transition period for delivering net-zero up to 2040 so developers can adjust to these higher standards.
- Allow more flexibility in the policy to allow the use of new local carbon and renewable energy technologies that emerge over the plan period.
- Does not explain what the delivery of net-zero carbon emissions means or when/how this will be achieved.
- No need to refer to homes being 'future proofed' to avoid temperature discomfort as this is already covered by Part O of the Building Regulations.
- Are the Council setting up a finance scheme towards off-site carbon reduction measures? Otherwise not clear how this would work in practice.
- For a client Greenslade Taylor Hunt advise policy should not be at the expense of compromising development viability, or go beyond the already stringent requirements of the Building Regulations. The requirement for major developments to provide calculations for the whole life-cycle carbon emissions through a nationally recognised whole life cycle carbon assessment is disproportionate and adds an additional unnecessary burden to the planning process.
- Morrish Homes supports the principle of moving to a low carbon or carbon neutral scenario. However, this should not be at the expense of compromising development viability, or going beyond the already stringent requirements of the Building Regulations.
- EDDC should relax planning rules for small wind turbines to boost renewable energy and reduce reliance on fossil fuels.
- Solar panels should be required on all new builds, including industrial and office buildings.
- The goal of net-zero carbon emissions is unrealistic and unattainable through renewable energy programs.
- Preference should be given to installing solar panels on existing and new buildings, rather than building them on farmland.
- The policy places too much emphasis on prioritizing "renewable energy" especially in regard to battery storage.
- The quest for 'net-zero' is undeliverable and bogus if delivered through 'renewable' energy, the technological production and maintenance of which is a major cause of pollution, fossil fuel use and environmental damage.
- 2040 is far too late. We need action now if we are to prevent human extinction at our own hands. It should be brought forward to 2030 and the term "net zero" should be replaced with "zero carbon".
- Climate change deniers are akin to flat earthers or 18th century slave owners and should not be given a platform.
- What scientific evidence do you have that the climate is in crisis and that justifies declaring a "climate emergency"? What are the costs of implementing Strategic Policy

27? What is the probability that East Devon will become carbon neutral by 2040? Will the carbon emissions be displaced to other parts of the world, e.g. China?

- The policy is too broad. It is important to distinguish between activities which genuinely assist with climate change and others which will fall within this policy but are either adverse or not as beneficial as they might be. It should be more measured and balanced, and less hysterical.
- The support given to maximising opportunities for the delivery of energy storage facilities is supported. However, it remains to be seen how this overarching support will be balanced should schemes for employment development for example propose to apportion some land for this use.
- Policy should include much stricter building requirements to meet renewable energy requirements and require all new buildings to incorporate solar panels or high-quality insulation standards.
- Policy should set numerical limits on actual construction emissions.
- The policy should abandon vanity projects like Seaton Jurassic and Blackdown House and shift investment towards improving the footpath networks, maximising public open space for humans and wildlife, and protecting our countryside from inappropriate housing estates.
- The Local Plan Viability Assessment should allow for an uplift in build costs for delivering net zero embodied carbon.

Policy 29 - Promoting renewables and zero carbon energy

- The Environment Agency support this policy and welcome the requirement for proposals to not have unacceptable impacts on water and biodiversity, and that non-renewable forms of energy generation will only be considered once all alternatives have been exhausted.
- National Farmers Union state Renewable energy has a key role on farm, both in making a business energy resilient in its own right and in some situations also providing energy for wider society. One of the barriers that exists that has limited take up in some situations are limitations in the grid network and although not strictly part of the Local Plan, we would encourage East Devon District Council to do what ever it can to encourage investment here to increase the amount of renewable energy that can be delivered.
- Devon County Council (DCC) suggest adding reference to the document 'A Clean Growth Vision for Development in the West of East Devon'.
- DCC suggest referencing the Devon Carbon Plan that eight times more renewable energy capacity is required in Devon.

- Newton Poppleford and Harpford Parish Council state that the word ‘unacceptable’ is not defined and think that schemes should only be approved with the support of the community.
- Lyme Regis Town Council worry that constraints may limit opportunities for renewable and zero carbon energy generation and would welcome the opportunity for dialogue about the delivery of cross-border community level local generation schemes.
- Hawkchurch Parish Council suggest the benefits of co-location of energy generation and consumers can be promoted by adjusting the wording of Strategic Policy 29. This policy should also include reference to cumulative landscape and visual impact. Specific wording included in representation.
- National Highways endorse the mention of ‘highways’ as a requirement for no unacceptable impacts.
- Agents for Bourne Leisure advise that they welcome the approach in the draft plan to promote renewables and zero carbon energy. In line with the approach taken for residential amenity, draft policies 29, 30 and 31 should be amended to provide adequate amenity protection of other sensitive uses, including visitor accommodation, to ensure that any adverse impacts are mitigated. This would ensure the draft policies are consistent with paragraph 158(b) of the NPPF, which does not restrict the protection of impacts to only residential amenity. The need to protect visitor amenity is crucial given the importance of tourism to East Devon’s economy
- Clyst Honiton Parish Council supports the goals of policies 29-31, but believes that they are not written in a way that is likely to encourage compliance. The exceptions listed in the policies are general requirements for all development, so there is no need to specifically state them in the policies.
- Recommend the words “where there are no unacceptable impacts” are replaced with a more permissive policy which supports renewable energy unless there is “significant and demonstrable harm” to the stated environmental considerations.
- EDDC has approved over 100 acres of solar arrays in Hawkchurch, a stunningly beautiful area with immense landscape and biodiversity value. This has led to concerns about the impact on the area's landscape, biodiversity, and health. Residents should have a say in what developments are acceptable in their area.
- The policy encourages community-led schemes but lacks guidance. EDDC should focusing on community-led schemes to achieve net zero. More examples and guidance would be helpful.
- Protect agricultural land for future food security. Assess Grade 1, 2, and 3a land quality before supporting renewable energy schemes.
- East Devon should be safeguarded from fracking.
- The new energy strategy makes it difficult to get planning permission for renewable energy projects. The strategy requires renewable energy projects to show that there are

no other options available and allows for plenty of scope to object to any zero-carbon or renewable intent.

- Renewable energy is not always zero-carbon. East Devon should support genuine low-carbon developments (such as Small Modular Reactors) in other regions and assess the carbon emissions of all renewable energy proposals.
- Renewable energy is a key part of the solution to climate change, but it needs to be paired with energy storage to ensure that it is reliable and affordable.
- Exmouth Town Council supports zero carbon and renewable energy schemes but wants to clarify the policy wording to ensure that unacceptable impacts are clearly defined. Exmouth Town council also wants to reference geodiversity in the policy and make a strong statement about not supporting fossil fuel driven solutions, unless absolutely necessary.
- The term "unacceptable impacts" has not been clearly defined, which is concerning. There is a risk that this could be interpreted as allowing any development, regardless of its impact on the environment.
- I support solar and wind farms over nuclear energy, which is not green and takes years to dismantle.
- We need to adapt our views on landscapes as they are not static and have changed throughout history. Onshore wind and solar are vital, and if we don't act now, the landscape will change drastically due to climate change.

Policy 30 - Suitable areas for solar energy developments

- The Environment Agency advise that many of the areas shown on maps as suitable for solar development are within areas at risk of flooding. They are satisfied that the requirement for 'no unacceptable impact on water' is sufficient to protect functional floodplains. The nature of solar development means that natural flood management and floodplain improvements can be easily implemented alongside development with little to no negative consequences.
- Woodbury Parish Council state that solar and wind farms are important but should not negatively impact on wildlife or hinder areas of natural beauty.
- National Farmers Union state Renewable energy production is a core part of the NFU's net zero plan and solar projects often offer a good diversification option for farmers. However, there is a need to strike a balance between food security and climate ambitions. It is important that large scale solar farm development is located on lower quality agricultural land or brownfield sites, avoiding the most productive and versatile soils. Utilising roofs and farm buildings for solar should also be incentivised as it delivers a sustainable method of energy production while avoiding any land use conflict and is the NFU's preferred approach.

- The Avenues Residents Association goes further by stating - the NFU clearly identifies that this country should be maximising production of food using existing farming capacity, but that in fact we are already short of production capacity, so clearly sacrificing farming land for solar panels makes no sense, and is both immoral and irresponsible
- National Highways endorse the mention of 'highways' as a requirement for no unacceptable impacts.
- National Highways request additional supporting text to include matters such as visual distraction, glint and glare, icing issues, dazzle and access (including construction traffic) in locations alongside the strategic road network.
- Devon County Council (DCC) feel there should be a more positive approach to domestic generation and energy saving in new builds, existing buildings, and car parks, rather than using high quality farmland which also has adverse landscape impacts.
- DCC recommends adding further detail on landscape impact by having regard to the intrinsic character and beauty of the countryside, located in least environmentally sensitive locations, well designed and integrated into the landscape, enhance landscape character and biodiversity. Add reference to Devon Landscape Policy Group Advice Note 2.
- Summerfield Planning Ltd on behalf of landowner state there is no intention to use site Clge_18 for solar development so it should be removed from the Policies map.
- Support identifying permissible sites for solar energy to tackle climate change and to make energy cheaper – must call for land to identify sites.
- Exmouth Community Associations advise - we strongly object to the proposal that areas on the very edge of Exmouth are suitable for solar energy production, especially the Maer Valley which our Neighbourhood Plan earmarks for the creation of a Valley Park.
- Barratt Homes considers that the areas identified should not be prohibited from delivering other types of development.
- Recommend the words "where there are no unacceptable impacts" are replaced with a more permissive policy which supports renewable energy unless there is "significant and demonstrable harm" to the stated environmental considerations.
- The National Trust support policy in principle but is concerned with the extent of the district which has been identified as 'Areas considered suitable for solar energy' as set out on the policies maps. Concern is raised around not taking into account listed buildings or their settings, noting that policy wording changes could be appropriate. Policy changes should reflect to importance of heritage assets and their setting noting adverse impacts that solar farms can have.
- All new builds should come with solar panels, greywater systems while avoiding fossil fuels for heating. This would reduce the impact of new homes on the environment, reduce our reliance on fossil fuels and make homes more efficient to run. I would like to see more homes built to the Passivhaus levels of efficiency.

- Post-build monitoring and enforcement: The council should set up a timetable and methodology for independent monitoring of new developments to ensure that they meet the net-zero carbon goals. The council should also have an explicit program of immediate action if the goals are not met.
- there is no evidence that a proposed 'whole life cycle carbon assessment' will take on board the full impact of the rare minerals and metals required to produce solar panels and wind turbines and the battery energy storage referred to in 27.
- Whole life cycle carbon emissions should also apply to policies in this section relating to solar, wind and storage.
- The Devon Carbon Plan says that local authorities should gather and keep information as a local evidence base, which will help demonstrate that it is financially viable to build net-zero carbon homes.
- The strategy of building net-zero carbon homes is an absolute necessity, as it helps in keeping energy costs down, making present and future resources more cheaply available, and will result in a subsequent reduced dependency on climate damaging fossil fuel extraction and burning.
- New connection to the gas grid must be stopped.
- The principle of moving to a low carbon industry is supported, but it should not be at the expense of compromising development viability or going beyond the already stringent requirements of the Building Regulations.
- Strongvox Ltd believes that the policy of requiring all new residential and commercial development to be net-zero carbon emissions is unsound. They argue that the policy is not realistic or achievable, and that it would add an unnecessary burden to the planning process. They recommend that the policy be stepped in line with government targets and requirements, or that it be deleted altogether.
- Morrish Homes supports the principle of moving to a low-carbon or carbon-neutral scenario, but not if it compromises development viability or goes beyond the Building Regulations. They believe the policy is unsound and should be amended to clarify that carbon-neutral development should be an aspiration, not an absolute requirement.
- Exmouth Town Council supports the policy of maximizing opportunities for renewable energy in new residential development. However, they have concerns about the clarity of the policy and the potential implications for air-conditioning installations. Specifically, they are concerned that the policy does not specify whether it applies to all new residential development or only development sites above a certain size. They are also concerned that the policy does not define what is meant by "maximizing opportunities" for renewable energy, and that it does not clarify whether air-conditioning installations are allowed.
- Islandwide Limited supports the principle of moving to a low-carbon or carbon-neutral scenario, but they believe that the policy is unsound because it could make development unviable and go beyond the requirements of the Building Regulations.

They propose that the policy be amended to clarify that carbon-neutral development should be an aspiration, not an absolute requirement.

- The local plan feels like a developer-led plan, which is a concern because developers are motivated by profit and may not be willing to invest in net-zero housing. EDDC should take control of the plan and require developers to build to Passivhaus standards, which would make homes more energy-efficient and reduce carbon emissions.
- This is political nonsense and has no place on a formal consultation.
- Net-zero carbon, and biodiversity-sustaining credentials should be the baseline consideration for all new development. Buildings need to be put in place that are net-zero carbon, and to take opportunities for energy schemes.
- There is a lack of good examples of net-zero development. The council should provide examples of net-zero development so that developers can see what is possible.
- There should be an explicit statement on environmental standards. The council should make it clear that all new houses must meet minimum environmental standards, such as having solar panels and EV chargers.
- EDDC needs to have the power to ensure that developers comply with the policy's requirements and to be strict monitoring of developers to ensure that they meet net zero carbon emissions.
- Net-zero development should be more affordable, such as providing financial incentives to developers.
- The policy should not include air conditioning. Air conditioning is a major source of carbon emissions, and it should not be included in the policy.
- Policy 30 should be ambitious and should not be afraid to set high standards. EDDC should be willing to take a leadership role in the fight against climate change.
- The idea of zero carbon is unrealistic, as all life on Earth is carbon-based
- More emphasis needs to be added to being British Made.
- EDDC should mandate a high and objectively quantifiable level of certification for both building and performance, as well as enforcing the overall net-zero requirement. The council should not allow developers to sidestep high performance building standards by adding solar panels to offset a house's poor performance.
- East Devon's solar policy is harming the local economy and environment. Solar farms on farmland are unsightly, reduce crop yields, and make it difficult to access land for grazing or other agricultural activities. Solar farms should be built on developed land instead, where they can help to reduce the amount of energy that is imported from other countries and create jobs in the local area.
- To ensure a sustainable future, we must invest in renewable energy sources such as wind and solar power. These sources are clean, abundant, and reliable, and they will help us to reduce our reliance on fossil fuels.
- The allocation of land for solar power has not been properly considered. Land that is adjacent to existing homes, north-facing, forested, or shaded should not be considered

as suitable. Some land must be reserved for food production, environmental benefit, and amenity use. Land adjacent to Ridgeway in Colyton should be excluded as it would increase flooding risks for the town.

- The policy should promote the use of commercial rooftops for solar energy generation, such as the installation of solar panels on warehouse roofs.
- Solar farms can increase biodiversity by planting wildflowers, hedgerows, and trees. Developers should include these measures in planning applications and ensure they are implemented and maintained.
- Exmouth Town Council Members have concerns about the solar policy map, which shows all permissible areas instead of restricted areas. They also feel that the policy should reference domestic uses of solar energy, such as water heating and solar thermal.
- This policy is not included on the policies map.
- The policy map designates a vast area of East Devon as suitable for solar energy, but this is too broad. A more targeted approach is needed, eliminating areas near settlements or in highly visible locations.

Policy 31 - Suitable areas for wind energy developments

- Woodbury Parish Council state that solar and wind farms are important but should not negatively impact on wildlife or hinder areas of natural beauty.
- National Farmers Union believe that the recent policies on wind development and what is currently proposed in the emerging Local Plan is too restrictive and skewed towards the concept of 'large scale wind farms. The Low Carbon Study has made this same mistake and only mapped areas suitable for 500kW and above. Recent reports, such as the Devon Carbon Plan show an acceptance of wind by the public and it is important planning policy catches up with this.
- There is a clear role and ability for farm businesses to install small turbines (20-50kW) and with the wind speeds in many areas could easily contribute 50,000kWh/year. This, when combined with solar could make a farm businesses energy independent, not only helping to secure its financial future, but also taking pressure off the grid and at certain times allowing it to provide energy back to the grid (where grid infrastructure allows). We accept the concern and need for 'large on shore wind farms' to be controlled
- Hawkchurch Parish Council suggest the following rewording 'Landscape, visual or residential amenity (including cumulative landscape and visual impacts);'
- National Highways endorse the mention of 'highways' as a requirement for no unacceptable impacts.

- National Highways request additional supporting text to include matters such as visual distraction, glint and glare, icing issues, dazzle and access (including construction traffic) in locations alongside the strategic road network.
- Devon County Council suggest removing “where landscape sensitivity has been identified as being low/moderate/moderate” as this depends upon the size and number of turbines and refine the suitable areas using a landscape sensitivity assessment approach.
- Support identifying permissible sites for wind energy to tackle climate change and to make energy cheaper – must call for land to identify sites.
- For clients Greenslade Taylor Hunt advise the use of energy storage facilities is encouraged. However, the binary approach to not permit this development where it is in direct conflict with any policy in the plan that allocates land for a different specified use is not sound. There needs to be leniency written into the policy to allow energy storage on sites that have been allocated for other uses
- Buckerell Parish Council are concerned that identifying land suitable for solar development indicates a presumption in favour of such development. The area of search should be replaced by a criteria-based policy especially relating to sensitive landscape areas/important views
- Exmouth Town Council Members support the policy, but they believe that it should also mention the potential for micro and domestic wind turbines, as well as offshore wind energy.
- Policies that allow domestic wind turbines to be built on all domestic dwellings should be encouraged.
- Wind energy and solar power should be concentrated in areas like Exeter Airport, which is a loss-making, polluting site with a large amount of unused land. This would free up green belt land for other uses and create a more sustainable future.
- Wind farms and solar panels are unlikely to be welcome in most parts of our district, especially within AONB
- It is essential to educate communities about how the visual impact of wind and solar infrastructure is a minor cost when compared to the benefits of helping to address climate change.
- Onshore wind energy will have to play a part in electricity generation, even though it has some drawbacks. The climate emergency requires emergency measures, which may have impacts on landscape and visual amenity. People's concerns about their visual impact should be secondary to the urgency of the situation.
- The policy could be more supportive of onshore wind energy development. We should expand the definition of "suitable areas" and make it easier to develop wind farms, except in cases where there are strong environmental or other concerns.
- The environmental cost of wind turbines is significant. Each turbine requires 900 tons of steel, 2,500 tons of concrete, and 45 tons of non-recyclable plastic to build. They have a

lifetime of only 25 years and need up to 700 gallons of oil for their gears and hydraulic systems, which must be replaced every year. Wind turbines are also a threat to wildlife, with some studies estimating that they kill up to 300,000 birds each year.

