

## Local Plan Issues and Options consultation, January-March 2021 – summary of main issues raised and Officer response

At the ‘publication’ stage, the Regulations<sup>1</sup> make clear that we must publish a statement setting out:

- i. Which bodies and persons were invited to make representations under regulation 18,
- ii. How those bodies and persons were invited to make such representations,
- iii. A summary of the main issues raised by those representations, and
- iv. How those main issues have been addressed in the local plan

We will address these four points in a ‘consultation statement’ that will be published at the ‘publication’ stage. For points iii and iv, the following series of tables set out a summary of the main issues raised by representations on the East Devon Local Plan 2021 to 2040 Issues and Options Consultation, which took place from 18 January to 15 March 2021. There is a table for each of the 14 chapters in the Issues and Options, and the main issues are broken down by question, and then by topic within the question where appropriate. An Officer response shows how each main issue has been addressed in preparing the Working Draft East Devon Local Plan. As plan making work progresses similar reports to this will be prepared in respect of feedback on for further consultation documents. An over-arching report will be prepared for and submitted at part of the plan Examination paperwork.

This feedback report should read alongside and in conjunction with the Issues and Options report that was consulted on, see: [issuesandoptionsreport-jan2021.pdf \(eastdevon.gov.uk\)](#) and also a feedback to consultation report that we produced, see: [2a. Consultation feedback report Ver 03.pdf \(eastdevon.gov.uk\)](#)

The ‘summary of main’ issues referenced in the table below are taken from the feedback report.

### Introduction

Comments were not logged or recorded against the introduction chapter of the Issues and options report which just contained background factual information.

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<sup>1</sup> The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), Regulation 17d.

## Objectives, scope and background

Chapter / Topic / Qu	Summary of main issues	Officer response
<p>Objectives, scope, background / Question 2: The scope of the local plan</p>	<p>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.</p>	<p>It is welcomed that feedback received was generally positive and the objectives were for the most part endorsed.</p> <p>In the draft local plan further work went into refining the overall objectives and also into ensuring a differentiation from plan aims. Aims are taken to be about what we hope to do, our overall intention, whereas objectives are taken to be specific practical and achievable actions to achieve the aim.</p> <p>At this stage it is not considered that sub-objectives should explicitly follow from the listed objectives, though as policy develops there will be themes and issues that emerge as, by default if not explicitly stated, as being akin to sub-objectives.</p>
<p>Objectives, scope, background / Question 2: The scope of the local plan</p>	<p>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</p>	<p>The plan objectives are not in priority order and in producing the working draft local plan we have not sought to create a priority order, the proposed text advises of this. In the working draft plan all of the objectives should be read together and carry the same weight.</p>

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	<p>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.</p>	<p>We are aiming to create a suite of policies that are informed by plan objectives and these policies are used in determining planning applications. Making decisions on planning applications can sometime involve balancing competing considerations so sometime an individual plan objective, or one or more policies, cannot be applied in its own right and in totality in arriving at decisions. Matters can also be complicated by need to apply national planning policy and legislation and other considerations. This can help explain why sometimes it may be felt that some matters (sometimes) are not implemented in practice.</p>
<p>Objectives, scope, background / Question 2: The scope of the local plan</p>	<p>Issues that were not covered or fully touched on in the objectives that people raised comment on included:</p> <ul style="list-style-type: none"> <li>• No specific reference to tourism;</li> <li>• Traffic volumes and road safety, specifically for pedestrians;</li> <li>• Planning for less crime;</li> <li>• Addressing coastal erosion;</li> <li>• Agricultural matters;</li> <li>• Off grid living;</li> <li>• More references needed to communities;</li> <li>• Specific objectives around young people;</li> <li>• Disability issues;</li> <li>• More accommodating policy for self-builders;</li> <li>• The local community should be a priority;</li> <li>• More restrictions on development;</li> </ul>	<p>In preparing the working draft local plan account has been taken of these matters and although they are not explicitly referenced through changes to plan objectives, which at this stage are not significantly changed from the issues and options consultation document, a number of matters highlighted are addressed or raised through proposed policies in the new local plan.</p>

Chapter / Topic / Qu	Summary of main issues	Officer response
	<ul style="list-style-type: none"> <li>• Creating safe and secure environments with low crime levels (resulting);</li> <li>• Preserving the built heritage.</li> </ul>	
<p>Objectives, scope, background / Question 2: The scope of the local plan</p>	<p>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.</p>	<p>At the working draft stage of plan making the officer recommendation is to seek to accommodate dwelling numbers that are generated by the Government standard formula. Though we added in a ten percent additional flexibility allowance. This approach is seen as appropriate to address future housing provision in East Devon without running a significant risk of the plan be found un-sound at Examination on account of under provision.</p>
<p>Objectives, scope, background / Question 2: The scope of the local plan</p>	<p>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.</p>	<p>Sometime there can be differing views expressed on a given subject matter so it is not possible to agree to everything that is said. It is also relevant to note that for a plan to be sound it needs to comply with legislation and national guidance. These may be contrary to some opinions expressed. The Council do, however, listen to comments made and seek to take into account all comments when arriving at final conclusions.</p>
<p>Objectives, scope, background /</p>	<p>Many respondents highlighted the relevance, value and importance of neighbourhood planning work in informing the new Local Plan, and</p>	<p>Noted and agreed. The value of NPs, the relationship between them and the emerging Local Plan, and</p>

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<p>Question 3: Making the best use of existing Neighbourhood Plans</p>	<p>there was some acknowledgement of the difficulties of reconciling a new Local Plan coherently and in a meaningful way with numerous neighbourhood plans.</p>	<p>some the challenges and opportunities within were the subject of a webinar held with NP groups in May 2021 which fed into a paper on the subject taken to Strategic Planning Committee in June 2021. The relationship with NPs continues to be a theme throughout as the work of preparing the LP progresses.</p>
<p>Objectives, scope, background / Question 3: Making the best use of existing Neighbourhood Plans</p>	<p>Overall, responses received could be split into two broad 'schools of thought' 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 &amp; 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.)</p>	<p>Noted. EDDC is taking a balanced approach somewhere between these 2 ends of the spectrum, which acknowledges the role and status of our neighbourhood plans whilst also taking an objective evidence-based approach to the Local Plan, following the latest national policy guidance/direction.</p>
<p>Objectives, scope, background / Question 3: Making the best use of existing Neighbourhood Plans</p>	<p>Responses frequently highlighted that NPs:</p> <ul style="list-style-type: none"> <li>• have been subject to significant local consultation and provide the LPA with evidence of community views and aspirations</li> <li>• provide a wealth of evidence on needs and issues at the local level</li> <li>• have been encouraged and supported by the District Council</li> <li>• have taken considerable local time and resources to develop</li> </ul>	<p>Agreed. In response, Officer Reports / Topic Papers taken to Strategic Planning Committee in relation to the Local Plan report on implications for/relationship with NPs. Two papers have been taken to SPC to date (Oct 21) on the subject of NPs and the LP work specifically and Members have expressed their strong support for NP</p>

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	<ul style="list-style-type: none"> <li>• have been subject to a transparent and democratic process, including public vote</li> </ul>	<p>and seeking to avoid triggering extra work unnecessarily through the development of the emerging LP for NP Groups and work with the body of evidence / local knowledge they hold. A Communications Plan for NP communities during the LP preparation has been agreed, and the wider public will have various opportunities to put views forward in during the plan making process.</p> <p>A searchable database has been prepared of all made NP policies to aid considering the relationship with emerging LP policy and to help inform potential emerging LP policy.</p> <p>A webinar was held in May 2021 specifically for NP Groups to inform and open a dialogue re. the emerging LP. NP Groups were consulted on a ‘fact check’ exercise to inform the evidence paper on the Role and Function of Settlements, and roughly monthly updates on LP work are sent by email to all NP contacts in the district and our dedicated NP officers has engaged with groups individually. A second webinar for NP Groups and others on the approach to settlements is scheduled for November 2021, and quarterly going forward.</p>
	<p>Other respondents sought to highlight that:</p> <ul style="list-style-type: none"> <li>• there are variations in the level of detail across neighbourhood plans</li> <li>• that the age of plans needs to be taken into account</li> </ul>	<p>Agreed – neighbourhood plans are important and are being considered, but they are also not the only consideration, and in some cases they are now more than 5 years old and will need to be considered</p>

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	<ul style="list-style-type: none"> <li>• that they do not necessarily represent an up to date or ‘whole community’ view</li> <li>• the Local Plan will need to consider the latest evidence and national policy available</li> </ul>	<p>alongside more up to date evidence. It is however intended to alert NP groups to potential conflicts between their plans and emerging LP strategy/policy at the earliest opportunity and to seek to avoid unnecessary conflict/superseding of NP policy it where possible.</p>
<p>Objectives, scope, background / Question 3: Making the best use of existing Neighbourhood Plans</p>	<p>The middle ground in the responses was 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.</p>	<p>Agreed – see above.</p>
<p>Objectives, scope, background / Question 3: Making the best use of existing Neighbourhood Plans</p>	<p>Suggested that we 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.</p>	<p>Agreed in principle. This is being picked up through the new database of made Neighbourhood Plan policies, the report taken to SPC in September 2021 on common themes, planned improvements to mapping of NP policies, and on-going involvement and liaison with our dedicated NP Officer as part of the team leading the development work on the LP.</p>
<p>Objectives, scope, background / Question 3: Making</p>	<p>Suggested we 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</p>	<p>Agreed. As per response above we have developed and are implementing a Communications Plan for communicating and engaging our neighbourhood</p>

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the best use of existing Neighbourhood Plans	neighbourhood plans, identify early any likely conflicts with emerging Local Plan policy and work to find solutions where possible	planning communities, including providing roughly monthly updates, sharing topics papers, and holding webinars. However, there is a limit to what can be shared ahead of it being taken before members, so liaison about potential conflicts with individual plans is expected to start in the new year after the initial working draft LP is taken to SPC in December 2021. Wider community consultation is scheduled for Spring 2021 on the draft plan.
Objectives, scope, background / Question 3: Making the best use of existing Neighbourhood Plans	Build in formal steps/mechanisms into the Local Plan preparation process to consideration and review and the relationship with neighbourhood plans	Noted – this is a work in progress and will be challenging within the Local Plan timetable that Members have set. This is picked up in part through the development of the database of NPs and implementation of the agreed Communications Plan for NP communities and Officers will be seeking a steer from Members on this when presenting the early working draft LP to December Strategic Planning Committee.
Objectives, scope, background / Question 3: Making the best use of existing 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 content of current made NPs in the district is one source of evidence for the LP that is being considered as the work of plan production progresses, across all topics included those frequently highlighted. In line the PPG on Plan Making, paragraph reference 006, we are taking into account the policies and proposals of made (as well as advanced) neighbourhood plans, are seeking not to duplicate or supersede them unless this can be clearly justified. References to NP policies



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		and proposals will be included in the Local Plan documentation as appropriate.
Objectives, scope, background / Question 3: Making the best use of existing Neighbourhood Plans	Use neighbourhood plans to inform the development of masterplans	Noted. The use of site masterplans and the role of NP's in informing these will be explored as the LP work progresses and sites are identified for allocation.
Objectives, scope, background / Question 3: Making the best use of existing Neighbourhood Plans	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	Agreed. This is fully acknowledged in the Communications Plan that has been developed for NP Groups, and is being put into practice. For example, invites for the 2 <sup>nd</sup> webinar on approach to settlements scheduled for November 2021 have gone to all parish councils and all EDDC Members as well as all Neighbourhood Plan groups. The role of neighbourhood plans is being considered in a number of areas, including provision of rural housing, but it is recognised this is not the only solution.

