East Devon Local Plan

Local Plan Issues and Options report Consultation feedback report – May 2021

Feedback report on consultation on the local plan issues and options report that was consulted on from 18 January 2021 to 15 March 2021

East Devon – an outstanding place

Contact details

Planning Policy team

East Devon District Council

Contents

1   Introduction

1.1   This report provides feedback on responses that have been received to the East Devon Local Plan Issues and Options report consultation. The issues and options report formally met Regulation 18 of the plan making regulations The Town and Country Planning (Local Planning) (England) Regulations 2012 (legislation.gov.uk) and was available for public comment from 18 January 2021 to 15 March 2021.

1.2   In this report we summarise what has been said but not comment or respond to it. Over the course of 2021 (and potentially beyond) more detailed assessment will be undertaken of responses received and this will feed into reports to Strategic Planning Committee of the council on specific subject based matters.

2   The issues and options report that was consulted on

2.1   To start the local plan making process and seek initial feedback to inform policy development we consulted on a local plan issues and options document. The consultation document contained a series of topic based sections and included questions. We invited responses to the questions via an online questionnaire. We also, however, made a pdf version available for those without internet access or who were facing technical or other problems with completing it on-line.

2.2   For more information about the document consulted on and to read a copy of it, containing questions asked, see:

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

3   The communication strategy

3.1   To encourage participation in the consultation we worked closely with the communication team of the Council. This work involved extensive engagement with potentially interested parties and organisations and sending material out to various media sources.

3.2   The communications plan, highlights key communication activities undertaken, can be viewed on the Council web site at:

https://eastdevon.gov.uk/media/3722722/local-plan-comms-doc-final-25-march-2021.pdf

4   Questionnaires and other written responses received

4.1   In the issues and options report there were a number of questions asked and we specifically requested that people respond using the online questionnaire form that was provided, most respondent did. However, we also made the pdf questionnaire available to people who had not been able to complete the on-line form and in a small number of cases some people did not have a computer or internet access. In a limited number of other cases there were possible technical problems in respect of the operation of the software or the way individuals had their computers set up, this appears to have blocked address details being logged. There were also problems encountered by people not being able to save the questionnaire or being aware of the relevance of saving submissions that were part completed. Overall, however, technical problems in the software or set-ups appeared limited.

4.2   A large majority of responses to the consultation, addressing questions asked in the document, came in via completed questionnaires, in total 598 questionnaires (that at is the responses from 598 respondents) are logged on the consultation software. Whilst the majority of these responses were submitted on-line a sizeable minority (51 – around 8.5%) were emailed or posted in and added to the software by officers. Of the paper or pdf copies received six were added in full to the software. However, because of the nature, format or content of some submissions, the responses from 45 respondents, it was not possible to add these in full to the software, for these respondents their 'tick box' response appear but not all text aspects of their written answers.   Typically responses were not added because they exceeded word limits or they included graphics or maps. The only limited exception to this approach was where it was possible to abbreviate words used in submissions in order to meet character/word limits. It should also be noted that some respondents, 26 in total, uploaded additional documents as part of their submission to the software.

4.3   There was a further category of responses where respondents may have commented on some questions in the consultation, though not necessarily through using the consultation form. Further, in some cases in commenting on answers they may have given qualified support for or favoured or a mixture of available answers. Though in many cases it was not necessarily fully clear what specific options may have been supported For these responses it was not seen as appropriate for officers reviewing submissions to seek to interpret responses, especially not so when a respondent could have made their comments directly online. Added to these were responses from respondents that did not seek to fill in the questionnaire at all, rather they gave general comment about the consultation and the future local plan. Many of the 'non-questionnaire' responses received have been by public bodies, private companies or land owners (or agents acting for them) or by other organisations.   It was always to be expected that some organisations and individuals would not fill in the questionnaire or respond directly to questions asked.

4.4 Overall there were responses from 59 respondents that fell into the category of not using the questionnaire at all or using it in a qualified manner that made it not credible or unreasonable for officers to add responses to the consultation software. Plus there was one additional respondent that submitted sometime after consultation closed, on the 9 April 2021, that was in this category and that is logged on the record of responses received.

4.5 There were, therefore, a number of respondents that we believe could have readily completed the questionnaire on-line but chose not to do so, despite our encouragement. This was specifically the case for agents submitting responses for clients (notably land owners and developers). It is disappointing that these responses did not come in on-line as they have complicated and added to the time needed for processing comments.

4.6 In total, therefore, there were 702 respondents to the consultation, of which the consultation software has 598 logged responses. The responses not on the software are disproportionally from agents acting for landowners and the data in this report should be read in this context.

5   A note on statistical validity of the consultation

5.1 The questionnaire was made freely available for anybody or organisation to complete and the Council encouraged participation. Choice of filling in the questionnaire was therefore a self-selecting exercise and the results in this report are the views expressed by those people that chose to make submissions. Responses should not therefore be read as being a verified statistically robust representation of the public as a whole. However the level of participation is such for the result to be considered as representing valuable informative.

6   Where to view consultation responses

6.1 Responses to the consultation can be viewed on the Council web site with contact details redacted, where appropriate, and to accord with our privacy standards.
https://eastdevon.gov.uk/planning/planning-policy/emerging-local-plan/initial-representations/

7   Background information of those making submissions

7.1 In the questionnaire we asked people to provide background information on where they lived, their age and whether they were responding as a private individual or in some other capacity. These questions were asked to understand more about the characteristics of those responding.

7.2 Most responses received were from people with an East Devon postcode though there were also responses from other parts of the country as well, though most of these were from agents representing clients or from other bodies or organisations.

7.3 The overwhelming majority of people responding were in the 56 to 70 and 70 plus age groups. Younger people made up a far lower level of respondents. Data in the graph below sets out more information on this, with most respondents, 76%, that completed the questionnaire and who are logged on the software being private individuals.
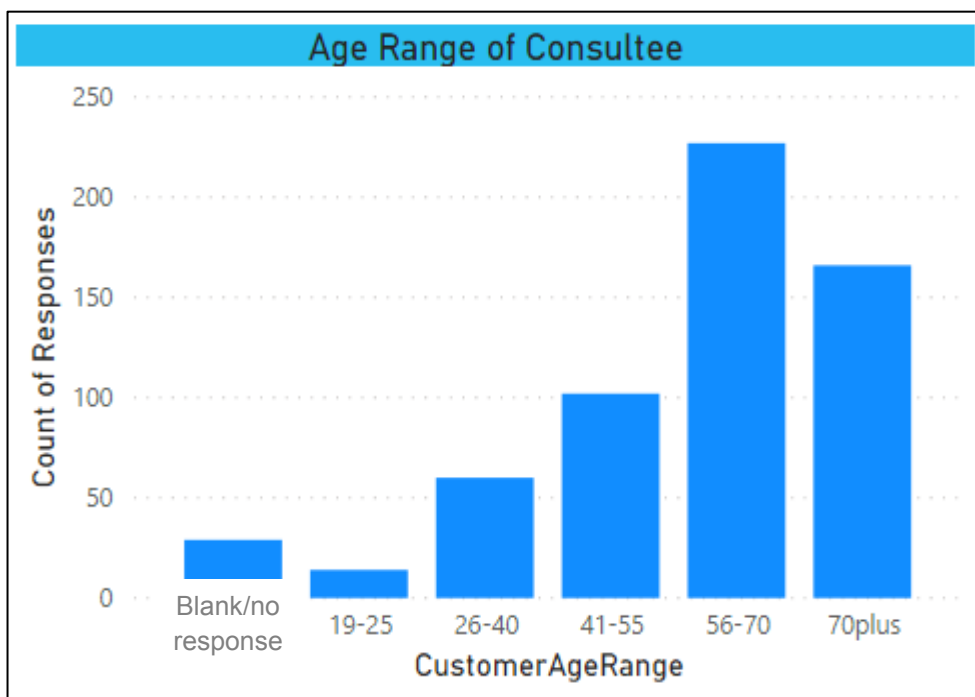

8 Responses received to questions asked

8.1 Set out below are details of the questions asked in the consultation and the number and/or percentage mix of response received. We also provide a succinct commentary on some of the key issues arising n commentary that was provided. It is advised, however that we do not seek to identify and highlight all and every point raised in comments made. To do so would result in a very long document that could take many weeks to complete. To see all matters raised all responses received they will need to be viewed in their entirety. In providing feedback we concentrate specifically on questions asked in the full issues and options document and specifically the wording in the actual questions asked.

8.2 It should be noted that there was no requirement to complete all or any of the consultation questions. Where people did not complete a question then the answer is given as a blank/no response.

Question 1 - Local Plan Objectives

In paragraph 2.1 of the Issues and Options report we set out a series of suggested objectives for the future local plan that covered issues to include climate change, meeting housing needs and supporting the economy. We asked people if they were the right objectives.

Count of Responses by Question1

65 (10.87%)

149 (24.92%)

Question1
- yes
- no
- blank/no response

384 (64.21%)
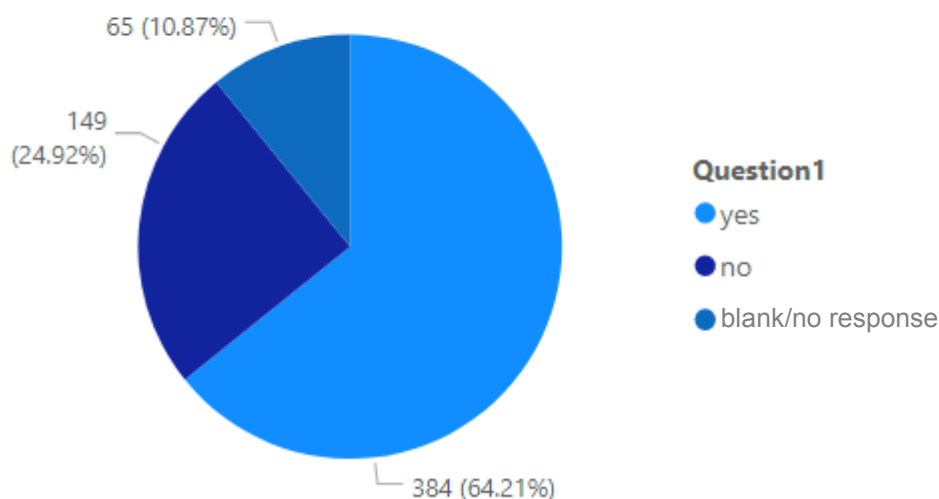
Although most respondents, nearly two thirds – 64.2%, ticked the yes box a number of these did suggest other objectives as well. It should be noted that many of the 24.9% that ticked the no box also suggested alternatives, as did some of the 10.9% of respondents that left the box blank.

The draft objectives in the Issues and Options report were generally well received by respondents with a number highlighting suggested minor changes to wording or focus. A number of people went into matters of some detail in comments received commented on such issues as not building on floodplains or not building more retirement homes. There was though comment on the structuring of objectives and how some may, could or should follow on from one-another, Also comment that there was felt to be something of a mix-up between aims and objectives in text as currently drafted. Comment was also made that sub-objectives or actions should follow on from the listed objectives.

A further general theme that featured in comments was a question around whether the objectives featured in a priority order and if so whether they were in the correct order. On this specific point it is advised that the intent was not that they feature in a specific priority order – they are ordered to follow the chapter structure that follows in the actual issues and options consultation document itself. Some respondents favoured certain objectives over others or felt that certain ones should

carry more weight, whilst there suggestions or wording adjustments to some objectives. A more sceptical view expressed by some respondents was that whilst much of what was said may be fine in principle (and in written text) but it may not be implemented in practice.

Issues that were not covered or fully touched on in the objectives that people raised comment on though this list is not exhaustive) included:

- No specific reference to tourism;
- Traffic volumes and road safety, specifically for pedestrians;
- Planning for less crime;
- Addressing coastal erosion;
- Agricultural matters;
- Off grid living;
- More references needed to communities;
- Specific objectives around young people;
- Disability issues;
- More accommodating policy for self-builders;
- The local community should be a priority;
- More restrictions on development;
- Creating safe and secure environments with low crime levels (resulting);
- Preserving the built heritage;

In commenting on the objectives, or indeed matters outside of the objectives, there were some respondents that were concerned that too much development is occurring whilst in contrast some (though a smaller number) were concerned that things are over-restrictive and more development should be promoted. A number of respondents (specifically from the development industry) sought reference to exceeding minimum housing levels with calls for an objective to refer to increasing housing delivery.

There was also (perhaps erring to the extreme) the view that it makes no difference what people say and comments will not be taken into account.

Question 2 – The scope of the local plan

In paragraph 2.2 of the Issues and Options report we propose producing a single plan, but it would be possible to produce a series of plans to cover the different issues. We asked which option people favoured.

Question 2: The scope of the local plan: Do you think we should?

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

Count of Responses by Question2
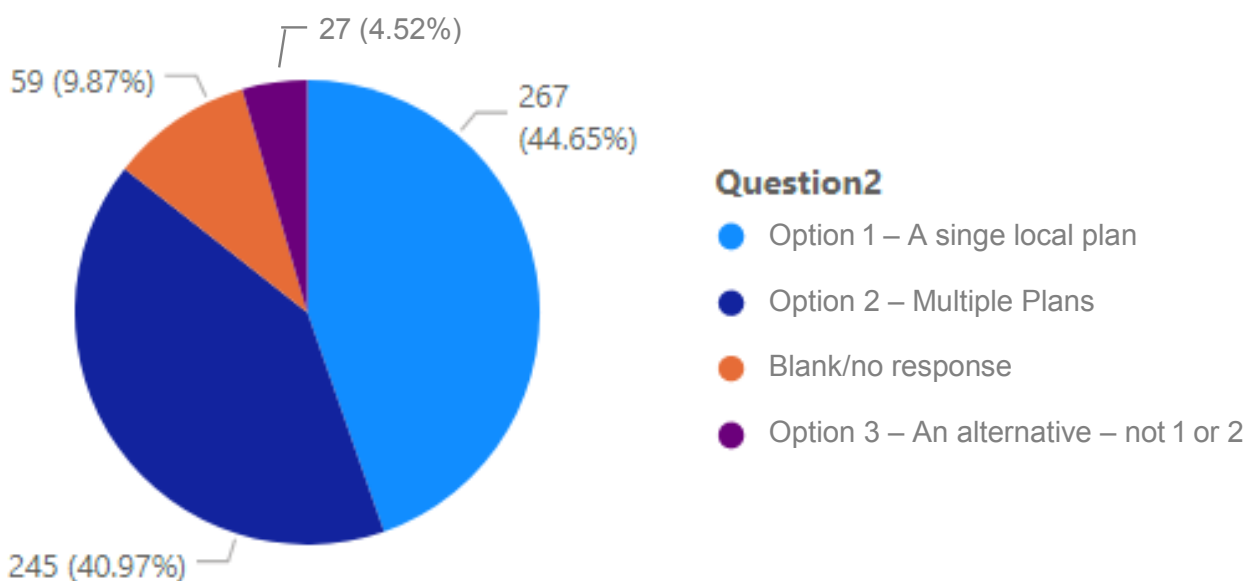
There were slightly more respondents favouring production of a single local plan than there were producing multiple plans, 45% compared to 41%. Blank/no responses accounted for 10% of 'respondents' whilst just 5% favoured an alternative to Options 1 and 2.

People who responded with option 1 felt a single plan would be able to show the overview of the district and deliver the objectives in a more cost effective and consistent way. A single plan can ensure no conflict between policies. In general, people believed a single plan would provide a better structure for understanding and be easier to follow.

People who responded with option 2 felt multiple plans would discover local matters, with a stronger focus on the local planning issues. It would encourage more participation from the public, as people could focus on their interest part only. Some others felt that multiple plans would give better flexibility to reflect the changes in the society, and easier for the review and update on a regular basis.

The importance of the neighbourhood plan mentioned by the respondents across all options. They supported neighbourhood planning should be included in the new Local Plan.

Other common comments included:

- A single plan would need to be more sensitive to local issues
- If the right stakeholders are engaged early on an Option 3 could entail coordinate parallel sets of plans
- When developers are building housing, they segregate the planning of houses through financial means
- There is confusion at so many 'Plans' and 'Consultations'
- A series of targeted plans would be more digestible and encourage accessibility and participation
- Neighbourhood plans and local town councils have a proper say in the developments
- Single Plan maintains focus and speed but both rural and built up areas need to be represented equally
- Allowing people live and work locally, more self-builds, more Passive house standard and renewable heating, more small-scale development in villages for local young people to set up home
- An infrastructure delivery plan needed

Question 3 - Neighbourhood Plans and the new Local Plan

Neighbourhood plans have been agreed for around 20 of our communities (typically whole parishes) and at least a further 12 are at different stages of preparation. In the Issues and Options consultation we touched on the role of neighbourhood plans and their relationship with the local plan and asked how we might make best use of neighbourhood plans to inform the new Local Plan. Responses to this were captured solely via a free text box.

As previously reported, many respondents highlighted the relevance, value and importance of neighbourhood planning work in informing the new Local Plan, and there was some acknowledgement of the difficulties of reconciling a new Local Plan coherently and in a meaningful way with numerous neighbourhood plans. Overall, the responses received can be split into two broad 'schools of thought' which exist on a spectrum of views expressed. At either end of the spectrum are:

1. Those who feel neighbourhood plans should essentially be sacrosanct/paramount in the process, and fully incorporated into & endorsed by the Local Plan (predominantly expressed by those who have been directly involved or live in an area with a neighbourhood plan they support), and;
2. Those who acknowledge there is a role for Neighbourhood Plans and a value as a point of reference, but feel that many are too protectionist and that the Local plan strategy must be able to be developed entirely unconstrained by them, and require them to align (typically stated by developers/land owners and commercial entities and their agents.)

In seeking to reconcile these views, key points to consider from the responses are that neighbourhood plans:
- have been subject to significant local consultation and provide the LPA with evidence of community views and aspirations
- provide a wealth of evidence on needs and issues at the local level
- have been encouraged and supported by the District Council
- have taken considerable local time and resources to develop
- have been subject to a transparent and democratic process, including public vote.

And also that:
- there are variations in the level of detail across plans
- that the age of plans needs to be taken into account
- they do not necessarily represent an up to date or 'whole community' view
- the Local Plan will need to consider the latest evidence and national policy available

The middle ground in the responses is that neighbourhood plans cannot be ignored and that a way must be found to ensure they are given due consideration, in an open, transparent and

constructive way, as part of the preparation of the Local Plan. It was expressed a number of times that the starting point should be with a view to enabling them to remain in alignment as far as /wherever possible with the new Local Plan, but recognising that deviation would be justifiable to ensure conformity with national policy, to respond to new evidence, and where major changes in local plan strategy and policy are necessitated.