- I am pleased to learn that wind turbine blades can now be recycled. This is a significant step forward in the sustainability of wind energy.
- Support wind turbines on farmland as long as they do not harm agricultural production.
- I understand that these statements are general, but I cannot fully support them without more details. For example, what about innovative new products like home-efficient small wind turbines for individual houses?
- Wind energy developments may increase carbon emissions overall if not assessed carefully. All wind energy developments should have a whole life-cycle assessment and the full support of the local community.
- Supports relaxing planning regulations for domestic wind power generation, it would be easier for people to generate their own power and that there are new turbines available that are safe for birds and wildlife. The cost of installing and connecting wind turbines to the national grid has decreased significantly over time.
- There is evidence that wind turbines can be noisy, and that people living close to them can find the noise intolerable. This should be taken into account when granting planning permission for wind farms.
- Wind energy is essential, and as we are a coastal region, it is possible to site wind farms offshore.
- The policy should set clear and specific targets for wind energy generation, both in the short term and long term.
- Land grades of 3b should be excluded from wind farm development, and that materials for wind farms should be designed and manufactured in the UK or Europe.
- Wind energy has been criticised for its impact on the landscape, visual amenity, and residential areas. Some people argue that wind energy is not a reliable source of energy because it is intermittent and cannot store surpluses.
- EDDC should identify areas where new wind turbines would be acceptable to local residents, taking into account the benefits of local generation for farms, communities, and new developments. They should also encourage farms to install their own wind turbines and it should not be audible from housing areas.
- The policy does not include provisions for the decommissioning of wind farms, the reuse of land after wind turbines removed and the visual impact of wind farms.

Policy 32 - Energy Storage

- Newton Poppleford and Harpford Parish Council think that every new development should have the facility to produce and store energy.

- Hawkchurch Parish Council suggest the following rewording ‘Landscape, visual or residential amenity **(including cumulative landscape and visual impacts)**;
- Hawkchurch Parish Council suggest that Policy 32 be completely revised to bring it into alignment with the other energy policies and to conform with the NPPF and national guidance. The PC have also taken note of the way other local plans have been drawn up to safeguard communities and have considered the recent advice from the Fire Service regarding the Wadbrook battery storage proposed development. Suggested wording included in representation.
- Devon County Council welcome this policy – add reference to economic opportunities highlighted in ‘A Clean Growth Vision for Development in the West of East Devon’.
- Exmouth Town Council Members are supportive of this policy and believe that due to the cutting-edge nature of battery and smart systems, flexibility is needed to support technological advances as they come forward.
- Clyst Honiton Parish Council believes that restricting the use of such storage facilities to just East Devon could be seen as not complying with the Duty to Cooperate. It could also be difficult to prove or enforce.
- The BESS is a new technology which EDDC failed to understand its dangers, such developments will be harmful for the environment, landscape and residents.
- Concern about the potential risks of energy storage facilities, such as noise pollution, fire hazards, and environmental impacts. They believe that these facilities should not be permitted, and that the policy should be rewritten to reflect the risks
- The current policy on energy storage facilities is too restrictive. It should be amended to allow energy storage on sites allocated for other uses, where appropriate. Energy storage facilities can be compatible with other forms of development, such as employment or residential uses.
- Land grades of 3b should be excluded from the policy, even if this is not currently required by the NPPF. This is because land of this grade is more prone to fire, which could lead to significant damage to the environment and the surrounding area. In addition, there should be careful consideration of the proximity of appropriate firefighting resources and trained staff to any proposed development on land of this grade.
- Battery storage materials have a number of ethical, environmental, and economic challenges. The mining of battery materials can have a negative impact on the environment and the communities that live near mines. The production of batteries also requires a significant amount of energy, which can contribute to climate change. Batteries have a limited lifetime, which means that they eventually need to be disposed of, which can also have environmental impacts.
- EDDC can help kickstart a drive for more households to install solar panels and energy storage by providing financial incentives, educating the public about the benefits, making it easier to install, and partnering with local solar installers.

Policy 33 - Heat Networks

- Further clarity is required on existing and proposed heat networks within the district in addition to the operation of such networks and connectivity requirements. The policy as worded provides the onus on developers to achieve a connection in order to secure planning permission and it offers no flexibility in considering whether a connection is feasible on a site-by-site basis. The policy in its final wording should allow flexibility. The Council should also consider whether its strategy for district heat networks is consistent with its goals for net zero carbon given that often district heat networks are reliant on gas as the most viable option.
- Agents for Bloor Hones support policy but consider policy should reflect the fact that networks should not be gas based and recognition is given of very low heat demands of new homes meaning most new networks be non-viable.
- Exmouth Town Council members generally support the policy on heat networks, but they believe it needs to be strengthened in several areas. They want to ensure that heat networks use renewable energy, are well maintained, and are linked to the Energy Security Bill. They also want more clarity on how the threshold of 1200 homes was established.
- Clyst Honiton Parish Council suggests that heat networks must be powered by green energy only. The Cranbrook system uses carbon fuel, which should not be allowed under this plan. It is not acceptable to expect householders in the future to sign up to and pay for a heating network that they do not see as green.
- Developers assumes no heat network would be required as below policy threshold of 1,200 dwellings.
- Cranbrook Town Council is concerned about the resilience of the district heating system in Cranbrook. Cranbrook TC notes that the district heating system has failed every winter in recent years, and that the most recent failure was due to widespread valve failures in individual HIUs (Heating Interface Units). Town Council is also concerned that Eon, the operator of the district heating system, does not have the resources to respond to failures. As a result, residents have been left without heat and hot water for several days.
- Cranbrook TC is concerned that the draft local plan includes a requirement to connect to district heating where development is within 1 km of an existing network. The Town Council believes that this requirement should be revised to address the concerns about the resilience of the district heating system. Specifically, the council recommends that:
 - Cranbrook Town Council be a party to any contractual agreements for district heating so that it can exercise due control as a planning authority.
 - The strategic requirement in Strategy 33 be fully supported with operational resilience and the capacity to respond to system failures.

- Cranbrook Town Council work with Eon to improve the resilience of the district heating system and ensure that residents can report failures easily and quickly.
- Cranbrook Town Council provide financial assistance to residents who are affected by district heating failures.

- Change policy to clarify that commercial floorspace requirement relates to B1 use only, and that applicants should investigate the potential for heat networks as opposed to being strictly required to provide them.
- Central generation of heat should be more efficient than generation in individual buildings. This is because large central boilers can be more efficient than small individual boilers. However, this only works if it is economic for both the building occupiers and the heat generation organisation.
- It is better to have Passiv Haus standard homes as not much heat is needed in the first place.
- Cranbrook is a town in the UK that has a district heating network. The network has been plagued by problems, including a single supplier, high prices and poor reliability. This has led some people to question the value of district heating networks.
- Home Builders Federation highlights that for the foreseeable future it will remain uneconomic for most heat networks to install low-carbon technologies. This may mean that it is more sustainable and more appropriate for developments to utilise other forms of energy provision, and this may need to be considered.
- Home Builders Federation draws attention to Government consultation on Heat Network Zoning which identifies exemptions to proposals for requirements for connections to heat networks
- Housebuilders should have the freedom to choose whether to connect to a heat network. If they can meet the other objectives without connecting, there is no benefit to forcing them to do so.
- District heating networks are a better alternative to individual gas boilers, but they are not a long-term solution. We should focus on building houses that are more energy efficient and rely less on external power.
- Energy-from-waste schemes need to be considered.
- A comprehensive assessment of the carbon emissions associated with heat networks throughout their entire lifespan is required for all proposals.
- The requirement for properties to connect to heat networks may not comply with Building Regulations, may not be more sustainable than microgeneration sources, and may be contrary to competition law.
- The policy must be properly assessed in the upcoming viability assessment, which must also include a thorough assessment of the viability of older person's housing.

Policy 34 - Embodied carbon

- Retaining 'at least' the foundations should be deleted as foundations of older properties wouldn't be acceptable for modern building regulations – amend to “retain existing buildings unless refurbishment is either unviable or impractical”.
- McCarthy Stone is concerned that the proposed embodied carbon policy could make it unviable to develop specialist older persons' housing. They argue that the policy should be flexible enough to allow for sustainable development and be properly assessed in the forthcoming viability assessment. They also recommend that the viability assessment should include a proper assessment of the viability of older persons' housing.
- Exmouth Town Council Members support new policy on embodied carbon but worry about training implications and lack of mention of recycling.
- EDAL supports the objective of the policy to reduce embodied carbon but believes that the second part of the policy is unduly onerous and conflicts with the first part. The policy should be revised to refer to viability and practicality in terms of the reuse of existing buildings, and indeed in demonstrating net-zero lifecycle emission.
- Clyst Honiton Parish Council agreed in principle.
- New housing development should be more sustainable and tightly regulated to avoid repeating past mistakes.
- Home Builders Federation considers that this policy does not serve a clear purpose and it is not evident how a decision maker should react to development proposals, particularly in relation to how a reduction in embodied carbon is considered.
- This policy is an example of excessive environmentalism and should be dropped. We should rely on the discretion of our planning team to assess each application on its merits.
- The retention of foundations prevents self-builders from claiming zero-rated VAT. This may be an oversight or a deliberate policy to increase costs.
- Exmouth has lost many historical buildings due to neglect. Owners of vacant properties should be made to maintain them or have them compulsorily purchased.
- Planning requirements should include cement-free construction to reduce environmental impact.
- The policy is a good start, but it needs to go further. We need to build houses that last for centuries, not decades. This will reduce carbon emissions and waste.
- The destruction of forests and the concreting of large swathes of land will release vast amounts of carbon into the atmosphere, accelerating global warming.

Policy 35 - Flooding

- The Environment Agency suggest that paragraph 7.33 should be clear that development in areas of flood risk, in addition to a Strategic Flood Risk Assessment Level 2, need to meet the sequential test and here necessary the exception test in accordance with the NPPF.
- The Environment Agency note that this is an interim draft policy highlighting the issues likely to be covered in advance of the SFRA being completed. Their comments focus on what the new flooding policy should address, including adding:
 - Delivering developments and communities which are resistant and resilient to future floods.
 - When it will be expected that development helps to reduce flood risk overall.
 - Tighter standards for development within Critical Drainage Areas (CDA).
 - Where use of natural flood management (with associated BNG opportunities) would be appropriate for land further up a catchment from communities at risk of flooding.
 - Daylighting of culverts within sites and buffers of at least 8m from watercourses which are free of development.
 - Making space for flood defence mitigations and relocation of unsustainable communities.
- The Environment Agency recommend that in the fifth bullet point regarding run-off rates 'preferably' is removed. The expectation is that SuDS is implemented on all sites to provide betterment wherever possible, in all locations not just in CDAs.
- The Environment Agency note that Critical Drainage Areas are only referred to in the draft plan in relation to the Clyst Valley Regional Park. They are in the process of reviewing and renewing the CDAs and will seek to ensure these included in the plan if there are any updates for East Devon.
- The Environment Agency note that Natural Flood Management (NFM) is listed in the glossary but not actually mentioned within the local plan. There is NFM work ongoing or planned within East Devon and the plan offers an opportunity for new development to contribute to future NFM projects as part of schemes to reduce flood risk and/or achieve BNG.
- Natural England advise that the policy should include reference to the importance of SuDS in managing the flood and pollution risks resulting from urban runoff.
- South West Water would like policies to promote flood protection measures such as sealable airbricks.
- South West Water advocate the slow dispersal of surface water combining SuDS with green infrastructure.

- Devon County Council support this policy but suggest further detail on water quality and water re-use.
- Exmouth Town Council agree with the policy but are concerned that the sequential test jeopardises development in the town centre.
- Newton Poppleford and Harpford Parish Council does not support any development on land at risk of flooding.
- Clyst Honiton Parish Council suggests that sequential testing should be done before land is allocated in the Local Plan to ensure that only sites with lower flood risk are developed. They also propose rainwater storage for toilet flushing and other uses, as well as dredging of the rivers Exe and Clyst to reduce flooding.
- Several respondents thought this was a good policy.
- Flood risks likely to increase.
- Should consider nature based solutions to flood management.
- Natural flood management and SUDs on estates would be good.
- Climate change will bring more droughts limiting access to water.
- Broadly in agreement but don't agree with any building on land at risk of flooding.
- Strengthen policy to meet NPPF, avoid land needed for flood management, account for climate change, respect character and biodiversity, reduce run off and manage water holding habitat measures.
- Happy with policy but concerned that many allocations are close to rivers.
- Should consider disruption of drainage and natural carbon sink of deep soils and how development disrupts this.
- Should require planting in flood prone catchments to reduce run-off and increase infiltration.
- Concerned that policy will have no teeth and that the Environment Agency is often ignored.
- Many respondents raised concerns about the flood risk caused by solar farms, particularly run-off.
- Several respondents noted that surface water flooding is a serious problem in East Devon.
- Surface water flooding should be shown on maps.
- Concern about the lack of certainty of future flooding and if people don't take notice of the experts will compensation be given to those whose homes are flooded?
- A few respondents suggested planting more trees.
- Include beavers in the policy because they are part of the solution.
- Large green areas should be retained to act as sink to capture flash floods.
- Permission should only be granted where SUDs are required.
- Developers must address water management from the outset.
- Should be no building below sea level or close to floodable rivers.

- Should make clear that sequential test requirements on allocated sites have been undertaken.
- Should already have been done so homes could be insured.
- Needs to be applied to new developments.
- Do more to stop non-porous surfaces in urban areas.
- Greywater should be used for toilet flushing and surface water separated from sewage.
- Flooding is just a river following its winter channel.
- Seaton Tesco and surrounding housing?
- Policy should be more specific so that land needed for flood management is totally off limits.
- Please enforce this policy.
- Households should have rainwater storage tank.
- Policy incompatible with plans to build on 251 hectares of farmland in area already subject to surface water flooding and sewage overflows.
- Areas at risk of flooding are opportunities for biodiversity net gain and other green spaces.
- Policy is unnecessary as it just duplicates NPPF and PPG, contrary to NPPF para 16f.
- Good in theory but permissions have been granted in flood plains despite Environment Agency advice.
- Lower Otter Restoration Project has increased flood risk.
- Although building in areas at risk of flooding should be avoided, sometimes mitigation is possible.

Paragraph 7.35 - Water quality and supply

- The Environment Agency advise that the plan is more definite and require that the results of the Water Cycle Study will feed into site allocations and inform the distribution strategy.
- The Environment Agency suggest that other water quality issues should be acknowledged in the plan, including:
 - Detailing how development will protect and where possible improve the 8 bathing waters in East Devon,
 - How development will protect and where possible improve the Exe Estuary and Outer Exe shellfish waters, which are known to be affected by activities and operations in Exmouth and other urban areas.
 - The cumulative impacts on water quality of development within East Devon and other local authority areas draining to the same catchments. The cumulative scale of housing growth planned by East Devon, Exeter City and Mid Devon mean that

existing pressures on the water environment will be exacerbated. The plan therefore needs to be clear about how development will not cause a deterioration in these waterbodies and help secure improvements instead.

- The Environment Agency advise that there will be increased pressure on water supply from a growing population and hotter drier summers predicted due to climate change. They assume that the housing and economic developments envisaged in the plan will primarily connect to the public water supply and so the water for these will be managed through South West Water's (SWW) Water Resources Management Planning and the longer term Regional Water Resources plan up to 2050. However, where a development needs a water supply which is not provided by SWW (e.g. an onsite borehole or surface abstraction) an environmental permit may be required. The Agency are involved in wider, strategic discussions with SWW in relation to resilience and maintaining a secure supply of water for the future. As a result of the trend towards staycations over the last two years due to the Covid19 pandemic, SWW reported unprecedented water demand in the Mid to East Devon areas during the holiday period. This increase in demand combined with the hot dry weather experienced in the Summer of 2022 and the drier than normal Autumn that followed has put strain on the water supply infrastructure and sources used for abstraction. This is a foretaste of the pressures that are likely to be felt in the future regarding water supply as we experience more of the effects of climate change. Under climate change scenarios up to 2050, the Devon, Cornwall & Isles of Scilly area is modelled to potentially be impacted by much lower summer flows due to lower rainfall. It will be essential for public authorities to work with the water company and other abstraction licence holders to mitigate for and adapt to these changes. In light of the evidence of emerging trends towards water being an increasingly scarce resource, the Environment Agency strongly encourage the plan to include a policy requiring all new developments to demonstrate water efficiency, including grey and rainwater recycling, especially on major developments. In line with guidance, all new residential units shall demonstrate compliance with the more water efficient maximum use of 110 litres per person per day in line with Building Regulations approved document G, to be secured by planning condition.
- South West Water proposes policy wording to reduce flood events eroding soil and strengthening disposal of surface water on site.
- Lyme Regis Town Council support measures to specifically improve water quality in the river Lym and note the negative impact that relatively poor water quality is currently having on bathing water quality at Lyme Regis.
- The National Trust is supportive of the aims of this policy, however, considers that the policy wording should be strengthened from wording for policy requirements such as 'preferably' and 'ensure' to 'development must...' or other similarly robust wording.

- Clyst Hydon parish council is concerned that the EDDC local plan does not address water management issues. The plan does not mention how the increase in population will be accommodated within the water cycle, how the extra sewage requirements will be coped with, and where the extra water supply will come from.

Policy 36 - Coastal change management areas (CCMAs)

- The Environment Agency are pleased to see multiple policies relating to coastal change reflecting the good work that has been undertaken to understand and identify the areas that will be at most risk. They are fully supportive of Policy 36 which establishes CCMAs for East Devon and sets out policy on how new proposals within them will be considered. The policy is robust and unambiguous; they especially welcome the strong position that residential development (including changes of use) will not be permitted in CCMAs and that all other permissions will be time limited.
- Natural England Natural England supports policy and the designation of Coastal Change Management Areas as a key coastal planning tool. Sea level rise and coastal change are inevitable and bring both challenges and opportunities for people and nature. They consider the approach used and the methodology produced (policy justification 7.37) as clear, concise, and scientifically robust and would also highlight it as best practice for an evidence base for Local Planning Authorities to demarcate and designate their CCMA's
- Pleased to see managed retreat and sustainable community planning in this policy – cannot hold back the sea indefinitely.
- Several respondents considered it a good policy approach.
- Agree with policy but requires careful management.
- Agree new developments should be banned but should not restrict changes to existing buildings.
- Will have to concede land to the sea as sea levels rise.
- 'Get on with it please, we are already 20 years behind'.
- Economic and social benefits should not outweigh environmental considerations.
- Need explicit constraints on huts, cafes, carparks and caravan/camping sites.
- Community and environmental benefits should be secured for temporary modifications to existing commercial facilities.
- Coastal areas need to be conserved for landscape and amenity – important for tourism and employment.
- Blanket ban on development fails to take account of many different situations residents may encounter and more consideration and detail is needed.
- Not based on best available evidence in accordance with NPPF.
- Does not include margins of error in mapping contrary to normal practice.