## Designing for health and well-being

Chapter / Topic / Qu	Summary of main issues	Officer response
Health and well-being / Question 4 - How important do you think it is that we should actively promote health and wellbeing throughout our new local plan?	<p>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.</p> <p>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.</p>	<p>We have sought to address health and wellbeing in a through policies of the working draft local plan. Protecting open space and promoting access to high quality environments feature strongly in proposed plan policy. Strong support is given for pedestrian and cycle accessibility.</p>
Health and well-being / Other comment on chapter 3	<p>Ensure adequate provision of NHS services and rapid access to RD&amp;E</p>	<p>It is noted that health provision is very important but delivery and provision largely falls outside of the local plan and is really a matter of NHS provision and Government policy and expenditure. None the less as plan policy develops understanding capacity issues, future needs and future investment plans by the health providers will be important.</p>
Health and well-being / Other comment on chapter 3	<p>The Country park in Cranbrook is much hailed but it is already showing signs of damage from overuse</p>	<p>This point is noted but goes beyond local plan matters.</p>

Chapter / Topic / Qu	Summary of main issues	Officer response
Health and well-being / Other comment on chapter 3	The preservation of natural environment and wild life, ensure our children's wellbeing and mental health is sustained	The plan seeks to preserve and enhance the environment, for example through proposals of 20% net gain.
Health and well-being / Other comment on chapter 3	Should look to other countries that have been more successful in integrating pedestrians, cyclists and motorists in new developments	It is recognised that positive lessons can be learnt from elsewhere. At a national level there is also this recognition and where possible we would look to build best practice examples into policy making.
Health and well-being / Other comment on chapter 3	Promote health through activity clubs and holidays so people can support each other	This can become a planning matter at the implementation stage and for example at Cranbrook planning has a partnership role to play. It is , however, not as directly applicable to policy work, or at least initial policy formulation.
Health and well-being / Other comment on chapter 3	Provide a decent size garden and green play areas	It is recognised that play area provision is important and in future work we will be liking into space standards in development.
Health and well-being / Other comment on chapter 3	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	The point is noted and we are seeking to apply best practice in the East Devon local plan,

## Tackling the climate emergency

Chapter / Topic / Qu	Summary of main issues	Officer response
Climate / Question 5 - Energy efficiency of new buildings	<p>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.</p> <p>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.</p>	<p>There is strong support for achieving net-zero emissions from new development. Although the most popular option was to achieve it from a future date it is proposed that in the plan requires it from adoption, which was supported by 37% of respondents. It is felt that this is supported to the evidence, better reflects the ambition of the Council to tackle the climate emergency and achieve the best standards from development. It should also be borne in mind that the plan will take a number of years to adopt and so the date that the requirement will come into force will be some way in the future.</p>
Climate / Question 5 - Energy efficiency of new buildings	<p>Solar panels and electric vehicle charging points should be provided as standard on all new builds</p>	<p>Solar panels are an important source of zero carbon energy, however, the plan will likely seek to follow the energy hierarchy, which prioritises improvement to the fabric of buildings before imposing renewables, as they are more easily retrofitted. We will look into providing electric vehicle charging points through policy.</p>
Climate / Question 5 - Energy efficiency of new buildings	<p>Passivhaus standard should be encouraged and heat pumps should be the preferred source of energy</p>	<p>We will be encouraging passivhaus developments. Heat pumps will likely need to be provided to meet our proposed policy of requiring net-zero carbon emissions from new development.</p>

Chapter / Topic / Qu	Summary of main issues	Officer response
Climate / Question 5 - Energy efficiency of new buildings	Cost to make homes carbon neutral later on will be much more than if done now	Agree, we will be prioritising implementation of the energy hierarchy to reinforce this.
Climate / Question 5 - Energy efficiency of new buildings	Policy should be used to encourage small builders by giving preference to net zero designs in locations where development might not otherwise be accepted	Difficult issue as although the dwellings might be zero carbon the emissions from transport could be increased. Could also be hard to control so not pursuing currently.
Climate / Question 5 - Energy efficiency of new buildings	When done efficiently, net zero housing doesn't have to be any more expensive	Agree- the cost will only decrease of standards rise and the industry adjusts.
Climate / Question 5 - Energy efficiency of new buildings	A strong target will encourage innovation and reduce the overall cost over time	Agree- we intend to require net-zero emissions from plan adoption.
Climate / Question 5 - Energy efficiency of new buildings	Net zero by 2040 is too late	Opinion is understood and we are seeking to be more ambitious than ever before in this Plan, often exceeding Government requirements.
Climate / Question 5 - Energy efficiency of new buildings	Focus on larger developments to maximise the benefits	Certainly we will be looking to maximise benefits from larger developments, and their potential to utilise existing and proposed sources of waste heat within district heating systems.
Climate / Question 5 - Energy efficiency of new buildings	Need to ensure that net-zero really means net-zero, taking into account materials and construction.	Embodied carbon will have its own policy within the plan and we will also refer to it in the net-zero carbon policy.

Chapter / Topic / Qu	Summary of main issues	Officer response
Climate / Question 5 - Energy efficiency of new buildings	Could maybe include a graduated target	Graduated targets can often provide unnecessary complication, confusion and are hard to enforce so not pursuing at this stage.
Climate / Question 5 - Energy efficiency of new buildings	Need to focus on methane as well as carbon	Carbon is by far and away the most relevant greenhouse gas related to planning and forms the main focus in the Plan.
Climate / Question 6 - Provision of solar arrays/farms and windfarms	<p>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.</p> <p>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.</p>	We will be seeking to identify suitable areas for wind and solar energy, which was the most supported option in the issues and options consultation.
Climate / Question 6 - Provision of solar arrays/farms and windfarms	Need to encourage solar energy on brownfield land and new builds first over greenfield.	Agree, although there is little planning can do to encourage solar energy on existing buildings. We will also be requiring net-zero emissions for new dwellings and part of that requirement will likely be met by renewable energy.

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Climate / Question 6 - Provision of solar arrays/farms and windfarms	Solar panels offer the potential to enhance biodiversity when done innovatively	An interesting comment, further work can be done in this area.
Climate / Question 6 - Provision of solar arrays/farms and windfarms	Small scale generation is also important and should be encouraged	This will be encouraged through policy
Climate / Question 6 - Provision of solar arrays/farms and windfarms	Should encourage multi-use of solar farm land and protect most productive agricultural land.	This can be encouraged where possible.
Climate / Question 6 - Provision of solar arrays/farms and windfarms	Off-shore wind is most suitable over on-shore	Offshore wind is beyond the scope of land-use planning.
Climate / Question 6 - Provision of solar arrays/farms and windfarms	Should look at other forms of renewable like tidal, hydrogen and anaerobic digestion.	Low Carbon study investigated the potential for alternative forms of renewables.
Climate / Question 6 - Provision of solar arrays/farms and windfarms	Need to coordinate with WPD as network capacity has been an issue recently.	Agree, this will need to be factored in.

Chapter / Topic / Qu	Summary of main issues	Officer response
Climate / Question 6 - Provision of solar arrays/farms and windfarms	Wind arrays can become tourist destinations	Interesting comment. Another potential positive of promoting wind.
Climate / Question 6 - Provision of solar arrays/farms and windfarms	The word “suitable” and what it means needs careful consideration.	This is laid out in the low carbon study.
Climate / Question 6 - Provision of solar arrays/farms and windfarms	Need to consider co2 emissions from the construction and life cycle of wind	Interesting comment and may require further work
Climate / 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.	We will be pursuing many of these other objectives in the Plan.
Climate / Question 7 - Carbon saving measures	Climate change issues should be tackled through a national rather than a local strategy	Whilst it no doubt requires a National strategy, although all organisations have a responsibility to do everything in their power to reduce greenhouse gas emissions.



Chapter / Topic / Qu	Summary of main issues	Officer response
Climate / Question 7 - Carbon saving measures	Need to encourage pedestrianisation, park and ride, traffic management, cycle lanes and use of electric vehicles.	These can be encouraged through transport policies
Climate / Question 7 - Carbon saving measures	Need to encourage more working from home	No doubt Covid has radically impacted the way we work and will continue to do so. Home working can sometimes have other unintended consequences on town centre economics.
Climate / Question 7 - Carbon saving measures	Should encourage retrofitting of existing buildings as a priority, particularly over demolition	Agree and we intend to include a policy on this issue.
Climate / Question 7 - Carbon saving measures	Using landform and layouts to increase resilience to climate change	Agree this is important and will be referenced in the energy hierarchy and net-zero policy for new development.
Question 7 - Carbon saving measures	Work more with farmers through carbon trading / water improvement schemes	Agree these are important but likely falls beyond the scope of the plan.
Climate / Question 7 - Carbon saving measures	Also need to focus on protecting existing woodlands alongside planting.	Agree, this can be encouraged in other plan policies.

Chapter / Topic / Qu	Summary of main issues	Officer response
Climate / Question 7 - Carbon saving measures	Need to cover other forms of technology such as heat pumps and tidal.	Low Carbon study investigated the potential for alternative forms of renewables. Heat pumps will likely be required on new builds to hit plan policy carbon targets.
Climate / Question 7 - Carbon saving measures	Need to encourage more amenities near existing homes	Agree, plan policy will be supportive of new amenities.
Climate / Question 7 - Carbon saving measures	Should ban the use of gas entirely	Any ban would need to come through national policy, not local plan policy. However, it is unlikely that a gas boiler could be utilised to meet plan carbon targets for new development.
Climate / Question 7 - Carbon saving measures	Trees should be planted in urban areas as well	This will be encouraged in plan policy for new streets and development.
Climate / Question 7 - Carbon saving measures	Consideration needs to be given to areas that have yet to not have access to all fuels such as gas.	Gas will not be promoted through plan policy. The planning system allows for some flexibility to allow development contrary to policy, where material considerations justify permission.
Climate / Question 7 - Carbon saving measures	Potential to utilise hydrogen	Hydrogen still an emerging technology and requires further development.

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Climate / Question 7 - Carbon saving measures	No mention of airport which is a big emitter	Intention for an airport policy to encourage decarbonisation of operations.
Climate / Question 7 - Carbon saving measures	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	Agree that this should be factored in.

## Meeting housing needs

Chapter / Topic / Qu	Summary of main issues	Officer response
Housing / Question 8 - How many new homes should we plan for each year?	Current Government requirement was for us to build at least 928 new homes a year. Of the respondents 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	Noted
Housing / Question 8 - How many new homes should we plan for each year?	<b>HOUSING NEED</b>	
Housing / Question 8 - How many new homes should we plan for each year?	Government's 'Local Housing Need' is not need, it's demand/want/aspiration	Noted. To be found sound, including being consistent with NPPF and being positively prepared, the Local Plan has to seek to meet 'need' for housing, where 'local housing need' is as defined by NPPF. Plan need to use the NPPF definition.
Housing / Question 8 - How many new homes should we plan for each year?	Only plan on the basis of affordable housing need relating to local residents	Disagree. To be found sound, including being consistent with NPPF and being positively prepared, the Local Plan has to seek to meet 'need' for housing, where 'local housing need' (LHN) is as defined by NPPF. As well as calculating the current LHN, the Local Housing Needs Assessment (LHNA) includes a separate calculation assessing the level of Affordable Housing Need (AHN) which will inform the Council's decision on the amount of affordable housing provision to be set out in plan policy.

Chapter / Topic / Qu	Summary of main issues	Officer response
Housing / Question 8 - How many new homes should we plan for each year?	Want need assessment to focus on needs of specific groups -Prioritise meeting needs for younger people/economically active	Agree in part. The LHN assesses needs of specific groups. Consistent with NPPF and being positively prepared, the Local Plan will seek to meet 'need' for housing. It will include policies towards meeting the needs for younger people eg policy on first homes, affordable housing, rural exception sites and first home exception sites, and a mix of dwelling types and sizes. It will also include policy towards housing that supports the workforce, by focusing housing development at places that support greater settlement self-containment with jobs, houses, facilities /services
Housing / Question 8 - How many new homes should we plan for each year?	Want need assessment to focus on needs of specific groups - Prioritise meeting needs of an ageing population; older household downsizing	Agree in part. The LHN assesses needs of specific groups. Consistent with NPPF and being positively prepared, the Local Plan will seek to meet 'need' for housing. It will include specific policy towards meeting the housing needs for older people, policy on accessible and adaptable housing, and a policy on mix of dwelling types and sizes.
Housing / Question 8 - How many new homes should we plan for each year?	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	Noted. There is no evidence that any large conurbations have been buying up houses in East Devon for housing to meet their needs. The assertion is unsubstantiated and improbable. House prices in this District are relatively high, and there are much cheaper properties closer to those conurbations if they were seeking to purchase dwellings to house their residents.