There was less suggestion, in direct response to the question, about exactly how neighbourhood plans should be taken into account from a practical or process point of view. Those suggestions that have been made are summarised below, with the most common being that they should be reviewed to identify similar themes & policies, and that communities should be kept informed, consulted and engaged throughout:

- to undertake a comprehensive review of neighbourhood plans including their visions/aims/objectives, policies, designations (e.g. Local Green Spaces), identified sites for development etc. to identify key themes, issues and also differences and areas where neighbourhood plans might be plugging gaps in current Local Plan policy
- to engage widely and openly with neighbourhood plan groups, and the community at large, throughout the process of developing the local plan, in order to understand the strategy behind the neighbourhood plans, identify early any likely conflicts with emerging Local Plan policy and work to find solutions where possible.
- Use neighbourhood plans to inform the development of masterplans
- Build in formal steps/mechanisms into the Local Plan preparation process to consideration and review and the relationship with neighbourhood plans
- Recognise, clearly define and utilise the role of neighbourhood plans in supporting the delivery of national and local policy objectives & targets, and in responding to particular circumstances in local communities. Key areas identified included the natural and historic environment, influencing design, and making provision of development that is sustainable / supports the sustainability of towns and villages across the district

The point has also been made that not all of our communities have, or are likely to have, a neighbourhood plan in place, and so ways must be found to ensure that communities without one are not disadvantaged in any way in this process.

Question 4 - Planning for health and wellbeing

In Chapter 3 of the Issues and Options report we set out the health and wellbeing benefits of active lifestyles and the ways in which planning can promote this. We asked about the importance of promoting health and wellbeing throughout the local plan.

Count of Responses by Question4
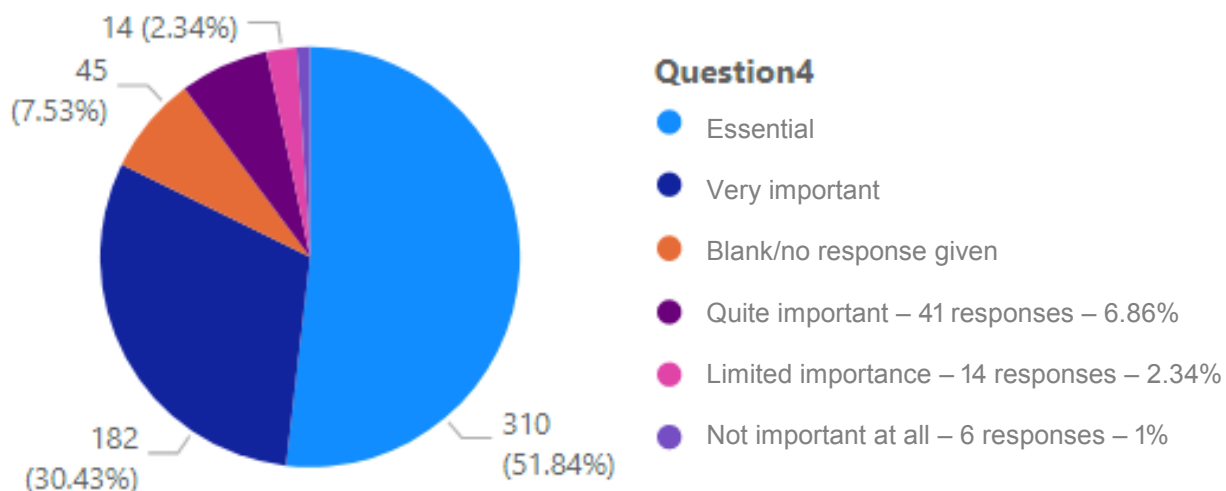
The majority of the respondent (82%) felt it is important to promote health and wellbeing throughout the Local Plan. The written comments mostly related to the Covid-19 impact, both physically and mentally. General comments supported preserving and maintaining open space and access to the natural environment. Numbers of comment suggested a safe and well-linked cycle and walk path should be part of local planning, this would encourage more non-vehicle travel within the local area.

Only a small number of respondents - 3% felt not important to promote health and wellbeing throughout the local plan, as they believed this should be a topic lead by NHS and Public Health England, not the key task for East Devon District Council and it is the responsibility for each individual.

Other common comments included:

- Ensure adequate provision of NHS services and rapid access to RD&E
- The Country park in Cranbrook is much hailed but it is already showing signs of damage from overuse
- The preservation of natural environment and wild life, ensure our children's wellbeing and mental health is sustained

- Should look to other countries that have been more successful in integrating pedestrians, cyclists and motorists in new developments
- Promote health through activity clubs and holidays so people can support each other
- Provide a decent size garden and green play areas
- At the MMO we have a 'Social', 'Access' and 'Tourism and recreation' within the South Marine Plan. All of these highlight the importance of blue spaces on mental health

**Question 5 - Energy efficiency of new buildings**

In paragraph 4.4 of the Issues and Options report we identify ways of reducing carbon emissions from new developments, including setting higher energy efficiency standards for new buildings. We asked about which approaches we should favour.

Option 1 – Plan for net-zero carbon from plan adoption
Option 2 - Plan for net-zero carbon from a future date?
Option 3 – Do neither of the above and not have a policy?

Count of Responses by Question 5
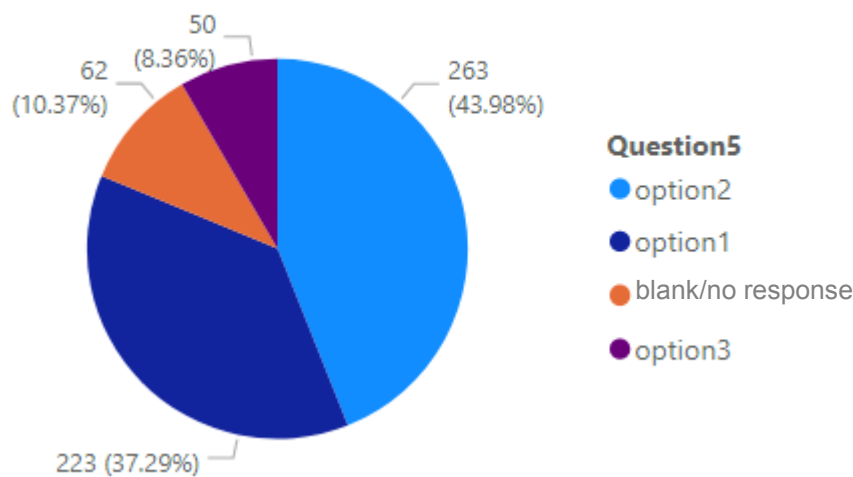
Slightly more people supported planning to ensure net zero carbon in new developments from a future date as opposed to from plan adoption – 43% to 37%. 10% of respondents felt we should either not have a policy or take a different approach.

People who responded with option 2, whilst feeling that the issue was important, often expressed concern over the feasibility of the target date proposed in option 1 and feared that too ambitious a target would compromise the delivery of affordable housing. Those responding with option 1 commonly stated that the climate crisis needs to be taken as seriously as possible now and that the development industry has had a lot of time to adapt already. Respondents choosing option 3 often felt that central government should take the lead on this matter rather than having fragmented local policies.

Other common comments included:

- Solar panels and electric vehicle charging points should be provided as standard on all new builds

- Passivhaus standard should be encouraged and heat pumps should be the preferred source of energy
- Cost to make homes carbon neutral later on will be much more than if done now
- Policy should be used to encourage small builders by giving preference to net zero designs in locations where development might not otherwise be accepted
- When does efficiently, net zero housing doesn't have to be any more expensive.
- A strong target will encourage innovation and reduce the overall cost over time
- Net zero by 2040 is too late
- Focus on larger developments to maximise the benefits
- Need to ensure that net-zero really means net-zero, taking into account materials and construction.
- Could maybe include a graduated target
- Need to focus on methane as well as carbon

Question 6 - Provision of solar arrays/farms and windfarms

Paragraphs 4.5 to 4.7 of the Issues and Options report deals with maximising energy from renewable sources. Question 6 sought views on the approach we should take in respect of solar arrays and windfarms.

Option 1 – Identify suitable areas for renewable energy developments
Option 2 – Not identify areas but offer general support
Option 3 – Take a more restrictive approach to renewables
Option 4 – None of the above

Count of Responses by Question6
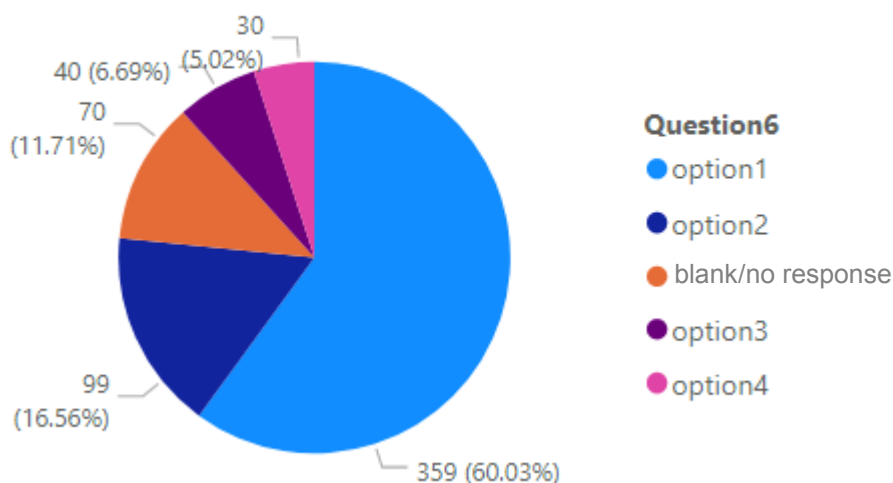
The most popular option by far with 60% support was for us to identify suitable areas for solar and wind energy. 16% of people felt we should offer general support and just 6% felt we should take a more restrictive approach. 5% of respondents felt that none of the options were suitable.

Many who responded with option 1 felt it was very important to encourage renewables whilst protecting the most important areas in the district like the AONB. Despite this, there was considerable concern over the potential visual impact of both technologies, even from those who responded with option 1. Some who responded with option 2 felt that a more flexible approach was needed, taking into account the local populations views and the Town Council. Those who responded with option 3 tended to feel these forms of technology were destructive to the environment and landscape. Those responding with option 4 provided a variety of comments, some which are covered below.

Other common comments included:

- Need to encourage solar energy brownfield land and new builds first over greenfield.
- Solar panels offer the potential to enhance biodiversity when done innovatively

- Small scale generation is also important and should be encouraged
- Should encourage multi-use of solar farm land and protect most productive agricultural land.
- Off-shore wind is most suitable over on-shore
- Should look at other forms of renewable like tidal, hydrogen and anaerobic digestion.
- Need to coordinate with WPD as network capacity has been an issue recently.
- Need to be careful over siting renewables near residential properties
- Wind arrays can become tourist destinations
- The word "suitable" and what it means needs careful consideration.
- Need to consider co2 emissions from the construction and life cycle of wind

Question 7 - Carbon saving measures

Paragraph 4.8 of the Issues and Options report sets out seven policy objectives for helping to achieve carbon neutrality including using 'waste heat', and promoting community led renewable energy schemes. We asked if people agreed with these and 59% of respondents answered yes.

Although most respondents ticked the yes box a number did suggest other objectives as well as did many that ticked the no box.

Count of Responses by Question7
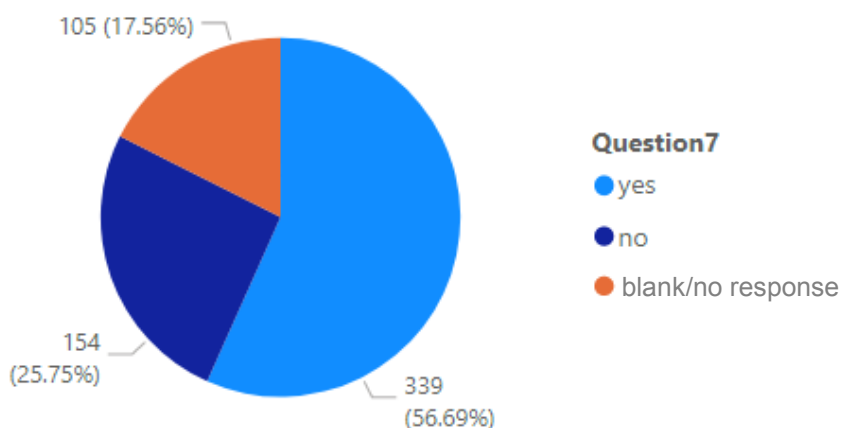
A wide range of responses and suggestions for additional carbon saving measures were received, including the following:

- Climate change issues should be tackled through a national rather than a local strategy
- Need to encourage pedestrianisation, park and ride, traffic management, cycle lanes and use of electric vehicles.
- Need to encourage more working from home
- Should encourage retrofitting of existing buildings as a priority, particularly over demolition
- Using landform and layouts to increase resilience to climate change
- Work more with farmers through carbon trading / water improvement schemes.
- Also need to focus on protecting existing woodlands alongside planting.
- Need to cover other forms of technology such as heat pumps and tidal.
- Need to encourage more amenities near existing homes
- Should ban the use of gas entirely
- Trees should be planted in urban areas as well
- Should be aiming for zero carbon or negative carbon
- Consideration needs to be given to areas that have yet to not have access to all fuels such as gas.
- Potential to utilise hydrogen

- No mention of airport which is a big emitter
- That the plan considers possible ways to adapt/be resilient to the impacts of Climate Change by providing bigger/better/connected habitats for the benefit of biodiversity and natural flood management (NFM) measures

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

In Chapter 5 of the Issues and Options report we set out the current Government requirement for us to build at least 928 new homes a year (although this figure can change). Paragraph 5.4 explains that we may need to almost double the number of affordable homes (to 461 every year for the next 20 years) to meet current and future needs. We asked about what level of housebuilding people would favour:
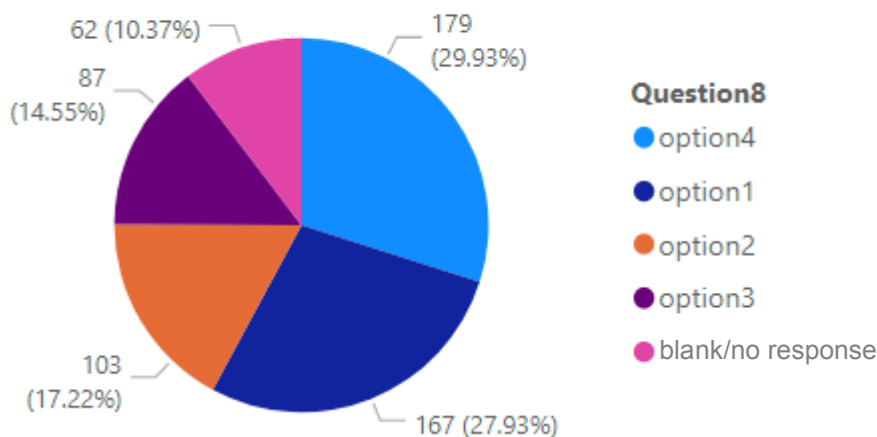
Option 1 – Plan for an average of at least 928 new homes built each year
Option 2 – Plan for a greater number of homes, for example 1,200
Option 3 – Plan to build considerably more homes each year
Option 4 – None of the above

Count of Responses by Question8

Of the respndents that favoured an alternative number quite a lot stated (or it could be inferred) that they favoured a level below 928. Had a below 928 been an option it might be expected that some respondents would have ticked that box. We will seek to do further work looking into possible numbers.

HOUSING NEED
Whose need/What type of need?

- Government's 'Local Housing Need' is not need, it's demand/want/aspiration
- Only plan on the basis of affordable housing need relating to local residents
- Want need assessment to focus on needs of specific groups
  - Prioritise meeting needs for younger people/economically active
  - Prioritise meeting needs of an ageing population; older household downsizing
- East Devon's need assessment should not be used to provide dumping ground for large conurbations to buy up housing and move its problems here

Standard method for assessing local housing need (LHN)

- Need clarification of how new house building is forecast why and where. Is it government use of disastrous algorithms or "guesswork"?
- Government should focus on its levelling up agenda, less on East Devon
- Are Government requirements applicable to East Devon?
- Challenge e.g. by CPRE to standard method/underlying assumptions/use of 2014 National Household Projections – advocating much lower figures
- EDDC must challenge the Standard Method & its use. ORS report –standard method giving 900pa (18,000) includes 1677 dws for net in-migration increase; 70% of housing built in previous plan period occupied by in-migrants. Impact on local residents' well-being
- Use of emerging evidence e.g. new population estimates, projections and 2021 Census data. Will it show that population is less than the level which informed 2014 household projections? – possible impact of Covid and Brexit
- East Devon population is shrinking. Why are more homes needed?
- Want LHN based on proper needs assessment of local population eg local parish surveys

Standard Method (SM) – amount of need

- 928pa is too high, it will drive up in-migration. Local residents' need is much less.
- PPG allows lower than SM figure provided there are exceptional circumstances
- Why oversupply homes to deliver need to meet affordable housing?
- Want housing need to reflect minimum LHN figure based on standard method

Further uplift to housing need figure

- 928 dwellings pa is too low. Want LHN figure to be above standard method
- PPG indicates if previous housing delivery exceeded minimum LHN, LPA should consider if this level of delivery is indicative of greater housing need. Delivery in the last 4 of last 7 years has been higher than LHN. Basing requirement on this LHN is not 'boosting supply'
- LHN figure is below the current Local Plan annualised requirement
- Standard Method is only a starting point. PPG advises there may be circumstances for increasing the LHN above Standard Method rate
- House price to annual work place based earnings increased from 6.0 in 2000 to 10.57 in 2019. East Devon's affordability ratio is one of the lowest in country.
- Must consider the reasons why significant uplifts taking may be needed, e.g.:
  o Demographic change
  o Market signals relating to housing affordability
  o Meeting all Affordable Housing Need (including all affordable home ownership aspirations). Additional to the Standard Method's affordability uplift. The ORS figure of 461 pa Affordable Housing Need is twice the delivery rate achieved in recent years

- o Economic aspirations/economic projections. Will there be sufficient working age population? Exeter and East Devon Enterprise Zone has a growth agenda. May need housing above LHN to support EZ ambitions
- o Meeting unmet need from neighbouring areas (Duty to Cooperate) e.g.
  - ▪ Lyme Regis – Dorset Council -. Limited opportunities at the town to meet needs for affordable homes and employment. Should consider opportunities in the vicinity of Lyme Regis to help meet the needs of the constrained town. Sites in East Devon well related to the town may be more suitable than sites in Dorset. Developer comment - Adopted East Devon Local Plan's commitment to work with West Dorset DC, Uplyme PC & Lyme Regis TC to explore solutions to meet local needs at Lyme Regis. Have collaborative discussions occurred & DtC been met?
  - ▪ Torbay Council advised GESP that Torbay is unlikely to accommodate its standard method LHN (586pa) beyond 2030. East Devon Local Plan needs to take account of neighbouring needs as part of ongoing consideration of cross boundary needs.
  - ▪ Exeter City – (developer comments) East Devon already meets a substantial part of Exeter's need. This will continue. Exeter Core Strategy Requirement total of at least 12, 000 fell short of the 15,000 need. Shortfall in Exeter supply/delivery. East Devon Issues and Options paper didn't consider this matter but it can't be ignored. If Exeter cannot meet its needs within its boundary, then may need to consider how East Devon could help meet this unmet need
- 2014 household projections used in standard method are not fit for purpose. They rely on past trends- a period of suppressed household formation. Increase LHN to address huge past under supply/national housing crisis
- Should use much higher LHNA figure. Comments suggest a range of figures:
  - o At 30% provision, 461 dws equates to 1536 pa (30720 over 20 years). Achieving a lower % of affordable housing raises the rate further
  - o over 1600 pa (i.e. previous Government SM figure) 32,000+ dws total
  - o significantly more than 1614 pa, helping to meet Exeter City needs
  - o Increase LHN to 2000+ dws pa (40,000+ over 20 years)
  - o If the Council are seeking to fully meet the 461 AHN and if affordable provision of new homes is 20-25%, then the total local housing need would be 1,844-2,305 dws pa (equates to 36,880 and 46,100 total dws over 20 years –this will be a challenge)
- Unmet East Devon Housing Need South Somerset DC seek confirmation through Duty to Cooperate that EDDC are able to meet their own housing needs within the District