- Whilst policy 36 is consistent with NPPF (paras 172 and 173) they are not appropriate because they are not supported by best available evidence.
- No provision to account for future coastal defence schemes that would reduce size of CCMA.
- Policy relies on computer models and should have reality checks.
- No case for restricting planning permission as should be judged on their own merits.
- Not sure policy based on best advice.
- 'Temporary' caravan sites need to be controlled to protect the beauty of coastal areas.
- Unsure if policy means that coastal erosion will be accepted.
- Sea level rises should be predicted in conjunction with flood risk – current road drainage cannot cope.
- Support Plymouth University involvement but more environmental impact assessors should be deployed to verify decisions.
- A few representors commented that the plan should be flexible when new information becomes available.
- Ban on new homes disproportionate to the threat and property owners should be allowed to take the risk.
- Criticism of lack of justification for prohibiting new building and conversions in the CCMA.
- Proposals not in best interests of residents and businesses.
- The sea level will rise and there are models to predict this that should be used at the front of the planning process and not as an add on.
- A couple of respondents raised concerns about projections of erosion beyond 20 years as there is too much uncertainty.
- Conversely, one representor thought it was a sensible precautionary approach and another thought it not sustainable to think in terms of less than 50 years for mitigation and adaptation.
- Property owners should be allowed to make their own decisions at their own risk providing that they do not affect other coastal areas.
- Planning permission is still given for coastal schemes.
- The South West Coastal Path needs to be maintained as it moves inward with erosion.
- The National Trust is supportive of this policy which is generally consistent with our own coastal policies/strategy. The opening statement for the policy clearly sets out the aims. In relation to the second bullet point, the policy wording could be strengthened further to set out that developers 'must demonstrate that they require a coastal location' or 'providing they absolutely require a coastal location.'

Comments relevant to Budleigh Salterton

- The Lower Otter Restoration Project already brings the coast close to residential homes

Comments relevant to Exmouth

- Exmouth Town Council supportive of policy but note it will have limited impact on Exmouth.
- Coastal plains in Exmouth should not be built on – previously floodplain.
- Good in theory, but don't want Devon Cliffs moving further back into the Maer Valley – already difficult for local community to access the beach.
- Agents for Bourne Leisure advise that parts of Devon Cliffs Holiday Park are located within the proposed CCMAa but it is considered that there are ways to more actively plan for changes within the coastal zone, particularly in relation to existing holiday parks. Bullet 1 of the draft policy helpfully provides a sensible risk-based approach to uses within the 0-20 year time horizon. We suggest that temporary static caravan pitches should also be allowed within this horizon. This would allow benefits associated with additional temporary holiday accommodation to be realised, whilst recognising the ability for static caravans to be removed or repositioned relatively quickly. Bourne Leisure also requests that 'tourism uses' are included within the second bullet point of draft Policy 36. Commercial development does not typically cover tourist uses and, as tourist uses are typically situated in coastal locations, it is important, for the avoidance of doubt, that the replacement, relocation and adaptation of other such uses at risk of coastal erosion are explicitly permitted within the emerging Policy.

Comments relevant to Sidmouth

- Welcome focus on coastal erosion but evidence for Policy 36 is too narrow and significantly different to Sidmouth Beach Management Plan.
- CCMA 100 year recession line is 6 times further in land than Beach Management Plan.
- Many representators commented that the CCMA map at Sidmouth not based on best available evidence and risks blighting many properties.
- Several respondents commented that the Plymouth University work was a nationwide study and not specific to Sidmouth.
- Will petrify an attractive 'green lung' based on general data from the University of Plymouth when EDDC has Sidmouth specific data.
- Plymouth study does not take local factors into account.
- Should wait for 5 years to see how sea defence works change erosion rates.

- Many respondents felt that the CCMA designated does not take account of Beach Management Plan works.
- Challenge not being able to make alterations to properties.
- Opposed because would blight both properties and town as a whole.
- Economic impact report should be provided.
- Several respondents expressed concern about property blight.
- Class action could be taken against the Council for property devaluation due to negligence.
- Why is a more dramatic study than the Beach Management Plan being used for the local plan?
- Large part of town would be abandoned on spurious evidence.
- Plymouth approach is experimental.
- Devon County Council rebuilt the Alma bridge on the basis that it had a life expectancy of at least 50 years.
- More accurate erosion rate should be calculated.
- Accelerated cliff erosion caused by previous sea defences and canalisation of River Sid preventing recharging of protective shingle by natural means.
- The over steep cliff formation cannot be seen as a natural process that should be allowed to continue unchecked so the Beach Management Plan needs to be implemented to return the erosion of the cliff to a natural level.
- Even if Beach Management Plan is abandoned it should be for owner to decide if they want to take financial risk of building.
- Erosion rates will be much slower once the Beach Management Plan is implemented.
- This doomsday scenario must be challenged.
- Mid point between Plymouth University and Beach Management Plan erosion line should be used.

Policy 37 - Relocation of uses affected by coastal change

- The Environment Agency welcome this policy but are concerned that no provision has been made to allocate land for existing uses to relocate to and without a mechanism in place to provide land and/or compensation it is not clear how functional this policy will be. As a minimum the plan should ensure that space is available for homes, businesses, facilities, infrastructure and habitats to relocate to.
- Natural England advise - In addition to built assets, this policy should also provide for the relocation of valued environmental assets away from areas of risk, with the provision of rollback of European protected sites and SSSIs, where the effects of sea level rise and coastal squeeze will cause condition to decline.
- A few respondents agree with policy.

- Acceptable in principle but detail will need to be considered on a case by case basis.
- Policy is appropriate but unlikely to be used.
- Policy should only be used when alternatives exhausted and like for like.
- Should not be misused to allow development on otherwise unsuitable land.
- Doesn't take account of local data.
- Should be no development within 2 metres of the coast.
- Predictions are not robust evidence, but continuing trends could be.
- Where property owners have offered to pay for defences and been refused the council should pay compensation for any losses.
- Exmouth Town Council agree with principle but concerned it will offer disproportionate protection for holiday accommodation sites.
- Better to clear sites than make local community responsible for dangerous structures.
- Support relocation rather than spending a lot of public money protecting a few properties.
- Supported for homes but now to allow holiday site to expand inland.
- Support relocating residents in their own community but not at expense of biodiversity.
- Agents for Bourne Leisure consider that tourism uses should be included in policy wording to allow for relocation of losses and as such to ensure that there is continued and ongoing investment in such facilities in East Devon, and so that the benefits to the local economy. They consider the amendments should be made as large sites need a phased period relocation period (3 months is too short). Bourne Leisure strongly objects to point 5 of Policy 37 and requests that this point is removed from the emerging policy. Tourism development, by its nature, is often located beyond settlement boundaries, and requiring relocated uses affected by coastal change to be consistent with the criteria set out in Policy 7 (Development beyond settlement boundaries), would be overly restrictive

Policy 38 - Development affecting coastal erosion

- A number of respondents support the policy.
- Correct balance need to be struck between allowing natural processes on undeveloped coast and protecting people.
- Exmouth Town Council think the policy is acceptable and the statement about the protection of the Jurassic Coast bold.
- Not all coastal erosion is natural and may have man made cause that needs to be taken into account.
- A problem created by man made interventions in Sidmouth should not then be treated as a natural process that carries equal weight with protecting coastal communities with all people being involved in making decisions.

- Natural coastal erosion must be allowed to happen – sea defences either fail or have an impact elsewhere.
- Need to conserve coastal areas for landscape and amenity which helps tourism and local employment.
- Should be strategic policy.
- Should reference vegetation helping to consolidate land.
- Should address on site by site basis.
- Changes over past 20 years caused by the like of English Heritage and the National Trust, who should be made to pay.
- Properties should be protected.
- Wooden breakwaters should be considered.
- Defences should be provided and houses not allowed to fall into the sea.
- Concern about cost to tax payer.
- Policy seems to imply natural processes that created the attractive landscape should continue unless there is a cost.
- Difficult to protect from natural process forever.
- Not right to use the Shoreline Management Plan here but disregard it elsewhere in plan.

Chapter 7 - Policy omissions from - Tackling the climate emergency and responding to climate change

- Need to consider river pollution.
- Natural England, in referencing paragraph 7.45 - Links to marine planning – advise - Links to marine planning could reference that developments impacting the intertidal environment may require a licence from the Marine Management Organisation (MMO). Natural England would recommend that East Devon District Council adopts the Coastal Concordat [A coastal concordat for England \(revised: December 2019\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/428212/A_coastal_concordat_for_England_revised_December_2019.pdf) for England to streamline decision-making in the coastal environment.

Chapter 8 - Meeting housing needs for all

Overarching comments

- Some developers challenge the suite of housing need policies.
 - The ability for the vision, homes and jobs to be delivered must be central to the setting of Local Plan policy but they do not consider this is the case. The Plan's approach, viewed as a whole, is in grave danger of impacting negatively on delivery of housing.
 - The plan almost completely relies on the private sector to deliver the plan aims/objectives but the endless ratcheting up of policy requirements will kill the goose that lays the golden eggs. This will be to no one's benefit. For my client to build 40 of the dwellings he wishes to build, he has to, according to draft policy, find land for 100 dwellings with sufficient additional land to provide the aspirational 20% BNG and also some employment land, which may or may not relate to any market demand.
- One respondent commented that this section is too prescriptive. The LPA must have control but should put the Councils/national Vision as the driving force, which can get lost with multiple sub points in each policy. Recognise that the world in 10 years will be very different to now. Questions whether a more prescriptive policy will remain fit for purpose
- Keep exceptions to a minimum to avoid abuse of policies.
- Another wants coherent strategic thinking that addresses specific housing need in rural areas and the climate change crisis at the same time
- The East Devon AONB team note that AONB's are included as part of a designated rural area for the purposes of locating affordable housing, and suggest that even if there is a proven need for affordable housing it should meet NPPF 177 if required, be located and designed to respect the aims and purposes of the AONB designation and include an appropriate LVIA.

Policy 39 - Housing to address needs

- Numerous responses from communities, developers, and registered providers. Mix of views. Detailed housing policies flow from this strategic policy. To simplify, where comments relating to matters in the detailed policies are repeated for the strategic policy, they are reported against the relevant detailed policies (40 to 50)

General comments

- Support for: principle for developing good quality homes that meet identified needs; creating sustainable, inclusive, mixed communities; delivery of full range of housing
- Well phrased and appropriate, other than settlement hierarchy
- Parish Council support this policy through its Neighbourhood Plan policies
- Policy should be delivered in every community in the district, and support communities' demographic diversity
- Alternative view - Rather than being part of general housing schemes being required to provide the mix of needs, instead the plan should allocate sites specifically for self-build and custom housebuilding, and sites for gypsies, travellers and showpeople, - separate from allocations for unrestricted market housing, or be allowed to come forward as unallocated exception sites beyond settlement boundaries.
- Should clarify policy – it represents a district-wide objective and does not prescribe a mix which is expected to be delivered through individual sites
- Wants flexible approach on mix, to recognise that needs and demand varies within the district and between sites; need to ensure scheme is viable and provides an appropriate mix for location, size, suitability/capacity and market.
- Refer to other evidence not just the LHNA; and include consideration of current demand
- Need whole plan viability study prior to submission, ideally with development industry input
- Policy issues are appropriate, but EDDC needs to provide evidence on their deliverability
- Concerns: Policy is too long. Not easy to digest. Out of date. Government housing targets not mandatory; more housing/people will increase pressure on services; need infrastructure; housing is being driven by demand, not by meeting local needs.
- Government's arbitrary formula puts district under immense, unreasonable pressure
- Housing distribution/spatial strategy including proposed new town, conflicts with policy 39– ie growth is not located where there is a need but where land is available
- The plan should take account of the rural dimension of housing needs. Trend for increasing property values and rental costs in the rural housing market as insufficient open market and affordable housing were delivered over many years. The trend's harmful impacts are significant and varied, eg
 - People with local connections are often unable to afford to buy or rent properties. They are priced out of their own communities.
 - Young people are disproportionately affected by issues of affordability and exclusion from the rural property market

- Demographic diversity in rural communities is reducing as they become increasingly dominated by older people. Young families are an ever-diminishing proportion of the rural population as they cannot afford to buy or rent in those communities.
- Declines in demographic diversity have adverse consequences for rural communities eg viability of local facilities and the ability of rural communities to support social clubs and community events vital to their local sustainability
- Important to create a social mix and meet future generation needs. To create healthy communities, homes should be mixed up on sites, not segregated
- Need small houses for starter homes and for people to down-size to in their own communities, including need for park homes. Current assets may not provide sufficient value for some households to enable move into eg new build smaller units
- Devon County Council state the internal space of buildings should be of practical size to allow adaptability and include sufficient space for families to spend time together.

Affordable Housing

Many community responses with a range of comments, including:

- Acute need for affordable housing
- Affordable rent and housing must really be affordable
- People can't afford housing build below market value.
- Want affordable housing, not luxury developments
- Want more affordable units of decent size, not just 1 and 2 bed units
- Need to provide affordable housing for older people wanting to downsize
- Maximising delivery of affordable housing is an empty promise. Lacks detail
- Query the definition of "affordable housing". Government definition doesn't address lack of affordable rental accommodation for singletons, the elderly (single/couples), people on limited incomes and young families. Not enough housing built for young people
- Poor provision of social housing across East Devon.
- Right to buy caused a major shortage in social housing, and should not occur
- Sale of council houses, and increasing reliance on private landlords to deliver rented accommodation is a problem as private landlords are now leaving the market
- Real need in East Devon is for affordable/social housing. EDDC should address need for more 'council-style' housing which is affordable and built to zero-emissions standards. Want EDDC to cooperate with housing associations and small builders
- Alternative view - Too much emphasis on affordable/social housing.
- Want higher targets/lower thresholds

- Community support for a minimum affordable housing provision that is clear and robust enough to withstand the pleas of viability from developers
- Concerns about implementation: Developers must meet affordable houses commitments; want allocation of new build housing specifically for locals need to be put in place with legal covenants; local connection test should apply to all sites, not just rural exceptions
- Concerns about principal residence: not just second homes, but also holiday lets displacing permanent tenancies in buy to let market; where is the evidence that the issue is just coastal towns? Property in this area is being bought up on a large scale as second homes and short term lets. Second homes need to pay high council tax- they impact on potential for locals to own their own home.
- Some community comments - want limit to AirBnB rentals and much tighter planning/ tax controls. Concern over impact of unregulated short term lets on local housing market eg loss of long term residential rental units to short term holiday lets/non-residential lets
- All new housing should be for local people, not for second homes nor AirBnB and should not draw in people from other parts of the country
- DCC (Economy) comment that short term lets is only an issue in a small number of coastal areas
- DCC (Public Health) wants the influence of second homes to be adequately addressed in relation to sustainability and affordable housing
- Should be a requirement for housing for essential local workers
- Use Land Registry Covenants to restrict the purchase of new builds so they can only be sold to local residents in problem areas
- Local connection criteria should apply to Sidmouth and smaller settlements, not just to rural exception sites
- Devon Wildlife Trust want policy to include requirement for enhancement of natural environment and building to achieve net-zero carbon.

Registered provider comments

- Housing Association planning consortium supports using LHNA and up to date local housing evidence – it ensures affordable housing is provided in line with objectively assessed needs
- And supports mix of tenures to meet affordable housing need over the plan period, particularly needs of younger people and key workers
- Supports keeping on-site affordable housing threshold under review - maximise opportunity for affordable housing delivery. The threshold should continue to be as high as possible

Developer comments

- Not clear what “maximising” delivery of affordable housing means, so replace with “optimising”.
- Some developers concerned that inclusion of second New Town delivers fewer affordable dwellings than if development is elsewhere. Cranbrook was only deliverable due to the injection of considerable amounts of Government grant
- More comments are set out under Policy 40

Specialist housing provision

- Wide range of housing options for older people. Including apartments (sheltered living; extra care); lifelong housing; adapted housing; specialist care including dementia care
- Is the demand more for independent living in own home, designed to meet the more specific needs of older people
- Opportunity for large care village (400-500 freehold apartments) with communal facilities available on site, plus ‘satellite’ areas for housing for families caring for older relatives
- Support - convalescence / care homes are needed
- Alternative view: Is there really a need for more care homes?
- Why encourage retirement homes? Contributing to our unbalanced age demographic. Retirement complexes create ghettos, breakdowns communities/leads to resentment when younger people don’t see affordable housing being delivered. Policy could give a green light to developers to deliver more age restricted/ retirement accommodation in Exmouth that is then marketed out of region.
- If there is an identified local need for age-restricted accommodation, want a local connection restriction to ensure that the policy facilitates freeing up of family homes locally
- Housing for older people should be within easy walking distance of town centres
- Should support adapted older persons housing in villages to enable downsizing What evidence is there that older people want to mix with families

Adaptable housing

- Supports good quality designs for homes, with flexible internal layout. Occupiers needs naturally change over time.
- DCC comments that internal space of buildings should be of practical size to allow adaptability and include space to enable families to sit together to eat
- Self build/custom build housing

- Opportunity to build high quality homes at an affordable price, help local people build their own affordable home. Supports including self build on smaller sites
- Self build is one of the key initiatives that help local people build their own affordable home
- Self-build is not a priority at a time when we have housing shortages. Self-build should not incur any subsidies from council-tax payers.
- This is an unnecessary constraint to developers, especially as there isn't always a demand for self- build/custom build plots. Only require them where there is clear market demand
- Allocating for selfbuild can inflate cost of plots
- Have any self build plots been approved by EDDC?
- Very few windfalls come onto the open market; should not compare windfalls to the Self build register
- Concern over impact of selfbuild on local area's characteristics
- Some developers do not agree that there is always demand for self build plots and consider the policy unnecessarily constrains developers – policy should be reworded so only required where there is clear market demand.