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Housing / Question 8 - How many new homes should we plan for each year?	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"?	Noted. Local housing need (LHN) is as defined by NPPF and the Standard Method is as set out in PPG. No evidence at this time that there is any exceptional circumstances ie no demographic reason why Standard Method should not apply to East Devon district. Work is in progress to assess if there are any economic or other reasons to justify a Local Housing Need rate higher than the Standard Method. The response may change as and when evidence such as the Employment Development Needs Assessment becomes available
Housing / Question 8 - How many new homes should we plan for each year?	Standard method for assessing local housing need (LHN) - Government should focus on its levelling up agenda, less on East Devon	Noted. Local housing need (LHN) is as defined by NPPF and the Standard Method is as set out in PPG. The updated method in December 2020 changed the LHN standard methodology for 20 large cities and urban centres, but it didn't change the method for East Devon. No further changes made by Government to the LHN definition or the Standard Method at this time.
Housing / Question 8 - How many new homes should we plan for each year?	Standard method for assessing local housing need (LHN) - Are Government requirements applicable to East Devon?	Agree. Government requirements are applicable to East Devon. Local housing need' (LHN) is as defined by NPPF and the Standard Method is as set out in PPG. The updated method in December 2020 changed the LHN standard methodology for 20 large cities and urban centres, but it didn't change the method for East Devon. No further changes made by Government to the LHN definition or the Standard

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		Method at this time. Work is in progress to assess if there are any economic or other reasons to justify a Local Housing Need rate higher than the Standard Method. The response may change as and when evidence such as the EDNA becomes available.
Housing / Question 8 - How many new homes should we plan for each year?	Standard method for assessing local housing need (LHN) - Challenge e.g. by CPRE to standard method/underlying assumptions/use of 2014 National Household Projections – advocating much lower figures	Noted. Local housing need (LHN) is as defined by NPPF and the Standard Method is as set out in PPG. No evidence at this time that there is any exceptional circumstances ie no demographic reason why the Standard Method should not apply to East Devon district. No evidence at this time to justify a level of housing need lower than the Standard Method
Housing / Question 8 - How many new homes should we plan for each year?	Standard method for assessing local housing need (LHN) - 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	Disagree. Local housing need (LHN) is as defined by NPPF and the Standard Method is as set out in PPG. No evidence at this time that there is any exceptional circumstances ie no demographic reason why the Standard Method should not apply to East Devon district. No evidence at this time to justify a level of housing need lower than the Standard Method
Housing / Question 8 - How many new homes should we plan for each year	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	Disagree. Local housing need (LHN) is as defined by NPPF and the Standard Method is as set out in PPG. PPG #15 makes clear that using post 2014 National projections does not comply with the Standard Method. No evidence at this time that there are any exceptional circumstances ie no demographic reason

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		<p>why the LHN Standard Method should not apply to East Devon district. Standard Method includes affordability adjustment to take account of past under-delivery. Under PPG, the high ratio signals that high house prices and hence affordability are a consequence of under delivery.</p> <p>Work in progress on the EDNA – Council will need to consider with the evidence when available justifies an increase in the LHN above the Standard Method.</p>
<p>Housing / Question 8 - How many new homes should we plan for each year?</p>	<p>Standard method for assessing local housing need (LHN) - 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</p>	<p>Noted. Local housing need (LHN) is as defined by NPPF and the Standard Method is as set out in PPG. PPG #15 makes clear that using post 2014 National projections does not comply with the Standard Method. No evidence at this time that there are any exceptional circumstances ie no demographic reason why Standard Method should not apply to East Devon district. Census 2021 data is not yet available to compare with the 2014 projections. ONS currently aim to release first Census results in late spring 2022, followed by further data releases.</p>
<p>Housing / Question 8 - How many new homes should we plan for each year?</p>	<p>Standard method for assessing local housing need (LHN) - East Devon population is shrinking. Why are more homes needed?</p>	<p>Disagree. Latest Mid-year estimates (2020) show that East Devon population continues to increase (125700 in 2001, 132,700 in 2010, 146,900 in 2019, rising to 148,100 in 2020). MYE 2021 is not yet available.</p>



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Housing / Question 8 - How many new homes should we plan for each year?	Standard method for assessing local housing need (LHN) - Want LHN based on proper needs assessment of local population eg local parish surveys	Disagree. Local housing need (LHN) is as defined by NPPF and the Standard Method for assessing District LHN is as set out in PPG. No evidence at this time that there are any exceptional circumstances ie no demographic reason why the Standard Method should not apply to East Devon district. No evidence at this time to justify a level of housing need lower than the Standard Method. Local parish surveys provide evidence on specific local needs eg when supporting Rural Exception site housing development proposals.
Housing / Question 8 - How many new homes should we plan for each year?	Standard Method (SM) – amount of need - 928pa is too high, it will drive up in-migration. Local residents' need is much less	Disagree. Local housing need (LHN) is as defined by NPPF and the Standard Method is as set out in PPG. No evidence at this time that there are any exceptional circumstances ie no demographic reason why Standard Method should not apply to East Devon district. No evidence at this time to justify a level of housing need lower than the Standard Method.
Housing / Question 8 - How many new homes should we plan for each year	Standard Method (SM) – amount of need - PPG allows lower than SM figure provided there are exceptional circumstances	Agree in part. Local housing need (LHN) is as defined by NPPF and the Standard Method is as set out in PPG. PPG allows for an alternative Method. If this results in a lower LHN, then the LPA needs robust evidence that it has used realistic assumptions of demographic growth and there are exceptional local circumstances to justify departing for the standard method. No evidence at this time of exceptional local circumstances ie no demographic reason why the

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		Standard Method should not apply to East Devon district. No evidence at this time to justify a level of housing need lower than the Standard Method.
Housing / Question 8 - How many new homes should we plan for each year	Standard Method (SM) – amount of need - Why oversupply homes to deliver need to meet affordable housing?	Disagree. The LHN is about need not supply. Local housing need (LHN) is as defined by NPPF and the Standard Method is as set out in PPG. The method incorporates an affordability adjustment, as a response to local price signals. The adjustment relates to the house price to work-place based earnings ratio for East Devon (updated figures are published annually by ONS). The adjustment is made to take account of past under-delivery. Under PPG, the high ratio signals that high house prices and hence affordability are a consequence of under delivery. Planning Obligations are expected to be the principal means of delivering affordable housing. The plan will consider how forecast overall housing supply enable the scale of forecast Affordable Housing Need, as identified by the LHNA, to be met. It will also consider if there is robust evidence of any other means to increase the potential to deliver affordable housing in the plan period.
Housing / Question 8 - How many new homes should we plan for each year	Standard Method (SM) – amount of need - Want housing need to reflect minimum LHN figure based on standard method	Agree, at this time. Local housing need (LHN) is as defined by NPPF and the Standard Method is as set out in PPG. No evidence at this time to justify a level of housing need lower than the Standard Method.

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		<p>Work in progress on the EDNA –to provide evidence about the scale of employment, economically active and the whether there is sufficient work force to fill the jobs. It may indicate if there is potential for higher employment growth. The council will need to consider the evidence and its economic aspirations. This may justify a further uplift to the LHN for East Devon. At this time there is no evidence that there is unmet housing need from other areas that has to be accommodated in East Devon.</p>
<p>Housing / Question 8 - How many new homes should we plan for each year</p>	<p>Further uplift to housing need figure - 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. Market signals relating to housing affordability</p>	<p>Agree in part. East Devon’s affordability ratio is one of the lowest in country. However, the correct PPG #15 quote is <i>“Where a strategic policy-making authority can show that an alternative approach identifies a need higher than using the standard method, and that it adequately reflects current and future demographic trends and market signals, the approach can be considered sound as it will have exceeded the minimum starting point.”</i> The LHN Standard Method incorporates the adjustment for affordability, so it already reflects market signals - its formula builds in the affordability ratio. So no further uplift to the LHN figure is required regarding affordability.</p>
<p>Housing / Question 8 - How many new</p>	<p>Further uplift to housing need figure –</p> <ul style="list-style-type: none"> <li>• 928 dwellings pa is too low. Wants LHN figure to be above standard method</li> </ul>	<p>Disagree, at this time. Local housing need (LHN) is as defined by NPPF and the Standard Method is as set out in PPG. NPPF expects the LPA to use the</p>

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<p>homes should we plan for each year</p>	<ul style="list-style-type: none"> <li>• 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’</li> <li>• 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</li> <li>• Must consider the reasons why significant uplifts taking may be needed, e.g. Demographic change</li> <li>• . 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</li> </ul>	<p>standard method for assessing local housing need Current LHNA is expected to indicate the LHN is 918 dwellings pa.</p> <p>Previous Local Plan requirement was 950 dwellings pa. Historic housing completions in East Devon reflected NPPF, with the boost to housing supply from delivery coming on stream at Cranbrook new settlement, and additional boost from large windfall sites east and west of the M5.</p> <p>PPG#10 indicates there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates. The Council therefore needs to consider whether for example there are changing economic circumstances or other factors might have on demographic behaviour</p> <p>Work is in progress on the EDNA to provide evidence about the scale of employment growth (at base line level or economic growth aspirations), and to assess if there will be sufficient economically active to meet the increase in forecast jobs. If there is insufficient workforce, the Council should consider its economic aspirations and the evidence, and whether increasing the level of housing need above the standard method level to accommodate will resolve the issue, so justifying an uplift to the District LHN. The Council</p>

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		<p>should keep this matter under review when the evidence becomes available.</p>
<p>Housing / Question 8 - How many new homes should we plan for each year</p>	<p>Further uplift to housing need figure - Must consider the reasons why significant uplifts taking may be needed, e.g. 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</p>	<p>Disagree. Calculation of the Affordable Housing Need is separate from the calculation of Local Housing Need. How that need to be met is not part of the LHN process. It is part of the subsequent step for the LPA to consider whether</p> <ul style="list-style-type: none"> <li>• the housing provision policy target should be higher than the LHN standard method rate, in order to deliver the AHN level; and</li> <li>• justify a level of affordable housing provision in policy, subject to evidence about viability and prospects of delivering the affordable housing</li> </ul> <p>Planning Obligations are expected to be the principal means of delivering affordable housing. The Council will consider whether forecast overall housing supply enables the scale of forecast Affordable Housing Need, as identified by the LHNA evidence, to be met in the plan period. It will also consider if there is robust evidence of any other means to increase the potential to deliver affordable housing in the plan period.</p>
<p>Housing / Question 8 - How many new homes should we plan for each year</p>	<p>Further uplift to housing need figure - Must consider the reasons why significant uplifts taking may be needed, e.g. Meeting unmet need from neighbouring areas (Duty to Cooperate) e.g.</p>	<p>Agree in part. Current LHNA is expected to indicate the LHN for East Devon is 918 dwellings pa. (Standard Method). EDDC has been diligent in undertaking the legal duty on the LPA, to engage constructively,</p>

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	<ul style="list-style-type: none"> <li>• 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 &amp; Lyme Regis TC to explore solutions to meet local needs at Lyme Regis. Have collaborative discussions occurred &amp; Duty to Cooperate been met?</li> <li>• 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.</li> <li>• 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</li> </ul>	<p>actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters. There is no evidence at this time demonstrating that there are unmet housing needs in other LPA areas that must be met in East Devon. The District Council will keep this matter under review and continue to be diligent in meeting its Duty to Cooperate.</p>
<p>Housing / Question 8 - How many new homes should we plan for each year</p>	<p>Should use much higher LHNA figure. Comments suggest a range of figures: At 30% provision, 461 dws equates to 1536 pa (30720 over 20 years). Achieving a lower % of affordable housing raises the rate further</p>	<p>Disagree – see response regarding to comments on Further uplift to housing need figure - Must consider the reasons why significant uplifts taking may be needed, e.g. Meeting all Affordable Housing Need (including all affordable home ownership aspirations). The Council will consider whether forecast overall housing supply enables the scale of forecast</p>