HOUSING SUPPLY

Comments divide into expand/accelerate supply (largely developers/ landowners) and constrain new build/use other sources (communities) as follows:

- Local Plan must comply with the Government policy and guidance. Must meet tests of soundness, e.g. be consistent with NPPF on boosting housing supply
- Local Plan needs to allocate more land for housing development. Several respondents used their Q8 response to support allocating their site

- For supply forecasts to be realistic, evidence needs to be consistent with NPPF and PPGs
- Large proportion of commitments are in the control of a small number of developers risky strategy. Too much reliance on a major site (Cranbrook)
- Need for a degree of flexibility in supply, to ensure housing requirement is met
- Already built more than we need. Devon CPRE shows East Devon provided 33% (1155) more housing than current Local Plan required in the past 5 years. Can recent over-supply be counted towards meeting Local Housing Need?
- Supply constraints - developers not using land holding. Don't allocate more
- Developers' business models control speed of delivery and focus on narrow range of development/house types and sizes that maximise profit, not need.
- Want no new build but could make better use of existing homes (use empty homes; subdivide), better use of land (higher densities), reuse land (redevelop brownfield)
- Convert offices to small units - meet homeless/young people's housing needs
- More Method of Modern Construction dwellings; More self-build/custom build

HOUSING REQUIREMENT
- Plan must set a strategic policy net housing requirement expressed as a minimum for the plan period for market and affordable dwellings, in line with government policy.
- Requirement figure must be justified by evidence, to demonstrate how the figure has been derived and is it realistic and achievable More work needed to evidence exact requirement, assess the likely proportion of homes that are affordable, and how far this meets need
- Requirement should not be below the level of need, including affordability
- Requirement should be realistic and achievable, meet full range of housing needs (specialist needs of the elderly, affordable and specialist housing)
- With a 30% affordable housing requirement on sites, applied to 1614 pa need over 20 years equates to 32,280 dws requirement (about 9,684 affordable homes). Is it achievable? Taking account of environmental constraints; 1200 - 1614 pa is more realistic, deliverable
- Increase housing provision across the district; growth address housing shortages
- Need to evidence the impact of requirement figure
- Local Plan should provide requirement figures for Neighbourhood plans
- Neighbourhood plans should determine their housing needs/requirements
- Policy target should be expressed as a maximum
- The higher the target the harder to achieve, not demonstrating 5 year supply
- Housebuilding has over-delivered - can we reduce the new plan target because current supply exceeds existing housing policy requirement
- Council should not plan or commit to any specific figure for new houses -focus on redevelopment/conversions/brownfield land
- Plan for little as possible new development. East Devon is overdeveloped
- No more housing. Should not set policy targets, they are arbitrary
- Should have a negative housing requirement if we want sustainability

HOUSING AND SPATIAL STRATEGY

- Links between spatial strategy, distribution of housing, meeting requirement
- Locate housing near employment or accessible by public transport
- Restrict new housing to cities/towns; but avoid urban sprawl
- Opportunities for major scale development delivering housing; but risks of relying on this
- No more housing near Exeter; area is over developed.
- More housing in and at villages
- Wider dispersal of housing across the district e.g. to support smaller settlements. Broad issue of no housing in the countryside (potentially this comment could include isolated development, Class Q development, rural workers housing)
- All of new housing built needs to be evenly distributed over all East Devon
- What is the impact of new housing on existing neighbourhood and residents
- Scale of development continues the concreting over the countryside
- Prioritise use of brownfield land for housing sites
- Make best use of land; avoid cramming and cramped dwellings, need better quality/ energy efficient homes. Demand for more space in homes likely to increase house prices,
- Don't build on greenfield land; protect Green Belt from housing development

AFFORDABLE HOUSING NEED (AHN) AND AFFORDABLE HOUSING SUPPLY

- Include total affordable housing requirement in Local Plan policy
- Plan should Meet all Affordable Housing Need. Have mixture of house sizes and tenures
- Need to retain affordable housing in perpetuity to avoid loss to market
- On site delivery of affordable housing is preferable (otherwise need off-site contributions)
- Increase percentage of housing in a development that is affordable - preferably 30% plus
- Vary affordable housing minimum % on sites, by settlement type. Ensure it is adhered
- Impact on viability from setting site affordable housing percentage too high
- What is the connection between AHN and overall Local Housing Need?
- Is the Affordable Housing Need (9,220) in the 2020 ORS report calculated correctly?
- Housing monitoring data needs to separate affordable housing supply achieved from development (256 last year) from other supply (64 last year)
- Supporting Neighbourhood Plans/parishes' housing surveys is more effective in delivering affordable housing than higher Local Plan housing requirement
- Define what is meant by affordable. Want more good quality social rented/Council housing - residents can't afford affordable rent
- Prioritise low cost housing for local people
- Should small sites and self build count as affordable?
- Make better use of existing homes/ council houses
- Impact of second homes/buy to let/holiday homes on house prices/affordability
- Impact of spatial strategy and the balance between small and large sites on ability to deliver sufficient affordable housing

Question 9 - Sites for small scale housing developments

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

Option 1 – Allocate or identify land for around 10% of homes to be on small sites
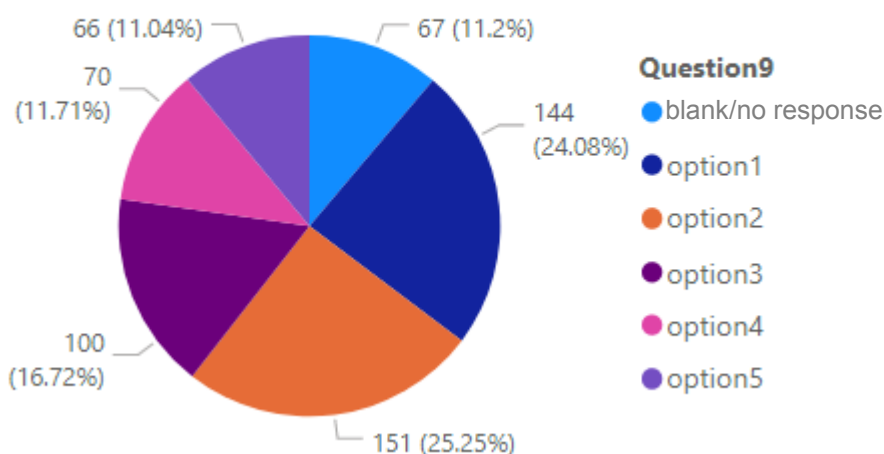**Option 2 –** Allocate or identify land for around 11% to 15% of homes to be on small sites
Option 3 – Allocate or identify land for 26% to 50% of homes to be on small sites
Option 4 – Allocate or identify land for 51% or more of homes to be on small sites
Option 5 – None of the above

Count of Responses by Question9

Similar level of support for allocating or identifying land for around 11% to 15% of homes on small sites (25% of responses) and for around 10% homes on small sites (24% of responses). Support declined in the options with higher percentages, with least support for option for 51% or more.

There was a wide range of comments on the subject, including:

- How will decision maker use policy/targets? Is policy realistic?
- Who decides site size - community/Council or developers/builders/owners?
- Community support for small sites/scale development for local need
- Developer support for range of sites scale appropriate to settlement category
- Volume house-builders still need to build high number of new homes required. Higher small sites % won't deliver sufficient housing to meet housing targets
- Plan precedence- should Local Plan use Neighbourhood Plan policies on site scale?
- Need clarity on what counts towards 'small site' target

- Arbitrary % targets. Need evidence on past delivery. Enough builders & sites?
- Site size limit is too inflexible/generalised; impact of density varies by place

Comments link targets to the Local Plan spatial strategy. Need for balance between appropriate scale development at smaller settlements and major growth of new settlement/town extensions. Spatial strategy and site allocation selection process have consequences. Larger strategic sites favour larger developers. Small sites enable small/builders to be involved. Other comments about:

- Most rural development is fairly small scale so small sites are very important
- Communities support more sustainable smaller sites with quality development - less disruptive; easier to absorb and into settlements. Does it aid village life, preserve identities?
- Dispersing more development to smaller settlements and a wider area could encourage unsustainable, creeping/isolated development in the countryside
- Target could result in sites' artificial sub-division, losing quality/contributions.

Comments address small site design and the impact on character and landscape. Small sites are opportunities for imaginative design/individuality relevant to rural areas. Concerns that it shouldn't equate to a crammed site or cramped homes, nor encourage 'garden grabbing' infilling, nor cumulatively change settlement character. But some people only want very small dwellings, that's all they can afford. Other concerns over small sites' impact on AONB, and impact on tourism from loss of countryside/landscape quality due to wide dispersal of small sites.

Other comments raise issues about site delivery, risk and viability, including:

- Economies of scale on larger sites. Small sites are more expensive to deliver
- Is East Devon too reliant on large, volume builders, focused on higher profit margin dwellings? Larger sites don't deliver housing that local communities need and e.g. Cranbrooke and town extensions have much longer lead-ins.
- Local builder SMEs know the local area/history and the local communities. Provide local employment. Could deliver wider range of dwellings. Small sites have shorter lead in time. Concern about supply chains, impact of CIL. Small sites could make use of existing infrastructure, public transport/services but more difficult to plan/secure infrastructure funds.

Comments on site size also consider affordable housing and self build

- Will a small site deliver affordable housing? Thresholds apply; too many small sites reduces the total amount of affordable housing achieved by development
- Would approach lead to artificial, splitting up of large sites, so sites fall below policy thresholds and don't contribute to services/affordable housing?
- Small sites are appropriate for self build and for groups to build cooperatively; opportunities for more high quality/energy efficient homes. Plots need to be available & ring fenced at realistic prices. Need for self build and live-work units to foster affordability & reduce use of car. Need to support CLTs. Large site doesn't preclude self build.

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

Paragraphs 5.8 and 5.9 of the Issues and Options report sets out the reasons for building a range of homes that can accommodate different life stage or health circumstances. We asked what approach we should take to encourage this, or is it not something the local plan should deal with.
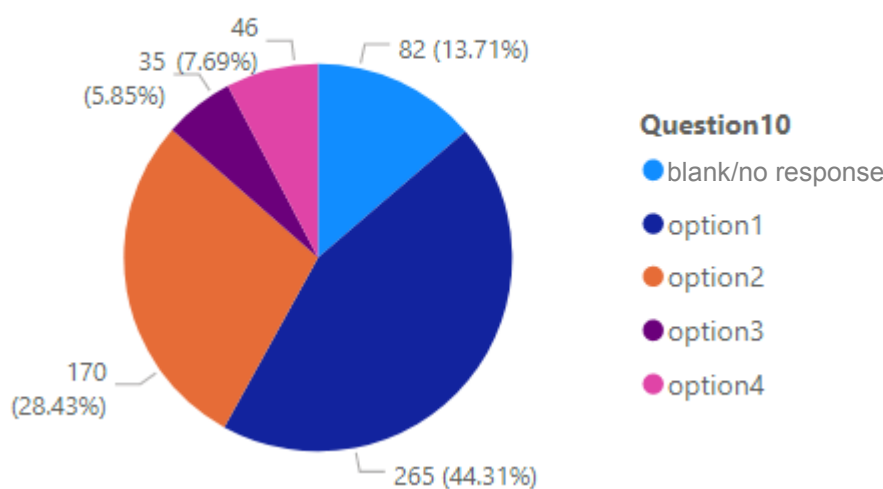
Option 1 – We should explicitly require housing provision for people at all stages of life
Option 2 – We should encourage but not require housing provision for people at all stages of life
Option 3 – not set standards for differing types of housing provision
Option 4 - None of the above or an alternative

Count of Responses by Question10

Greatest support is for requiring housing provision for people at all stages of life (44% of response) whilst 28% supported encouraging but not requiring housing provision for people at all stages of life. Little support for not setting standard for differing types of housing provision. 7% of responses supported option 4 – they focused on the needs of a particular group. Comments on requiring or encouraging divided broadly as follows:

- Communities consider requirement is necessary to provide mix needed by communities. Plan's purpose is to provide what's needed, not what maximises a return. Encouragement approach is unrealistic; market/developers haven't responded to encouragement.
- Developers consider requirement is unworkable, it leads to trade-offs/compromises, but encouragement is achievable. Individuals should decide their own need and the market respond. Developers are best-placed to assess market needs, supplying what they can sell.

Comments also include questions about evidence used to assess what type of housing the area needs, including what evidence is there of:

- Housing needs of different age groups/household types/life stages/ locations and the current occupation of housing stock by these categories

- Can the Council predict where people in different stages of life will want to live/shortfalls?

Some stress that local people not developers must be in control of the types of housing required by their population. They advocate using latest local need evidence, not generalised policy. Some support for using local input for plan making. Local Plan should take account of and not supersede Neighbourhood Plans' policies on meeting need.

Several respondents advocate prioritising the needs of specific groups. Comments focus e.g. on needs of young people, newly forming households and young families:

- Housing for young people should be first priority. Young people leave if no suitable units are available. Focus on affordable housing so they remain in the area.
- Newly forming households/young families need help getting onto the housing ladder e.g. starter homes, at a good standard that are really affordable, at locations with facilities
- Limit trend for extending housing; smaller properties keep being lost to the market
- Focus more on the needs of younger economically active people.

Other comments focus on the needs of people who are older. There is an ageing population. Older people don't all have the same needs but want choice through:

- Futureproof housing - Lifetime homes standards, or dwellings designed to be able to be adapted for independent living so people can stay in their homes,
- Flexible, multi-generational family housing, enabling mutual support.
- Instead of family homes, build housing for older people looking to downsize to release larger, under-occupied housing onto market for younger/family households. Build smaller accessible low rise housing/ground floor units, sheltered and extra care housing, and supported retirement communities, near facilities and good public transport locations.

Some comments link the types of housing need to spatial strategy, including:

- Build more homes for young people/families/economically active near Exeter.
- Need housing in Cranbrooke suited to older people.
- Require site allocations to make housing provision for people at all life stages. Mixed housing/communities are better for health/well-being/mutual support.
- More terraced housing, suited to all stages of life; Appropriate infilling allows downsizing
- Need for mobility/wheelchair access highlighted; how can market housing deliver?

Other comments focus on delivery. Communities perceive a risk that developers seek to vary legal agreements on viability grounds, reducing housing to meet specific local needs. In providing homes we still need high build standards, zero carbon footprint/renewable energy, green spaces/ nature rich environments. Developers' concern is that housing mix targets cause problems for achieving other objectives. Market demands, economic realities, and site suitability influence mix. Over-prescriptive requirements impact on viability, slow down delivery and casts doubt on LPA's overall housing land supply deliverability. Difficult to require mix on sites of less than 20 dwellings.

Question 11 - Additional housing policy objectives

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

Most respondents, 67%, ticked the yes box to the question about whether these 9 policy areas are appropriate to be addressed in the new local plan. Their comments on the nine additional housing objectives largely focused on applying other proposed local plan objectives to these policy areas, indicating potential aspects of Local Plan housing policy.

A number of respondents did suggest other major housing policy areas as well. A few responses to other questions also suggested housing policy areas. There is some overlap with other policy areas, notably design, climate emergency, jobs/economy,.and natural environment. (Comments relating to the housing matters covered by Questions 8 to 10, and 28 are set out in the summaries of comments on those questions.) Suggestions (summarised) include

- Delivering high quality housing; principles of Building Better; Building Beautiful
- Delivering decent homes with an emphasis on adequate internal space and external amenity space, reducing costs of heating and maintenance, resilient to climate change
- Delivering carbon neutral housing
- Incorporating habitats and biodiversity net gain into housing and housing development
- Housing design - traditional or modern? Use of local materials in housing developments, sympathetic to the local area
- Use of modern methods of construction to deliver housing
- Ensuring affordable housing is integrated with other homes in a site
- Designing out crime and the fear of crime in housing development
- Live-work units (as well as space for homeworking and need for broadband)
- Housing enlargement - extensions; use of annexes / functional links to the principal dwelling
- Addressing the issue of second homes, for example through
  - A principal residence policy in Local Plan to apply across the whole District; or in specific localities
  - A policy in the Local Plan for Neighbourhood Plans to contain specific policies on second home ownership
- Integrating housing development with adjacent developments and land uses
- Residential amenity (existing and proposed housing)
- Avoidance of too many houses resulting in town/village cramming
- Access to facilities and services and broadband in or from housing development
- Co-living in large social houses; houses in multiple occupation

Question 12 - Preference for location for future job provision

Paragraphs 6.4 to 6.7 of the Issues and Options report explains why much of the recent employment development has occurred near to Exeter and where future job growth could be located. We set out a number of differing potential areas in East Devon that could accommodate future job growth and development and asked people to indicate their level of support.
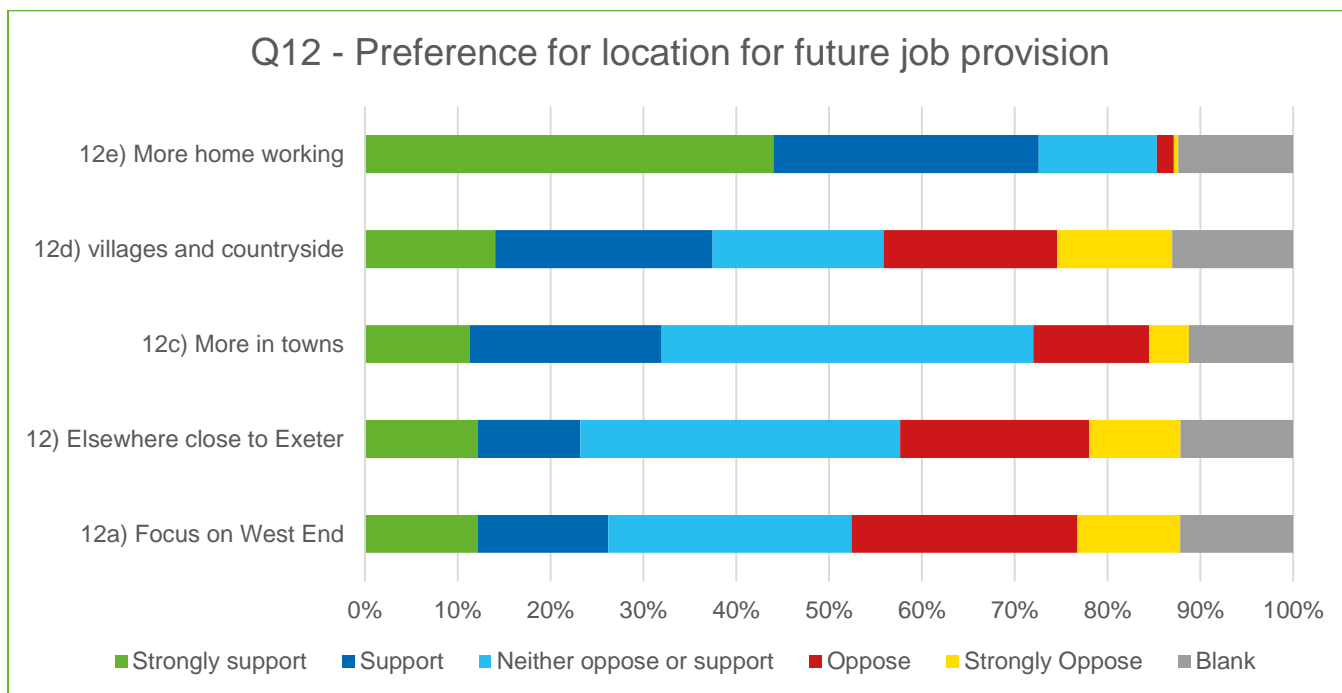
Overwhelmingly respondents supported increased homeworking in future. This will have wide ranging implications, for example in future housing design and infrastructure requirements, particularly broadband provision, and a need for less office space.