Private rented housing

- Relied on private landlords to provide capital to deliver rented houses, since sale of social housing with no funds for councils to replace it. But landlords continue to leave the market due to regulatory/tax changes, higher interest rates, threat of longer-term tenancies, and a broken court system
- Housing for rent should be carefully monitored, landlords shouldn't be able to buy up lots of these properties just to profit from them
- Admirable set of intentions around renting. But is it realistic without more joined up thinking/investment in social housing/a different Government?
- Town Council concern: impact of unregulated AirBnB accommodation on the local rental market is not addressed and that support needs to be given. Wants EDDC to get involved in the government's review into short-term lets, to regulate home rentals effectively.
- Needs assessments
- EDDC has vastly overestimated the amount of housing needed
- How are needs quantified. How can assumptions be challenged?
- Where was the public involvement in assessing local needs for housing?
- Local market evidence represents suitable/appropriate evidence from which to determine local housing needs

Mix of housing types

- Should maintain a social mix, and meet future generation needs.
- Be clear what is meant by 'mixed housing'. It should be mixed up to create healthier communities, not segregated.
- Where is the evidence about impacts of meeting mix of housing needs within a site? and eg do elderly people want to live next to families with children?
- Want more small houses for starter homes and for people to downsize to in their own communities. Makes their larger houses available for families.
- Often preferable to develop town centre brownfield sites, but living in small often overdeveloped town centre properties most without parking, often doesn't suit a growing family and compromises the ability to work from home
- Too much old, non-energy efficient housing available. New housing should be well built, sustainable, social housing for people with a local connection.
- EDDC should repossess vacant homes. Should not allow developers to let vacant buildings rot away; instead refurbish to meet community' local housing need.
- Must refurbish and insulate properly.
- Encourage, not penalise, local landlords. They lose rent and incur refurbishment costs after a tenancy ends and have increasing overheads that are not reflected in rentals. Amend policy to focus more on property that is well insulated, cheaper to run, and lower rent
- Self builds are a much lower priority than social housing due to more demand for this in the local community.
- Concerned that including self/custom-build housing and provision for gypsies, travellers and showpeople, within larger housing allocations is not viable/deliverable due to differing interests / ownerships. Either allocate sites to meet these 2 types of needs separately from those allocations for unrestricted market housing, or allow them as unallocated exception sites outside of settlement boundaries
- The Otter Valley Association support requirement for a mix of site sizes and encouragement of small builders.
- Devon Wildlife Trust wants the policy to include a reference to the requirement for the enhancement of the natural environment and building to achieve net zero carbon.

Policy 40 - Affordable Housing

Many comments received from communities, developers, and registered providers

- Numerous, mixed, community concerns on the need and provision of affordable housing
- Several responses that there is a housing crisis.

- Current stock of affordable housing is comparatively low. Limited supply of available cheaper market housing in the current housing stock
- Many residents, notably young people can't afford to buy or rent housing in East Devon. Urgent need for truly affordable housing.
- Need for affordable housing is high as house prices in East Devon are already high.
- High prices mean property is an investment. Most new houses are bought for high prices by buyers from SE, portfolio holders and BTL landlords, not Devon people.
- Large developers raise the market price by land-banking
- Private rented housing is in very short supply, and the market is very competitive.
- Buy To Let landlords charge high rents, worsening the housing crisis
- No amount of house building will significantly lower prices. Macro-economic and fiscal policy factors that drive price changes are outside the plan's control
- Study by Action for Homes reported 2867 dwellings in East Devon are second homes or long-term empty. This is unsustainable.
- Stop building to satisfy a demand for 2nd homes. It's driving up house prices making housing unaffordable and unavailable for local people. No second homes should be allowed.
- Concern over the impact on affordability and availability of housing to meet local need where housing is being used for short term lets eg holiday/business purposes
- Economic consequences eg recruitment issues if housing costs are unaffordable
- Should remove Right to Buy and cap future sale price of affordable homes, Right to Buy simply transfers social housing back to the market at higher prices for sale or for private rent at higher rental levels.
- It's not just the cost of housing. It's also important that housing is well insulated/cheaper to run for people with lower incomes needing to rent
- The definition of affordable housing is challenged. What price of housing is affordable? Government's definition is not 'affordable'. Many local people can't afford to buy discounted market housing/First Homes
- Redefine affordable housing to mean social housing. Greatest need is in local community
- New housebuilding pushes up cost of housing. Help to buy schemes are unrealistic
- Want more genuinely affordable housing for purchase and rent aligned with local wages across the existing centres of populations
- Should focus on social housing only, for low-income people with local connection. A large proportion must be for rent, owned by not-for-profit organisations
- Want far more social rented to rectify current housing inequality for people in poorly paid or part time jobs
- Policy represents long overdue action for creating balanced and mixed communities
- One Parish Council supports this policy through Neighbourhood Plan policies

- Another Parish Council is concerned that the policy is too detailed, and risks losing the point of defining just the delivery. Advocates a separate DPD on this subject, as the variations are so complicated, the Local Plan becomes just about this subject.
- Concern that policy opens the door for developers to claim that it is not viable to meet Plan requirements after site is allocated and has planning approval.
- Developers' profit should not be made by not delivering affordable housing
- Community support for a minimum affordable housing provision that is clear and robust enough to withstand the pleas of viability from developers. Perception that affordable housing secured by planning obligations in the past was then reduced/removed on viability grounds. Developers wriggle out of promised provision, and then only provide high-cost housing. Want this stopped. Want firmer control by EDDC over developers, and to hold developers accountable.
- But can't force developers to sell only to local people or at an affordable price
- Support for new approaches eg EDDC Housing Task Force, as delivery vehicle alternative to achieving affordable housing through major housing developments/ S106 agreements. Better for council to buy land and have social housing built.
- EDDC should repurpose vacant homes for housing needed by the community
- Deliver affordable homes for local families/workers on brownfield sites not greenfield
- Support on site provision, don't want offsite provision/contributions
- How many of the dwellings will go to young couples/local people? How will the Council stop others from acquiring multiple properties possibly subsidised by local money. How will you stop fraud?
- Devon County Council (DCC) welcome the proposed affordable housing tenure mix, highlighting the importance of providing housing for Essential Local Workers, including Social Care staff. Supports priority for key workers within the local eligibility criteria for First Homes
- DCC welcome the tenure mix but must increase/prioritise affordable housing to reflect need and protect affordable housing for local people.

Community concerns about Table 1 (mix) include:

- Wanting much higher percentage to enable young people to stay in East Devon
- Why reduce the affordable housing percentage compared to the adopted plan
- All new housing to 2040 should be affordable
- Why is the percentage in the new town so low, where is the evidence? The plan relies on the new town to deliver much growth but the low percentage of affordable housing will increase the imbalance across East Devon and make delivering much needed affordable housing more difficult. Why should other locations deliver more?
- Want more detailed, location specific mix, not a generic district-wide mix

- Will override the housing mix policies in made Neighbourhood Plans that are specifically tailored to meeting local needs, and informed by local evidence
- Want higher percentage in large developments
- Hasn't Cranbrook already met the need for affordable housing?
- Policy is very prescriptive
- Concern over how long an SPD will take to prepare/adopt

Developer concerns include:

- Some support the policy aims but some elements are overly onerous/ prescriptive, notably the prescribed tenure mix of affordable housing on qualifying sites.
- As well as need, should also take account of viability and deliverability. Unrealistic to negotiate every site on a one-by-one basis where the baseline aspiration or combination of policies is too high. This jeopardises future housing delivery
- Policy is impractical. No opportunity to reconcile differences between policy provisions and evidence of need. Should be informed by local market evidence/ sales information.
- Let developers present evidence of local needs to justify affordable tenure mix
- Size and type of affordable housing is a matter for negotiation on a site-by-site basis
- A particular affordable housing mix should not be enforced to the extent that it causes harm to other planning considerations

Developer concerns about Table 1 (mix) include:

- Only some support for reducing percentage from current 50% down to 35% across much of East Devon- it will unlock growth on small/medium sized sites
- 35% is reasonable if expressed as a target rather than a minimum
- This should be a starting point for considering suitable tenure mix

But there are many developer objections to the mix.

- Advocates a bespoke approach to address local affordable housing need – mix of types /sizes appropriate to the location of a planning application
- Fixing the mix type /tenure of affordable housing over a 20-year period is not a flexible policy approach.
- Unclear whether the mix for affordable homes in the 2nd new town needs to be deliver by each development parcel or across the whole new settlement. To provide distinct neighbourhoods policy should provide flexibility on type and size, to allow land parcels to respond to their unique characteristics and new evidence
- Lack of evidence to justify the level of affordable housing mix

- LHNA is not a viability study. No evidence on overall plan viability yet exists.
- Questions viability of delivering 35% affordable housing and tenures mix in Table 1
- Supports para. H – alternative tenures can be proposed where viability is an issue
- Table 1 should be a starting point – take account of latest available housing needs evidence, site size, capacity and suitability for house type and tenures, and practicality of long-term management by a registered provider, and overall viability
- Some reserve their position pending the viability assessment results.
- Unclear if the viability assessment will cover affordable housing percentage, or if viability is assessed on a case-by-case basis
- Should not apply to sites within the Cranbrook DPD area
- 35% is substantially above the current 25% for main towns. CIL rates applicable across East Devon were recently set based on current Local Plan policy level
- West End sites viable at 25% affordable housing (this is what has been achieved)
- New Town site developer supports target of at least 15% affordable housing – as issues eg delivery and strategic infrastructure are substantially different in a New Town compared to smaller development sites. 15% target needs to be evidenced and subject to viability assessment
- Differential percentages demonstrate viability problems of delivering 2nd new town. Large infrastructure costs mean it will deliver less affordable housing than if sites were allocated elsewhere. It also displaces those in housing need and places a strain on family ties (similar to Cranbrook meeting housing needs from Exmouth)
- Another developer advocates an alternative approach. Embrace the Lichfield evidence approach ie Enhance/speed up delivery by using higher amounts of affordable housing, (ie 35% affordable housing at new town)
- No objection to the overall Affordable Housing target of 35% (for the majority of the district), but reservations over the tenure mix of affordable housing, as worded this indicates 64% for Social Rent and 36% for First Homes. This offers no option for Affordable Rent or other forms of affordable home ownership. It also offers no room for future initiatives towards affordability as it is very prescribed as worded. There should be flexibility to provide all forms of affordable housing as defined in Annexe 2 of the NPPF
- Under-provision of affordable rent
- Suggest that specific reference to the 2022 LHNA is removed. Broader wording should be included along the lines of mix to reflect up-to-date evidenced need and market conditions.
- Some respondents want the tenure split for the 2nd new town to apply to the rest of the district as a starting point for considering affordable housing provision on new development sites, subject to viability and up to date housing needs evidence
- Some support reduced percentages compared to the adopted plan
- Objections to policy's mix of affordable housing types. Remove table 1 (and policy on dwelling size mix). Wants policy to provide flexibility ie enable precise mix of affordable

housing (size and tenure) to be determined on a site-by-site basis at the planning application stage, responding to needs at that point in time, and taking account of viability.

- Overall plan viability assessment should be publicly available for comment before the Reg 19 consultation, so that in line with PPG the plan can be informed by engagement with developers, landowners, and infrastructure and affordable housing providers.
- Detailed comments from provider of private sector specialist housing for older persons, wanting amendments. Eg exempt such housing from providing First Homes, Starter homes and Discount Market Sales on site; clarify when review mechanisms are appropriate and how/when viability is reassessed over the development's lifetime; don't apply a review mechanism to this type of housing; viability assessment should specifically assess viability of older persons housing; want consistent policies regarding thresholds for C3 use classes.

Table 1 – affordable home ownership

- Some support for at least 10% of affordable housing should be affordable home ownership products
- Queries about whether policy will delivery Government policy of 10% of all dwellings to be delivered as affordable homeownership products. Need evidence on delivery.
- Some question whether proposed tenure mix complies with Government policy on First Homes (25%) and 10% provision of affordable home ownership and local needs identified in LHNA 2022. Assert there is a significant under provision of affordable homeownership
- First homes percentage in Table 1 well exceeds national planning policy.
- High percentage of social rent will have a detrimental effect on site viability; concerns about target realism
- Under-provision of other affordable home ownership products (not First Homes)
- Selling discount open market housing is extremely challenging because of the need for a substantial deposit AND meet eligibility criteria
- Policy is not flexible – as well as national policy on first homes, the plan should allow other forms of affordable housing, informed by up-to-date local evidence.
- Some developers object to the reference that commuted sums (off site contributions) should be broadly equivalent to that required on site. They object because there is no clear reasoning setting out what the relevant calculation might be.
- Some developers object to the lack of definition of 'small clusters' in Clause 2d). (Relates to distribution of affordable housing across a site.) Must clarify.
- Possible contradiction between para 2a and para 2c. Question whether it is appropriate for C2/specialist accommodation to contribute towards affordable housing given they are not 'conventional' dwellings.

- Agreement with pepper-potting affordable housing across a development sites, and the dwellings to be tenure blind

Registered providers concerns include

- Plan should acknowledge Housing Associations' role in providing affordable housing
- Encourage developers to have early active engagement with Housing Associations so the latter have active role in planning/design/meeting their management needs
- Community Land Trusts have a proven track record in delivering affordable housing. Plan should acknowledge working relationship between Housing Associations to encourage commitment in the plan to support CLTs' choice of sites
- Disappointed over the significantly reduced percentage of affordable homes required on new development. Concerned that forecast supply is only 3,551. Should plan to meet the evidenced need for 4,070 as a minimum.

Table 1

- Supports expressing percentage provision in terms of "at least"
- Housing Association planning consortium disappointed with reduction from 50% down to 35% in, given EDDC's intention to maximise the delivery of affordable housing
- Housing Association planning consortium supports the inclusion of affordable housing in the development of the second new town, which should also be as high as viably possible
- The 15% figure for the proposed New Town does not represent sustainable, inclusive development. Need to explore ways to increase this percentage to create balance community with mix of different tenures from early in the development
- Housing Association planning consortium – policy does not broaden housing choice, ie a policy contradiction. It completely cuts out affordable rented tenure, and home ownership products eg shared ownership. These overlooked tenures are widely used by Housing Associations and are successful affordable tenures. Tenure mix in Table 1 contradicts policy that 'proposals will be supported where they broaden housing choice'
- Consortium wants flexibility in policy to allow affordable housing needs to be met across the full spectrum of tenures. Consider tenure split on a site-by-site basis, and evidenced to demonstrate local needs
- Housing Association planning consortium –has long held concerns about the introduction of First Homes and implications for delivery of traditional forms of affordable housing
- Concerned about affordable tenure mix. Do not support First Homes as a mandatory affordable tenure. Concern over the affordability of First Homes (deposit and income

requirements are higher than for shared ownership). Strongly advise against excluding other affordable home ownership options

- First Homes assists some first-time buyers to enter the property market but will likely not help as many households as shared ownership currently does
- Shared ownership is more accessible, and flexible - allows household to enter home ownership with a small deposit and staircase up to full ownership over time
- Should remove references to securing affordable housing in perpetuity, other than on Exceptions sites. NPPF only refers to affordable housing in perpetuity on Rural Exception Sites. Do not support securing affordable housing in perpetuity more widely as it restricts lenders appetite to fund development; investors are discouraged if there is no prospect of realising the investment and returns
- Support for financial contributions for development of 5 to 9 dwellings in designated rural areas, they boost affordable housing delivery in the district

East Devon AONB Partnership. Even if there is proven need, sites in AONB should meet NPPF, be located and designed to respect the aims and purposes of the AONB designation and include an appropriate LVIA.

Policy 41 - Housing to meet the needs of older people

Many comments received from communities, developers, and specialist housing providers.

- General recognition by respondents that the proportion of older people is increasing as people live longer lives. Offering older people a better choice of accommodation to suit changing needs helps them live independently for longer, feel more connected to their communities and help reduce costs to social care and health systems.

Community comments:

- Devon County Council (DCC) - need to strengthen this policy to support provision of a more diverse supply of housing for older people, in particular affordable rented accommodation eg extra care housing and adapted housing for people with specialist needs. DCC are currently updating their evidence base on the need for extra care housing within Devon. Request discussion with EDDC on how to make adequate provision for extra care housing in suitable locations in East Devon including securing the land and delivering facilities

Contrasting community concerns about planning for housing for older people:

- A policy on housing for older people is needed. LHNA statistics provides evidence of the scale of need for housing for older people.
- However, one community group asserts the population of East Devon is not ageing due to local resident population getting older. Very recently younger families are moving into East Devon, rather than traditionally the overwhelming number of retirees.
- One view is that the housing needs of East Devon lean towards retirement, adapted, and affordable smaller dwellings. Older people choose to move to East Devon “to enjoy the later years of our lives in peace and tranquillity, and in many cases downsized and would financially struggle to move anywhere else”.
- An alternative view - Be realistic. Those who can afford it want suitable housing for their old age and will pay for it eg Lifetime homes mix accessibility with some space; but not tiny retirement flats with high charges. Inheritance tax discourages moves to smaller properties
- Some want Policy 41 removed because it encourages further influx from other areas, causing further unnecessary over-development.
 - Why encourage elderly people to retire here?
 - East Devon’s population is amongst the oldest in the country, many in housing not specifically designed for them.
 - Natural decrease means housing is not required to meet needs of existing residents
 - Policy appears to meet needs of those retiring here from elsewhere.
 - Leads to in-migration of elderly people, and an increasingly elderly population and demographic imbalance.
 - Puts extra pressure on stretched health service.
 - Encourages specialist retirement housing developers to exploit development potential eg of popular seaside towns
- There are already too many retirement complexes in some areas (Exmouth is cited as one example), which are not serving the local community but have adverse impacts eg changing the demographics and character of the area, and low wages
- An elderly population cannot sustain the future of the economy. Must be a balance towards a more diverse age integrated population to attract the best to stay/live here
- Some want housing to meet needs of existing, ageing residents to be a priority but not those that retire here
- Some want Policy 41 removed because it is age restricted and discriminatory. The plan should focus on housing for younger people. Retirement flats do not provide affordable housing (on site or by contributions)
- If the local plan is seeking to create a market for provision of housing for the over 75s, then it should do likewise for the younger sections of the population

There is some community support for policy for housing for older people

- One Parish Council supports policy 41 through Neighbourhood Plan policies
- One respondent wants policy amended to include requirement for housing for older people wishing to downsize but stay in their village
- Housing older people generates employment. Supporting small traders eg decorators/gardeners, home adaptations; personal care; and cleaners. Older people support town centre commerce. Some older people provide child-care for their working families
- Some want a good mix of accommodation but needs vary.
- One Parish Council wants provision of truly affordable housing for older people, not just those wanting to downsize to release capital
- Some who downsize from rented family accommodation can find nothing in a central area, near family and bus routes
- Many older people are still very active but require homes that create less work and have less stairs. Lack of bungalows is creating a supply chain bottleneck
- Some want a more robust policy - secure developer contributions towards health costs and insist on local connection.
- Some want a more permissive policy - let the market determine supply mix and percentage, so development takes place in accordance with demand. Many specialist providers of elderly homes have 100% elderly occupation, ie no 20% allocation of development for youngsters

Range of contrasting community views on the type and location of accommodation

- One view is that developers focus on a narrow part of the market – high-price/high-specification (leasehold or freehold) which attracts in-migrants who can afford them. The policy encourages ghettoised accommodation of gated and specialist communities
- Although another respondent asserts that demand for private sector age restricted housing is not strong – can take time to sell once marketing by developers is withdrawn
- There is also concern over developers' interpretation of care class uses/care accommodation. This impacts eg on contributions towards affordable housing
- One respondent asserts that the policy focus is on institutional settings and not normal dwellings. Should revise policy to take account of the thousands of older people urged to stay in their homes which are unsuitable unless adapted.
- Some want affordable housing for older people, not large retirement flat complexes
- Some want housing specifically for the elderly needs to be for those on low incomes (there are plenty of expensive retirement flats)
- Some want all new social housing to be built to cater for all ages.