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		<p>Affordable Housing Need, as identified by the LHNA evidence, to be met in the plan period. It will also consider if there is robust evidence of any other means to increase the potential to deliver affordable housing in the plan period.</p>
<p>Housing / Question 8 - How many new homes should we plan for each year</p>	<p>Should use much higher LHNA figure. Comments suggest a range of figures: - over 1600 pa (i.e. previous Government SM figure) 32,000+ dws total</p>	<p>Disagree. In December 2020, Government withdrew the methodology that resulted in a need figure of approx. 1,600 dwellings pa. New LHNA is expected to indicate the district LHN is 918 dwellings pa based on the latest Government Standard Method as set out in PPG (December 2020). This would equate to 18,360 dwellings over 20 years. Work in progress on EDNA may lead to the Council revising its position regarding the LHN for East Devon</p>
<p>Housing / Question 8 - How many new homes should we plan for each year</p>	<p>Should use much higher LHNA figure. Comments suggest a range of figures: significantly more than 1614 pa, helping to meet Exeter City needs</p>	<p>Disagree. New LHNA is expected to indicate the District LHN is 918 dwellings pa based on the latest Government Standard Method as set out in PPG (December 2020). It would equate to 18,360 dwellings over 20 years. Work in progress on EDNA may lead to the Council revising its position regarding the LHN for East Devon.</p> <p>No evidence at this time demonstrating that there are unmet housing needs in other LPA areas that must be met in East Devon. The District Council will keep this matter under review and continue to be diligent in meeting the Duty to Cooperate.</p>

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<p>Housing / Question 8 - How many new homes should we plan for each year</p>	<p>Should use much higher LHNA figure. Comments suggest a range of figures: - Increase LHN to 2000+ dws pa (40,000+ over 20 years)</p>	<p>Disagree. New LHNA is expected to indicate the District LHN is 918 dwellings pa is based on the latest Government Standard Method as set out in PPG (December 2020). It would equate to 18,360 dwellings over 20 years. Work in progress on EDNA may lead to the Council revising its position regarding the LHN for East Devon.</p>
<p>Housing / Question 8 - How many new homes should we plan for each year</p>	<p>Should use much higher LHNA figure. Comments suggest a range of figures: 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 to 46,100 total dws over 20 years –this will be a challenge)</p>	<p>Disagree. Calculation of the Affordable Housing Need is separate from the calculation of Local Housing Need. How that AHN to be met is not part of the LHN process. It is part of the subsequent step for the LPA to consider whether</p> <ul style="list-style-type: none"> <li>• the housing provision policy target should be higher than the LHN standard method rate, in order to deliver the AHN level; and</li> <li>• justify a level of affordable housing provision in policy, subject to evidence about viability and prospects of delivering the affordable housing</li> </ul> <p>PPG on HENA (#24) is clear that ‘An increase in the <b>total housing figures included in the plan</b> may need to be considered where it could help deliver the required number of affordable homes’.</p> <p>Planning Obligations are expected to be the principal means of delivering affordable housing. The Council will consider whether forecast overall housing supply enables the scale of forecast Affordable Housing Need, as identified by the LHNA evidence, to be met</p>



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		in the plan period. It will also consider if there is robust evidence of any other means to increase the potential to deliver affordable housing in the plan period.
Housing / Question 8 - How many new homes should we plan for each year	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	Agree in part. New LHNA is expected to indicate the LHN for East Devon is 918 dwellings pa. (Standard Method). Equating to 18,360 dwellings over 20 years. Work is in progress to identify potential housing supply to meet this level of need. Currently anticipating that sites sufficient for about 6,900 dwellings would need to be allocated in the local plan. So far, sites assessed as potential plan allocations would have the capacity to delivery about 5,700 dwellings. Housing supply analysis is work in progress and will be updated as other supply and viability evidence becomes available. EDDC has been diligent in undertaking the legal duty on the LPA, to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters. The District Council will keep this matter under review and continue to be diligent in meeting Duty to Cooperate.
Housing / Question 8 - How many new homes should we plan for each year	<b>HOUSING SUPPLY</b> Comments divide into expand/accelerate supply (largely developers/ landowners) and constrain new build/use other sources (communities)	Noted

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Housing / Question 8 - How many new homes should we plan for each year	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	Agree. The plan continues to boost housing supply in East Devon.
Housing / Question 8 - How many new homes should we plan for each year	Local Plan needs to allocate more land for housing development. Several respondents used their Q8 response to support allocating their site	Noted. The total supply capacity from sites allocated for housing and from the housing part of mixed use site allocations equates to 5,700 dwellings at this time. All are expected to be delivered in the plan period. This includes 2,500 dwellings at the second new settlement. Additional dwellings at the second new settlement would be delivered after the end of the plan period (not in the 5,700 supply total). Note there are 4,170 dwellings on allocations at the Cranbrook Expansion Areas in the Cranbrook DPD. These are not included allocated in the new East Devon Local Plan so not part of the 5,700 dwellings capacity in Local Plan allocations referred to above.
Housing / Question 8 - How many new homes should we plan for each year	For supply forecasts to be realistic, evidence needs to be consistent with NPPF and PPGs	Agree, consistency with NPPF is one of the tests of soundness. Supply forecasting of major sites (gross 10+ dwellings) commitments and allocations is applying PPG approach to produce housing trajectory for each site. Separate forecasts for housing delivery from aggregated small site commitments and future windfalls. Work in progress to produce document detailing the evidence and analysis underpinning the housing trajectory for the plan period.

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Housing / Question 8 - How many new homes should we plan for each year	Large proportion of commitments are in the control of a small number of developers risky strategy. Too much reliance on a major site (Cranbrook)	Agree in part. Significant proportion of existing commitments is owned/controlled by major volume builders, including most of the allocations in the Cranbrook DPD. But there are smaller consented sites being developed by SMEs. Local plan should include policy target for the percentage of dwellings to be delivered from smaller sites (20 or less dwellings) New allocations in the new plan include many smaller sites, as well as the proposed second new settlement.
Housing / Question 8 - How many new homes should we plan for each year	Need for a degree of flexibility in supply, to ensure housing requirement is met	Agree. The future is uncertain. Not all sites may be developed. Plan should identify sufficient allocations to ensure that identified supply with realistic prospects of delivery in the plan period exceeds the housing requirement policy total. A 10% degree of supply flexibility is suggested (ie would equate to identifying the potential for a total supply of about 20,200 dws)
Housing / Question 8 - How many new homes should we plan for each year	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?	Disagree. LHN is 'policy-off' ie does not take account of the ability of supply to meet the level of need. LHN is calculated at the point of the start of the plan period, using information from previous years and forecasting forwards. Housing completions achieved before the start of the plan period (1/4/2021) do not count towards the local plan policy for housing provision requirement for the plan period. PPG Housing supply and delivery #32 states " <i>Where areas deliver more completions than required, the</i>

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		<p><i>additional supply can be used to offset any shortfalls against requirements from previous years</i>". However, this relates to oversupply against the <b>'planned requirements'</b> ie those in the adopted plan, not the justification of the new provision requirement for the plan period in the new Local Plan, to be determined through the plan-making process.</p>
<p>Housing / Question 8 - How many new homes should we plan for each year</p>	<p>Supply constraints - developers not using land holding. Don't allocate more</p>	<p>Disagree. Housing completions in the last 5 years exceeded current Local Plan target. New Local Plan must provide sufficient certainty of achieving the housing provision requirement policy, ie by allocating sites. Current supply forecast suggests new allocations need to provide 6,900 dwellings net capacity (excluding Cranbrook). LPA needs evidence to demonstrate sites have realistic prospects of being deliverable and developable to 2040. Cranbrook Expansion Area sites were delayed pending outcome of the Cranbrook DPD Examination. These are expected to deliver in the new plan period. Axminster Eastern extension allocation had been halted by viability issues relating to the relief road and water quality/impact on and sites of international importance (site not proposed for allocation in the new plan).</p>
<p>Housing / Question 8 - How many new</p>	<p>Developers' business models control speed of delivery and focus on narrow range of development/house types and sizes that maximise profit, not need.</p>	<p>Noted. Local Plan provides new opportunities for housing development, with range of sites and sizes, including smaller sites that should be attractive to</p>

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homes should we plan for each year		SMEs. Anticipate that most housing will be developed by the private sector. Plan should include policies towards meeting a range of needs.
Housing / Question 8 - How many new homes should we plan for each year	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)	Agree in part. New homes are needed to deliver sufficient housing to meet forecast needs (LHN), so additional site allocations are needed. But the plan should include policy for reusing land and buildings, making better use of land, and intensification (eg HMOs, subdivision, annexes/extensions/alterations)
Housing / Question 8 - How many new homes should we plan for each year	Convert offices to small units - meet homeless/young people's housing needs	Noted. Plan should include policy for reusing land and buildings, but it also needs to ensure that sufficient employment land and premises, including offices, in places that support existing communities and settlement self-containment. Need to retain buildings to provide employment, provided that they meet business requirements. Awaiting EDNA evidence about employment land/buildings supply and quality. New prior approval route for conversion of some offices and other uses to residential under the new Permitted Development Class MA.
Housing / Question 8 - How many new homes should we plan for each year	More Method of Modern Construction dwellings;	Agreed. Design policy should encourage use of MMC in suitable locations, as it can speed up delivery of housing development

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Housing / Question 8 - How many new homes should we plan for each year	More self-build/custom build	Agreed. Plan should include policy towards self-build and custom build housing, and could identify site specific requirements for serviced plots for self-build and custom build housing on larger site allocations.
Housing / Question 8 - How many new homes should we plan for each year	<b>HOUSING REQUIREMENT</b>	
Housing / Question 8 - How many new homes should we plan for each year	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	Agreed. Definition of affordable housing should be consistent with NPPF. To justify the affordable housing requirement total for the plan period, the Council will need to consider the evidence about the Affordable Housing Need, and how much need can be met by forecast of affordable housing supply for the plan period. Deducting the affordable housing provision requirement from the total net housing requirement results in the total market housing requirement for the plan period.
Housing / Question 8 - How many new homes should we plan for each year	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	Agreed. Work is in progress on new LHNA and evidence of need. Additional work in progress on the housing supply trajectory, to evidence reasonable prospects of delivering forecast housing supply in the plan period. Evidence on overall plan viability to be commissioned, to inform future decisions on housing requirement and supply forecasts (including site

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		<p>allocations). Audit trail document (Housing topic paper on need, supply requirement and affordable housing) to be produced demonstrating how the Council used evidence to inform the Council's choice of the housing provision requirement total to be set out in policy (and its breakdown into affordable housing requirement and market housing requirement).</p>
<p>Housing / Question 8 - How many new homes should we plan for each year</p>	<p>Requirement should not be below the level of need, including affordability</p>	<p>Agreed at this time. Work is in progress on the housing supply trajectory, to evidence reasonable prospects of delivering forecast housing supply in the plan period. Evidence on overall plan viability to be commissioned, to inform future decisions on housing requirement. The Council should consider the evidence about the ability of supply to meet the LHN (standard method) before a conclusion can be reached about whether East Devon need can be met, whether there is any unmet need from East Devon, and whether there is any evidence of unmet need from other LPAs that should be met in East Devon. Work is in progress on the EDNA which may justify considering if the East Devon LHN should increase.</p>
<p>Housing / Question 8 - How many new homes should we plan for each year</p>	<p>Requirement should be realistic and achievable, meet full range of housing needs (specialist needs of the elderly, affordable and specialist housing)</p>	<p>Agree in part. Work is in progress on the housing supply trajectory, to evidence reasonable prospects of delivering forecast housing supply in the plan period. Evidence on overall plan viability to be commissioned,</p>

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		<p>to inform future decisions on housing requirement and supply forecasts (include site allocations)                      Plan should include policy towards meeting housing need. Different needs overlap, so the plan should avoid double counting. Work is in progress to</p> <ul style="list-style-type: none"> <li>• forecast the scale of affordable housing supply</li> <li>• provide evidence to justify the percentage of housing on sites above thresholds, to provide specialist housing for elderly people, for accessible and adaptable housing</li> </ul> <p>Plan should make separate provision for Gypsy and Travellers and Travelling Showpeople pitches/plots.</p>
<p>Housing / Question 8 -                      How many new homes should we plan for each year</p>	<p>What is the connection between the overall Local Housing Need and Affordable Housing Need</p>	<p>The Local Housing Need Assessment provides both the LHN and AHN evidence. The assessed LHN already incorporates an 'affordability adjustment'. But LHN and AHN are two separate calculations. How the Affordable Housing Need is not part of the LHN process. How AHN is to be met is a supply question. It is part of the subsequent step, when the LPA considers:</p> <ul style="list-style-type: none"> <li>• should the housing provision policy target be higher than the LHN standard method rate, in order to deliver the AHN level</li> <li>• justifying a level of affordable housing provision in policy, subject to evidence about viability and prospects of delivering the affordable housing</li> </ul>



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		<ul style="list-style-type: none"> <li>• what is the impact of raising the requirement eg on spatial strategy, on the environment, economy and on communities</li> <li>• testing the percentage of affordable housing to be delivered on sites above a specified site size threshold that would be viable</li> </ul> <p>2020 LHNA indicated an AHN of 9,684 over the plan period if all affordable housing need is met. But this includes those in private rented accommodation who aspire to affordable home ownership but without realistic prospects of having the resources to afford affordable home ownership.</p> <p>Planning Obligations are expected to be the principal means of delivering affordable housing. LPA should consider whether forecast overall housing supply enables the scale of forecast Affordable Housing Need to be met in the plan period. It should also consider if there is robust evidence of any other means to increase the potential to deliver affordable housing in the plan period. The LPA decides the scale of housing provision requirement and affordable housing requirement in policy, mindful of NPPF ie that the plan should be ‘aspirational but deliverable’,</p>
Housing / Question 8 - How many new homes should we plan for each year	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.	A local housing need of 1,614 dpa would be high. Government has withdrawn the methodology that produced that number.