The other options did not result in very clear preferences. There was slightly more support for additional development in the towns, villages and countryside than opposition but significant numbers of respondents did not express a preference or left the form blank.

The suggestion that additional employment development should be located close to Exeter, including a focus on the West End, did not elicit a preference from most respondents, although the slight majority of those that did express a view were not supportive.

The written responses to this question covered a wide range of issues and included:

General

- Respondents generally support new employment but want it in suitable locations; delivered alongside housing (and at a similar scale) to reduce commuting; environmentally sustainable/incorporating biodiversity gains; and supported by adequate infrastructure.

- Homeworking was overwhelmingly supported but requires optimum broadband and mobile capacity. Houses need to be big enough to accommodate office space. Can be isolating so would need to consider other measures to promote healthy lifestyles and social cohesion
- Given the significant economic shock caused by the Covid pandemic, the Plan needs to take account of the latest evidence on likely recession, and plan for a long recovery and a shift in economic circumstances. Plan should be flexible as full impacts won't be known until the medium term.
- There should be a focus on training and employing young people and wages need to improve to cover the cost of living. Reliance on low paid/part time/seasonal jobs creates inequality and poverty
- Office spaces/hubs should be located close to public transport and shared, no longer a need for lots of office space for individual businesses
- Promote sites for technology and green business/industries
- Landscape/countryside should be protected to increase investment in tourism

Allocated sites

- Existing sites should be built out before greenfield sites are developed. Undeveloped sites e.g. at Heathpark, are an eyesore and detract from surrounding businesses.
- There is no longer a need for allocated employment sites and they may be more suited to meeting housing needs/ Do not allow allocated employment sites to be used for housing, especially if land is surrounded by other employment uses and would constrain their activity

West End/Growth Point

- Interrelationship with the development within the city boundaries – competition for these jobs with Exeter residents
- Skypark, science park and development at the growth point is slow – there is still capacity. Opportunity at Cranbrook to have small business clusters and develop land around Exeter airport.
- Developers supporting continued west end focus /'east of Exeter', but to look to alternatives to that north of the A30, including along the A3052. Aspirations for Hill Barton and Greendale to grow countered by concerns that they are inappropriately large for the countryside location and are poorly controlled

Towns and Villages

- Allocating employment land in towns was seen as desirable but should be at a scale commensurate with settlement size and focus on small-medium businesses.
- Town centres should focus on retail and services with housing above. Resist change of use
- Small, cheap workshops/storage units are needed in towns and villages, ideal for start ups
- Access and infrastructure constrain rural development- focus on small, local provision

Question 13 - Differing jobs sectors in East Devon

Paragraphs 6.8 to 6.10 of the Issues and Options report discuss what sort of jobs the local plan should encourage, including the opportunities to attract new and emerging sectors with highly skilled jobs. We asked about the level of support for different options.
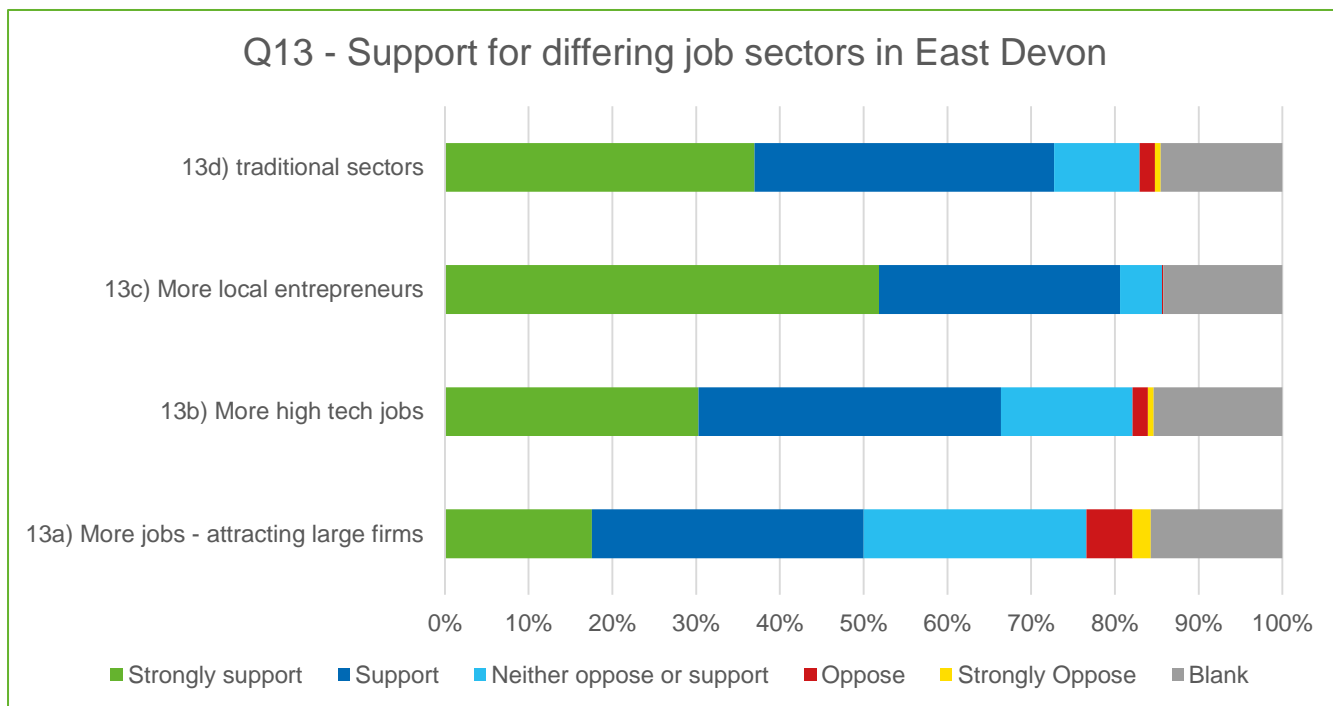
Support was strongest for more local entrepreneurs (51.8% strongly support) and traditional sectors (37% strongly support), followed by more high tech jobs (30.3% support) and, finally, more jobs through new and larger employers (17.6% support), with more than a quarter of respondents having no opinion on the latter and more than 7% opposing or strongly opposing this option.

There was a wide range of comments on the subject, including:

- More jobs would only attract more people to the area rather than help local residents;
- Diversity in the job market will deliver better resilience;
- A good mixture of jobs is needed – not just tourism, care and agriculture;
- How homeworking will continue to be the norm for many post-Covid, and that this will have a positive impact on climate change;
- To attract more high-tech employers we need far better internet connectivity across the district;
- Environmental and sustainability consideration should be key when promoting any form of employment, with the promotion of more green initiatives;
- People need jobs that offer an income that allows living in East Devon to be affordable;

- Small and medium sized businesses should be the future – not large employers – and that adequate provision should be made for new SMEs;
- Employers should be encouraged to offer apprenticeship and training programmes;
- Major employment projects should be located in the West End (east of Exeter).

There was a great deal of concern over the care sector, with calls for higher pay for these valued roles and more investment in the training and recruitment of staff, along with allowing care workers adequate time for home visits and ensuring they are paid for travel time.

There were also calls to prioritise support for agriculture, especially for smaller farmers who can provide local produce so residents can cut down on 'food miles' and 'eat local'.

Question 14 - Additional economic policy objectives

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

Although most respondents (76%) ticked the yes box, a number did suggest other objectives as well as some people ticking the no box.

Suggestions included:

- A policy on the regeneration of sites for mixed development;
- A more radical approach to providing accessible quality training;
- An objective to build self-sustaining communities for a diverse range of people;
- Support for shared workspaces that can provide more affordable premises/overheads, as well as provide support through social networks;
- The development of strategies to encourage upskilling and apprenticeships within new business development, particularly with young people in mind, as well as with those who have had to change career due to significant changes in the market;
- Support the provision of new/additional B8 (storage/distribution) sites for small and medium sized enterprises across the district;
- The promotion of rural economic growth by supporting the expansion of existing employment sites that are operating successfully and have reached – or are close to reaching – full capacity, as development opportunities are limited in the rural areas.

Criticism was made of Point 4 *(That may allocate further or additional sites if there are shortfalls identified or review shows that existing employment sites are unlikely to be developed or built-out)* as an ambiguous way of saying industrial and/or housing sites might have to spread around the area, that this approach seems to go against other parts of the report (including Point 5 discussed below) and could also conflict with environmental policy and town boundaries.

There was support for Point 5 *(Considering how we may embed environmental and sustainability considerations more fully into economic development objectives and in so doing how this can support a transition to low carbon/greener economy)* as the delivery of jobs close to where people live will reduce the need to commute and result in a more sustainable pattern of development, contributing to making the change towards a net-zero carbon future.

Other comments included:

- Economic policies should balance the health and well-being needs of the community and that GDP "is not a measure of happiness";
- Given that agriculture and tourism are "the biggest industries in East Devon", it would be a mistake to "concrete over" further areas of the district;
- That we need "employment nearer to homes not homes nearer to employment";
- Policy should make it much more difficult to reallocate land already designated for employment use to change to housing, with any loop holes being removed.

Question 15 - Town centre uses

Chapter 7 of the Issues and Options report considers options for the roles of our town centres. Question 15 sought views on these options and we set out a number of differing potential uses and approaches to promoting town centre vitality and activity. Levels of support were sought.
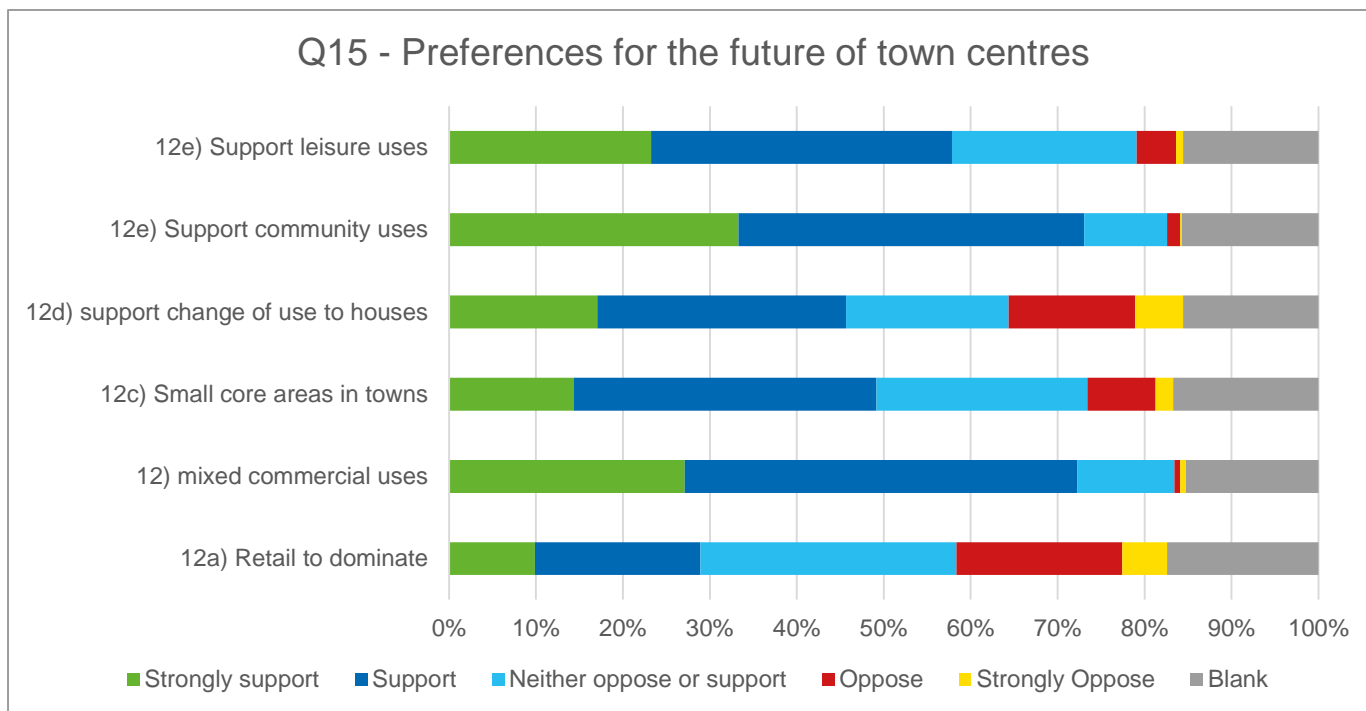
Most respondents favoured mixed commercial uses in town centres, with over half of respondents supporting leisure or community uses and very little opposition to these. Dominant retail use (as has traditionally been promoted by policy) received around 30% support and a similar level of opposition. . In the written comments the use of upper floors for services, community activities and housing was strongly supported and a range of measures suggested to encourage this.

A significant proportion of respondents (around 20%) were opposed to change of use to housing, although this also received considerable (quantified) support. In the written comments most concern related to the permanent loss of retail units to housing and the consequent impact on the retail function of the town centres. Edge-of-centre and first floor residential use received considerable support.

The need for town centres to be vibrant social spaces was expressed by many respondents. A range of activities, areas to sit and increased community, health and service uses were seen as a major draw.

Individual comments related to a wide range of issues. The following summaries capture the main points:

- The objective should be to build self sustaining communities for a diverse range of people/ retaining community cohesion and high footfall
- Service industries and cafes should be encouraged to improve vitality. If these can be established above shops that would double the footfall
- A strong focus on heritage, culture and the arts to make each town centre special
- Plan for social spaces (café's, gardens, stalls, pop-up shops) to encourage use of outside areas. Encourage street markets, music, food events to create vitality
- Uses at first floor and above should be strongly encouraged- Gyms and leisure uses, housing and community use
- Housing should not dominate but should be integrated to maintain a mix of uses and reduce vehicle movements/Allow housing on the edge of centres but retain centre for shopping/services. Only allow housing where adequate facilities (including parking and outside space) can be provided for the residents.
- A split of opinion between it being better to have housing than empty shops and concern that, once a shop is changed to housing, it is permanently lost.
- Retail uses should be promoted in town centres and footfall is still encouraged despite on-line shopping. This could include town centre showrooms with goods available to see/try on before collection/delivery from warehouses, speciality retailers and goods collection points e.g. for those who aren't at home to collect packages.
- Greater pedestrianisation (day-time car free streets) and more convenient public transport
- Cheaper business rates, car parking and affordable space for community groups and arts
- Promote shared community use- for sports/gyms but also education/culture/spiritual uses
- Potential for seaside towns to be redeveloped, prioritise removing existing eyesores and establish a coherent character for new development
- Rural settlements should not lose existing retail and community facilities.
- Need to accept that private cars are inevitable in rural areas
- Policy should be flexible so that it can quickly respond to changing circumstances

**Question 16 - Additional town centre policy objectives**

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

Although most respondents (67%) ticked the yes box, a number did suggest other objectives or qualify their choice. These (summarised) comments included:

- Different responses are needed for each town centre. These should be produced in consultation with the local community and neighbourhood plans.
- Out of town retailing should be resisted and, where it is allowed, should have similar conditions to town centres e.g. parking charges and be accessible to pedestrians and cyclists
- Make centres pedestrian and public transport friendly. Make car parking cheap or free.
- Offer a town wide online presence so small retailers can offer goods online and share costs
- Need to promote local foods and goods, encourage farm shops but not as competition to the High Street shops (or there could be a co-op shop for local farmers to sell through)
- Redevelop out of town shopping areas as housing (especially sheltered housing)
- Accept out of town retailing and improve access to it and the shopper experience. Encourage linked trips to town centres.
- Make town centres social spaces and focus on the shopper experience

Question 17 - Designing beautiful spaces and buildings

Chapter 8 of the Issues and Options report explained how attractive places can be planned and Question 17 sought to find out how important you think it is that this is done.
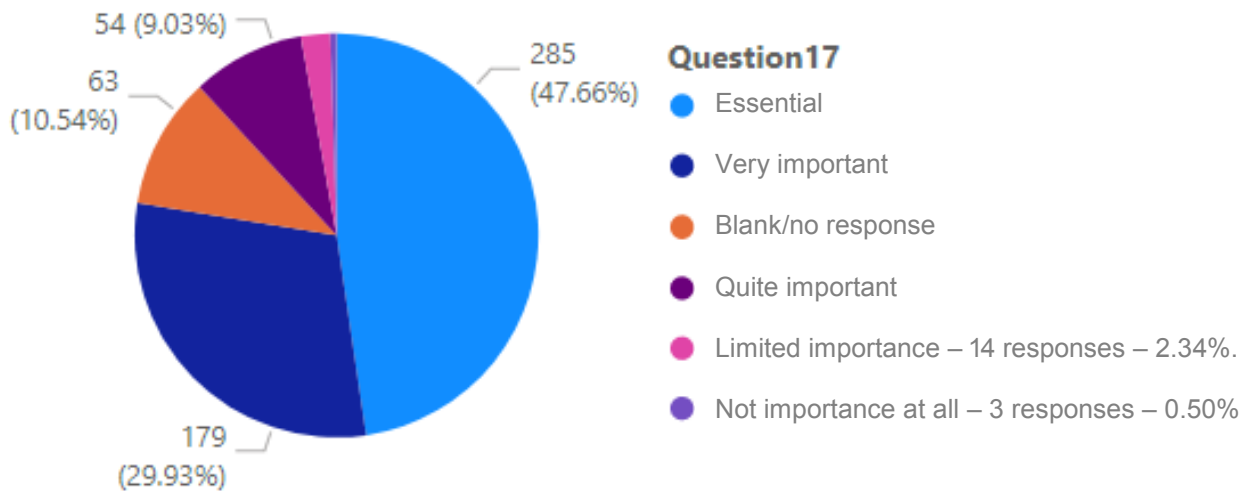
Over three quarters of respondents (77.5%) thought it essential or very important that places be planned to be attractive.