- Others want more small houses for older people to downsize to in their own communities (towns and villages)
- Another view is that park homes can satisfy the needs of older people; opportunities to expand existing retirement villages eg Otter Valley Park
- There is support for new housing to be designed for whole life/ease of use by older people
- Some comments highlight a shortage of bungalows for people who want to still live independently. The plan should be explicit about providing bungalows. Others want to protect existing stock of bungalows/single level living. Concern over conversion of 2-bedroom bungalows to houses.
- Allocations should locate housing for older people close to community facilities
- Some want new housing for elderly people to be for those on low incomes, built near town centres on brown field sites. However, there is concern in towns eg Budleigh Salterton and Exmouth, development sites are too far for the town centre
- Sidmouth Cycling Campaign want sites to be easily accessible by walking, cycling and mobility scooters – as routes incorporating steps can be an obstacle to access
- Some say the policy is too prescriptive, inflexible, excessive social engineering. Housing for older people is not appropriate on all developments nor in all locations. So why 'pepper pot' elderly people as a percentage of every new development?
- No mention in plan of housing for 'comfortable' retirees to move in to and downsize

Range of developer comments:

Some developers support the principle of appropriate housing to meet needs of older people, but only where there is evidence of such need

- Housing for older people is not restricted to just traditional care homes and nursing homes. Developers are providing opportunities for a wide range of housing accommodation products designed to meet a range of needs including retirement living apartments; extra care apartments. Greater focus on independent living, as well as flexibility for moving into accommodation with care (to varying levels) and communal facilities on site
- But not every site will be appropriate for older persons housing, so the policy needs to be more flexible
- Policy needs to be subject to robust viability assessment. Cost and viability implications:
 - Specialist housing in Use Class C3 is age restricted general market housing, retirement living or sheltered housing and extra care housing or housing with care
 - C3 housing is not excluded from affordability calculation

- Significant extra cost with specialist housing – need to provide adequate communal facilities, and for some schemes provide on-site staff accommodation
- Concerns about viability. In any viability assessment EDDC should acknowledge that the viability of specialist older persons' housing is more finely balanced than 'general needs' housing. So, housing typologies should be robustly assessed

Concern over the percentage in Clause 6:

- Blanket policy approach of 20% exceeds the need to meet at least 1,630 net additional specialist dwellings (by almost 1000 units). Could over deliver one form of accommodation at the expense of others that are needed. Wants a more targeted approach with flexibility embedded.
- Some developers are concerned that the policy requirement local plan allocations of 20 to 199 dwellings to include at least 20% specialist older person dwelling far exceeds the lower end of identified housing needs. In combination with a 35% requirement for affordable housing this would mean less than 45% standard market housing delivery on a site. (including self-build/custom build plots). Overall viability of schemes becomes doubtful. Policy is perverse. For a traditional housebuilder to deliver its market products it must deliver 60% of plots to affordable housing, older persons housing and self/custom build, and only 40% for its product. No evidence provided about the viability of the policy
- Should not apply to sites within the Cranbrook DPD area
- Concern over other clauses
- Provider of specialist housing for older persons comments that:
 - to be consistent with latest PPG Amend policy ie insert new point c) at end of point 1- set plan period requirement “ at least 6,224 should be specialist older persons dwellings”, based on LHNA evidence of need. Then planning applications don't have to provide proof of need for older persons housing.
 - Determine planning applications for specialist housing for older people, based on Market accommodation for older people in the form of age restricted general market housing, retirement living or sheltered housing is in Use Class C3 (dws); and Extra care housing, housing with care, residential care home and nursing home accommodation (including end of life / hospice care and dementia care home accommodation) are in Use Class C2. Local Plan policies on affordable housing and Exception Sites then don't apply to C2 element.

- Another specialist provider is concerned that urgent action is needed to meet need. Supports sub-clause 5 in widening choice. Sub clause 6 is welcome, but strategic sites are often inappropriate locations. Need for older persons housing is self evident, no need for developers to provide up to date evidence of local need
- Devon County Council welcomes policy but would like greater support for a more diverse supply of housing for older people, in particular affordable rented accommodation eg extra care housing and adapted housing for people with specialist needs, in particular in main settlements of Exmouth, Honiton, Sidmouth and Seaton.
- Inconsistency between criterion 4 re. “site is within 400m” and criterion 6 re. “ all development proposals for 20 to 199 or 200 or more dwellings...” - what if a development is beyond 400m of facilities? Need to clarify criterion 6.
- Clause 4. Refers to sites easily accessible by walking to town centres. Suggest this should be modified to “sites easily accessible by walking, cycling and mobility scooters” as routes incorporating steps, for instance, can be an obstacle to access.
- Clause 12a refers to Clause 8. This appears to be in error and should refer to Clause 7.
- Alternative view - Some developers oppose the policy:
- Instead of properly planning for specialist accommodation for older people (i.e. allocating) the Local Plan requires specialist accommodation for older people on site allocations above site thresholds. This depends on developers to contribute towards this need. It is an additional obstacle to conventional residential development.
- Many allocations and windfall sites are not suitable/appropriate for specialist older persons housing. Insufficient for policy 41 to be ‘flexible’.
- More appropriate to identify /allocate suitable sites specifically for providing specialist older persons housing. Allocating sites for specialist housing can provide greater certainty and ability to deliver in appropriate accessible locations such as town centres
- Local plan should only identify and allocate suitable and deliverable sites specifically for providing specialist older persons housing that meet those needs and respond effectively to demand. Want EDDC to look at evidence of need and supply across the district and engage with providers to understand operational requirements

Another alternative view - One respondent proposes a different approach. East Devon has amongst the highest percentage of elderly people in England ranging from early-stage retirement to frail elderly in need of care. The choice of retirement housing is limited and care homes and specialised housing with care are in crisis. The proposal relates to

- Horizon care village developments and satellite retirement developments
- Ambition is for a rolling programme of construction across the country
- Each development of approximately 500 homes comprising:

- High density, high specification freehold service apartments for frail, elderly and people with long term health conditions
 - Extensive on-site communal facilities
 - Specialist Dementia Unit
 - Separate development of freehold family homes for families caring for family member with a long-term health condition and children caring for a disabled parent
 - Satellite developments for early-stage retirement
 - On-site care and support (day care, respite care, reablement/rehabilitation, end of life care) - caring for multiple health conditions. Actively pull residents from acute settings and reduce long term conversions to long term nursing/residential care
 - Managed by Community Interest Company in consultation with residents' Commonhold Association
- In process of establishing a Care Academy - extend training for care workers to include long term health

Policy 42 - Accessible and Adaptable Housing

A range of comments on this policy, from the community but mostly from developer, housing association and specialist housing provider respondents. Mix of views.

Community responses:

- Devon County Council welcome this policy due to the importance of providing for groups which may not be catered for under conventional housing (such as older people and younger adults who may have disabilities or mental health issues).
- Growing need for properties to comply with Part M(2) or Part M(3) of Building Regulations
- EDDC hasn't taken this approach in the past. How will it be achieved?
- Town Council - policy targets will produce a very small number of accessible and adaptable homes, even on large developments. All new homes should be designed as homes for life.
- All housing aimed at seniors should be accessible to avoid people having to leave their home if they become disabled
- All new housing should meet those with a disability needs. Remove the word affordable as no new home will ever be affordable to those on low incomes.
- All affordable and rented homes should be wheelchair accessible
- Policy is useless without community facilities/services to meet the needs of these people
- Policy should also cover alterations and extensions to buildings, not just new build

- Only reflect the need of local communities as of today; do not encourage more in-migration
- Not good enough in a Climate Change Crisis
- Much of our housing is not suitable for wheelchair access, and cannot be altered

Developer responses:

Some developers support provision of accessible/adaptable housing.

- Policy is sound. Welcome Council's recognition that M4(3) provision is only required where supported by site suitability/viability
- New housing is opportunity to improve provision; depending on implementation and SPD
- Concern over how long an SPD will take to prepare/adopt

Some developers have concerns and objections

- Government proposals for mandating M4(2) requirement (and M4(1) in exceptional circumstances) are subject to further consultation on technical details, to be implemented through Building Regulations. M4(3) would continue to apply as now where a local plan policy is in place and where a need has been identified and evidenced.
- One respondent asserts that policy breaches Government guidelines by not recommending that 5,119 households/ at least 30% of the need for adapted housing could be met
- Flexibility is needed as certain standards may be difficult to achieve on certain sites and standards may evolve during the plan period
- Needs to be consistent with PPG; take account of site-specific factors eg flooding, topography/engineering levels, as they make some sites less suitable for M4(2)/M4(3) dwellings particularly if step free access cannot be achieved/not viable. This doesn't just apply to step-free access. Build flexibility into the policy -allow developers to demonstrate in some cases why this level of M4(2) may not be achievable
- Some developers object as policy requires 100% of all homes to be delivered to these standards. LHNA evidence is 30% of need to be M4(2) and M4(3) Goes beyond Building Regulation requirements, Part M4(2) and M4(3) are not mandatory. No evidence to demonstrate this is necessary/justified. Viability not tested
- Concern over the size of properties this policy will necessitate, and on delivering a mix of homes on site, how this affects density requirements and impacts on viability
- Policy should be subject to robust viability assessment

- Inability to scrutinise Reg 18 plan viability, will necessitate further consultation as part of iterative process in drafting policies before reg 19 stage
- If EDDC wishes to adopt the higher option standards for accessible, adaptable and wheelchair homes it should only do so by applying the criteria in PPG. Need local assessment evidencing the specific case for East Devon. And need a transition period
- Should not apply to sites within the Cranbrook DPD area – where development of the new town proposals are subject to a separate recently adopted DPD. Policy 42 will impact of development already progressing through the development management process
- Need to consider future market demand
- The proposed requirements need to be justified with evidence. If higher accessibility standards are justified, transitional arrangements are needed to allow developers to adapt to the new requirements, which will have implications in terms of additional floorspace required and associated cost.
- A Housing Association planning consortium supports the policy direction, but reminds the Council how the increased delivery of such properties may affect viability and overall affordable housing delivery in East Devon.

Comments from specialist housing providers raise concerns:

- One provider of specialist housing for older persons wants clauses b and c deleted from policy. Policy must be properly assessed within the forthcoming viability assessment, including a proper assessment of viability of older person's housing. Asserts that
 - Policy confuses older person's housing with wheelchair accessible housing.
 - M4(3) standard housing may institutionalise an older persons scheme reducing independence contrary to the ethos of older persons; notably extra care housing.
 - M4 3 Housing has a cost implication and may reduce the number of apartments that can be provided on an older person's housing scheme further reducing viability
 - Difficult for EDDC to justify the policy approach in absence of a viability study.
 - A 10% M4 (3) requirement for older people's housing would be justified (ORS para 7.56) and more viable rather than 100% requirement (ORS study para 7.57) in that would make sites unviable and result in a poor delivery of older people's housing.
 - People with a long-term disability or illness that requires wheelchair adaptable housing will not meet the age threshold for older person's housing. This further justifies disaggregating M4 (3) housing from older person's housing
- Another specialist provider asserts that the housing sector is increasingly challenging 100% requirement policy at Examinations and Appeal. Justification for 100% M4(3) requirement for wheelchair adaptations is based on flawed assumptions, and not sound.

- In the provider's development there is no need for apartments to meet M4(3) requirements with less than 1% of occupiers using a wheelchair full time. (eg where specialist housing is for the active elderly)
- Long term wheelchair users will have moved into suitably adapted homes earlier in their lives, and likely to remain there.
- Those in retirement living apartments with short term wheelchair use, can do so in home built to M4(2).
- Residential care/nursing homes are more appropriate for those needing permanent wheelchair use and greater care
- People with long term mobility disabilities would be in a different setting; not occupy an independent living retirement development.
- Cost of M4(3) provision is unjustified
- Caselaw - no policy requirement or control that LPA can impose over open market private apartments that could mandate that they must be sold to a wheelchair user

Policy 43 - Market housing mix

Several comments on this policy, mostly from developers .

There are a few comments from communities:

- Parish Council supports through Neighbourhood Plan policies
- Another Parish Council considers the policy has too many caveats, so needs tightening
- EDDC hasn't taken this approach in the past. How will it be achieved?
- Town Council- supportive, but implementation details will be important. Await SPD
- How will the housing need evidence be gathered?
- Policy will need 'teeth' otherwise anticipate developers will object and appeal
- Need less 4 bed dwellings and more 2 bed dwellings, eg for younger, local people.
- Not just about number of bedrooms. It's also need sufficient living space including for home working.
- Should concentrate upon densities and room sizes. Create accommodation in roof spaces
- Absurdly prescriptive. It supposes we can predict bedroom requirements to 2040.
- Inflexible, compared to market delivery. Won't housebuilders provide for/adapt to market?

Most comments are from developers:

- Some developer/housebuilder respondents support objective of policy to provide mix of house types and property sizes in locations consistent with spatial strategy
- Acknowledge policy includes acceptable circumstances where a proposals departure from the required housing mix is justified. Retain this in future iterations of the plan

However most developer comments are concerned that the policy is too prescriptive:

- Some assert the policy is misguided and unnecessary Let the housing market determine if Market mix is most appropriately left to the developers to determine. Policy should be deleted
 - Should not have a table with suggested mix based on 2022 needs in the Policy for the plan period up to 2040
 - Can't implement policy based on the number of properties for sale. Outside EDDC control
 - Households are free to choose what open market housing they want and can afford. Including demand for housing larger than they need
 - If there is the need for the size of property then, developers respond to that demand.
 - Plan should take a proportionate approach, not try to control every element of a scheme. Putting ever increasing levels of detail and ratcheting up requirements will not aid delivery of housing
 - Housing needs change over time and differ across District.
 - Decide on a site-by-site basis
- Others want Policy 43 to state that the mix of property sizes for market housing shown in the East Devon Local Housing Need Assessment 2022 is a starting point
 - Some broad support for policy but needs to avoid being overly prescriptive so development can respond to local character and setting
 - Want a flexible approach towards housing mix which recognises that needs and demand vary from area to area and site to site; ensures that the scheme is viable; and provides an appropriate mix for the location and market
- Policy should refer to demand. to reflect that people generally express a demand for a property that is bigger than they specifically need

- New housing doesn't just cater for net household growth. It is a means for people to move around within the market, freeing up properties along the housing ladder, eg enabling households to upsize
- Policy should refer to trend for homeworking many reasons why people want more space for this
- Some object to the percentages in the table in the policy, as they are based on the Local Housing Needs Assessment 2022 The LHNA is a starting point, - the mix should also have regard to local evidence, site specific consideration and viability
- Conflict between 2022 LHNA data and local up to date evidence of parish housing need
- Some suggest that specific reference to the 2022 LHNA is removed. Broader wording needed eg mix to reflect up-to-date date evidenced need and market conditions.
- EDDC should work with local communities to carry out local housing needs assessments
- 1 bed market housing is not typically desirable/viable. Combine 1 and 2 bedroom figures
- Policy should refer to different types, not just sizes LHNA does not consider need for bungalows. These have an important role in meeting needs. Add reference to different types of accommodation, specifically bungalows.
- Concerns that this should not be a blanket policy: across all sites
 - Should only apply to larger sites and/or take account of local character/density.
 - EDDC should work with local communities, and carry out local housing need assessments to inform a case-by-case assessment of appropriate housing mix, for housing delivery to meet identified need
 - Want flexible policy, as housing needs change over time and differ across district.
 - Should decide housing mix on a site-by-site basis at the planning application/ Reserved matters state, taking account of up-to-date evidence on need, supply, demand and location. Control mix by planning conditions.
 - Should not apply to sites within the Cranbrook DPD area.
- Example of departures is very detailed. They could be broader. Market conditions should be an example of where a departure from 2022 LHNA may be appropriate
- Amend sub-clause 4 to exempt specialist forms of development e.g. specialist older persons or student housing
- Paragraph 5 should be deleted as unclear what it will require in practice, given the policy already accepts the need for flexibility (in paragraph 4).
- Clause 5 only allows different open market mix in exceptional circumstances. This does not provide sufficient flexibility as required by NPPF
- Unclear what is meant by market conditions evidence demonstrating lack of marketability' and what is required. Should delete.

Policy 44 - Self Build and Custom Build Housing

Several comments from community and developer respondents, with a range of views.

Community comments are mixed.