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	Increase housing provision across the district; growth address housing shortages	The level of Local Housing Need (standard method) in the new LHNA is expected to be 918 dwellings pa. EDNA evidence may justify an uplift to this figure. The Council then will decide whether the housing provision requirement is based on the LHN standard method or a higher level.
Housing / Question 8 - How many new homes should we plan for each year	Need to evidence the impact of requirement figure	Agree, the impacts will be assessed through the forthcoming evidence on Sustainability Appraisal, the Habitats Regulations Assessment, the Equality Impact Assessment, and the Health Impact Assessment. And the overall assessment of plan viability.
Housing / Question 8 - How many new homes should we plan for each year?	Local Plan should provide housing requirement figures for Neighbourhood plans	Disagree – NPPF#66 states “ <i>strategic policies should also set out a housing requirement for designated neighbourhood areas</i> ”. However, the District housing requirements will be met through a combination of completions since the start of the plan period, existing sites with planning permission that will be built during the plan period, windfall development (an allowance is made for future supply in the plan period) and through allocation of sites for development as part of the local plan and the Cranbrook DPD. Therefore it is not necessary for housing development to be allocated in neighbourhood plans to meet identified district level requirements. And therefore there is no need for local plan policy to set out housing requirement figures for Neighbourhood Plans. This is subject to identifying sufficient additional allocations to fill the gap between the 6,900 allocations needed and the estimated 5,921 dwellings capacity on recommended site allocations.

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		Neighbourhood Plans can still allocate sites to meet identified local community needs for housing.
Housing / Question 8 - How many new homes should we plan for each year	Neighbourhood plans should determine their housing needs/requirements	Agree. See response above regarding the issue of the Local Plan providing policy setting out housing requirement figures for Neighbourhood Plans
Housing / Question 8 - How many new homes should we plan for each year	Policy target should be expressed as a maximum	Disagree. NPPF makes clear that housing provision requirement policy should be expressed as a minimum. Expressing it as a maximum is be consistent with the NPPF, and likely to result in the policy being found not sound.
Housing / Question 8 - How many new homes should we plan for each year	Housebuilding has over-delivered - can we reduce the new plan target because current supply exceeds existing housing policy requirement	Disagree. Housing completions achieved before the start of the plan period (1/4/2021) do not count towards the new local plan policy for housing provision requirement for the plan period. Past supply cannot offset housing need as at April 2020 and future need arising through the plan period.
Housing / Question 8 - How many new homes should we plan for each year	<p>Council should not plan or commit to any specific figure for new houses -focus on redevelopment/conversions/brownfield land</p> <p>Scale of development continues the concreting over the countryside</p> <p>Don't build on greenfield land; protect Green Belt from housing development</p>	Disagree. The HELAA is work in progress. But at this time there is no evidence that dwelling capacity on available sites on previously developed land would be sufficient to deliver the scale of housing that needs to be identified through local plan allocations. Some site allocations and some future windfall sites are expected to be on brownfield sites, but new development on greenfield sites will still be necessary.

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		No land in East Devon is designated as Green Belt.
Housing / Question 8 - How many new homes should we plan for each year	<p>Plan for little as possible new development. East Devon is overdeveloped</p> <p>No more housing. Should not set policy targets, they are arbitrary</p> <p>Should have a negative housing requirement if we want sustainability</p>	<p>Disagree. NPPF requires that the LPA as the strategic planning authority for East Devon undertakes plan making to identify how objectively assessed housing needs are to be met. Local Plan strategic policy must set out the housing provision requirement for the plan period. The HELAA is work in progress. But at this time there is no evidence that dwelling capacity on available sites on previously developed land would be sufficient to deliver the scale of housing that needs to be identified through local plan allocations. New development will be necessary. The scale and distribution of housing provision, and the site allocations will be tested through the Sustainability Appraisal/Strategic Environmental Assessment. A negative housing requirement is wholly unrealistic. It would mean no development and dwellings being lost by enforced demolition, conversion or change of use.</p>
Housing / Question 8 - How many new homes should we plan for each year	<b>HOUSING AND SPATIAL STRATEGY</b>	
Housing / Question 8 - How many new	<p>Links between spatial strategy, distribution of housing, meeting requirement</p> <p>Locate housing near employment or accessible by public transport</p>	Agree. Spatial strategy, distribution of housing and the economic strategy all focus on improving

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homes should we plan for each year		settlement self-containment, achieved by locating housing and employment development at existing and new settlements, with employment accessible by active and/or public transport.
Housing / Question 8 - How many new homes should we plan for each year	Restrict new housing to cities/towns; but avoid urban sprawl	Disagree. Spatial strategy, distribution of housing and the economic strategy all focus on improving settlement self-containment. ie Co- locating housing and employment development at existing and new settlements, with employment accessible by active and/or public transport. Higher scale housing growth is proposed at larger settlements with services and facilities to support population and businesses. Policy on high quality design should ensure development makes best use of land, creating places where people want to live and work, but avoiding unnecessary urban sprawl. But urban growth is still necessary to provide the housing to meet needs. The plan also allocates smaller scale housing development at Tiers 3 and 4 settlements where small windfalls may also occur.
Housing / Question 8 - How many new homes should we plan for each year	Opportunities for major scale development delivering housing; but risks of relying on this	Agree in part. Spatial strategy includes proposals for second new settlement, and growth directed to Tiers 1 and 2 which include major scale development delivering housing (as well as Cranbrook DPD allocations). The plan does not rely just on larger sites. It proposes allocating a range of other housing sites which provides choice, and mitigates risk. The

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		plan's approach to supply flexibility, including the scale of flexibility (10%) further reduces the risk of under delivery of supply over the plan period.
Housing / Question 8 - How many new homes should we plan for each year	No more housing near Exeter; area is over developed.	Disagree. Development on the Western side of the District is necessary if housing need is to be met. The preferred spatial strategy would proposed a second new settlement, plus development east of the M5 with access by active and public transport to services and facilities in the urban area of Exeter. Policy on housing in Cranbrook Expansion Areas is provided separately in the Cranbrook DPD.
Housing / Question 8 - How many new homes should we plan for each year	More housing in and at villages	Agree in part. Spatial strategy proposes allocating smaller scale housing development sites at Tiers 3 and 4 settlements where small windfalls may also occur. The plan should also include policy on Rural Exceptions sites and First Homes Exception sites adjoining settlement boundaries enabling housing to be developed at appropriate villages.
Housing / Question 8 - How many new homes should we plan for each year	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)	Disagree. Wide dispersal of housing is not the preferred distribution strategy. The plan should include policy towards housing development in the countryside, notably policies on Rural Workers housing, Rural Exceptions and First Homes Exceptions sites, and Gypsy and Travellers and Travelling Showpeople sites. Some housing

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		development occurs in the countryside through the prior approval route for PD Use Class Q.
Housing / Question 8 - How many new homes should we plan for each year	All of new housing built needs to be evenly distributed over all East Devon	Disagree. Wide dispersal of housing is not the preferred distribution strategy.
Housing / Question 8 - How many new homes should we plan for each year	What is the impact of new housing on existing neighbourhood and residents	Noted. Work is in progress of the Sustainability Appraisal/SEA and other assessments to identify the impacts of the scale and distribution of housing provision, and housing site allocations for housing. This will inform Council decisions on plan-making.
Housing / Question 8 - How many new homes should we plan for each year	Scale of development continues the concreting over the countryside	Noted. Insufficient brownfield sites available so greenfield site development will be necessary, to meet housing need. Spatial strategy and distribution of housing focuses development at existing and new settlements to avoid wide dispersal across countryside
Housing / Question 8 - How many new homes should we plan for each year	Prioritise use of brownfield land for housing sites	Neither NPPF nor PPGs support 'blanket' prioritisation of use of brownfield sites for development before any greenfield development. Nor do they prioritise the use of brownfield sites for housing. PPG Housing supply and #21 allows the LPA to identify priority sites, including brownfield land, to be delivered earlier in the plan period. But evidence would need to demonstrate sites are deliverable.. Work in progress on HELAA and site assessments, plus the forthcoming plan

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		viability study should enable LPA to consider whether there is evidence to support phasing of site allocations. Work is in progress to assess whether existing and previously allocated employment sites should be allocated in the plan, or if they can be released for other uses including housing. Some of these are brownfield sites.
Housing / Question 8 - How many new homes should we plan for each year	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,	Agreed. Plan should include policy on these matters. Viability study should consider the implications of standards on costs of different types of housing sites to assess the impact.
Housing / Question 8 - How many new homes should we plan for each year	<b>AFFORDABLE HOUSING NEED (AHN) AND AFFORDABLE HOUSING SUPPLY</b>	
Housing / Question 8 - How many new homes should we plan for each year	Include total affordable housing requirement in Local Plan policy	Agreed. Policy should specify the net affordable housing provision requirement for the plan period
Housing / Question 8 - How many new homes should we plan for each year	Plan should meet all Affordable Housing Need. Have mixture of house sizes and tenures	Agree in part. How AHN is to be met is for the LPA to consider when deciding <ul style="list-style-type: none"> <li>• if the housing provision policy target should be higher than the LHN standard method rate, in order to deliver the AHN level; and</li> </ul>



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		<ul style="list-style-type: none"> <li>what level of affordable housing provision should be proposed in policy. This is subject to evidence about viability and prospects of delivering the affordable housing</li> </ul> <p>PPG on HENA (#24) is clear that ‘An increase in the <b>total housing figures included in the plan</b> may need to be considered where it could help deliver the required number of affordable homes’.</p> <p>Meeting all 9,220 AHN forecast would require a very significant uplift in housing requirement to enable the affordable housing to be delivered – as Planning Obligations are expected to be the principal means of delivering affordable housing. The Council will consider whether forecast overall housing supply enables the scale of forecast Affordable Housing Need, as identified by the LHNA evidence, to be met in the plan period. It will also consider if there is robust evidence of any realistic prospect of other means to increase the potential to deliver affordable housing in the plan period</p>
<p>Housing / Question 8 - How many new homes should we plan for each year</p>	<p>Is the Affordable Housing Need (9,220) in the 2020 ORS report calculated correctly</p>	<p>Noted. The ORS study assesses affordable housing need consistent the relevant national planning policy and planning practice guidance. The AHN of 9,220 is for <b>all</b> affordable housing need. It includes those households who can afford to rent housing but aspire to affordable home ownership although they are</p>