A lot of respondents made the point that 'beauty is in the eye of the beholder' and queried who would be responsible for deciding what was an attractive design. There was support for the use of design codes, particularly if individually tailored to specific sites and with input from local communities, but also significant levels of concern that they may stifle creativity and individuality. Several respondents emphasised the importance of flexibility in design codes, although some thought that developers were likely to ignore them. A significant number of responses favoured more general guidance rather than design codes.

The importance of green and open spaces that incorporate existing features was raised by many of the respondents, often linked to increasing habitat/biodiversity. Some respondents favoured function, sustainability and affordability ahead of beauty.

There were several comments that bold new designs should be encouraged and one respondent suggested that 'architects should be allowed have fun when designing'; another made the point that buildings need to change or we would be living in 'mud huts'. The following bullet points give a 'flavour' of the comments received to illustrate some of the matters raised:

- All buildings should be sympathetic to the local environment and not look out of place;
- Buildings should sit well in the landscape;
- Space and well designed buildings improve wellbeing and make the area a desirable place to live;

- Planning never has created any beauty. Just consider council housing design and ugly tower blocks. The only buildings that are beautiful were built before planning was thought of;
- It is essential that design codes are included. If not any "anything goes";
- General guidance and then make decisions based on individual applications;
- Dull homogenous developments are uninspiring and unstimulating. The number one priority should be to ensure that new buildings produce minimal emissions, are energy self sufficient and are made sustainably, but this can be combined with beauty. A building that is made from sustainable natural materials will look more attractive;
- "Beautiful" is such a subjective term! Impossible to define! However, it is possible to define limits in terms of size and height for a development. These should be generous in existing high density areas, much less so in rural and AONB settings;
- Good design is an investment for the future;
- Beauty is subjective. If you make a plan for that then again you will have planners having personal views on something, where quite frankly they shouldn't, especially as 99% of them have never worked in the private sector and certainly never run a business. The state needs to stop thinking it can control everything and knows better than everyone else;
- Local character and distinctiveness is vital, otherwise everywhere looks the same and bland;
- There are higher priorities, e.g. carbon neutral and
- Good for well-being and tourism.

Question 18 - Additional design policy objectives

Paragraph 8.8 of the Issues and Options report identifies two areas with the potential for additional policy work. These are encouraging innovative designs and incorporating wildlife friendly elements into developments. We sought views on whether these were appropriate.

Although most respondents ticked the yes box (71%) a number did suggest other objectives as did people ticking the no box.

There was a lot of support for wildlife friendly design and many respondents thought this scope should be widened to include a range of sustainable features, such as sustainable urban drainage systems.

Encouraging innovative design was quite divisive, with some support, but many respondents saying that buildings should blend with their surroundings and others saying that innovative design can cause eyesores.

Other objectives put forward included:

- Safe buildings;
- Building for life;
- Design refuse bins into all new builds;
- Joined up rights of way/exercise routes;
- Climate and biodiversity;
- Green infrastructure;
- Secure cycle storage;
- Protect from light pollution; and
- Allotments.

Question 19 - The importance of conserving and enhancing heritage assets

Chapter 9 of the Issues and Options reports describes our heritage assets and sets out the positive impacts they can have on our quality of life and local economies. We sought views on how important people thought heritage protection is.

Count of Responses by Question19
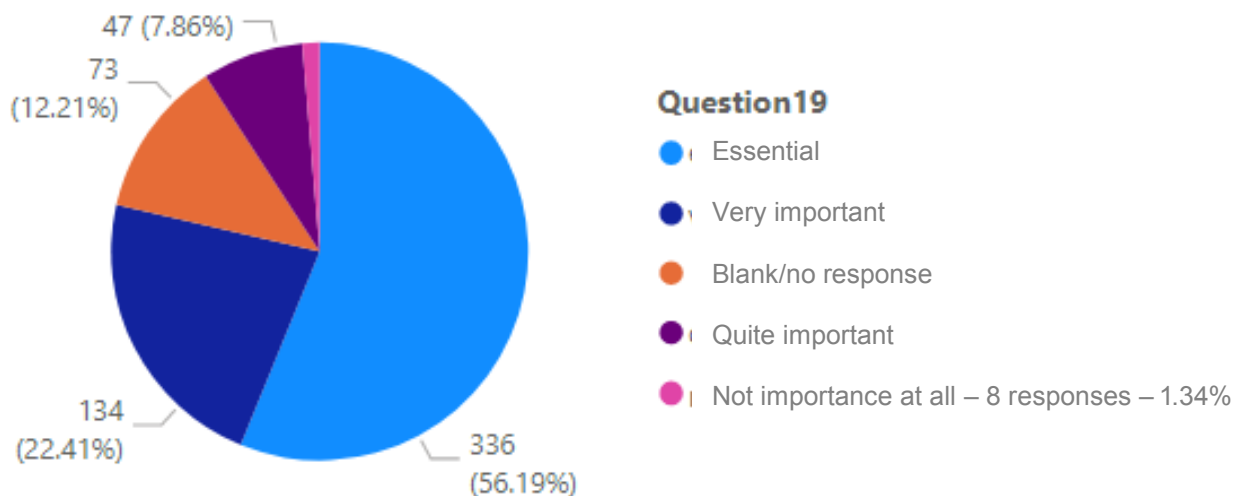
78.6% of respondents said that it is either essential or very important to conserve heritage assets.

There was a lot of support for conserving heritage assets for their historical, architectural, community and tourist value. However, and often within this support, there were many comments about allowing historic buildings to change with the times, for example by allowing alterations to make them more environmentally sustainable.

Of particular note are the comments of Historic England, as the Government's advisor for the historic environment. Historic England found much to welcome in the Issues and Options report but raised the following issues:

- The holistic nature of the historic environment and links with other issues, including talking climate change;
- The importance of all heritage assets, which affects the wording of objective 7 and the approach to historic environment strategy;
- The need for up-to-date and relevant historic environment evidence to inform allocations and designations (with reference to the NPPF paragraphs 31,35,184 and 185;

- The need for a heritage topic paper and positive strategy for the historic environment to consider:
    - The current state of East Devon's historic environment;
    - Key issues in terms of understanding, conserving, enhancing and enjoying East
    - Devon's historic environment as well as the wider benefits this brings including for local character and distinctiveness;
    - How effective the adopted local plan has performed in relation to these issues,
    - The delivery of a positive strategy for the historic environment (as in NPPF paragraph 185) and against its own objectives for delivering sustainable development in respect of the historic environment; and
    - How the new local plan intends to positively respond to these matters.

Question 20 - Development in protected landscapes

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

Option 1 - Place significant restrictions on development
Option 2 - Allow for development to meet local needs
Option 3 - Allow for greater levels of development
Option 4 - None of the above or an alternative
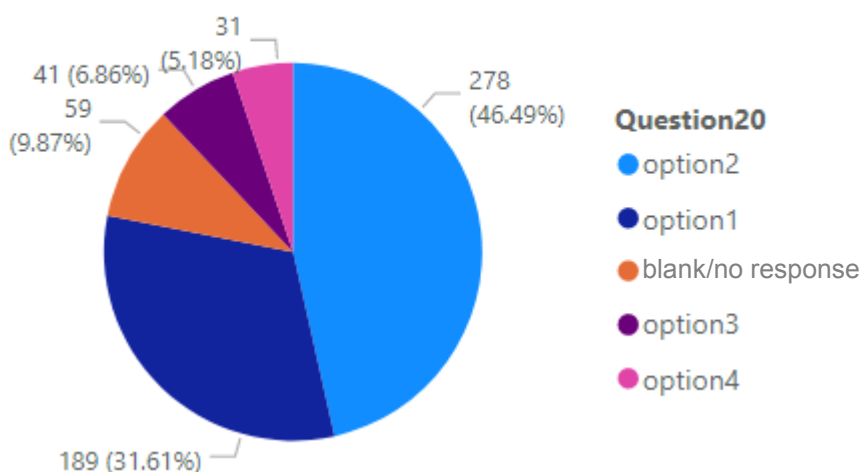
The most popular option was allowing for development to meet local needs with 46%. 31% of respondents supported a very restrictive approach. Only a small number of respondents – 7% supported greater levels of development and 5% supported none of the proposed options. A number of people supporting option 2 felt that small scale development could enhance villages and offer opportunities for local self-builders. Many responding with option 1 felt that protected areas were protected for a reason and that large scale growth should be directed to less sensitive areas. Those responding to question 3 often commented that protected areas could sustain more development if done well and it might rebalance large scale growth in the west end of the district and protect services and facilities.

Lots of other comments were received under option 4 and are touched on below:

- Neighbourhood Plans need to be taken into account
- We need to maintain green spaces in and around villages
- East Devon should look into national park designation
- Brownfield sites should be considered before greenfield

- AONB boundaries are often arbitrarily drawn and there should be a more nuanced test as to whether development in appropriate.

Question 21 - Net gains in biodiversity

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

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

Count of Responses by Question21
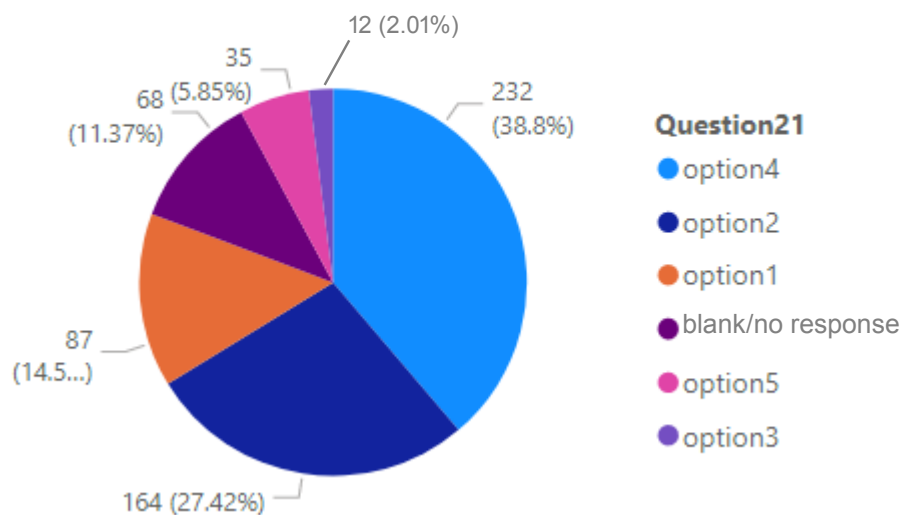
The most popular option is to utilise a combination of approaches to secure net gain for biodiversity with 38%. 27% of people thought we should seek to secure habitats locally whereas 15% thought we should deliver net-gain on-site. The least popular option was to pay a cash tariff towards a strategic delivery scheme with just 3% support, although this was supported by the RSPB who felt it could deliver better gains to biodiversity than ad-hoc schemes. 5% of people felt that none of options were suitable or proposed alternatives.

Those who responded with option 4 regularly commented that different approaches would be needed in different locations and flexibility could allow for enhanced gains. Those proposing alternatives or supporting none of the options are touched on below:

- Protection of existing biodiversity should be considered first and foremost
- Need to work with landowners and farmers.
- Biodiversity gain should be legally enforceable
- Existing trees need to be protected from development

- You can't put a cost on wildlife
- Need to spread biodiversity around the district and not focus on one particular area.
- Plan could also explore opportunities created through green financing

22 - Additional natural environment policy objectives

Paragraph 10.8 of the Issues and Options report identifies 10 additional themes for the natural environment that may benefit from policies in the local plan. We sought views on whether these were appropriate.

Although most respondents ticked the yes box, 69%, a number did suggest other objectives as well as did those ticking the no box.

A wide range of responses and suggestions for additional natural environment objectives were received, including the following:

- All new homes should be built with nesting boxes for migrating birds.
- Should support 25% tree cover
- Should incorporate wildlife corridors between wild areas including a green bridge over major roads like the A30.
- Need to include SUDS
- Need to consider water quality and rivers
- Clyst Valley Regional Park will be critical achieving biodiversity objectives
- Expand Cranbrook County Park
- Provide better pedestrian access across the railway line
- Urban green spaces should be wilder and less manicured.
- Need to integrate wildlife within new development better.
- Need to protect exist trees and hedgerows better.
- Green wedge policy needs to be reviewed.
- Should include timescales for delivery.
- Should mention the south marine plan.
- Create more valley parks and nature reserves and deliver benefits in those areas.
- Local Plan needs to take a key role in designating and protecting biodiversity areas.
- Concern that if a minimum is set this will only ever be what's provided.
- Pollution in rivers including the Yarty must be tackled
- Nature Recovery Networks will be key to identifying opportunities

Question 23 - Promoting accessibility by walking and cycling

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

Option 1 - Focus new development as small clusters of growth in locations within easy walking or cycling distance of existing services and facilities
Option 2 - new development on a small number of growth areas where the large scale development will support the delivery of new accessible services and facilities
Option 3 - A combination of 1 and 2
Option 4 - Do not require facilities and services to be within walking distance of new development but require them to be available within the settlement
Option 5 - None of the above

Count of Responses by Question23
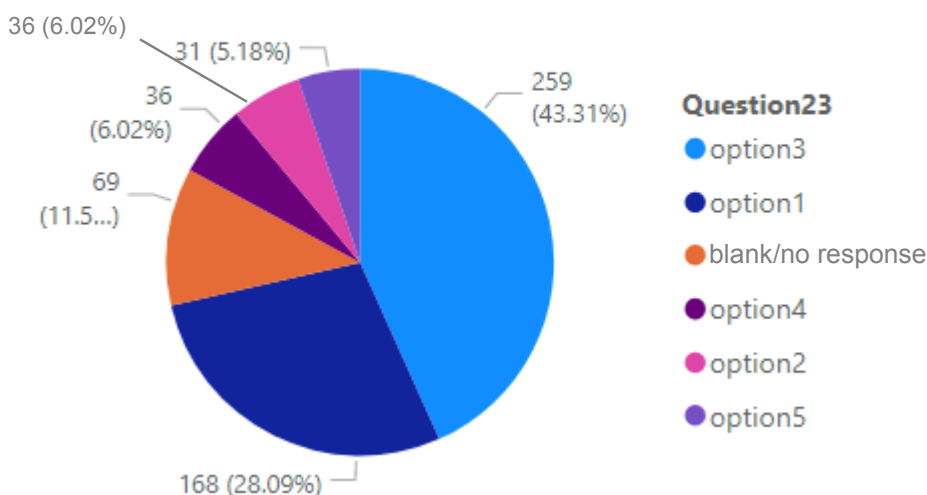
The most popular response, chosen by 43% of people, was option 3 which would enable some growth where existing facilities and services are accessible and have capacity, along with development at a small number of growth areas to be developed with new services and facilities. A significant number of people (28%) chose option 1 to have small clusters of growth in locations within easy walking or cycling distance of existing services and facilities. Just 6% supported the more relaxed option 4 of only ensuring services and facilities within the same settlement, regardless of walking and cycling distance.

A summary of the main issues raised on this question follows below:

General

- Support sustainable transport.
- Guide new development to locations that can be served by a choice of transport modes.
- East Devon is a rural district and opportunities to access development by walking, cycling and public transport are far more limited than in cities and urban areas; opportunities will also vary across the district. This should not prevent good development coming forward, as reflected in NPPF paragraphs 103 and 84.

- Sport England's Active Design is a key guidance document intended to help unify health, design and planning by promoting the right conditions and environments for individuals and communities to lead active and healthy lifestyles.
- The rise of internet activity reduces the importance of travel.
- Should also consider wheelchair usage.
- Employment opportunities should be provided alongside new housing, preferably within a specified radius e.g. one mile.
- Question is worded very subjectively and not quantified – what is "easy" for one resident is not for another.
- Ensure sustainable transport infrastructure is resilient to flooding and coastal change.
- Design residential areas as low-traffic neighbourhoods to reduce cars, increase walking/cycling, and increase use of local services/facilities.
- Tourism development should not be subject to the same requirements as housing in terms of walking and cycling access due its particular requirements – holiday accommodation is often located in rural areas away from existing services and facilities.

Access to services/facilities

- Support small development in villages where it's possible to access services/facilities by foot and cycle within 800m, along with routes to larger settlements – such sites should form the basis for the district's housing delivery.
- Increase the walking distance from 800m to 2km to improve health and well-being.
- Services/facilities should be provided before new development is built.
- The level of growth needed to create new services/facilities in a village of less than 1,500 people would be so large that it would be environmentally unacceptable
- Avoid dispersing new development to reduce the need to travel and maximise accessibility to facilities and services.
- Focussing development on locations with good access to facilities and jobs (i.e. western part of East Devon) helps reduce reliance on car travel, therefore minimises air pollution, congestion, and carbon emissions. This will also improve viability as less transport infrastructure required.
- Acceptable walking distances will vary depending the nature and quality of any routes – 800m is not an appropriate measure in itself.
- Allow people to live where facilities/services are not accessible by walking or cycling, otherwise smaller villages such as Upottery, Rawridge and Smeatharpe will stagnate.
- Directing development to only locations with existing services/facilities restricts the scale and location of future development e.g. a new settlement would not be allowed under this approach.
- The Paris idea for the '15 minute city' is a great idea to provide all local services within easy reach.
- Issues such as fitness levels, time availability, distance to travel, children to drop off at school, weather conditions mean that car use will still be prevalent – cannot dictate whether a person will work locally or use local facilities.
- Relocate village schools to locations where children live rather than relying on car journeys out to local village schools.
- East Devon's facilities and infrastructure are already insufficient and cannot take any more.

- Allowing more homes on brownfield sites and town centres will support local facilities.
- Should also consider facilities and services outside but near to the plan area e.g. those in Lyme Regis, as these are used by East Devon residents.

Walking/Cycling

- Ensure safe, attractive, well-lit, and connected walking and cycling routes.
- Combine walking and cycling routes with green corridors for wildlife to improve access to nature.
- Reduce conflict between walkers and cyclists by providing separate paths.
- Need shared use paths in new housing development, informed by comprehensive plans, to ensure walking and cycling are prioritised
- Need to develop walking and cycling routes between existing settlements e.g. between Sidbury and Sidford, from Tipton St John, Feniton to Sidmouth.
- Encourage people to walk/cycle locally to improve health, live more sustainably, and reduce carbon emissions
- Encouraging walking/cycling may be appropriate for younger people, but some areas (e.g. Sidmouth) have very high concentration of elderly people for whom a car is essential.
- Difficult to encourage sustainable travel from new development on the edge of settlements due to long distance and topography e.g. Exmouth.
- Must provide secure cycle parking, including charging points for electric bikes.
- Co-ordinate walking and cycling plans with the EDDC Clyst Valley plan which is very detailed.
- Steep topography and busy, dangerous small roads in East Devon discourages cycling.
- Encourage cycle use to help tourism in the area.
- Need to provide changing facilities for walkers and cyclists.
- Ensure aspirations for development accord with latest guidance, including LTN1/20 and Gear Change.
- The development of new walking and cycling routes should avoid adverse impacts on important sites for nature and priority species and habitats.

Public transport

- Do not allow development where there is no existing public transport infrastructure.
- The older age profile means that public transport should be prioritised ahead of walking and cycling.
- The high costs discourage people from using the bus.
- Far better public transport is required e.g. three trains per hour from Whimple to Exeter, rather than one every two hours; more frequent bus services in rural areas; providers working together.
- Support the principle of a park and ride scheme on the outskirts of Sidmouth.
- The provision of additional train services and new stations is very expensive and do not often transport people between their homes and workplaces to help reduce congestion at peak times.
- Much easier and cheaper to extend existing bus services rather than provide a new service to a new community.