- Parish Council supports through Neighbourhood Plan policies
- Another Parish Council questions the need for the policy during a housing crisis. Would someone working in a low paid job ever consider this option?
- Proportion of selfbuild in UK is too low. Big developers' schemes/national designs dominate, resulting in identical looking estates. lacking in vernacular look.
- Doesn't really promote selfbuild. EDDC should take selfbuild seriously. Opportunity for high quality homes at affordable price. Help local people build their own affordable home.
- No selfbuild units built in last 6 years. Misleading to compare windfall sites to the selfbuild register. Only a small percentage of windfalls come on to the open market.
- Supports promoting self-build, especially truly affordable, smaller units
- Supports encouraging Neighbourhood Plans allocating suitable sites
- Town Council – viability consequences when combined with affordable housing policies?
- Selfbuild should be lower priority than social housing
- Policy is irrelevant. Not a priority.
- Do not permit grandiose designs unless the selfbuilder has the funds
- Avoid inappropriate development eg in AONB, CAs, SACs
- Self-builds should reduce embodied carbon, use sustainable energy, limit car spaces

Most comments are from developers, with a mix of views:

- Some developers/builders oppose policy for delivering self/custom build as a percentage of larger sites. Potential conflict: between housebuilder and selfbuilder; and in managing communal areas. Advocate small bespoke allocations for selfbuild or just policy support for such housing on exceptions sites in/adjacent to settlements.
- Policy is onerous, not justified and not achievable. Will delay delivering housing
- Policy is not market-facing market facing to provide It would be more effective to have an exception site policy that allows self-build or custom-build on a case-by-case basis.
- Question whether self/custom builders want to build on a larger housing scheme.
- PPG sets out how LPAs can increase the number of permissions that are suitable for self and custom build housing. Possible alternative policy mechanisms to delivery

opportunities for self/custom build eg small /medium size sites specifically for this purpose, or policy allowing them outside but adjacent to settlement boundaries

- EDDC does not have appropriate evidence to justify site threshold and percentage of self- build housing

Some developers have concerns and some want the policy reworded:

- Policy should be worded with the ability for appropriate triggers to be negotiated on a site by site basis.
- Unclear whether there is a demand from custom and self-builders to live on site within larger developments
- Only require self/custom build plots where clear market demand for them on developments. Where there is no demand, the developer should not be penalised for not delivering specialised dwellings on new developments
- Concerns about: mixing styles/materials; site safety/security. How will EDDC control this?
- Developers' reluctant to offer selfbuild plots within larger areas potential conflict eg from styles and design/ management of communal areas/plots that are unfinished
- Health and safety concerns about enabling access to plots within active construction site
- The inclusion of affordable plots will have viability and delivery constraints. Lack of cost assessment and viability evidence to justify policy
- Should not encourage selfbuild at the expense of small builders. Instead, develop smaller sites/ encourage local building businesses to prosper/employ local people
- Should not apply to sites within the Cranbrook DPD area
- Provider of specialist housing for older persons wants new clause – 'Older person's housing schemes are exempt from the above requirement'. Such schemes are often on brownfield sites, need to be high density, minimum of 35 to 40 flats and already marginal viability. Threshold is impractical/not suitable. No room for self-build plots.

More specific comments from developers on Clause 1

- 5% requirement should only apply to the market housing, not the whole site capacity
- What is the evidence to justify the percentage and size thresholds?
- Amend Clause 1a to '6 to 12 months' for marketing; remove 'from being fully serviced and developable' as it's unnecessary/causes delay
- One respondent wants marketing period of 6 months (maximum of 12). A developer suggests a marketing period of 12 months (not 24 months) as more appropriate.

- Clause 1a - 24 months window doesn't help self-builders. Developer only sells the plot if retained as the builder. No price advantage, which puts off self-builders. Developer builds rest of site in the 2 years then claims self-build plot not sold
- Site could be developed within 24 months which would require developers to pause building on a development. 12 Months is more appropriate
- Clarify Clause 1b – Define 'early stage'. Access/services can be conditioned
- Impractical to provide road access on large, phased strategic sites at an early stage of the development or to make the self-build provision available for sale before 50% of the dwellings on the site have been commenced. Instead, require developer to make available the self and custom housebuilding for sale before 50% of the dwellings had commenced in a phase containing self and custom build housing Amend 1b to be accessible for pedestrians as well as vehicles
- Clause 1b - policy could be worded with the ability for appropriate triggers to be negotiated on a site by site basis
- Delete Clause 1c – no justification for requiring the self/custom build plots to all be made available before 50% of the dwellings have been commenced. Instead control through conditions
- Developer states not possible to make custom and self-build plots for sale before 50% of dwellings on site have been completed as would mean significant health and safety concerns with enabling access to plots on an active construction site
- Clause 1c - policy could be worded with the ability for appropriate triggers to be negotiated on a site by site basis
- 1e Wording is not accepted - impossible to commit to such wording at an early stage due to factors which may impact on development implementation eg fundamental health and safety implications during construction
- Clause 1f - affordable plots will have viability and delivery constraints. having a policy that requires affordable plots, adds an extra layer of complexity
- Combine clauses 1g and 1h and clarify to ensure any potential design code/ passport relates to the self or custom build dwellings and not conventional dwelling
- Delete Clause 1i is unreasonable. No legislative or policy basis to impose a requirement for any obligation for developments to be delivered and completed within a set timeframe. No lawful means to implement – cannot be reasonably enforced or conditioned. 3 years is too short for completion. Policy could lower interest in self/custom build.
- In law, it is the responsibility of the Council, not landowners or developers, to ensure that sufficient permissions are given to meet demand
- Thresholds are impractical and unsuitable for specialist forms of accommodation such as retirement living apartments for the elderly. They are high density accommodation and there is insufficient room to accommodate self/custom build plots on the site
- Thresholds are incompatible with other specialist housing eg flatted development

Policy 45 - Residential Subdivision of Existing Dwellings and Buildings and Replacement of Existing Dwellings

Only a few respondents commented on this policy:

- The Environment Agency state that this policy represents an opportunity to embed within the plan their local flood risk standing advice for changes of use to residential and replacement dwellings in areas at risk of flooding. This would help provide certainty and consistent expectations for applicants, simplify decision-making for planning officers, and ensure such proposals result in more resilient buildings.
- Parish Council supports through Neighbourhood Plan policy
- Town Council - Policy is subjective. How to define 'adequate'?
- Some community support for policy. Easy to subdivide older properties to produce more dwellings density and without unduly changing street character. Subdivision is an opportunity to save older historical buildings as part of the area and to retain original fixtures/fittings
- Subdivision must be in keeping with the property and surrounding area; meet standards.
- Supports retaining existing buildings. It reduces the amount of building materials required and reduces waste to be disposed of
- Supports minimising hard surfaces in front gardens
- Supports adequate parking provision
- Every development needs off street parking but without hard surface on front garden
- Wants requirement for covered storage in the development.
- Does not support rebuilding/replacing smaller homes with larger homes
- Concern about subdivision impacts ie out of character, loss of gardens, overbearing, noise
- Policy is too specific/over the top. Is it necessary?
- Embedded carbon policy is too prescriptive/complicated/too wordy. Environmental benefits unclear. New buildings are built to higher standard/deliver more dwellings than replaced.
- Adverse impact on the sustainability of smaller villages. Policy does not support villages to attract future generations. Does not provide comfort for anyone considering investing money in purchasing a property in smaller villages not in the settlement hierarchy tiers that they will be able to later reasonably develop them further.so that growing families are not forced to move to find housing appropriate to their needs

Policy 46 – Householder Annexes, Extensions, Alterations and Outbuildings

Only a few respondents commented on this policy. Some support but also some concerns.

- One Parish Council supports through Neighbourhood Plan policies
- Another Parish Council considers this policy is not justified. It could restrict farmers' ability to meet the changing needs of their family. These properties would enjoy PD rights. Policy 46 is inconsistent with Policy 50 which allows minor works without reassessment of need.
- Town Council – what is the justification for limiting GIA increase to 30%?
- Concern that alterations tend to make houses bigger, reducing the stock of smaller houses for people to down-size to or use as starter homes
- Policy is correct, but the problem is that the policy is not applied. Need stronger monitoring of policies otherwise policy is ineffective
- PD rights are more stringent in AONB, particularly loft conversion. Wants para 8.99 amended to exclude loft conversions in AONB where design is acceptable
- Considers that annexes and extensions and outbuildings must not have a detrimental visual, amenity and privacy impact on neighbouring properties
- Proposals must take account of neighbours' views
- Extensions need to be in keeping with main building; should meet housing standards
- Agrees annexes, extensions, outbuildings should be integral or linked to the main dwelling
- Town Council - must condition annexes so they are ancillary to main dwellings AND not AirBnB accommodation. Concern about enforcement
- One respondent takes a contrary view. Wants annexes to be able to be used for social housing when their need by the family in the main building has ceased. Why have an empty property that could instead meet other people's needs.
- Extensions/alterations are concreting over gardens, and reducing on-site parking
- How to manage increased drainage pressure? Or protect against loss of flora?
- Concern over impacts on neighbours from extensions built too close to site boundary
- Extensions e.g. to create bedroom(s) can turn into AirBnBs. Need to take enforcement
- Adverse impact on the sustainability of smaller villages. Policy does not support villages to attract future generations. Does not provide comfort for anyone considering investing money in purchasing a property in smaller villages not in the settlement hierarchy tiers that they will be able to later reasonably develop them further so that growing families are not forced to move to find housing appropriate to their needs
- Disagrees with ban on improvements to affordable house or agricultural worker's dwelling.

- Why restrict buildings' potential? Why treat affordable and market housing differently?
- Reduce or remove policy. It is too prescriptive/arrogant/overdone. Planning controls on extensions are already sufficient, don't need more controls
- Should focus on existing old/abandoned properties that can be regenerated to provide dwelling(s). Regenerating brownfield sites should be the priority, not new-build.

Policy 47 - Hostels and Houses in Multiple Occupation (HMOs)

Only a few respondents commented on this policy

- Some support for policy
- HMOs should not be used to house young families. HMOs only appropriate of young single people, not the norm for older adults (except by choice)
- No mention I plan of better use of existing housing by encouraging the conversion of large houses to multiple occupancy
- Concern over poor HMO provision in Exeter, apart from student lets
- Overly prescriptive. But problems can occur, warranting close scrutiny of applications
- Clause 2 - Provide more parking spaces on site to avoid on street parking.
- Size of parking spaces/garages needs to be realistic, mindful of modern car sizes
- Objects to Clause 2 not requiring cycle storage if site has access to public transport or is within 800m walking distance of town centre. Cycling is an attractive mode at that distance
- Clause 2 – concern if provision is not made for parking. On-going cuts to bus services mean that cars will be needed even in town centres. Need electric car charging
- Clause 4 Town council supports the policy but internal standards need higher specification
- Clause 5 Sensible policy for careful subdivision of large houses which can help meet need
- Must maintain HMOs to high standard. And retain character. Use suitable insulation to avoid damp. Need for soundproofing.

Policy 48 - Provision for Gypsy and Travellers, and Travelling Showpeople Sites

Only a few respondents commented on this policy.

- The Environment Agency are pleased that this policy includes a requirement for these proposals to 'avoid sites vulnerable to flooding or affected by any other environmental

hazards that may affect the residents' health and welfare'. This is essential because such developments are considered highly vulnerable and should not be permitted in areas at risk of flooding.

- Sites must support the needs of the travelling community.
- Supports need to make adequate provision
- No evidence to justify quantum of pitches at proposed new town
- Town Council questions EDDC plans for vanlifers. How will plan differentiate legally between travellers, showpeople and vanlifers?
- Sites must have access to utilities (water, sewerage & water disposal, drainage)
- Sites for small groups only
- Sites should not affect residents of the area.
- Sites should not tolerate antisocial behaviour
- Doubts that the new settlement would be suitable
- Proposed LP allocation is next to M5. Contrary to WHO's health requirements – noise/pollution impacts
- For countryside sites -wants evidence that needs cannot be met elsewhere in district
- Approved provision in Hawkchurch is used for social housing (static caravans and touring pitches). No further need in Hawkchurch. Look elsewhere rather than change use once approved

Policy 49 - Rural Exception Sites and First Homes Exception Sites

Most comments on this policy were from communities and a Housing Association Consortium.

- One Parish Council advocates a separate Affordable Housing DPD, to include this policy. Exception sites in rural villages are very sensitive. Should be aimed at 'Social Rents' and not affordable rents
- Some broad support for policy. Part of strategy to deliver affordable housing.
- Should encourage every village to bring forward schemes under this policy. It's the best way at present of producing homes badly needed for natural growth in communities deemed 'unsustainable' as shops, pubs and schools shut due to lack of customers/pupils
- CLT comment is that Rural Exception sites offer CLT a more appropriate planning method to secure affordable housing sites that will have community support. This contrasts with reintroducing settlement boundary which frustrates CLT in trying to secure land for the building of affordable housing.
- Why not 100% as affordable housing?

- Housing Association Planning Consortium supports the policy proposal for a small element of market housing to provide sufficient cross-subsidy. Affordable housing delivery can be fast-tracked when there is no grant funding available
- Consortium emphasises that NPPF/PPG do not define small. Local Plan's definition for this policy is too prescriptive, will inhibit the ability to maximise affordable housing opportunities on Rural Exception sites
- Rural exception sites should encompass self-build.
- EDDC will need 'teeth' to implement the policies. Need more detail on implementation
- Any guarantee that dwellings approved would not be sold on to the open market for profit, and to outsiders? How would this be implemented?
- Should protect AONB from development. Policy could lead to development in the AONB. Inconsistency between policies. New starter type homes are not allowed AONB by this policy. So should reject sites eg Exmouth 17, Littleham fields of 410 houses in the AONB.
- Policy should not be justified on a District wide basis; housing need should relate to settlement.
- Housing Association Planning Consortium considers that as well as the LHNA, plan should recognise the East Devon Housing Register as another key evidence based to inform Rural Exception Site proposals
- Query raised about relying only on East Devon Local Housing Needs Assessment to justify exception scheme in a small village of under 3000 people. This is contrary to PPG-which requires proven need in relation to the local community. Need to amend policy
- 2 comments about Rural Exception Sites and First Homes Exception Site clause 2 ('A small element of market housing...')
 - A Town Council considers the percentage of market value housing to be high.
 - A Community Led Housing CIC considers clause 2 is impractical. Rural communities seek 100% affordable housing on RESs. Landowners will require the open market plots, which are then unavailable to CLT/HA for cross subsidy. Landowners dispose of land for affordable plots at £1, but it's not enough cross subsidy to deliver affordable housing without grant. Homes England can regard the landowner as benefitting too greatly and refuse to allocate grant. CIC consider that enough landowners are willing to bring sites forward at 100% affordable housing. Under NPPF the opportunity for market homes on RESs is at the LPA's discretion
- Devon County Council query whether the last paragraph would include Gypsy and Traveller community who are already residing on a particular site. They highlight the adverse issues with this, and that it would be severely limiting for families
- Support for SPD to provide further guidance

- Occasionally this type of development is justified but only rarely, ie 'exceptional'
- Keep Exception sites to an absolute minimum. They cause settlement boundary creep. Keep development within the settlement boundaries and housing plans being proposed. Apply this approach to the development plan before any exception sites are considered.
- Policy could be unnecessary if more restrictions were placed on second homes, Airbnbs, buying to rent. Or if more affordable housing were built.
- Policy approach is second best. It doesn't apply rigour to strategic planning
- Should not allow this type of development if it is on sites rejected under the Local Plan. Instead seek more affordable housing when site allocations are being developed.

Policy 50 - Housing for rural workers

Only a few respondents commented on this policy:

- Parish Council supports through Neighbourhood Plan policies
- National Farmers Union support the specific provision for rural workers to allow the provision of a suitable property (either conversion or new build) on a farm business where a need can be clearly shown.
- Must look after the Farming and Agriculture Community. Need to maintain our agricultural industry and support those that work in it notably those with a local connection
- Concern that many agricultural workers dwellings have been lost over the last 20 years
- Policy is necessary to solve the problems caused by the recent lack of migrant workers
- Support for stringent requirements being placed on rural businesses. This compares with very poor enforcement of illegal development in the countryside, that's led to retrospective applications and time-related confirmations of planning status.
- Any dwelling should be linked to the rural occupation on site and not located elsewhere within the vicinity. ie farm workers on farms
- Policy should never be used by businesses that are not proper rural businesses
- Town Council - policy might be open to abuse at the cost of the countryside. It could have unforeseen consequences when change of use applications result in rural properties being used as holiday accommodation. Policy 50 is at odds with the diversification policy.
- Policy is more prescriptive than last plan. More appropriate if policy aligned with wider sustainability /policy goals (eg local facilities and employment) than being prescriptive.
- Specific comments on clauses
 - Clause 1a. One respondent does not support the word 'existing need' as applied to rural businesses. It's self-defeating, unnecessary and could be interpreted as

meaning they already live on site. Meeting the test of 'essential need' to be resident on site is sufficient

- Clause 1d. Unclear if policy means that a greater visual/environmental impact next to an existing building is preferable compared to a lower impact of an alternative location. Wants more concise text eg just minimise the visual and environmental impact.
- Clause 1e. One respondent considers 150sqm is excessively large compared to standard sized accommodation. Another considers that a 'one size fits all' approach to floorspace is not appropriate. A specific floorspace figure could be discriminatory. Floorspace should be commensurate with the functional need
- Clause 3 – Clarify the phrase 'need is unproven' ie say 'financial' need is unproven.
- Devon County Council suggest a time clause for the review of an occupancy condition should be added to clause 3 in the policy.

Chapter 8 - Policy omissions from - Meeting housing needs for all

There were calls for policy on or related to:

- Concerns that housing should be for local need/people and not holiday or 2nd homes. Call for policy around restricting 2nd holiday homes, and short term lets
- Include a principal residence policy. Could a covenant be used to protect affordable housing from being purchased from outside the District?
- Should recognise the results of the Letwin Review on housing buildout. The housing market controlled by the big 4 builders was broken. Support proposals to require rapid build out once Planning Permission has been granted, rather than slow build out to maintain high prices and profitability
- Devon County Council state the influence of second homes needs to be adequately addressed in relation to sustainability and affordable housing.
- Rain gardens:
 - The Sid Valley Biodiversity Group -
 - Welcomes the inclusion of references in the draft Local Plan to permeable areas for gardens at Policy 45 – although there could be more robust recommendation for 'rain gardens' to be provided to ensure the same policy outcomes.
 - Sustainable Drainage Systems: It is disappointing that there is no insistence in the draft Local Plan to the use of SUDS schemes, in particular for new developments.