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		unlikely to have the resources to be able to afford affordable homeownership products in the plan period.
Housing / Question 8 - How many new homes should we plan for each year	Need to retain affordable housing in perpetuity to avoid loss to market	Agree in part. Policy on affordable housing should include mechanisms to retain affordable housing in perpetuity, where the affordable housing is delivered through development.
Housing / Question 8 - How many new homes should we plan for each year	On site delivery of affordable housing is preferable (otherwise need off-site contributions)	Agree. Affordable housing policy should express the expectation of onsite affordable housing, and only exceptionally would contributions for off-site provision be appropriate.
Housing / Question 8 - How many new homes should we plan for each year	<p>Increase percentage of housing in a development that is affordable - preferably 30% plus</p> <p>Impact on viability from setting site affordable housing percentage too high</p> <p>Vary affordable housing minimum % on sites, by settlement type. Ensure it is adhered to</p>	<p>Agree in part. The affordable housing policy should set out the contributions expected from development ie specify the amount of affordable housing required, to be sought through planning obligations, on sites meeting qualifying criteria. NPPF makes clear that such policies should not undermine the deliverability of the plan. The overall plan viability study is to provide evidence to justify the percentage.</p> <p>The amount of affordable housing is higher on Rural Exception sites and First Homes Exception sites. Affordable housing is principally delivered through legal agreements and therefore subject to negotiation.</p>
Housing / Question 8 - How many new	Housing monitoring data needs to separate affordable housing supply achieved from development (256 last year) from other supply (64 last year)	Agree. Evidence about delivery needs to show how many affordable dwellings were delivered through the development management process. This, together

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homes should we plan for each year		with viability evidence and the percentage of affordable housing sought from qualifying sites will help to inform the forecast of affordable housing delivery from development. The evidence base will record how many affordable dwellings have been delivered through other mechanisms.
Housing / Question 8 - How many new homes should we plan for each year	Supporting Neighbourhood Plans/parishes' housing surveys is more effective in delivering affordable housing than higher Local Plan housing requirement	Disagree. Neighbourhood plans and parish surveys can help to add to the potential supply of affordable dwellings, including support for Exceptions sites. However, the main supply of affordable housing is still expected to be through planning obligations related to housing development on qualifying sites
Housing / Question 8 - How many new homes should we plan for each year	Define what is meant by affordable. Want more good quality social rented/Council housing -residents can't afford affordable rent	Noted. For plan-making purposes, the definition of affordable housing is as set in national planning policy (NPPF and the May 2021 Written Ministerial Statement on First Homes).
Housing / Question 8 - How many new homes should we plan for each year	Prioritise low cost housing for local people	Agree in part. Plan should include a 'local connection' test in affordable policy where this is not precluded by national policy, e.g.: on Rural Exceptions sites; or where national policy allows a local connection test (such as First Homes – but this is restricted to the first 3 months from when the affordable house is made available, after that it reverts back to the test set out in national policy)

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Housing / Question 8 - How many new homes should we plan for each year	Should small sites and self build count as affordable?	Disagree. Only count dwellings as 'affordable' if they meet the definition of affordable as set out in National planning policy. (NPPF and the May 2021 Written Ministerial Statement on First Homes).
Housing / Question 8 - How many new homes should we plan for each year	Make better use of existing homes/ council houses	Agree in part. The occupancy of the Council's housing stock and overall housing policy towards empty homes are issues for EDDC as a housing authority. Bringing long term empty homes back into use is a priority. Provided the empty home was last used for residential purpose (with planning permission or lawful) further planning approval should be unnecessary (approval may be needed eg for extensions). The Plan should consider whether having a local plan policy on empty homes is a reasonable alternative. At this time it should not be a preferred option.
Housing / Question 8 - How many new homes should we plan for each year	Impact of second homes/buy to let/holiday homes on house prices/affordability	The Council Plan identifies the need for a study about second homes in East Devon. There are some parts of the district where the proportion of second homes is higher. This study needs to establish whether there is evidence that would justify including a policy in the plan to limit the occupation of proposed housing development to principal use only. At this time, this is not a preferred policy approach, but the position may change when new evidence is available.

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Housing / Question 8 - How many new homes should we plan for each year	Impact of spatial strategy and the balance between small and large sites on ability to deliver sufficient affordable housing	Noted. Local Plan policy should set out both the site size thresholds, percentages and locations for seeking affordable housing. The percentages can be higher on Exceptions Sites. NPPF includes policy for 10% of the housing requirement to be met from sites no larger than 1 hectare (ie about 20 dwellings or less). But if sites fall below the threshold, then they would not contribute to affordable housing.
Housing / Question 9 - Sites for small scale housing developments	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.	Noted
Housing / Question 9 - Sites for small scale housing developments	<p>Need clarity on what counts towards 'small site' target</p> <p>Arbitrary % targets. Need evidence on past delivery. Enough builders &amp; sites?</p> <p>How will decision maker use policy/targets? Is policy realistic?</p>	<p>Noted. NPPF includes policy for 10% of the housing requirement to be met from sites no larger than 1 hectare (ie about 20 dwellings or less). All net completions in the plan period on sites below that threshold will count towards the small site target. The plan should set out the percentage target for small sites in policy. Evidence of past delivery on sites of this size will help to inform the assessment of whether the policy is deliverable.</p> <p>Policy target is used primarily to inform the plan-making process, including site selection for allocations, and to support other policies eg when used in combination with</p>

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		<ul style="list-style-type: none"> <li>• Exceptions sites policy to encourage small sites in appropriate locations</li> <li>• policy on subdivision and building conversions within settlement boundaries</li> <li>• policy on dwellings for rural workers</li> </ul>
Housing / Question 9 - Sites for small scale housing developments	Would approach lead to artificial, splitting up of large sites, so sites fall below policy thresholds and don't contribute to services/affordable housing Target could result in sites' artificial sub-division, losing quality/contributions	Small sites target is not intended to encourage artificial subdivision of larger sites, including where this would evade the affordable housing contribution. Policy should include a clause making clear that artificial subdivision of larger housing sites will not be supported.
Housing / Question 9 - Sites for small scale housing developments	Who decides site size - community/Council or developers/builders/owners?	Noted. Council determines local plan site allocations through the plan-making process which will be subject to consultation and testing at Examination. Development management process determines planning applications submitted by developers/builders, within the context of the development plan Agree. The local plan should propose a range of site sizes and types, at locations appropriate to the spatial strategy, including the settlement hierarchy
Housing / Question 9 - Sites for small scale housing developments	Community support for small sites/scale development for local need	Noted. The Local Plan should identify both the total housing provision requirement and the affordable housing provision requirement. Reliance on only small sites to deliver the total housing provision is likely to be unrealistic. Larger sites are needed to

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		enable the housing provision to be sufficient to meet identified needs.
Housing / Question 9 - Sites for small scale housing developments	Developer support for range of sites scale appropriate to settlement category	Noted. The local plan should propose a range of site sizes and types, at locations appropriate to the spatial strategy, including the settlement hierarchy.
Housing / Question 9 - Sites for small scale housing developments	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	Agree. The local plan should propose a range of site sizes and types, at locations appropriate to the spatial strategy, including the settlement hierarchy, and enable the housing provision requirement policy to be achieved.
Housing / Question 9 - Sites for small scale housing developments	Plan precedence- should Local Plan use Neighbourhood Plan policies on site scale?	Disagree. The tests of soundness require the LPA to justify the policies and proposals in the local plan, including strategic policy about the scale of housing provision requirement
Housing / Question 9 - Sites for small scale housing developments	Site size limit is too inflexible/generalised; impact of density varies by place	Agree in part. Sites sizes will vary. The plan should make provision for a range of site sizes and types. NPPF#69 proposes 10% of housing should be on smaller sites, but this can be varied if there is the plan's evidence base can provide strong reasons why the 10% target cannot be achieved. The plan should include a policy target for smaller sites, but this will be shaped by evidence about supply forecast to be delivered in the plan period, in order to achieve the housing provision requirement policy.

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		Density can also vary, but making efficient use of land is NPPF policy
Housing / Question 9 - Sites for small scale housing developments	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	Agree. Both the spatial strategy and the need to achieve the housing provision requirement in the plan period are determinants in the policy approach to site size. The plan should include a policy target for smaller sites, to provide a range of sites, which is supportive of SMEs
Housing / Question 9 - Sites for small scale housing developments	Most rural development is fairly small scale so small sites are very important	Agree. The spatial strategy should provide the overall approach to the distribution of development and the expectation that housing development at lower tier, rural settlements within the settlement hierarchy would not be as large as in the higher tiers.
Housing / Question 9 - Sites for small scale housing developments	Communities support more sustainable smaller sites with quality development - less disruptive; easier to absorb and into settlements. Does it aid village life, preserve identities?	Noted. The spatial strategy should set out the overall approach to distribution of development and the expectation that housing development at lower tier, rural settlements within the settlement hierarchy would not be as large as in the higher tiers. However, larger schemes are needed at the higher tier settlements, and in the new settlements in order to meet the housing provision requirement in the plan period.
Housing / Question 9 - Sites for small scale housing developments	Dispersing more development to smaller settlements and a wider area could encourage unsustainable, creeping/isolated development in the countryside	Agree. Spatial Strategy and local plan policies should make clear the policy towards the management of housing development in the countryside, as well as development within settlement boundaries. Impact of



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	Concerns over small sites' impact on AONB, and impact on tourism from loss of countryside/landscape quality due to wide dispersal of small sites	a dispersal option to be tested though Sustainability Assessment to identify impacts, so dispersal can be compared to other distribution options.
Housing / Question 9 - Sites for small scale housing developments	Comments address small site design and the impact on character and landscape. Small sites are opportunities for imaginative design/individuality relevant to rural areas.	Agree. Opportunity for SMEs, self-build and custom build to bring positive benefits for individual design. But there is still a need for larger scale development at the higher tier settlements, where it might be expected that volume house builders will focus their activity. Local Plan should include policy on high quality design which applies to all parts of the District.
Housing / Question 9 - Sites for small scale housing developments	Some people only want very small dwellings, that's all they can afford.	Noted. The plan should provide for a range of dwelling sizes as well as site sizes. The plan should include policy on space standards, to ensure that development delivers decent homes.
Housing / Question 9 - Sites for small scale housing developments	Concerns that small site shouldn't equate to a crammed site or cramped homes, nor encourage 'garden grabbing' infilling, nor cumulatively change settlement character.	Noted. The question asked related to small sites in terms of a threshold for the number of dwellings, rather than the sites being small and cramped. The plan should include policy about high quality design, including internal space standards, amenity for the occupiers and neighbours, and impact of uses
Housing / Question 9 - Sites for small scale housing developments	Issues about site delivery, risk and viability, including - Economies of scale on larger sites. Small sites are more expensive to deliver	Noted. The local plan should propose a range of site sizes and types, at locations appropriate to the spatial strategy, including the settlement hierarchy. The policy should propose a percentage target for housing to be delivered on smaller sites, and the overall plan viability

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		study will need to test the options for the percentage target.
Housing / Question 9 - Sites for small scale housing developments	Issues about site delivery, risk and viability, including - 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	Agree in part. The local plan should propose a range of site sizes and types, at locations appropriate to the spatial strategy, including the settlement hierarchy. Larger sites are needed if the housing provision requirement policy is to be achieved. Local Plan policy should propose a percentage target for housing to be delivered on smaller sites, and the overall plan viability study will need to test the options for the percentage target.
Housing / Question 9 - Sites for small scale housing developments	Will a small site deliver affordable housing? Thresholds apply; too many small sites reduces the total amount of affordable housing achieved by development	Agree in part. Some small sites would be the threshold for seeking affordable housing contributions. So - necessary to have sufficient sites above the threshold to achieve the amount of affordable housing provision requirement to be proposed in policy
Housing / Question 9 - Sites for small scale housing developments	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	Agree. Local Plan should include policy towards self-build and custom build. There will also be opportunities within site allocations, and windfalls including Rural Exception sites
Housing / Question 10 - Planning for housing	Range of reasons for building a range of homes that can accommodate different life stage or health circumstances. We asked what approach	Noted