**Cars (including Electric vehicles)**

- Restricting car parking spaces in new development does not encourage walking and cycling.
- The increase in zero emission vehicles means that car access can continue alongside walking and cycling.
- The growth of electric vehicles will not address road safety and congestion issues
- Electric car charge points are essential.

Question 24 - Additional sustainable transport policy objectives

Paragraph 11.7 of the Issues and Options report identifies 13 key issues that may need to be considered around the theme of sustainable transport. We sought views on whether these were appropriate.

Although most respondents ticked the yes box, 81%, a number did suggest other objectives as did some people ticking the no box.
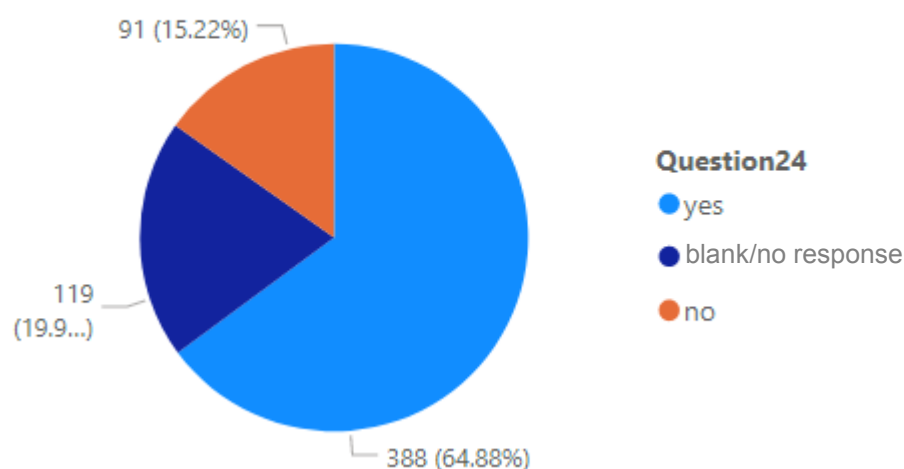
A summary of the responses on this question follows below, ordered by the 13 issues presented in paragraph 11.7 of the Issues and Options:

Bus routes and promoting public transport

- Buses are OK but tend to run E-W and not where people go – how much control does EDDC have on rural and local bus services?
- Public transport needs to be cheaper, with improved reliability, routes and times.
- Smaller frequent "hopper" buses required to outlying villages to reduce reliance on cars.
- Need to include bus priority measures.
- Need a 30 minute train frequency on Waterloo line, double track the Exeter to Honiton line, re-establish the old Sidmouth/Budleigh Salterton line.
- Bus, coach and train travel should be encouraged with clear routes and links for active travel to and from stations etc.
- Public transport is no longer viable following the virus and you might as well accept that the private car is the future in rural areas.
- The presence of a bus or train service does not make, de facto, a community 'sustainable': the frequency of services, and how they link with village/local needs, must also be taken into account.

- Take advantage of Government initiative to support reversal of Beeching rail closures e.g. reinstate railway from Ottery St Mary to Feniton, and then beyond to the edge of Budleigh Salterton and Sidmouth.
- Obviously over the past year of the pandemic, passenger numbers had to reduce but they will return again and increase once people are able to safely travel – do not allow low usage of the past year to negatively influence public transport provision.
- Ensure car parking charges are set at levels that do not undermines bus or rail services.
- Encouraging traffic over any level crossing should be fully assessed and discussed with Network Rail.
- Need to recognise the importance of cross-boundary bus links, such as route between Taunton and Axminster which provides opportunities for South Somerset residents to access employment and train station at Axminster.
- Need a clear strategy to focus development along sustainable corridors such as railway lines. Must acknowledge the importance of sustainable transport as a system, especially the first mile / last mile link to railway stations.
- Need much greater recognition of the role of shared transport, including shared bikes at key hubs (stations) and car club vehicles so that people have access to a car when other modes are not an option.
- At Exmouth there needs to be a reduction in the number of cars coming to the seafront e.g. provision of a park and ride.
- Support a park and ride scheme on the outskirts of Sidmouth, provided certain criteria are met.

High quality walking and cycling networks

- Prioritise pedestrians in all road upgrading projects to include provision for pedestrians and cyclist.
- All roads in new developments to have footways for pedestrians.
- Pedestrians and cyclists to be given greater priority in town centres.
- All new residential developments should include secure accommodation for cycles.
- There are a lot of hills in East Devon - not everyone can cycle; bicycles & pedestrians don't mix too well in Town Centres.
- Total waste of time building cycle paths as cyclists don't use them e.g. Trafalgar Way in Axminster and Darts Farm to Totnes.
- Walking and cycling routes to schools, shops, station etc should be clearly signed or information provided to every household. An active travel network must be designed and mapped for each town and local travel information readily available for journey planning. E.g. a town travel website like in Exmouth www.gettingaroundexmouth.org
- Needs to be more investment in cycle routes: "a report by Cycling UK found that for every pound spent on cycling and walking schemes, £13 of economic benefit is produced."
- Walking and cycling are not much use to older or disabled individuals.
- Designate some minor roads around towns and villages as quiet, shared routes with 20mph speed limit and appropriate signing.
- Support a shared pedestrian and cycle pathway from Sidbury to Sidford and linking with the Byes, and between the Byes and Port Royal.
- Integrate active travel routes with green infrastructure networks.

Accessible locations

- Promoting of such activities is desirable but the realities of life should not be ignored as most households own, need and drive a car or van.
- Development clearly should be located where there is the possibility of accessing services via means other than the private motor car, but with increasing use of electric vehicles, home working, and online shopping, this is old fashioned thinking.
- Policy should require development to demonstrate how they will reduce the need to travel through their location, design and infrastructure; supported by robust travel planning – include these requirements in an overarching infrastructure policy.

Protecting services and facilities

- Need to consider how existing smaller settlements can be made more sustainable through proportionate additional development to support local services and reduce need for commuting.

Large scale development

- Require large scale development to provide a mix of uses on site and/or show how a range of different uses can be easily accessed from the development by walking, cycling and public transport
- Too prescriptive to require all large-scale development to provide a mix of uses on site, as some sites will not be suited to mixed-use development.
- The proposed Denbow new settlement will promote walking and cycling, ensuring facilities are accessible, and achieving sustainable transport objectives.

Set walking distances

- Impracticable to set walking distances - these fixed absolute measures of objective acceptability is that they are often in tension with other elements of policy.
- The 800m walking limit does not allow for the possibility of cycling from home. If properties have to be within this limit it may result in Bus routes being sent through residential areas when not needed.
- 800m is not far for fitter individuals, but with Devon hedges and narrow lanes, may not be attractive with traffic so need some flexibility.

Set sustainable travel targets

- Set standards for new development relating to the proportion of people who will walk, cycle and use public transport. These standards should correlate with locally accessible bus routes; cycle routes and footpaths.
- Any targets for walking, cycling and use of public transport need to be broad rather than absolute, recognising that targets will vary greatly by location and development type.
- Some of the measures you mention are subjective e.g. define high quality cycling networks and if setting targets then you need to enforce them.

Protect transport sites and routes

- Don't allow development on sites which might be used for by-passes or light railway - trams etc.

Provide large-scale transport facilities

- Support the provision of road side services through proposing a new Motorway Service Area for the M5, located between Broadclyst and Poltimore. This would address congestion issues at Junction 28 and 30 where existing services are 'off line', and boost the local economy.

Exeter Airport

- We should be looking at less air travel, not more, as it is a big contributor to climate change.
- Fully support the ambition of the Local Plan to recognize of the importance of Exeter Airport as a regional airport which has an important part to play in the economic success of both East Devon and the wider South West region.

Levels of car parking, including for electric charging

- Housing density and car parking are fundamental drivers of viable transport services, reducing transport demand and supporting local facilities.
- Address the need for electric car charging infrastructure - home charging points for electric cars should be provided in all new builds in the district.
- Must provide sufficient parking and safe road widths to allow for the flow of vehicles especially emergency access.
- New developments should have car ports instead of garages as garages are usually too small for modern cars and get used for storing junk instead of cars, forcing on-street parking.
- There should be one parking space per bedroom.
- Any car park provision at a new factory or office block should have small spaces and be at least 100m away to encourage people to walk (except blue badge).
- Restrictions designed to be 'sustainable' by trying to discourage people from having cars simply do not work, instead the street scene of new developments is disfigured by congested car parking, including on pavements (e.g. Alfred's Gate in Newton Poppleford).
- The requirement for car charging points is not necessary as the Government propose to introduce this requirement through Building Regulations.
- Overnight parking of commercial vehicles can be a blight on a community and needs to be considered in the plan provision.
- The costs of car charging points should be included in the Local Plan viability assessment.
- If car charging point is required, a passive cable and duct approach means that the householder can later arrange to install a physical charge point suitable for their vehicle and in line with the latest technologies.
- Electric cars are good at reducing emissions but do not reduce congestion.

Overnight lorry parking facilities

- Agree with the importance of the provision for lorry parking facilities.

Cycle racks and electric bicycle charging

- Require cycle racks and electric charging for bicycles.
- Unnecessary to provide electric charging for bicycles as cyclists can charge up sufficiently overnight.

Other issues raised

- Car pooling could be a solution to reducing emissions.
- Encourage local business development so that people within villages don't have to drive to city hubs.
- Exmouth central needs residents only parking permits.
- I'd commend to you Exeter City Council's Supplementary Planning Document on Sustainable Transport: www.exeter.gov.uk/stspd.
- There should be an appreciation of lessons learnt during the pandemic – temporary moves for more road space to public transport, bikes and pedestrians may lead to more permanent measures.
- Must consider access for disabled people.
- The objectives set out are applicable to urban areas, but a different approach is needed for rural areas.
- Transport-related development should be informed by heritage assessments to ensure harm to heritage assets is considered.
- Transport policies and infrastructure should take full account of impacts on the natural environment.
- State that promoting sustainable transport can improve access to nature, which improves mental health and public appreciation of nature.

Question 25 - Facilities and services that are important

Chapter 12 of the Issues and Options report deals with infrastructure requirements and asks what facilities are important to people, this information will help us prioritise what may be needed and where. We asked respondents to score listed services and facilities in accordance with their importance to where they live or would want to live

Q25 - The comparative importance of facilities to people in their community
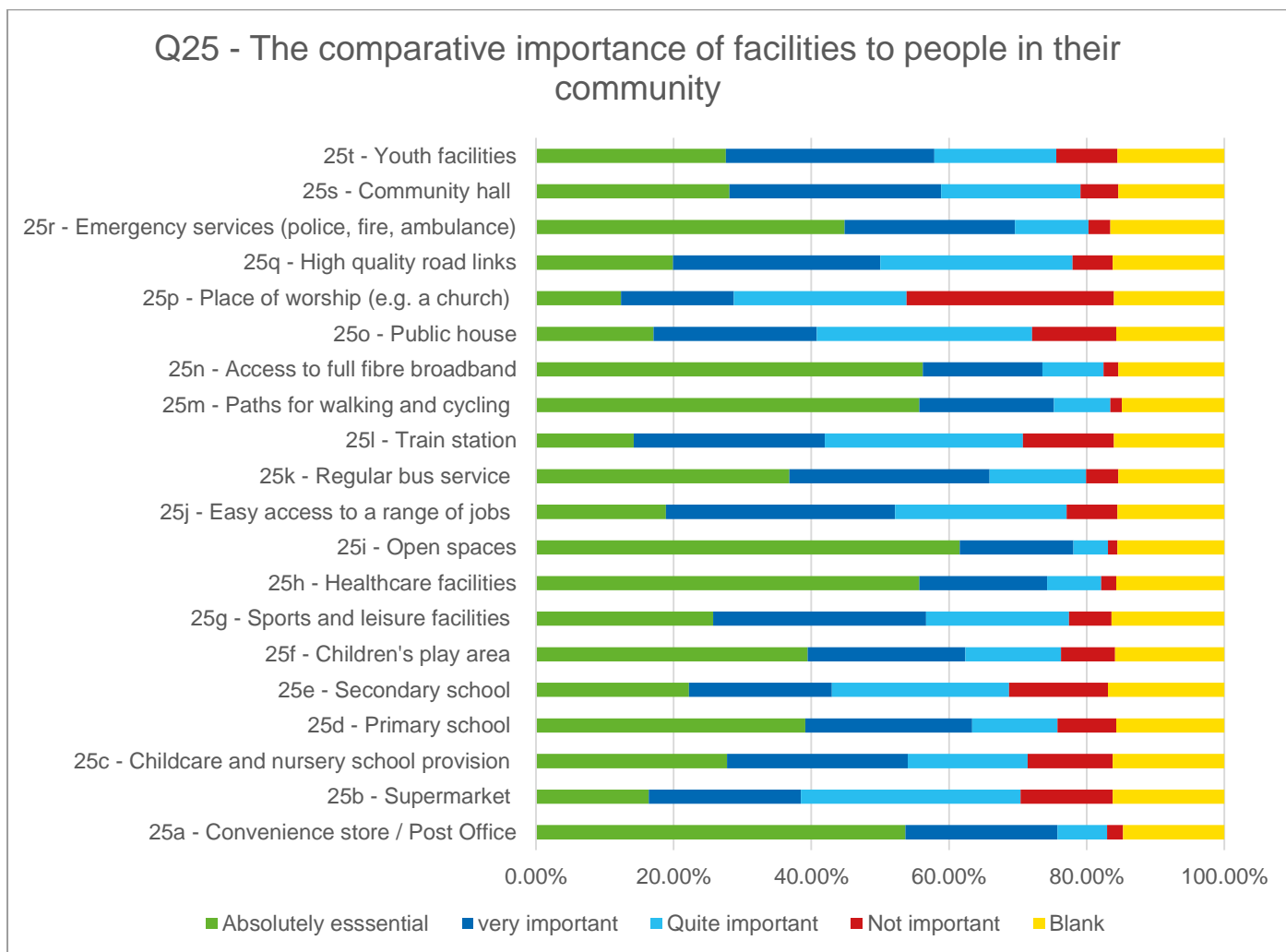
The comments show that people attached most importance to open spaces, with just over 60% of responses stating this as being essential when thinking about where they would like to live. Other services and facilities identified as being essential by over 50% of respondents are access to full fibre broadband; paths for walking and cycling; health care facilities; and post office/convenience store. A place of worship is seen as least important.

A summary of the main issues raised on this question follows below:

Prioritising facilities and services

- Would be better broken into two distinct areas: one for people wishing to live in towns and cities, and the second for people wishing to live in more rural locations.
- These services and facilities are impossible to assess and prioritise – it depends on size of development, and what is in place already.
- What you feel is important will vary depending on what stage of life you are in – if you have family living at home your ideas would be different to if you are retired.
- Some services are required by people whatever their age, which should be given more importance (e.g. food shop, post office, medical facilities); others are used only by a section of the community so may be totally irrelevant to many people but vitally important to others (e.g. schools) so should have secondary importance.
- Some facilities are more important to the spatial strategy than others, as they are used more frequently – for example, a convenience store would be visited more than a healthcare facility; more people frequent public houses than places of worship; there are more pupils at primary school per household than secondary, and secondary pupils can travel by bus to school so not necessarily required within walking distance.
- For settlements with significant growth (50 dwellings plus), the following are essential: convenience store, primary school, children's play area, open space, walking and cycling routes, broadband, community meeting place, good public transport links. Other higher order facilities (e.g. healthcare, secondary school) should be within an accessible distance by bike or public transport.
- It is difficult to prioritise, say, 'youth facilities' over a 'post office' – ideally, all of the above should be accessible.
- This is a bad question - hard to see how you can rank any of these as less than very important. Did you mean services available within 1km, 5km? 10km?
- It's not necessary for emergency services to be right next to where I live as long as they have good access.
- Youth facilities are important but must reflect modern demands, encourage physical activity.
- Access to full fibre broadband is essential for employers as well as residents. E.g. it will enable the NHS to expand the services that can be undertaken from home which will reduce the carbon footprint by eliminating unnecessary travel.
- Public houses are not as essential as a community café which operates at different times of the day than a pub.

Facilities and services that should be added

- Add recreational and fitness needs and providing social meeting points with recreational services (coffee shops etc).
- Add facilities for community development e.g. City Farms; nature reserves; cycle repair facilities.
- Include access to nature as an important facility i.e. open space that is nature rich, particularly for children for their imaginative and physical development.
- Add services which are essential to the everyday lives of the vast majority of people: chemist, bank, cashpoints, fresh produce shops (greengrocer, butcher), post office (separate out from convenience store as two not mutually exclusive), libraries, vets, Garden Centres, DIY, Builders Merchants, Solicitors and Accountants and Funeral Offices, Coffee

Shops, Hotels, Restaurants, Take-aways, Petrol Stations, Garages, Clothing, Furniture, Hardware and Charity shops, opticians.

- Add dentist and hairdresser to the list.
- Add allotments.
- Add fast electric vehicle charging points.
- Car parks (to minimise on-street parking) are needed.
- Public toilets should be available in all communities.
- Need to ensure sufficient mobile coverage is delivered from the outset.
- Family centres/Surestart to provide support for young families are important so some community hall or suitable space is necessary, particularly in rural areas or small villages.
- We need libraries, venues for cultural leisure activities, theatre, cinema, performance art venues, galleries, heritage collections - obviously not in every town and village but certainly needs to be accessible.

Other issues

- Encourage the idea of multi-use spaces e.g. a pub being a cafe, restaurant, shop, sports venue and a post office altogether, particularly in the more remote villages.
- Tipton St John Primary School needs to stay in the village.
- We need local hospitals but the policy has been to shut them.
- Put the infrastructure in place first to allow development.
- Active Design is a key guidance document intended to help unify health, design and planning by promoting the right conditions and environments for individuals and communities to lead active and healthy lifestyles.
- Essential for off road cycle paths to school.
- Childcare and Nursery School provision is required to attract a suitably qualified and skilled workforce to support the populations' health care needs.
- Require health impact assessments for any new development proposed.
- 5 bus services a day cannot be considered viable or attractive to use – it is minimal provision for those who have no other option.
- In principle, new settlement proposals such as Denbow can deliver the essential and most importance services required in a comprehensive manner from the outset.
- Strategic-scale development can provide or contribute towards these facilities, benefitting both new and existing communities.
- The growth of online shopping and use of car to access supermarkets, have together reduced the importance of being close to a supermarket.
- The data used by the Local Plan does not acknowledge the actual steady year-on-year increase in the volume of traffic using the A3052 which cause significant delays.
- Important that new homes are provided in sustainable locations with a range of local facilities, with affordable access to a wider range of facilities in the wider vicinity.

Question 26 - Additional infrastructure and service provision policy objectives

Paragraph 12.9 of the Issues and Options report identifies five other infrastructure and service policy objectives. We sought views on whether these were appropriate.

Although most respondents ticked the yes box, 66%, a number did suggest other objectives as well as did people ticking the no box.