Chapter 9 - Supporting jobs and the economy and vibrant town centres

General matters raised in respect of this chapter included

- Lyme Regis Town Council would like more emphasis on and greater support for working from home to help with the climate crisis.
- In the absence of the EDNA it isn't possible to appropriately assess alternative strategies
- Need should be assessed on a sub-regional basis, with East Devon accommodating a higher level of employment
- East Devon should accommodate Exeter's displaced employment land through allocations

Policy 51 - Employment development within settlement boundaries

- Respondents were generally supportive of the principle of encouraging employment at settlements and providing local jobs and jobs alongside new housing.
- Strong support for improving town centres and focussing employment in them.

More specific points included:

- Devon Wildlife Trust advised that Natural context is missing from this policy. Reference should be made to the inclusion of the natural environment within employment areas in order to ensure that people are able to work in areas where they are connected with nature.
- Policy is contradictory- only allowing employment if there are no adverse amenity impacts could exclude most employment uses, thus allowing a change of use to residential.
- Need to create well paid jobs for local people, not just encourage specialist employees to move to the region. The existing local workforce need improved and better skills training, the choice of jobs being made available, and increased wages. A lovely natural environment doesn't compensate for low wages.
- Housing development needs to be explicitly linked to increases in employment land so local people can work close to home.
- Clyst Honiton Parish Council believed that commercial development in rural areas should provide jobs for locals and not increase traffic. They are concerned that office developments could lead to more vehicle movements.

- Gittisham Parish Council stated that the Local Plan's allocation of 15ha of employment land at Honiton is excessive, given the amount of vacant employment land and floorspace in the area. The council also believes that the development of high-quality employment opportunities at other sites in East Devon will make Honiton less attractive as an employment location.
- Support policy approach of resisting loss of employment land but this approach should be further strengthened by a policy that limits housing development if additional employment land is not developed in parallel.
- Support joint commission of Economic Development Needs Assessment for the greater Exeter area. Crucial to ensure that the extra employment land will be sufficient to accommodate the additional jobs required and siting will be suitable and minimise commuting.
- Employment opportunities should be developed within or next to existing employment sites, and not within residential developments.
- There should be a coherent framework for recovery and growth beyond allocating slabs of bare employment land. EDDC is well placed to encourage sustainable economic activity by supporting established businesses, encouraging start-ups, and creating a positive and welcoming environment for the sector.
- Economic growth is entirely compatible with the green agenda.
- A range of independent businesses should be encouraged, and selling and producing local products would support this.
- Business parks (such as Liverton) should not be expanded until they are full.
- Redevelopment of business parks (such as Pankhurst) indicates that there is not a need for large commercial uses.
- Commercial use in the countryside should be restricted to farms and agricultural use only.
- Failure to control ancillary use has led to a proliferation of retail and hospitality at out-of-town centre locations, damaging town centres.
- The Plan should include a positive strategy for the future development of town centres and masterplans for all East Devon towns to set out the measures (and actions) to meet their potential
- Each town centre should have an individually tailored set of proposals (or Masterplan) to take them through the Plan period. These should comprise a mix of specific proposals and general policies pertaining to that town. They should be core sections within an East Devon Local Plan, as they are everywhere else.
- Town centres need basic maintenance and cleaning; decent essential facilities and services; modest levels of investment and adequate, reasonably priced parking. Town centres in East Devon look and feel neglected and abandoned.
- Decent town centres are essential to tourism

Policy 52 - Employment development in the countryside

- This policy received quantified support as some respondents felt that employment in the countryside should be linked to rural activities/produce and there was concern that unacceptable impacts could arise from traffic and noise.
- National Farmers Union state that farm businesses will always need to develop and adapt in order to meet market requirements and also stay viable. This is not always 'intensification' as stated in the draft plan but may just be moving into a different part of the agricultural sector, which would require different infrastructure. Where a business can show a need to develop in order to remain financially viable it is important that the local plan can facilitate this or it risks contraction in agricultural businesses and a loss of employment.
- Object to policy as it doesn't recognise benefits of business parks in the countryside eg Greendale Barton. Agents for the owners say that the site is not isolated, a major A road with bus stops runs alongside it, the site is very attractive to businesses and is fully occupied, it is operationally sustainable due to being exclusively powered by renewable energy generated on site and the owners have a 22 ha expansion plan to enhance overall sustainability as well as providing for more businesses. In future it will meet the needs of the new town.
- Support a wide mix of sites and intensification/extension of successful sites
- Include policy reference to need to balance adverse aesthetic impacts against benefits in areas of high employment demand
- Include reference in policy to additional consideration being given to existing employers to safeguard existing valuable jobs
- Re-use of existing rural buildings only where they are not close to residential buildings so would not impact upon their amenity with additional traffic, noise etc.
- Intensification of current operations is permitted with some constraints, but need greater consideration of the impact on residents and traffic. Workshops using heavy machinery generate noise and cause distress to nearby residents.
- First section of policy requires criteria on which to judge potential harm.
- Second part of policy is unrealistic in terms of being readily accessible to the Tier 1 and 2 settlements via a range of modes of transport, and noting that the farm diversification policy refers to access to tiers 1-4.
- Is this policy intended to apply to agricultural development? A separate policy for agricultural buildings and other development such as slurry lagoons would be better.
- Policy should require a demonstrable demand for new Employment development in the countryside as otherwise there is the risk the land could be used for residential purposes by default.
- This policy is open to mis-use

- Too permissive and open ended. Development in the countryside should be limited to that which supports local and rural enterprise and has no visual impact or requirement for HGV's unsuitable for local lanes.
- Commercial uses in the countryside should be associated with agricultural use, increasing sustainability and access to local produce. This would reduce need to import food.
- Converting old farm buildings such as barns into independent shops ie a farm shop or to rent as a home or holiday is ok, but priority must be given to agricultural workers.
- Local farm shops should be encouraged (Exmouth was suggested as a potential location)
- This is standard policy to control these circumstances but should be enforced.
- The East Devon AONB team support the requirements that “the scale, siting and appearance of buildings and activities associated with the proposed development is appropriate to the rural character of the area and will not adversely impact local amenity” and “no adverse impact on the character of surrounding natural or historic environment”.
- Policy is too restrictive by not applying to existing business parks, industrial estates, employment sites in the countryside – need to provide opportunities for rural businesses to grow, crucial for the prosperity of the rural economy.
- Support intensification of existing rural employment businesses but policy text does not reflect more supportive justification text.
- Hawkchurch Parish Council - As it stands, this policy could allow development that would have adverse effects on local neighbourhoods because of increased traffic, noise, etc. Criteria should be included that address such potential impacts. It would also be worth considering the location in relation to settlement boundaries – any such business in the immediate vicinity is more likely to have adverse impacts on communities.
- Policy must be explicit that development includes the intensification of businesses via the expansion of their operational sites.

Policy 53 - Farm Diversification

- The Environment Agency support this policy and welcome acknowledgment that it may be necessary to limit the scale of on-farm anaerobic digester. There are some existing sites in the district that attract complaints and further expansion should be considered very carefully, especially for businesses that could cause additional or new complaints regarding odour, noise, dust, or other nuisances.
- Suggest that 'established farm holdings' are defined as those that have been operational for some years until present.

- National Farmers Union support the policy but state that it is hard to always remove all adverse impacts and these must be viewed objectively and not allowed to be weighted heavily against a proposal
- Need to consider what adverse impacts such as traffic, noise or other pollution, there may be when in, for example an historic village or hamlet, close to homes / with quiet lanes used by residents for walking, cycling, horse riding etc. Here the adverse impacts would likely be greater than those in the open countryside and carry greater weight against any positive impacts.
- The policy needs a bolder, clearer statement that the loss of farmland from food production will be resisted. Diversification should be supported but primarily as a means of ensuring continued food production and only as a last resort to move into other land uses.
- Last bullet should be re-worded more positively, ""proposals provide for the retention of hedgerows and trees and improvement in biodiversity"".
- A further bullet - that any diversification are to have no impact on existing views of hill-sides, AONB and ridge lines.
- A demand for new Employment development on Farms must be demonstrated to avoid this land being used for residential purposes by default.
- There is potential conflict with the rural workers accommodation policy in so far as rural farm accommodation could be used as holiday accommodation under a diversification application and this should be controlled.
- Alternative methods of food production that keep emissions of greenhouse gases to a minimum should be encouraged. Precision Fermentation could be a community-led way of sustaining the local populace but would need infrastructure such as energy and water to support it which need planning for.
- Encouraging diversification makes sense to allow additional income streams for farming businesses.
- Farm buildings should be retained for their heritage value and uses should be appropriate to this eg no unsightly scrap yards etc
- The picture accompanying this policy is not a farm.
- These are standard provisions to control this kind of development.
- The East Devon AONB team support the requirements that “the scale, siting and appearance of buildings and activities associated with the proposed development is appropriate to the rural character of the area and will not adversely impact local amenity” and “no adverse impact on the character of surrounding natural or historic environment”.
- Paragraph 1 is too restrictive in specifying use classes which could prevent additional and much needed income streams; the criteria in paragraph 3 will ensure proposals are acceptable. The policy should be worded more flexibly like current Local Plan Policy E4

Policy 54 - Resisting the loss of Employment sites

There was no question associated with this Policy on the Commonplace consultation webpage. Exmouth Town Council made a general comment that, in Exmouth, the existing policy relating to the loss of employment land has not proved effective and they have lost several employment land allocations in favour of housing development. More robust protection is needed; Clyst Honiton Parish Council believes that this policy may be too restrictive, as it could prevent villages from developing in a way that benefits their residents. Some villages have had unwanted employment sites for many years, and local people would like to see these sites redeveloped into housing. Keeping these sites derelict can harm the village's schools and local services, and the council is concerned that this policy could prevent villages from addressing this problem; Churchill Retirement Living supports the need to retain high-quality employment sites, but they have concerns about the wording of policy 54. The term "employment" is not defined, and the preconditions listed in the policy are too extensive and time-consuming. They would delay the regeneration of previously developed sites.

Policy 55 - Employment and Skills Statements

- Devon County Council state reference should be made to the Skills Academy, aeronautical engineering opportunities and implications of moving towards Net Zero.
- The trigger is too high, should be required at much lower thresholds
- Clarification is required as to the type of skills and ensure they are inclusive
- Schools, colleges and HE providers need to be involved as well as employers
- What is EDDC's strategy for employment? How can a policy be written without the supporting evidence
- Further evidence is required, the policy is unsound. If there is a skills gap, it should either be a matter for the education sector to address or if there are training needs a matter for an employer to identify and address as they see fit.
- Imposing additional financial obligations relating to this requirement is yet another financial burden on development, resulting in the potential to reduce job creation and the opportunities naturally presented for informal on the job learning.
- This requirement is too onerous and too big a risk for the developer- eg the end users may be as yet unknown, there is no evidence that the end users will have either a skills gap or be feasibly able to deliver on commitments.
- This will create a disadvantage to developers in East Devon competing against sites in authorities without such requirements
- Jobs need to be created for local people, and not just specialist jobs to encourage more people into the region. It must start at local level first. The existing local workforce must

see an improvement in more and better skills training, the choice of jobs being made available, with an associated improvement of wages

- Let the market decide without any further interference.
- Important to support growing sectors, but unclear how the policy will do this
- Developers must adhere to the statements and EDDC take action to enforce them
- Apprenticeships are key- Skills in wood carpentry, thatching and farming in the agricultural area must be encouraged. Many skills have been lost.
- Independent and sustainable businesses should be the focus, to reduce commuting
- Over prescriptive, and far too complicated. The costs of implementing this policy will exceed any benefit.

Policy 56 - Town centre hierarchy, sequential approach and impact assessment

- Unsure how this will regenerate town centres.
- Support that out-of-centre sites should be accessible by bicycle and well connected to the centre.
- 'Edge of (town) centre' developments should only be allowed where it is shown there will be no adverse impact on the vitality and economic vibrancy of its nearby town centre.
- Prefer current policy.
- Object to inclusion of Hawkchurch as a Tier 4 settlement on transport grounds (only one bus per week) and concern that shop is reliant on volunteers and will be engulfed by the proposed allocation.
- This hierarchy seems wrong. Tier 3 centres vary considerably. Budleigh is fairly large. Lypstone has a train line. The other three settlements should be tier 4.
- The accessibility of edge-of-centre and out-of-centre sites on foot and bike needs to be such that anyone can use the provision rather than only being possible for those who are fit and able or confident enough.
- Exmouth town should be redeveloped as it has lost its historic character and is bland and run down. This could extend to celebrating maritime heritage on the seafront, restoring the arcade building and building a new swimming pool with hot tubs
- Independent businesses with a focus on sustainability need encouraging. Farm shops could be located in towns.
- Focus housing in the town centres (especially Exmouth) as an alternative to building on the AONB's/countryside
- Shop frontage and signs must also be kept in keeping with the heritage of the area as this too can have a negative impact on the area.
- Artisan markets and craft markets and farmers markets should be encouraged.

- Out of centre sites should be actively discouraged and policy should reflect this. A 'sequential test' is very unlikely to be robust enough to protect our town centres.
- The policy does not recognize the problems that our town centres face, the issue of adequate and cheap parking, and does not offer any hope for improvement
- Sidmouth Cycling Campaign support the policy that out of centre sites should be accessible by bicycle and well connected to the centre.
- Exeter Cycling Campaign would like 'by these modes' to be added after 'centre'. Currently this doesn't actually say that they should be well-connected to the centre by public transport, bicycle and foot. They can be accessible from some other point by all those things, but not necessarily the centre, so this should be explicitly stated.

Policy 57 - Town Centre development

- Devon County Council welcome this policy but suggest it is strengthened to ensure there is no overall erosion of critical mass of activity within its retail core.
- Devon Wildlife Trust advised the requirement for enhancement of the natural environment should be included within this policy. The provision of well designed, connected, diverse natural corridors through town centres can act as important flagship projects showcasing the benefits of the natural environment.
- Cranbrook town centre is poorly designed and doesn't really exist. It isn't clear where the shops are/will be and they aren't close to the station.
- Support the reference to shop frontages as it is consistent with the current SPD relating to Exmouth's shop front policy.
- Object to loss of retail premises to housing.
- The statement that change of use to residential will only be permitted if 'there is no demand for town centre use' should be strengthened. With an increasing number of businesses closing it would be good to see more positive proposals for invigorating town centres.
- Should Beer really be in this group?
- Exmouth Town centre lacks visual appeal. There needs to more character and are good examples of this are Sidmouth, and cities such as Bath.
- Rejuvenation (of Exmouth) is a must and to encourage independent, sustainable businesses rather than more hairdressers, charity shops and fast food outlets.
- This is a standard version of a long-established policy. The use of upstairs accommodation for residential purposes is greatly discouraged because many of our town centre buildings are listed or are situated in a Conservation Area, so alterations to allow occupation are very expensive and are often rejected.
- Exeter Cycling Campaign would like to explicitly mention the need to enable cycling as a means of transport, with prominence given to properly-designed and located cycle

parking. Towns like Honiton and Axminster currently have very few Sheffield cycle parking stands and these are often inconveniently located.

- Churchill Retirement Living supports the proposed Exmouth Town Centre boundary.

Policy 58 - Local shops and services

- Local shops and services overly restrictive eg no craft shop allowed
- Fully support, communities would be damaged by village shops closing
- Lack of footfall is not the main issue, viability and high running costs are leading pubs/PO's to close
- Local facilities reduce the need to travel, especially important in rural areas with limited public transport
- The policy is fine, but our planning team do not require evidence of lack of viability to be supplied, and certainly do not question that evidence. As is so often the case, it is not the policy but its application that is the problem

Policy 59 - Rural shops

- Local shops and services is overly restrictive (e.g. wouldn't permit a craft shop)
- Seems unlikely that the 30 mile radius policy would ever be enforced!
- Support this policy. Farm shops are good, but we need to develop town and village centres too.
- Need more sustainable retail including farm shops and shops that sell locally made items. Too much stuff is bought from overseas making this unsustainable.
- ED has a vast array of creators and agricultural farms that we must work together with. Darts farm and greendales are good examples.
- Increase farmers markets
- The policy used to be for a 60% requirement and this should be retained.
- Requirements have not been enforced. The large number of rural shops (especially selling non-local goods) collectively undermine existing town centres, where rates are paid, overheads are much greater and car parking charges are extortionate.

Policy 60 - Sustainable Tourism

- Devon County Council query how the loss of visitor accommodation policy will be applied to premises only recently begun to be used as visitor accommodation (e.g., Airbnb).

- Definitions are absent. Net Zero - does this mean on site or as part of the total visitor journey? (Exeter and Honiton are probably the most sustainable parts of EDDC but probably not what is meant by this policy). Improvements in public transport to access some areas would be required. How would it be achieved?
- Sidmouth TC - We welcome the proposed measures in the draft Local Plan relating to the change of use from hotels and guest houses. However, the serviced holiday accommodation sector is so important to the economy of Sidmouth that we would like to see these provisions strengthened so that change of use becomes a very last resort.
- Coast Meets Country Project - Response to Local Plan Consultation sets out a number of initiatives that the group are pursuing/supporting. It has not been possible to summarise this response here and so the representation should be read in full.
- If the sustainable tourism policy was applied 100%. then there would be no new tourist facilities.
- Support diversification of farms by providing tourist accommodation.
- Support protection of the AONB's by restricting further tourism development.
- Caravan sites such as Devon Cliffs are not sustainable due to their sheer volume and the increase stress on our local sewage works, infrastructure and Jurassic coastline.
- Discouraging hotels will increase second homes, Air BnB's etc to the detriment of local communities. Local communities will be 'hollowed out'
- The strangulation of the hotel industry across the district is very bad news for the wider economy and jobs, and has certainly undermined our town centres.
- The normal traffic access and visibility issues are dealt with adequately by normal planning policy and a specifically anti-car provision is not required in the Local Plan.
- Support retention of holiday accommodation, and especially hotels, but enforcement is needed to resist their loss. DM team need to apply the policy.
- Policy does not explain the anti-car and anti-hotel stance. Anti-car would seem to exclude towing caravans or anyone wishing to holiday in the more rural parts of the District...
- The Tourism Strategy is long on hyperbole and well-meaning policy statements, but has no practical proposals to improve the tourism offer.
- Caravans and campsites are encouraged (despite unsightly toilet blocks, shops etc) but not quality hotel accommodation.
- Disappointing that there is no appetite for encouraging cycling and walking by the signing of suitable routes. Need to capitalise on South west coast path.
- The East Devon AONB team welcome the inclusion of advice about the sensitive nature and importance of the AONB with restrictions on the erection of new buildings.
- Otter Valley Association are concerned that increasing year round tourism could harm the outstanding natural environment which draws tourists

- Sidmouth Arboretum suggest that the policy would be stronger if there was a specific mention of the mature trees and hedgerows that typify the surrounding natural environment of most of rural East Devon.
- Agents for Bourne Leisure advise that they endorses draft Policy 60 in principle, and welcomes the Council's strategic vision for tourism, "that East Devon be the leading, year-round tourism destination in Devon". The tourism sector is a significant economic driver for the area, and it is crucial that the Plan is supportive of investment and growth of the industry, with a positive approach to sustainable tourism development during the plan period.