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for people at all stages of their life	we should take to encourage this, or is it not something the local plan should deal with. 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.	
Housing / Question 10 - Planning for housing for people at all stages of their life	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.	Noted. To provide clarity and certainty, the Plan should set out policy on mix of housing, disaggregated by tenure and size.
Housing / Question 10 - Planning for housing for people at all stages of their life	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	Disagree. To provide clarity and certainty, the Plan should set out policy on mix of housing, disaggregated by tenure and size. Policy focuses on housing provision requirement and the suite of housing policies to meet needs. It should include a policy towards market housing mix.
Housing / Question 10 - Planning for housing for people at all stages of their life	Is there evidence 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?	Noted. LHNA provides evidence housing needs of different groups, with forecasts over the plan period, taking into account forecast changes in household types. It does not try to predict the needs of individual people or households
Housing / Question 10 - Planning for housing for people at all stages of their life	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	Noted. Plan making requires the production of a local housing needs assessment, to consider the range of housing needs over the plan period. The use of robust evidence to inform the local plan preparation will be

Chapter / Topic / Qu	Summary of main issues	Officer response
	using local input for plan making. Local Plan should take account of and not supersede Neighbourhood Plans' policies on meeting need.	tested at Examination. The strategic local plan policies on meeting housing need will not be superseded by Neighbourhood plan policies. Local evidence is particularly helpful when considering planning applications, or in support eg of Rural Exceptions sites.
Housing / Question 10 - Planning for housing for people at all stages of their life	Advocate prioritising the needs of specific groups - focus e.g. on needs of young people, newly forming households and young families: Housing for young people should be first priority. 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 Young people leave if no suitable units are available. Focus on affordable housing so they remain in the area	Noted. The plan should include policies to support meeting housing needs, including those of young people, newly forming households and young families. This includes the affordable housing policy, the target for first homes, and policy on Rural Exceptions and First Homes Exceptions sites
Housing / Question 10 - Planning for housing for people at all stages of their life	Advocate prioritising the needs of specific groups - focus e.g. on needs of young people, newly forming households and young families: Limit trend for extending housing; smaller properties keep being lost to the market	Agree that the plan should include policies to support meeting housing needs, including the need for smaller dwellings (subject to the LHNA evidence). The plan should include policy regarding extensions and alterations, mindful of the potential impact of cumulative extensions leading to a potential reduction in the amount of smaller properties in the District
Housing / Question 10 - Planning for housing for people at all stages of their life	Advocate prioritising the needs of specific groups - focus e.g. on needs of young people, newly forming households and young families: Focus more on the needs of younger economically active people	Agree that the plan should include policies to support meeting housing needs, including the need for younger economically active people. This include the affordable housing policy, the target for first homes, and policy on Rural Exceptions and First Homes Exceptions sites, as well as market housing mix

Chapter / Topic / Qu	Summary of main issues	Officer response
<p>Housing / Question 10 - Planning for housing for people at all stages of their life</p>	<p>Advocate prioritising the needs of specific groups 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 There is an ageing population. Older people don't all have the same needs but want choice through 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</p>	<p>Agree that the plan should include policies to support meeting housing needs, including housing for older people, both Use Class C3 general housing and C2 Specialist housing. There should also be policy towards accessible and adaptable housing which is expected to overlap with the need for housing for older people, and policy on high quality design.</p> <p>The plan should also include policy on annexes to enable greater flexibility in housing to adapt to changing needs of households over time</p>
<p>Housing / Question 10 - Planning for housing for people at all stages of their life</p>	<p>Link the types of housing need to spatial strategy - Build more homes for young people/families/economically active near Exeter</p>	<p>Agree in part. The plan should include policies to support meeting housing needs, including housing that meets needs for young people/families/economically active. Spatial strategy proposes settlement hierarchy including new settlement, and housing and mixed use on the Western side of the District.</p>
<p>Housing / Question 10 - Planning for housing for people at all stages of their life</p>	<p>Link the types of housing need to spatial strategy - Need housing in Cranbrook suited to older people</p>	<p>Agree, new settlements should provide a mix of housing to meet a range of housing needs The Cranbrook DPD, now at an advanced stage of preparation provides the principal development plan policies for the Cranbrook area.</p>
<p>Housing / Question 10 - Planning for housing</p>	<p>Link the types of housing need to spatial strategy - Require site allocations to make housing provision for people at all life stages. Mixed housing/communities are better for health/well-being/mutual support</p>	<p>Agree in part. The plan policies on meeting housing need and mix apply across the District. But no need to</p>

Chapter / Topic / Qu	Summary of main issues	Officer response
for people at all stages of their life		duplicate the generic housing policy in each site allocation policy .
Housing / Question 10 - Planning for housing for people at all stages of their life	Link the types of housing need to spatial strategy - More terraced housing, suited to all stages of life; Appropriate infilling allows downsizing	Noted. The local plan should include policies to provide for a mix of housing to meet needs, with a range of house types, appropriate to the locality. .
Housing / Question 10 - Planning for housing for people at all stages of their life	Link the types of housing need to spatial strategy - Need for mobility/wheelchair access highlighted; how can market housing deliver?	Agree. Local plan should include policy on accessible and adaptable housing and on wheelchair user dwellings. Sustainability Appraisal can test options for the site size thresholds to be applied for this policy.
Housing / Question 10 - Planning for housing for people at all stages of their life	Comments focusing 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.	Noted. Policy requirements and contributions sought will be tested through the overall plan viability assessment, to demonstrate that the plan is deliverable
Housing / Question 10 - Planning for housing for people at all stages of their life	Comments focusing on delivery. 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	Disagree, policy needs to provide more certainty about requirements relating to mix and tenure, so that needs can be met.
Housing / Question 11 - Additional housing policy objectives	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	Noted

Chapter / Topic / Qu	Summary of main issues	Officer response
	<p>Plan housing policy. There is some overlap with other policy areas, notably design, climate emergency, jobs/economy, and natural environment</p> <p><b>See the following for suggestions for other major housing policy areas</b></p>	
<p>Housing / Question 11 - Additional housing policy objectives</p>	<p>Delivering high quality housing; principles of Building Better; Building Beautiful</p>	<p>Noted. Policy should be included on high quality design. Not necessary to duplicate this in the housing policies.</p>
<p>Housing / Question 11 - Additional housing policy objectives</p>	<p>Delivering decent homes with an emphasis on adequate internal space and external amenity space, reducing costs of heating and maintenance, resilient to climate change</p>	<p>Noted. Strategic policy on meeting housing needs should refer to delivering decent homes. Policy should be included on high quality design, addressing internal space standards.</p>
<p>Housing / Question 11 - Additional housing policy objectives</p>	<p>Delivering carbon neutral housing</p>	<p>Noted. Policy should be include relating to Climate change and carbon emissions. Not necessary to duplicate this in the housing policies.</p>
<p>Housing / Question 11 - Additional housing policy objectives</p>	<p>incorporating habitats and biodiversity net gain into housing and housing development</p>	<p>Noted. Policy should be include relating to habitats and biodiversity net gain. Not necessary to duplicate this in the housing policies.</p>
<p>Housing / Question 11 - Additional housing policy objectives</p>	<p>Housing design - traditional or modern? Use of local materials in housing developments, sympathetic to the local area</p>	<p>Noted. Policy should be included on high quality design, which includes both traditional and modern design.</p>

Chapter / Topic / Qu	Summary of main issues	Officer response
Housing / Question 11 - Additional housing policy objectives	Use of modern methods of construction to deliver housing	Noted. Modern methods of construction could be used on a wide range of sites. Policy should not preclude the use of MMC
Housing / Question 11 - Additional housing policy objectives	Ensuring affordable housing is integrated with other homes in a site	Noted The affordable housing policy should make clear that sites including affordable housing should be tenure blind, to ensure that affordable housing is integrated with other homes on the sites
Housing / Question 11 - Additional housing policy objectives	Designing out crime and the fear of crime in housing development	Noted. Policy on high quality design should include safe and secure development, including designing out crime and the fear of crime. Not necessary to duplicate this in the housing policies.
Housing / Question 11 - Additional housing policy objectives	Live-work units (as well as space for homeworking and need for broadband)	Noted. Live work units could be developed on a wide range of sites. Policy should not preclude the this type of development.
Housing / Question 11 - Additional housing policy objectives	Housing enlargement - extensions; use of annexes / functional links to the principal dwelling	Noted. The plan should include policy on extensions and alterations, to manage the impact of enlargement as well as providing for choice and flexibility. It should also include policy on annexes, include the need for annexes to be subordinate and ancillary to the principal dwelling and for there to be functional links between the annexe and the principal dwelling
Housing / Question 11 - Additional housing policy objectives	Addressing the issue of second homes, for example through <ul style="list-style-type: none"> <li>• A principal residence policy in Local Plan to apply across the whole District; or in specific localities</li> </ul>	Noted. The Council Plan identifies the need for a study about second homes in East Devon. There are some parts of the district where the proportion of



Chapter / Topic / Qu	Summary of main issues	Officer response
	<ul style="list-style-type: none"> <li>A policy in the Local Plan for Neighbourhood Plans to contain specific policies on second home ownership</li> </ul>	<p>second homes is higher. This study needs to establish whether there is evidence that would justify including a policy in the plan to limit the occupation of proposed housing development to principal use only. At this time, this is not a preferred policy approach, but the position may change when new evidence is available. Likewise, Neighbourhood Plans can include policy on Principal Residence if the evidence justifies this. It is not necessary to require Neighbourhood Plans to contain specific policy on this issue.</p>
<p>Housing / Question 11 - Additional housing policy objectives</p>	<p>Integrating housing development with adjacent developments and land uses Residential amenity (existing and proposed housing)</p>	<p>Noted – Policy towards residential amenity should be set out in policy on high quality design, as well as policy on annexes/extensions and alterations; residential subdivision, and also mixed use/and employment development</p>
<p>Housing / Question 11 - Additional housing policy objectives</p>	<p>Avoidance of too many houses resulting in town/village cramming</p>	<p>Noted. The spatial strategy should address the issue of the increase in the amount of housing at settlements. Policy towards annexes/extensions and alterations; residential subdivision, and replacement dwellings also should include clauses regarding the impact on the character of the area.</p>
<p>Housing / Question 11 - Additional housing policy objectives</p>	<p>Access to facilities and services and broadband in or from housing development</p>	<p>Noted. The spatial strategy should address the issue of the need for access to facilities and services, in the context of settlement self containments. Not necessary to duplicate this in the housing policies.</p>

Chapter / Topic / Qu	Summary of main issues	Officer response
Housing / Question 11 - Additional housing policy objectives	Co-living in large social houses	Noted . Plan should include policy towards subdivision and co living accommodation
Housing / Question 11 - Additional housing policy objectives	Houses in multiple occupation	Noted – plan should include policy towards HMOs and hostels, as this raises some issues additional to those from subdivision of residential dwellings and buildings

## Supporting jobs and the economy

Chapter / Topic / Qu	Summary of main issues	Officer response
Economy / 12/ Summary	<p>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.</p> <p>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.</p> <p>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.</p>	<p>The expectation that homeworking will continue in future, and the potential policy implications, are noted as are the other responses.</p>
Economy / 12/ General	<p>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.</p>	<p>This approach is fundamental to achieving the aims of the Plan. The distribution strategy and policies to reduce carbon, improve energy efficiency, provide adequate infrastructure in a timely manner and improve/enhance the environment and biodiversity are all matters addressed through proposed policies.</p>
Economy / 12/ General	<p>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</p>	<p>This will be achieved through a number of interrelated policies. Space standards for residential houses will incorporate some homeworking space.</p>

<b>Chapter / Topic / Qu</b>	<b>Summary of main issues</b>	<b>Officer response</b>
Economy / 12/ General	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.	An economic needs assessment is being undertaken to establish the likely future employment needs of the District.
Economy / 12/ General	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	Noted but this may be beyond the scope of the Plan. Sites are being allocated for high value uses and Employment and skills statements will be required on major development schemes.
Economy / 12/ General	Office spaces/hubs should be located close to public transport and shared, no longer a need for lots of office space for individual businesses	It is likely that this will be the case. A needs assessment is currently being undertaken to establish the level and type of employment land that is required.
Economy / 12/ General	Promote sites for technology and green business/industries	A number of major sites in the West End will be allocated for these purposes including land south of the airport, land south of the Science Park and tourism and other policies.
Economy / 12/ General	Landscape/countryside should be protected to increase investment in tourism	There are a number of protective policies in the Landscape chapter of the plan that will achieve this. The sustainable tourism policy will ensure that tourism protects, enhances and capitalises upon the natural environment.
Economy / 12/ General	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.	This is noted. A needs assessment is being undertaken to establish the level and type of employment land that is needed across the District.