A summary of the main issues raised on this question follows below, in order of the five issues identified in paragraph 12.5, plus transport:

Prioritising between infrastructure and affordable housing

- By being ambitious with its housing delivery targets, the Council will be able to secure Community Infrastructure Levy charges and financial contributions (where the threshold is met) to go towards local services.
- Need a better district-wide plan for spending CIL and related funds.
- S106 for communities always seems to be for sports & leisure facilities – whilst this is commendable it seems restrictive when other uses may be more relevant e.g. community shops or public houses, village halls etc.
- Essential that the items in your 'wish list' are not seen as something that are either/or – such issues need to be provided at all new developments and across existing settlements.
- Building a community life and cohesion for well-being and mental is important, including community initiatives to encourage a more sharing society.

Balancing viability and infrastructure delivery

- Support recognition of the balance between providing appropriate infrastructure and achieving viability, deliverability and affordable housing – robust viability evidence is vital and should involve the development industry.
- Early collaboration on infrastructure requirements is essential to achieve a viable and deliverable new settlement.
- It is vital that more of the uplift in development value is retained by the community in order for the right level of infrastructure to be provided.
- Agree with objective 10 that infrastructure needs should be secured at an appropriate time to support new development.
- Although infrastructure will require capital funding, should also mention need for revenue funding so public transport is provided on an ongoing basis.
- Clarify developer contributions/mechanisms for securing highways infrastructure funding in a single overarching infrastructure policy rather than individual plan objective or site policies.
- New education facilities to serve new development should be funded by that development through fair and proportionate contributions – the new Local Plan will need to identify sites for new school where required.

- S106 agreements for education are preferred to CIL, as they provide greater certainty that funding will be available.
- Focusing new development on larger sites rather than piecemeal development is beneficial to securing necessary infrastructure improvements.
- Objective 10 could be improved by reflecting strategic needs as well as those required to support new development.
- Minimising air and noise pollution and increased access to green open space for leisure and well-being is far preferable to grandiose undeliverable sports centres and unviable commercial enterprise.

Accessing Government funding

- Funding from the Government should be explored as it can assist in deliverability of large projects.
- If Government is driving high levels of growth then it must properly fund infrastructure.

Engaging with communities

- If forums were held or EDDC staff were to periodically attend Parish & Town Council meetings you would engage better and gain local knowledge of many of these issues.
- One problem with establishing a new community is there are no residents to consult.
- The views of local communities and organisations must be listened to.

Sustaining facilities in villages and rural areas

- Increased housing can improve the sustainability of villages and rural areas through more people supporting local services.
- Villages are unlikely ever to be able to reach a population threshold size to fully support many types of facilities i.e. more than a small community shop, community hall, church. Growth of the size required would be environmentally unsustainable.
- Refusal to recognise that a small shop, for instance is no longer viable and holding the owner to the current planning consents until the situation has become worse can mean missed opportunities.
- Once smaller villages lose their schools, shops, pubs and medical facilities, it rips the heart out of the village. On the other hand villages that have these services are not necessarily suitable for development if those services are at capacity.
- Preventing small villages and hamlets from growing consigns them to stagnation and their eventual demise.
- Parking for residents in local villages needs to be a priority especially during weekends and holidays.

Transport

- Does not mention additional rail infrastructure in the Honiton or Axminster areas.
- It is not reasonable to require Network Rail to fund rail improvements necessitated by commercial development – therefore developer contributions are required, in particular at railway level crossings such as Crannaford crossing.

- Does not emphasise the importance of bus provision in East Devon, with significantly more people moved by bus than rail.
- Transport is a key issue in the scale and location of development to ensure sustainable lifestyles and modal shift.
- The NW quadrant of East Devon on the A3052 corridor has transport constraints particularly in terms of public transport.
- Refer to the high quality active travel corridors (Exe Estuary and Clyst Valley).
- Need a robust transport evidence base to consider the transport impact of planned growth, identifying suitable phasing and mitigation where required.
- More Park & Ride in larger towns.

Other policy areas

- Provision for the homeless are very important services and are missing from the listed facilities.
- You are missing a golden opportunity by not thinking about Dunkeswell Airfield, the runway is both good enough and long enough to take small turbo props / jets which can have enormous business benefits spin offs.
- The emerging plan should consider facilitating and supporting the production of locally produced foods and renewable energy.
- Appropriate infrastructure provision should go hand in hand with development, not just keep building houses and then worry about the lack of infrastructure afterwards AKA Cranbrook.
- Utility and Service providers, and other relevant agencies should help prepare the Local Plan by identifying their land need and ensuring services such as water supply, sewage, electricity, public transport, rail providers etc can be provided to accommodate future planned development.
- Second Homes are missing from this policy – they stifle the lifeblood of a community, and result in loss of housing for the young,
- Teignbridge Local Plan encourages town and parish councils to assume responsibility for open space instead of installing estate rent charges – recommend this for East Devon.
- The text on digital communications should emphasise the role it has in reducing the need to travel, therefore responding to the climate emergency.
- Include more detail on flood and coastal risk management infrastructure, recognising there is often a significant funding gap.
- Consider foul drainage infrastructure requirements.
- The Police force has responsibility for delivering services to new communities, but the Home Office grant and council tax precept does not cover costs for infrastructure required because of new development – therefore Local Plan policies should state additional police infrastructure is funded from s106 developer contributions (appeal decision APP/X2410/A/12/2173673 accepted this principle).
- NPPF para 8, 20, 26, 32, 91, 92, 95, 127 support need for police infrastructure.
- Police infrastructure should be defined in the Local Plan to include buildings, vehicles and equipment.
- Consider how the proposed Infrastructure Levy will change the funding of infrastructure.

- Consider the relationship between some community infrastructure and the historic environment and how the Infrastructure Delivery Plan, planning obligations and CIL could be used to conserve and enhance heritage assets.
- Need to include infrastructure policies which aim to improve healthcare and outdoor sports pitch provision in communities where there is an identified need for them.

Question 27 - Retaining and refining the existing settlement hierarchy

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

Option 1 - Some hierachy as current Local Plan: 7 Towns plus Cranbrook and the 15 villages
Option 2 - A hierachy that retains the towns and Cranbrook but has a lower number of villages that may accommodate development
Option 3 - A hierahy that retains the towns and Cranbrook but has a higher number of villages that may accommodate development
Option 4 - Do something different in terms of a hierachy or not one

Count of Responses by Question27
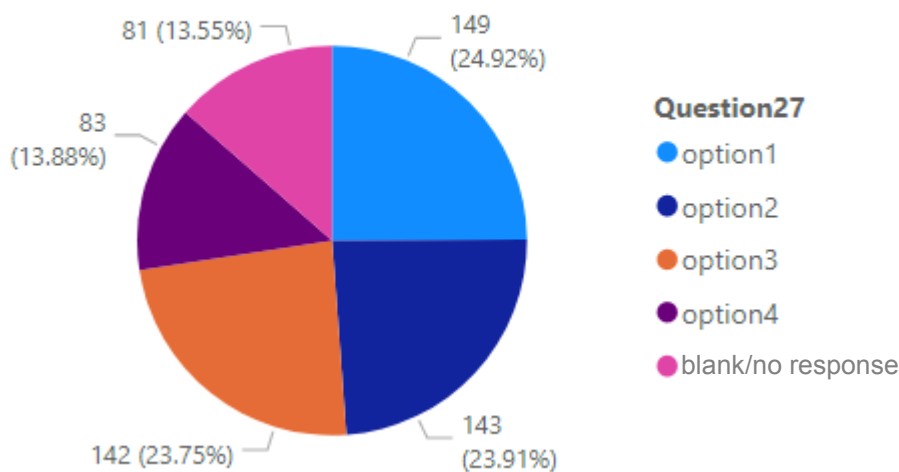
There was little difference in the popularity of options 1, 2 and 3. Option 1 to retain the same settlement hierarchy as the current Local Plan was marginally the most popular, chosen by 149 respondents, closely followed by option 2 to have fewer villages (143 respondents), and then option 3 for a higher number of villages (142 respondents). An alternative approach was suggested by 83 respondents (14% of the total).

A summary of the main issues raised on this question follows below:

Settlement hierarchy – general issues

- Suggest a scoring system based on key facilities/services to rank which villages should be in the hierarchy.
- There is no need for a settlement hierarchy, instead there should be an open planning strategy which enables development proportionate to the size of an existing settlement.
- The development strategy should be informed by environmental constraints, with an ecological assessment, providing biodiversity net gain.
- An assessment should be undertaken to consider the settlement hierarchy.

- Need to consider roles played by settlements across the border in Mid Devon, Somerset, Dorset.
- The options are too ambiguous, and grouping all seven towns together does not consider the individual strengths and weaknesses of each one – need to consider local need, impact on character, infrastructure, and the environment on an individual basis.
- The transport impacts of development allocated at each settlement will need to be tested through a robust transport evidence base.
- Need to ensure that the development strategy does not cause significant harm to the historic environment.
- The spatial strategy should not pre-determine the capacity of every settlement and further environmental evidence (e.g. heritage and landscape capacity) should inform the numbers and site selections for each settlement.
- A better hierarchy that reflects environmental sustainability would be:
  - tier 1 - West End, North of Blackhorse, Pinhoe, Cranbrook;
  - tier 2 – seven large towns and new town outside AONB if required;
  - tier 3 – small towns and villages with over 1,500 people outside AONB and basic facilities, namely Broadclyst, Clyst St Mary, Colyton, Feniton, Lympstone, Newton Poppleford, Uplyme, West Hill, Whimple, Woodbury.
  - Tier 4 – villages in AONB and outside with populations under 1,500 people
  - Tier 5 – hamlets/open countryside.
- Prefer the following hierarchy:
  - Cranbrook
  - West End
  - 8 Towns (including Colyton which has more of a town character)
  - 14 Villages (potentially add Dunkeswell to this list)

Settlement hierarchy – Towns and West End

- Settlements that have expanded in recent years to the point where services are stretched and the environment is under threat (such as Ottery St Mary) should be protected from further significant growth.
- Concerned that Cranbrook could become too large and overrun villages and hamlets nearby.
- Cranbrook is a success and should be turned into a district of Exeter and made the focus of new development alongside infrastructure.
- Exmouth should be considered separately above the other towns as it is much larger with a very broad range of services and railway station.
- Ottery St Mary has had lots of new development in recent years, which has not supported the town centre but has meant that local schools and health centre are oversubscribed as there was no increase in infrastructure.
- Most development should take place in towns as that is where shops and jobs are, to limit out-commuting.
- The Towns must retain their prominent position in the hierarchy given the jobs, services and facilities they provide (option 2), particularly those with good transport links and limited environmental constraints (such as Axminster).

- The settlement hierarchy should allow the towns of Budleigh Salterton and Sidmouth to grow, despite being in AONB, through carefully controlled policies to respect their character and meet local needs.
- The current spatial strategy is leading to a lack of social cohesion at the seven towns by: not meeting affordable needs where they arise, residents of working age moving to Cranbrook, and the towns being inhabited by an increasing elderly population.
- Concentrate additional development in the West End, as towns lack facilities, and new development on the edge of towns is too far to walk or cycle to the town centre.
- The definition of the West End should be enlarged to include a wider area in the western part of the authority, where there is good access to Exeter, attractive destinations for employment investment, potential to enhance public transport, and located outside environmentally sensitive areas.

Settlement hierarchy – Villages

- Villages do not have the infrastructure to support much new development – if lots of homes are built there will be many more car journeys to facilities in the main towns.
- Small villages, even without facilities (such as Exton), should be given higher importance to protect the identity of towns.
- There are many other villages with a minimum of four services and good public transport that could easily accommodate small-scale development and allow the younger generation to stay in their local area.
- Adding more houses to villages will not improve the availability of facilities, it will just overpower what is already there.
- Some of the listed villages have issues which make them inappropriate for much development e.g. Newton Poppleford in an AONB, Sidbury has difficult access roads.
- Some villages (e.g. Beer and Colyton) are substantially larger than others and can therefore support more house and jobs.
- The built-up area boundaries at villages are too tightly constrained and do not allow for expansion to help maintain existing services.
- Oppose developer proposal for housing at Sherwood Farm, Feniton due to concerns about flood risk, highways, primary school capacity, landscape character, unsustainable location.
- Feniton has the opportunity for strategic expansion given its train station, essential services which could be enhanced, and to address existing flood risk issues.
- A greater number of villages should be identified to improve flexibility for the supply of housing and jobs and to ensure local needs are better met.
- The current strategy discounts villages such as Awliscombe and Talaton where there is a desire for sustainable growth and facilities that would support the village – it does not allow communities to grow as they wish.
- Option 3 for a higher number of villages is most consistent with NPPF paragraphs 78, 11a, 35, 59.
- Need to consider the accessibility of villages to higher order settlements and employment opportunities, particularly by sustainable travel, when identifying the villages and their levels of growth.

- Feniton, Chardstock, Whimple, Woodbury, West Hill, Offwell, Lympstone are villages of a suitable size to accommodate growth that will sustain existing and new services and meet housing need.
- In the future all villages will be more sustainable because of more people working from supporting local facilities and services, without the need to commute.

Other issues

- New housing is poorly designed, too small and too expensive – bring back council built affordable housing.
- The new Local Plan must support the level of growth that the community at each settlement would like.
- Re-use existing buildings rather than building on green belt.
- The need for housing should be evidenced locally and not driven by Government.
- Exeter should not be the focus as it receives out of proportion investment and benefits.
- Some sustainable locations currently fall outside the area of a major settlement but which could extend that settlement e.g. proposed site at Sowton would extend Exeter.
- Focus development along a sustainable corridor such as the railway line.
- There is potential for growth along the A3052 corridor which benefits from proximity to Exeter and existing employment and infrastructure.
- One or more new towns should be developed, including land at Axehayes, west of Hill Barton Business Park; Clyst Valley Garden Village in vicinity of Clyst St George; Denbow (land between A30 and A3052); along the M5 between Cullompton and Cranbrook.

Question 28 - Broad distribution of housing development

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

Option 1 - As existing
Option 2 - More West End focused
Option 3 - A less West End focussed pattern
Option 4 - an alternative to the above
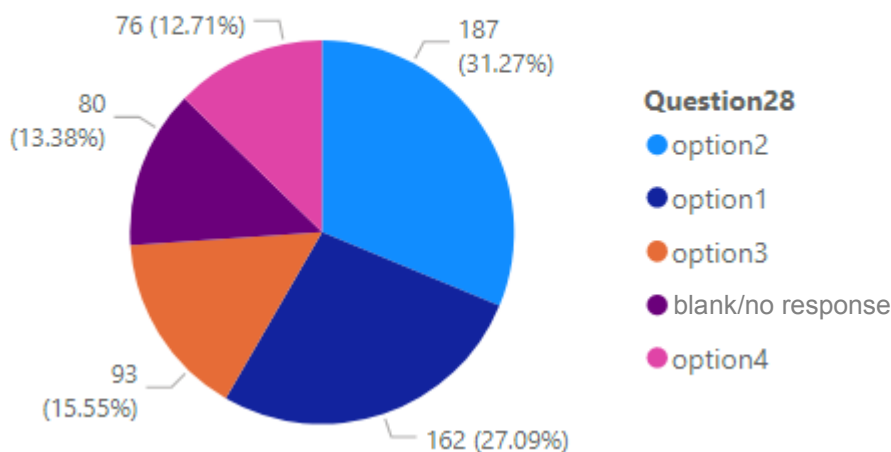
A more West End focused approach to new housing development was most popular, with 31% of responses. This was closely followed by continuing the current pattern of development (option 1 – 27%), which would still see most new homes being built at the West End. A smaller proportion of people (16%) supported less focus on the West End and more homes at towns and villages elsewhere in the district. A summary of the main issues raised on this question follows below:

As existing distribution

- Maintain a focus on the West End, in order to capitalise on in its inherent attributes and linkages, whilst making careful adjustments to allow for more growth to come from other parts of the district.

More West End focussed

- West End proportion of development should be 70%, with remainder to three main towns and minor targets for smaller towns and villages.
- The West End should have 80%+ of new housing, no large development of villages should be allowed.

- As it's proving difficult to attract jobs to the wider district, it makes sense to concentrate housing in the West End to minimise commuting.
- The distribution of development will depend on the total number of homes to be delivered in East Devon – if less development is required then more than 75% should go to West End and less than 5% to villages; but if high amount of new housing then one or two new towns are likely to be needed.
- The West End should include a wider area within which development should be focussed, where there is good strategic access.
- A focus on development at the West End will direct development to a highly sustainable location with a significant level of employment opportunities, transport/public infrastructure and sustainable transport options, achieving carbon reduction.
- Exeter is highly constrained both in terms of its administrative boundaries but also its physical context, which includes areas of high landscape value to the north and west of the city. Therefore, surrounding areas should contribute significantly towards meeting Exeter's development needs.

Less West End focussed

- It is important to provide housing across the district to all towns and villages with facilities, to meet local needs, encourage people to work closer to their home, and encourage job creation – not just the West End.
- A less West End focussed approach would address the significant concerns in the Local Plan Inspector's report (para 26, 27) regarding meeting housing need, particularly for affordable housing, in the rest of the district.
- Small scale development in villages and towns may help sustain local facilities and high streets.
- There are many villages with a primary school and village hall which should be supported with reasonable development.
- New housing in villages should accommodate growth to diversify supply, meet local needs and support rural facilities, consistent with NPPF paragraph 78.
- The Plan should look to strengthen the Towns and Villages rather than dumping houses to solve the Exeter housing needs.
- The distribution of housing on smaller sites across East Devon de-risks the delivery of focusing housing on fewer, larger sites in the West End that could prejudice the Council's Local Plan if they were to stall.
- The number of new homes being built on the edge of Exeter and at Cranbrook is having a huge toll on traffic, parking and infrastructure in and around Exeter.
- The West End should be protected from further development due to negative impacts on wildlife, so more development should go at the towns and villages elsewhere.
- Less West End focussed (option 3), as this has led to inflexibility and stalled housing delivery due to considerable infrastructure requirements, viability, market saturation, and SANGS issues.
- The West End dependency on Exeter will become less important as people move away from towns and cities to being able to live and work in rural areas.
- Strongly support infilling at towns and larger villages, and building houses on the edge of East Devon's villages where a significant amount of small-scale development can be accommodated without detriment to their character.

Alternative distribution

- Suggest a more even approach that meet local needs, and not the extremes of options 2 and 3: 35% at West End, 35% at Towns, 30% at Villages.
- Options 2 and 3 look too extreme – suggest 55% at West End, 25% at Towns, and 20% at villages, especially of more villages are added to settlement hierarchy.
- Focus development near existing rail routes (including large site east of Honiton), which may justify investment in the West of England line and rail projects in Exeter.
- Suggest a mix of 50% in West End, 30% in towns and 20% in villages.
- To recognise the important role of towns and villages, the pattern should be: West End: 20%, Main Towns: 70%, Villages and rural area: 10%.
- Suggest a 'Town focused' strategy whilst also recognising the role that sustainable villages can play – Towns 45%, West End 40%, sustainable villages 15% - would better meet local needs and provide housing for those of a working age.
- A better approach would be to look at the suitability of individual settlements for accommodating growth, having regard to a range of factors including land availability, constraints, accessibility, services, facilities and infrastructure but also market signals.