Policy 61 - Holiday Accommodation Parks in designated landscapes

- Strongly support policy of not allowing new or expanded large holiday parks in sensitive coastal landscapes.
- Improvements to existing sites should be achieved through use of darker shade units and landscaping and increased tent provision as this is more affordable and lower impact on the landscape.
- The existing policy has not worked as existing large sites have continued to expand.
- Caravan parks have become too large causing visual harm in some cases.
- Existing sites have badly impacted the World Heritage Site and AONB, they should not be allowed to increase further.
- Why are caravan parks allowed and hotels are precluded.
- The East Devon AONB team support the advice and justification relating to designated landscapes
- Devon Wildlife Trust advise that they would like to see the policy reworded to to include for the requirement to deliver a minimum 25% biodiversity net gain to account for the impacts on these sensitive landscapes.
- Agents for Bourne Leisure object to policy they consider it unduly onerous and unreasonably restrictive for existing holiday parks, particularly, as the supporting text states, considering that "the majority of East Devon lies within one or more designated landscapes". They consider the needs of the tourism sector and demands of tourists are continually changing, and it is important to cater for and adapt to these needs and demands in order to continue to attract visitors, increase the level of expenditure and support local jobs. Continual investment in holiday park accommodation and facilities is therefore required to attract new and repeat visitors and policy is far too restrictive.

Chapter 9 - Policy omissions from - Supporting jobs and the economy and vibrant town centres

- Are the economic development/employment policies intended to apply to agricultural development? The criteria do not seem to be a good fit, but there does not appear to be a separate specific policy for agricultural buildings and other development such as slurry lagoons. It is considered to be a significant omission if there is no policy to deal with such development which can have consideration impacts on the landscape and environment of the rural parts of the district, particularly the AONBs.
- No mention of promoting the agricultural/horticultural sector or supporting young people to continue working and living on farms.
- Tourism is vital for the area, but we do not want second homes. Sustainable and green tourism is good. Sites like Devon Cliffs are not.
- Retail and produce must be sustainable and where possible be locally produced and made. Independent shops and farm shops are a good example.
- AONB must be protected.
- Hill Pond, adjacent to Hill Barton Business Park should be allocated as an employment site. It is within single ownership, is available for development now and could be delivered quickly; It is an infill/rounding off site. The road to the west and north of the site would mark a clearly defined boundary to the employment development in this location; It is not within any protective designation related to landscape character and any development would be viewed in the context Hill Barton Business Park to the east and Yeo Business Park to the north and, when built out, the employment development immediately to the south; There is an existing access to the site via Axehayes Lane, which has direct access to and from the A3052. There is potential to form a pedestrian connection to the footway network within Hill Barton Business Park
- Support is given for allocating Land to the East of Liverton Business Park (Exmo 18). This is proposed for three hectares of employment use. This allocation will help the Estate to continue to deliver new jobs through its existing development of the Estate's adjacent Business Park. Notwithstanding our concerns, set out above, about the lack of settled evidence on the overall form of employment need, the location of Exmo 18 alongside existing and successful employment uses and its site adjacent to the most important town in the District strongly suggests that development of this land for employment can make an important contribution to the District's economy.

Chapter 10 - Designing beautiful and healthy spaces and buildings

General matters raised in respect of this chapter included

- The Environment Agency support the link between climate change resilience and green infrastructure with good design.
- A respondent commented - “I would prefer all new housing estates to enhance the environment by incorporating new hedgerows, tree planting, houses to all have swift bricks and solar panels, electric charging points, walking and cycling routes, environmentally diverse green spaces, good links to public transport”
- Design guidelines need to include measures to retain or provide new hedgerows and trees as well as to enhance these with planting of new appropriate species.
- View expressed - The majority of new build often fails communities because the houses are too small, small to non-existent gardens, too many houses on the site, grossly inadequate parking leaving residents frustrated and others annoyed because people encroach elsewhere. New sites need less houses to give people more space and more car parking, at least two spaces for every new house.
- A high number of additional comments flagging that recent developments have failed to deliver well designed buildings and places.
- New homes should make use of off-site volume modular building techniques.
- Developers and house builders must be far more rigorously monitored to ensure that they build well in the multiple unit market as well as in the elite up market sites.
- Green infrastructure and biodiversity enhancements, sustainable travel, modern heating, insulation, solar [power generation] should become the norm in all new developments.
- Developers must be held to account with building poor quality housing. Too many issues with new builds that cause more problems than they are worth. They must be built with character in keeping with the area such as farm style housing.
- Buildings with historical value must be renovated and not demolished because a developer would rather pull it down and build 5 houses on its footprint. Those that own vacant houses and leave them to rot must be penalised. Former Rolle College site and Goodmores farm are a prime example. Any buildings destroyed by fire, water etc that had an architectural or historical value must be rebuilt in a similar style.
- Otter Valley Association would like to see more emphasis on the value and benefits of good design, especially the growing evidence on the influence of design in the built environment on physical and mental health and well-being. Paragraphs 126 to 134 in the NPPF could be used to strengthen the design policies in the Plan. The OVA would like to see a more proactive and collaborative approach, which will engage with local communities effectively.

- If any new housing is to be built it must be high quality and in keeping with existing architecture (ideally using local materials and craftspeople), but modest in size in order to be genuinely affordable for working people who have grown up in the area and provide vital skills (nurses, teachers, tradespeople etc).
- It is imperative that it is environmentally friendly and developments are required to make use of ground source heat pumps, air source heat pumps, solar panels, water recycling, sustainable materials, natural planting and drainage solutions to protect the local environment. It is inexcusable in this day and age that developers can build new housing that avoids these measures and hastens global warming.

Policy 62 - Design and Local Distinctiveness

- The Environment Agency note the reference to the waste hierarchy as a positive but consider the plan could go further and embrace the circular economy. The circular economy may be a better way of committing to ways of reducing waste and reusing materials. In planning terms this can be particularly important when considering refurbishing or repurposing buildings rather than building new.
- Newton Poppleford and Harpford Parish Council are concerned that the policy uses terms that are subjective and not measurable. They also consider that: 'space' should include private rear gardens; developments of more than 5 homes should have variation in design detail, light pollution should be mitigated.
- Devon County Council support point 2 on the implementation of the waste hierarchy and recommend this is expanded to include the design phase.
- Devon and Cornwall Police suggest permitting proposals where they "have considered designing out crime principles and imbedded them into the design in order to reduce the opportunity for crime and anti-social behaviour".
- Much more could be said in the explanation on the importance of:
 - The influence of design on physical and mental health and well-being
 - Effective engagement throughout the design process and tools to achieve this (detailed in the NPPF and NPPG)
 - Distinctive design, providing a strong sense of place, and which is sympathetic to local character and history
 - Mixed use, legibility (encouraging ease of movement), public space and realm, inclusive and accessible neighbourhoods
 - The desirability of flexible / adaptable homes

- Home Builders Federation considers the policy wording should not be interpreted by decision makers as conveying the weight of a Development Plan Document onto the document types listed in the policy. The documents have not been subject to examination and do not form part of the Local plan. Requirements should be set out in sufficient detail to determine a planning application without relying on other criteria or guidelines set out in separate guidance.
- Home Builders Federation states that the NDSS are optional, and only to be introduced where there is clear evidence of need. EDDC will need robust justifiable evidence
- Housing Association planning consortium is concerned that there is no reference to the evidence base study that supports and justified the 'need' to implement NDSS as per PPG. Application of NDSS can undermine viability of affordable housing developments. Essential that NDSS are robustly viability tested.
- EDDC does not have robust ways to evaluate "high quality design". Guidance should be developed to assist developers and individual applicants in producing Design and Access statements that should be clear and simple.
- Devon Wildlife Trust would encourage EDDC to strive for more than 'to reduce carbon emissions over the lifetime of the development'. We recommend the inclusion of the requirement for the provision of net-zero homes within this policy and would like to see EDDC strive for carbon positive homes. The trust provides more detail on specific wording amendments they would wish to see made.
- Policy should make it clear that poorly designed developments will be refused.
- Development should allow for modern and innovative designs, so long as it is truly "high quality". Developers' standard portfolio of 4 or 5 designs carpeted across a large development should be resisted.
- Provision for low/no carbon energy as source of heating and lighting with appropriate external/internal storage to be built in at design stage. Solar generation or heat pumps should be integrated at build stage.
- Energy efficiency should be prioritised.
- Support for measures to reduce carbon emissions.
- Spaces between buildings can be as important as the design of the buildings themselves and provide coherent linkages across a wider area.
- Policy should ensure adequate gardens / outdoor space is provided.
- Support for measures to enhance biodiversity.
- Who decides what trees and hedges are worthy of retention? All trees and hedgerows are worthy of retention (unless diseased).
- Biophilial measures to be integrated as part of the design to be evaluated.
- There is evidence that living close to nature makes housing very popular and more valuable. Consider cavity bricks for nesting birds, trees, ponds, long grass and wildflowers, hedgehog highways, green spaces etc eg <https://www.barratthomes.co.uk/new-homes/dev001701-canal-quarter-at-kingsbrook>

where Barratts have worked with RSPB

- Support for minimum space standards.
- Well thought through, and so good to see design being taken so seriously. Good design means fit for purpose!
- Please ensure that EDDC is equipped to implement all the good intentions included in these policies and will follow through.
- Good design may mean NO street lighting in a rural setting. Light pollution should be kept to a minimum particularly where development is adjacent to dark areas eg of farmland or AONB.
- We support the intention to focus design attention on the most sensitive sites including allocations within AONBs or affecting a heritage asset and to address this by producing design codes for certain allocated sites and specific areas. The AONBs will be happy to work with the council on this. We welcome the retention/update of the existing local plan design policy (D1) (Blackdown Hills AONB Partnership).
- Sustainable transport should be integrated into new housing areas from the start.
- Exmouth Town Council Members commented that “high quality design” is very subjective and open to interpretation / in the eye of the beholder. Also, that Design and Access statements vary in quality but are often treated as a tick box exercise as part of the planning application process. Members support introduction of space standards but raised concerns about achieving this in the context of viability challenges by developers and increasing costs of building materials. Also risk that the same houses are built all over the country to the point where every new community is starting to look the same. As a result, the distinctiveness of places gets forgotten and communities lose their identity. Will design codes be produced by EDDC and will they have any legal status? Concerns were also raised about broader enforcement operations relating to the mitigation of noise, smell dust etc.
- Any new houses/developments should be built to passivehaus certification standard.
- EDDC should promote the construction of residential accommodation above commercial premises in or near Town/Village Centre. This would mean Town Centres not being 'dead' after 5pm.
- Housing development should be varied in size and tenure with affordable housing distributed over the site rather than clustered in one area.
- Suggestion that the policy wording is woolly, including terms such as worthy of retention, safe environment, necessary and appropriate street lighting, good levels of daylight.
- Request for the addition of a requirement for off-road parking spaces, with carports preferred to garages.
- Policy should include a requirement for integrated rain-water storage / retention.
- Concern expressed over combined sewer systems not being fit for the future – request to separate the processing.

- The East Devon AONB team supports the intention in paragraph 10.3 for the Council to provide design codes for sites allocated that lie within the AONB and other sensitive locations and the advice provided in Policy 62.
- National Grid request the inclusion of an additional criteria to ensure design policy is consistent with national policy, stating “x. Taking a comprehensive and co-ordinated approach to development including respecting existing site constraints including utilities situated within sites”.
- Agents for Bourne Leisure set out that in line with legislation a Design and Access Statement should only be required for applications for major development and request policy amendment. They consider that the design criteria listed within the policy should not apply to all developments, as they cannot be met by all development types. For example, as caravans are not classified as buildings/development, it is not possible to meet the full requirements of this draft policy for this type of proposal. They also seek further refinement to plan policy in respect to matters relating to impacts from development.
- A developer recommends amendments to criterion 2 as it is not possible for developers to ensure future occupiers adopt sustainable waste disposal methods, so amend to state that development should include measures to promote the management of waste.
- A developer is unclear what is meant by ‘identify opportunities for design that minimises risk associated with climate change’.
- Clause 6 – no evidence has been provided to justify the requirement for these optional standards. So the policy is currently unjustified.

Policy 63 - Housing Density and Efficient Use of Land

- Devon County Council query whether efficient use of land also refers to renewable energy proposals of farmland, where there could be an option to utilise unused space on buildings.
- Comments calling for appropriate development density to safeguard gardens, outdoor space, and distance between gardens.
- Maximising site densities, which is an implication here, may create more units but unenviable living environments. People need space and privacy as well as good housing.
- Concern that increased density forces cars to park on the roadside.
- Comments suggesting that increased housing density to maximise use of land is not always a good idea as it can increase impact on the natural world, interfering with connectivity of animal movements.
- Sympathetic development in line with the existing build is what is needed.

- Design guides may be required to support design quality for higher density developments.
- I hope we will consider flats and apartments as part of this. As long as acoustic insulation is properly attended to, flats are a very pleasant option. They can provide bigger rooms, better layout and more pleasant living than a house on a tiny footprint.
- The Codes identified in section 63 assume that facilities such as bus/train services remain static (or improve) through time. Higher densities mean lesser provision of off-street parking and garaging. In the last year Stagecoach have reduced service provision to towns such as Ottery/Honiton/Axminster and reliance on using the car for journeys has been adversely affected.
- Some recent housing developments assume that residents will walk or cycle. With a higher than average proportion of elderly this assumption is erroneous.
- This policy is meaningless since conserving/ enhancing the character of the area and efficient use of land may be in tension as recognised in para 10.9; surely for each site both minimum and maximum densities are needed.
- Exmouth Town Council Members are broadly in favour of a minimum density standard but feel that a tiered system may be needed to reflect optimum densities in built up versus rural areas. Also, that the efficient use of land is potentially in opposition with environmental sensitivity.
- It was noted that there are unforeseen consequences with optimising housing density. i.e. extra pressure on already-stretched primary healthcare services! The impact of development needs to be borne in mind - not just how efficiently the land is used.
- Suggested need for a further consultation once the policy is further advanced.
- Minimum density standards for towns should consider the facilities and services of the town, not just the location with regard to transport. For example, Axminster has a limited number of services, shops and facilities, and those that there are, are severely underfunded or run purely on charity (e.g., the swimming pool). If a minimum density is set, then more funding and investment should be put into the town's facilities and services to meet the needs of the current residents as well as to facilitate further numbers.
- We have seen increased density as land prices have increased to ensure the development is financially viable, even though a developer does not need to build 'affordable housing' if the developer can prove to the District Valuer it is financially unviable.
- Play/community/allotment areas have been severely reduced over the last few years in size and increased density to meet the profit margin of c20%?? We do not wish to see high tower blocks, as per our British cities, which would not fit in with the East Devon landscape.
- All design codes should incorporate the policy guidance in the NPPF around irreplaceable habitats and urban tree cover.

- As a rule, the more 'rural' the environs, the less dense should be the development. All other things being equal, we want to see high levels of density, and this can be achieved with clever design, but lines of boxy housing closely cramped together in semi-rural, village edge locations, is not acceptable. Smaller sites with individual house design and reasonably sized private gardens can make development much more acceptable, and nice homes to occupy.
- Hawkchurch Parish Council - We note the wording of this policy has not been finalised but there is no reference to differential housing densities dependent on the location of the development. For example, distinguishing between town, suburban or more rural settings. This would be in line with national guidance and reflect what other areas do to address the acceptability of different densities and intensity of housing in different areas.
- Exceptions to minimum density standards should be allowed based on local characteristics.
- I fully support this policy and hope that it will be strictly adhered to. Too many sites in Lypstone simply have had one or two large houses built on them when they are capable of accommodating far many more much needed smaller dwellings.
- Home Builders Federation recommends that the policy provides appropriate flexibility to allow developers to take account of the evidence in relation to site specific conditions, market aspirations, deliverability, viability and accessibility.
- And need to consider policy in the context of other policies eg open space, biodiversity net gain, cycle and bin storage, housing mix, residential space standards, accessible and adaptable dwellings, energy efficiency, and parking,
- Often density standards impede good design. Density should be the outcome of detailed design process, not the starting point
- Implications of a Design Code requirement should be included in the viability assessment
- Design codes are resource intensive and add financial burden and potential delay to development as well as a burden on local authority resource. Wording requiring design codes for developments of ten dwellings or less in sensitive locations should therefore be reconsidered.
- Agents for FW Clarke - PPS3 had minimum density requirements. The NPPF does not. We object to the proposed setting of minimum densities. Not every single aspect of professional planning judgement needs to be set out in black and white.

Policy 64 - Display of Advertisements

- The policy is fine. It is all about enforcement, and strict adherence to protecting the look of the countryside, closely controlling illegal advertising, and being very conscious of distracting drivers.

- Needs to be in keeping with the area.
- Advertising needs to be controlled. Some town centres are devalued by gawdy and scruffy signage and there should be stronger measures to stop it.
- Again, please promote good design and creativity to commerce, with possible guides to avoid environmental degradation.
- General support for policy expressed by multiple representations.
- Exmouth Town Council Members are supportive of this policy but commented that there is no reference to the need for advertisements to be environmentally friendly - e.g. type of illumination.
- All [advertisements] should require planning permission.
- The policy should make it clear that advertising in rural areas and the AONB will not normally be acceptable.
- Lighting at night should be discouraged as it is a waste of energy, affects wildlife and spoils the night sky. The national adverts like McDonalds signs should also be controlled as they destroy the local character.
- Devon Wildlife Trust advise where illuminated, the type and level of illumination should reflect the general level of lighting in the area.' 'and must consider potential impacts on biodiversity' should be added to this statement.

Chapter 10 - Policy omissions from - Designing beautiful and healthy spaces and buildings

- None identified