New settlement

- New towns with their own facilities and services are the best way of providing housing.
- Suggest a new settlement close to major road and railway located near to Silverton and Cullompton; or near to Crediton.
- Suggest a whole new town redevelopment on the Smeatharpe Airfield site.
- Cranbrook shows that the new town approach does not work – narrow roads with no parking, and the promised amenities have not happened.
- Support a more West End focussed approach, including a new settlement at Denbow (between A30 and A3052) which could accommodate around 10,000 homes.

Other issues

- The broad distribution of housing development is the fundamental initial policy decision for the Local Plan, from which all other policies can flow.
- There must be no coalescence of settlements.
- No housing should be allowed for second home owners.
- Prefer smaller individual developments rather than national house builders.
- Exeter Airport is a prime brownfield site if it goes out of business.
- Green corridors are essential between new development to maintain rural character.
- The existing Local Plan has not had much time to implement its goals, but that does not mean it should be changed.
- Must deliver state of the art broadband/mobile network throughout the District to support increased home working and to attract new technological and environmentally friendly businesses.
- The strategy for distributing development should be informed by environmental constraints; for example the condition of rivers and their ability to accommodate more treated sewage effluent and other pollutants.

- Rather than set a percentage split, set out clear criteria for development in each settlement and if a site meets the criteria then it should be supported.
- Question why we need so much additional housing – the need should be evidenced locally and not driven by Government.
- Stop development on green belts and use existing buildings.
- There should be a size limit on developments in villages and rural areas as they don't have capacity to accommodate significant expansion.
- Development to the highest environmental net gain standards should be prioritised.
- Need to ensure sufficient homes and jobs in towns and villages to make them sustainable.
- The AONB largely prevents development outside the western part of the district.
- Sidmouth should be protected from development as it's surrounded by AONB.
- It may be necessary to expand to expand some towns and villages in AONB if there are no alternatives.
- Exmouth has been greatly expanded in recent years so should not be expanded further given the surrounding environmental constraints.
- Exmouth is by far the largest settlement and should see more growth to ensure younger people can remain in the town, given the recent growth of older people at the town – this will help meet affordable housing need at the town.
- Specifically research housing demand in the towns and villages to enable a more bespoke approach and meet local needs.
- A joint plan with Exeter should be produced covering Cranbrook and the West End with numbers kept separate from the remainder of East Devon, to reflect that this area is meeting Exeter's housing need.
- The distribution of housing should have regard to the requirement for appropriate airport safeguarding.
- Need to ensure that developers incorporate a high percentage of affordable homes in new development.
- Take into account new development just outside East Devon's boundary e.g. large expansion in Chard and Bridport which are 8-9 miles away.
- Recommend an Appropriate Assessment and additional SANGS to alleviate increase recreational pressure on the SPA and SAC sites.
- Need to know what levels of growth at individual settlements each option would mean, otherwise it's hard to comprehend the 'real world' impacts of the options e.g. will Exmouth receive 100 new houses or 1,000? West Hill one home or 20?
- Large housing sites and urban extensions should include policies requiring developer-funded police infrastructure.
- A fixed number of new homes should be identified on the edge of Exeter, rather than a percentile, as a percentile risks building more homes than the number of jobs available.
- The distribution of the additional 6,615 new homes must be accompanied by clear analysis and justification, with district, town and parish councils identifying areas for development in their communities.
- The transport impact of planned growth should be assessed to ensure the impact of development on the strategic road network can be safely accommodated, and consideration given to the necessary transport infrastructure.
- Need to ensure that the distribution of development does not cause significant harm to the historic environment.

- The distribution of development must be based upon accessibility, maximising opportunities to travel to jobs via sustainable travel modes.
- Sites on the edge of towns with limited environmental constraints that do not require major new infrastructure should be prioritised.

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

Paragraphs 13.15 & 13.16 of the Issues and Options report sets out a range of option for accommodating development. Respondents were asked to give there levels of support.
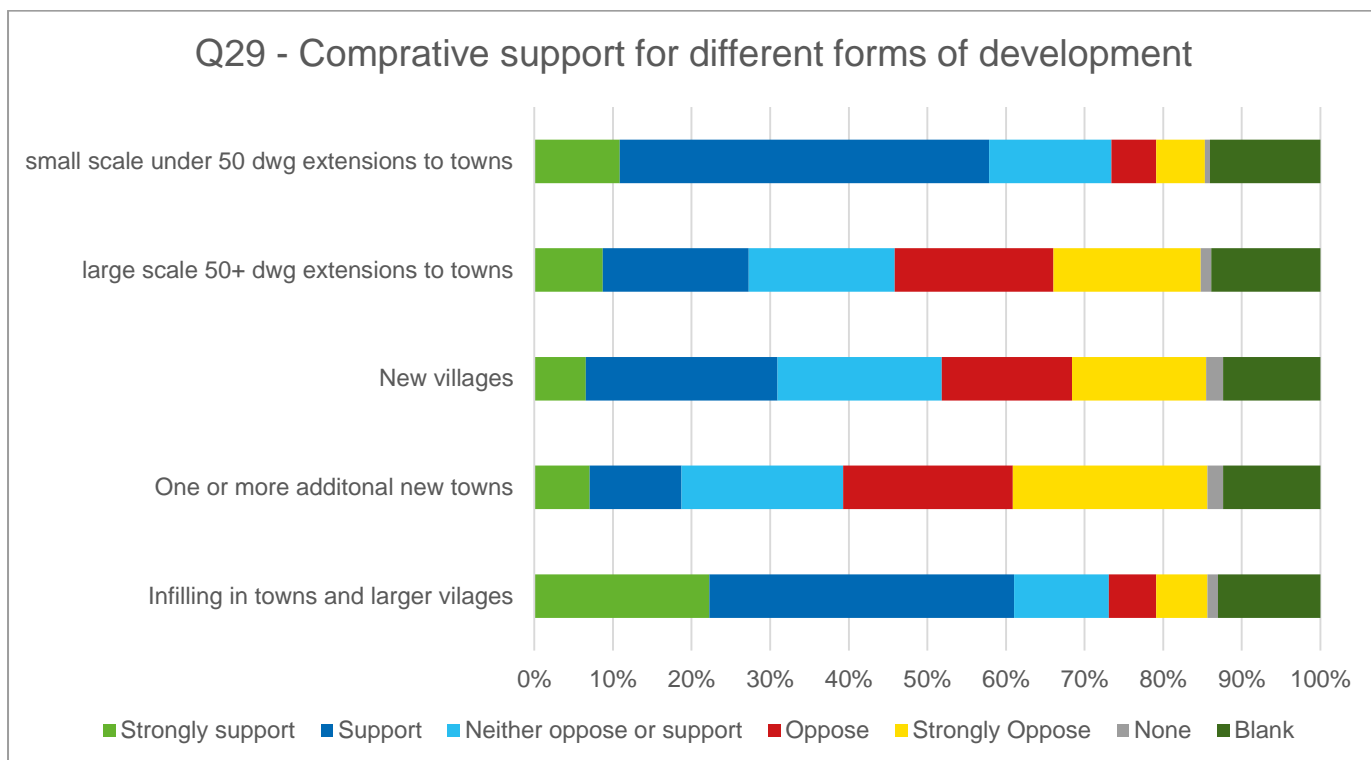
Over 60% of respondents supported infiling in towns and larger villages in East Devon for future development, and over 55% of respondents supported small-scale extensions to towns. Both development options gained strong support with a small proportion (12%) of oppose. In the written comment, some respondents expressed their concern about large-scale development that would change the charter of East Devon and the importance of the natural environment and AONB. Also within the district, lack of suitable necessary infrastructure to support any extra development allocation.

A significant proportion of respondents (around 40%) were opposed to one or more additional new town or any large scale extensions to the town. Most of them shared the same concern about infrastructure, and Cranbrook often mentioned as an example. For small proportion who supported the additional new town or large scale extensions to town believed East Devon need more affordable housing and housing for young people, also developing a new town would be more sustainable than infiling in the existing village. Because the existing road network and infrastructure not designed for extra development.

New Village had a similar number in both support and oppose, both over 30%, and no clear preferences from written comments.

Other common comments included:

- Converting vacant retail premises to homes especially affordable home
- It should be up to individual landowners to decide on building matters
- Leave the villages along
- A diverse approach to new housing is required, not a single approach
- Retaining the identity of existing habitations essential
- The broad distribution of housing development is the fundamental initial policy decision for this Local Plan
- The villages in east Devon usually don't have the roads for many more houses
- We should preserve community identity. We should not allow villages to merge or allow towns to eat up villages
- New towns can be planned to reflect the needs of the future
- An objective needs assessment should be carried out for of each our settlements
- Buildings should take place close to existing infrastructure and places with potential for jobs creation
- Villages need to have slower growth over the full length of the planned period, not fast development
- Unable to comment on large scale urban expansions, as the term "over 50 dwellings" not clear enough, as it could be 60 dwellings or 600 dwellings

Question 30 - Establishment of a Development Corporation

Paragraphs 13.17 to 13.19 of the Issues and Options report explained the role that a development corporation could play in delivering very large scale developments. Question 30 asked for views on how important a corporation could be.

Count of Responses by Question30
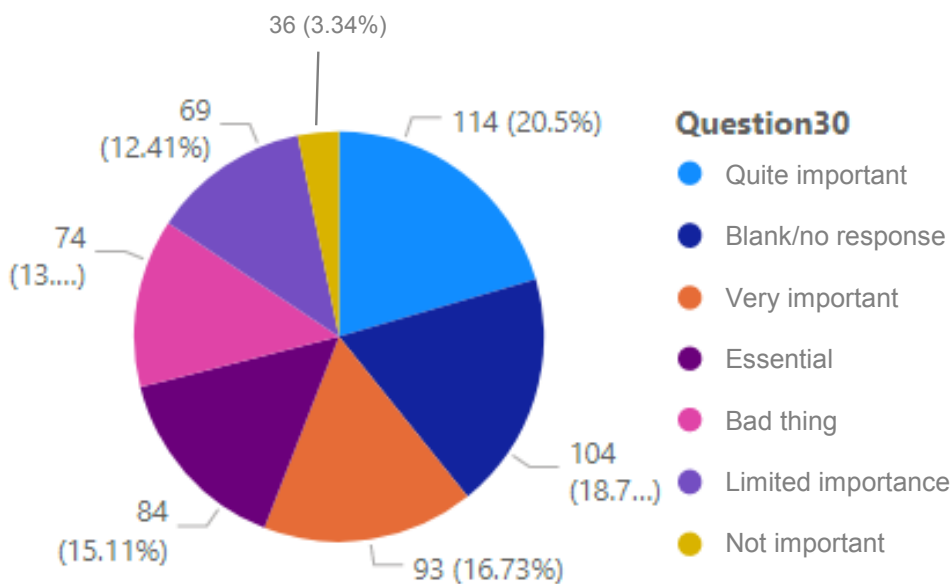
If one or more big strategic sites for housing or mixed-use development are allocated in the new East Devon local plan, 31% of the respondents felt it is essential or very important to have Development Corporations, however they emphasised not support any large development within the district. They thought EDDC should have more control over the development progress, site provision and the Design Code. Some people concerned with the structure of Development Corporations, as members should come from different backgrounds.

A small proportion of the respondents (13%) felt it is a bad idea, most of them do not support any large development and believed it is not suitable for East Devon. Some people felt it is just another layer of bureaucrats; it would be another layer to slow down the development process. Numbers of respondent believed Local Planning Authority could handle development; there is no need to have another organisation. Few people concerned Development Corporations would be too powerful, and local voice would not be considered.

Over 20% of respondents left it blank for this question, which is higher than any other questions in the consultation. From the written comments, numbers of respondent felt they do not understand the idea of Development Corporations, thus unable to answer the question.

Other common comments included:

- RSPB recommends it has a strategic aim to ensure that biodiversity assets, included protected sites, are safeguarded, that biodiversity offsetting and biodiversity net gain is required from all developments, that nature-rich greenspace is provided, and that all developments maximise opportunities for wildlife
- Development Corporations are part of the problem, not the solution
- A good idea as long as it is managed properly and doesn't become a clunky, slow-moving vehicle tied up in red tape and bureaucracy
- Very easy to miss out on key stakeholders and community needs if not having Development Corporations
- This has huge scopes for issues with cronyism. The directors would have to be voted on
- A freestanding body with broad representation from all interested parties can make a real difference; can attract a range of funding and expertise
- A development corporation would do what it says. Government policy would override any opposition
- It would develop into a monster, building for the sake of building, anywhere and everywhere
- Many of the time community members feel we are only listened to at the time people need to show they have had public consultation. After that, the public is ignored (or appear to be)
- Lesson learnt from Cranbrook must be carried forward to any new town development. Development Corporation must be accountable to the district council and not become a sponge soaking up funds
- East Devon is not a Liverpool, Teesside or London Docklands with large tracts of derelict & obsolete industrial sites requiring a comprehensive strategic development agency

Question 31 - Planning for development beyond 2040

Paragraph 13.20 of the Issues and Options report considers the timeframe that the local plan should consider. Views were sought on possible end dates with the question asked of whether we should plan for an end date that was well after 2040. The options also related this to whether or not a new town is proposed.

Count of Responses by Question31
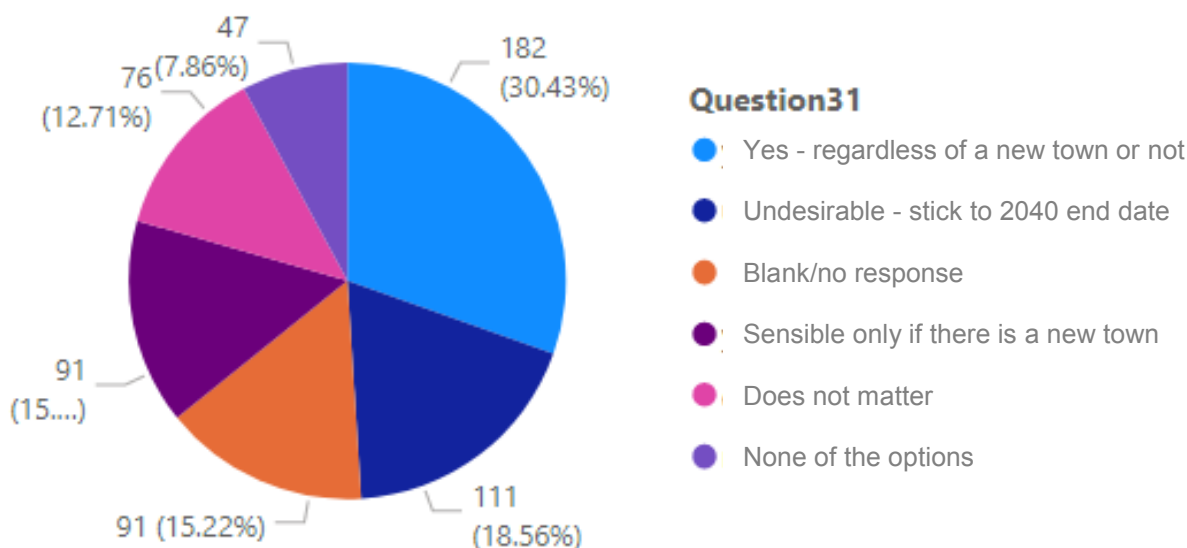
A large proportion of respondent (30%) thought it would be sensible to plan for development in East Devon for a date well beyond 2040 in this Local Plan, an extra 15% felt sensible only if a new town is proposed in East Devon. Respondents felt planning for the long term is essential and sensible; especially on the topic as if new town development, climate change and net-zero carbon, all required a long-term vision and strategy. LPA or planning should not be limited by the plan period, however, most of them though should have good flexibility on the long term planning, to face the changing society, and have a good balance between short term and long term planning.

19% of the respondents felt it is undesirable, planning should be in line with the plan period, and 20% of the respondents chose "It does not really matter what end date is set" or "None of these options". In the written comments, people shared similar though on these three options. A lot of them felt 20 years is a good length for planning for the future, it is too many variables to consider planning beyond 2040. As the world changing rapidly, there are too many uncertainties. It would be more sensible to have regular review and update on the local plan, and some respondent felt LPA should focus on the existing challenges, for example, post-pandemic and post-Brexit.

Other common comments included:

- Setting an end date is irrelevant as local and national government requirements will change so much
- What is important is to have effective monitoring to ensure that the Plan is working as it should and if not to implement necessary changes to reflect circumstances
- We have limited resources; stop wasting them in these endless planning, objectives and theorising
- Central government changes its mind with each election (particularly with a change in political party)
- Have a single plan where the policies are flexible and able to adapt to future demands without the need for every few years producing a new local plan
- Planning should be a continuous process, but allocating resources now to plan post 2040 would be wasting time and money

Question 32 - And finally...?

As a final question we asked if people had any further comments.

Not surprisingly a varied range of points were raised in response to this question with some respondents elaborating on points made earlier in their submission and in some cases people cross-referencing to supporting documents that had submitted. In this succinct summary we aim not to repeat matters already summarised in this report, nor highlights matters that go beyond planning policy considerations. Also there were many area and location specific points raised that are not summarised..

Themes and matters raised in comments included:

- The potential to be more radical and less traditionalist in approach to plan policy;
- The uncertainty of Covid and the potential for the plan to be rapidly out of date;
- A need for cross-boundary working, especially with Exeter (though there was also opposition to cross-boundary plan making);
- More decision making should rest with local communities and people;
- Government changes to the planning system should be more fully referenced;
- Need to resist small gas fired electricity generation plants;
- Room sizes in new developments need to be given more consideration.
- The local plan should be implemented and policies not over-ridden when it comes to decision making;
- Tourism and agricultural matters should be given greater prominence;
- Waste management should be covered in the plan;
- The Council's own housing company should be providing more housing;
- Concern over levels of second and holiday homes;
- Need for an up to date Playing Pitch Strategy;
- Should have regard to the South Marine Plan (under the Marine and Coastal Access Act).

9 Issues raised that were not covered in the issues and options document or questionnaire

9.1 A number of respondents raised issues that were not covered in the issues and options report. Whilst many of these were planning and local plan relevant issues some were less relevant and others not at all.

9.2 Particular attention is drawn to the fact that a number of land owners and developers (and agents acting for them) submitted details of specific sites that they would wish to see developed. In the consultation we did not seek site specific submissions or details about possible development sites. For this reason, and for reasons of considering such sites now being premature in respect of the plan making process, we do not report on or comment on these sites in this feedback report. However, interested parties may wish to view representations made on our web site. It should also be pointed out that site submissions could also come through the Housing and Employment Land Availability Assessment – Call for Sites.

10 Conclusions and next steps

10.1 This report provides a summary of consultation responses.

10.2 Responses received to the consultation will help inform development of the local plan over the coming months and specifically debate on future policy choices. The intent is that work to be undertaken in 2021 and early 2022 will lead to the production of a draft plan that will be presented to committee of East Devon District Council leading to public consultation in the Spring of 2022. After this the intent is that the Publication draft of the plan will be published and available for comment in 2023 after which it and supporting papers will be submitted for examination.

10.3 In this report we seek to feedback on what people have said in feedback, we do not however, and at this stage, provide comment on how comments made may inform or be taken into account.