Chapter / Topic / Qu	Summary of main issues	Officer response
		Where long-standing allocations have not been developed we need to understand why and either address the issues or delete the allocations
Economy / 12/ General	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	Noted
Economy / 12/ General	Interrelationship with the development within the city boundaries – competition for these jobs with Exeter residents	Noted. We are working with Exeter City Council to ensure sufficient provision is made across the area. This matter will be addressed through the Duty to Cooperate statement of common ground.
Economy / 12/ General	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.	This is addressed through the West End policies. As the Plan covers a 19 year period, additional employment will be allocated in this area for science park expansion and the transformational sector
Economy / 12/ General	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	Noted. A full review of existing employment land will be carried out and any new site allocations will be based on a needs assessment.
Economy / 12/ General	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.	This is a key objective and will be delivered through policy and based on a needs assessment.

<b>Chapter / Topic / Qu</b>	<b>Summary of main issues</b>	<b>Officer response</b>
Economy / 12/ General	Town centres should focus on retail and services with housing above. Resist change of use	The town centre policies reflect this ambition.
Economy / 12/ General	Small, cheap workshops/storage units are needed in towns and villages, ideal for start ups	This is a policy objective. A needs assessment is currently being undertaken to establish the scale and type of development that is needed.
Economy / 12/ General	Access and infrastructure constrain rural development- focus on small, local provision	Policy will take these issues into account. Development will be at a scale to reflect the location and local infrastructure.
Differing jobs sectors / 13 / Summary	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.	These responses are noted.
Differing jobs sectors / 13 / General	More jobs would only attract more people to the area rather than help local residents	The aim of policy is to provide a wide range of jobs and increase average wages and training opportunities. These will benefit existing residents as well as those moving to the District.
Differing jobs sectors / 13 / General	Diversity in the job market will deliver better resilience	Noted

<b>Chapter / Topic / Qu</b>	<b>Summary of main issues</b>	<b>Officer response</b>
Differing jobs sectors / 13 / General	A good mixture of jobs is needed – not just tourism, care and agriculture	Land will be allocated specifically for business, offices and industrial uses, based on a needs assessment. Planning policy will aim to deliver a wide range of employment types.
Differing jobs sectors / 13 / General	How homeworking will continue to be the norm for many post-Covid, and that this will have a positive impact on climate change	Provision of home working space will be incorporated into the space standards for new houses. An economic needs assessment is being undertaken to ascertain how much land is needed for employment in the District and this will take account of recent changes in working behaviour.
Differing jobs sectors / 13 / General	To attract more high-tech employers we need far better internet connectivity across the district	Noted
Differing jobs sectors / 13 / General	Environmental and sustainability consideration should be key when promoting any form of employment, with the promotion of more green initiatives	The plan will address this in a number of ways. In summary, settlement will be more self-contained, reducing the need to travel, buildings will be constructed to higher environmental standards, and a net-zero carbon target will be pursued.
Differing jobs sectors / 13 / General	People need jobs that offer an income that allows living in East Devon to be affordable	Increased wages are a key policy aim
Differing jobs sectors / 13 / General	Small and medium sized businesses should be the future – not large employers – and that adequate provision should be made for new SMEs	Land will be allocated for all scales of business based on an Economic Demand Needs Analysis.

<b>Chapter / Topic / Qu</b>	<b>Summary of main issues</b>	<b>Officer response</b>
Differing jobs sectors / 13 / General	Employers should be encouraged to offer apprenticeship and training programmes	Noted, but this may be beyond the scope of the Plan. Developers of major sites will be required to produce Employment and Skills Statements committing to investing in the local workforce.
Differing jobs sectors / 13 / General	Major employment projects should be located in the West End (east of Exeter)	This is the intention of policy, combined with policies to encourage settlement self-containment in the rest of the District
Differing jobs sectors / 13 / General	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.	Noted, but this may be beyond the scope of the Plan
Differing jobs sectors / 13 / General	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’.	Noted, but this may be beyond the scope of the Plan. Policy will support the establishment of rural shops selling locally sourced produce.
Additional economic policy objectives / 14 / Summary	<p>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.</p> <p>Although most respondents (76%) ticked the yes box, a number did suggest other objectives as well as some people ticking the no box.</p>	The support is welcomed.



<b>Chapter / Topic / Qu</b>	<b>Summary of main issues</b>	<b>Officer response</b>
Additional economic policy objectives / 14 / General	A policy on the regeneration of sites for mixed development	This will be addressed through policy
Additional economic policy objectives / 14 / General	A more radical approach to providing accessible quality training/ 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	Noted, but this may be beyond the scope of the Plan. An employment and skills statement will be required on larger sites, committing the developer to employing local staff and investing in skills and training.
Additional economic policy objectives / 14 / General	An objective to build self-sustaining communities for a diverse range of people	This will be a key aim of the Plan
Additional economic policy objectives / 14 / General	Support for shared workspaces that can provide more affordable premises/overheads, as well as provide support through social networks	Provision of such spaces will be supported through policy. In practice, shared spaces are an operational matter.
Additional economic policy objectives / 14 / General	Support the provision of new/additional B8 (storage/distribution) sites for small and medium sized enterprises across the district	This will be addressed through policy
Additional economic policy objectives / 14 / General	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.	Noted, this will depend on wider factors such as location, scale and accessibility

<b>Chapter / Topic / Qu</b>	<b>Summary of main issues</b>	<b>Officer response</b>
Additional economic policy objectives / 14 / General	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.	Noted, however new site allocations will be based on evidence of need/demand for employment, making it harder to argue that the land is no longer required. The plan will make provision for sites to cover shortfalls.
Additional economic policy objectives / 14 / General	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.	This is the approach favoured by policy.
Additional economic policy objectives / 14 / General	Economic policies should balance the health and well-being needs of the community and that GDP “is not a measure of happiness”	The policy approach is to concentrate employment close to homes and plan for a range of jobs. Increasing average wages (particularly for those in low paid, insecure jobs) will contribute to workers wellbeing and quality of life. It is agreed that there are differing potential alternatives to our employment strategy and that GDP is not the only measure.
Additional economic policy objectives / 14 / General	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	Noted, however employment allocations will account for a very small % of the land available in East Devon, and will be concentrated at existing settlements.

<b>Chapter / Topic / Qu</b>	<b>Summary of main issues</b>	<b>Officer response</b>
		Brownfield sites will be developed in preference to greenfield sites where this is appropriate and viable.
Additional economic policy objectives / 14 / General	That we need “employment nearer to homes not homes nearer to employment”	The policy approach is to provide homes and jobs together
Additional economic policy objectives / 14 / General	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.	The allocations will be based on evidence of need/demand for employment, making it harder to argue that the land is no longer required

## Promoting vibrant town centres

Chapter / Topic / Qu	Summary of main issues	Officer response
Town Centres / 15 / Summary	<p>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.</p> <p>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.</p> <p>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.</p>	The responses are noted and will inform Town Centre policy.
Town Centres / 15 / General	The objective should be to build self sustaining communities for a diverse range of people/ retaining community cohesion and high footfall	This will be a key policy aim
Town Centres / 15 / General	Service industries and cafes should be encouraged to improve vitality. If these can be established above shops that would double the footfall	These are uses which are encouraged in town centre policy.
Town Centres / 15 / General	A strong focus on heritage, culture and the arts to make each town centre special	This is an objective of the town centre and built heritage policies.

Chapter / Topic / Qu	Summary of main issues	Officer response
Town Centres / 15 / General	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	Noted. Policy encourages such uses but the temporary nature and 'on street' location means that the actual events are beyond the scope of the local plan.
Town Centres / 15 / General	Uses at first floor and above should be strongly encouraged- Gyms and leisure uses, housing and community use	This will be a key policy aim
Town Centres / 15 / General	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.	This will be a key policy aim
Town Centres / 15 / General	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.	Noted
Town Centres / 15 / General	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.	Noted. The town centre and primary shopping frontage policies aim to encourage and retain retail uses.
Town Centres / 15 / General	Greater pedestrianisation (day-time car free streets) and more convenient public transport	Traffic management is a County Highways matter but policy can support greater pedestrianisation and improved access to public transport through the strategic and design policies of the plan, by directing development to those settlements best served by

Chapter / Topic / Qu	Summary of main issues	Officer response
		public transport and by making layouts accessible and convenient to walkers.
Town Centres / 15 / General	Cheaper business rates, car parking and affordable space for community groups and arts	This is beyond the scope of the local plan
Town Centres / 15 / General	Promote shared community use- for sports/gyms but also education/culture/spiritual uses	Policy will require this
Town Centres / 15 / General	Potential for seaside towns to be redeveloped, prioritise removing existing eyesores and establish a coherent character for new development	This will be addressed through the local plan town-specific chapters and design policies
Town Centres / 15 / General	Rural settlements should not lose existing retail and community facilities.	Policy will resist the loss of existing facilities in these settlements and encourage provision of new/additional facilities.
Town Centres / 15 / General	Need to accept that private cars are inevitable in rural areas	Noted. Policy intent is to reduce the need to travel and the impact of private vehicles through a combination of settlement self-containment, directing new development to the most sustainable locations, encouraging walking, cycling and public transport and requiring provision for electric vehicles.
Town Centres / 15 / General	Policy should be flexible so that it can quickly respond to changing circumstances	Policy is intended to be flexible and responsive.

Chapter / Topic / Qu	Summary of main issues	Officer response
Additional town centre policy objectives / 16 / Summary	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.	Support for the suggested additional policy areas is welcomed.
Additional town centre policy objectives / 16 / General	Different responses are needed for each town centre. These should be produced in consultation with the local community and neighbourhood plans.	It is envisaged that the Plan will include town-specific chapters, with policies informed by consultation and NP's (as well as other evidence)
Additional town centre policy objectives / 16 / General	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	It is envisaged that a sequential approach will be taken, with town centre locations being preferred to out of town locations. Parking charges are not within the control of the local plan
Additional town centre policy objectives / 16 / General	Make centres pedestrian and public transport friendly. Make car parking cheap or free.	The local plan will promote sustainable methods of transport and design/layouts which facilitate public transport, cycling and walking. Parking charges are not within the control of the local plan
Additional town centre policy objectives / 16 / General	Offer a town wide online presence so small retailers can offer goods online and share costs	This is a town management matter and is outside the scope of the local plan
Additional town centre policy objectives / 16 / General	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)	This is a town management matter and is outside the scope of the local plan

Chapter / Topic / Qu	Summary of main issues	Officer response
Additional town centre policy objectives / 16 / General	Redevelop out of town shopping areas as housing (especially sheltered housing)	It is intended that retail uses on employment sites would revert to employment uses if retail is no longer viable. Permitted development rights (depending on size and location) may allow retail units to be converted into houses without permission in some cases.
Additional town centre policy objectives / 16 / General	Accept out of town retailing and improve access to it and the shopper experience. Encourage linked trips to town centres.	A sequential approach will be taken, with town centre locations being preferred to out of town locations.
Additional town centre policy objectives / 16 / General	Make town centres social spaces and focus on the shopper experience	It is envisaged that this will be a key aim of town centre policy



## Designing beautiful and healthy spaces and buildings

Chapter / Topic / Qu	Summary of main issues	Officer response
<p>Question 17 - Designing beautiful spaces and buildings</p>	<p>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.</p> <p>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.</p> <p>Several respondents emphasised the importance of flexibility in design codes, although some thought that developers were likely to ignore them.</p> <p>A significant number of responses favoured more general guidance rather than design codes.</p> <p>The importance of green and open spaces that incorporate existing features was raised by many of the respondents, often linked to increasing habitat/biodiversity.</p> <p>Some respondents favoured function, sustainability and affordability ahead of beauty.</p> <p>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’.</p>	<p>We recognise that beauty is subjective, but the National Design Guide shows how well designed places can be achieved.</p> <p>Design codes are best when applied to a specific site and should be flexible enough to encourage innovation.</p> <p>The local plan can include a policy that sets out general design considerations. We considered producing an East Devon Design Guide, but this was not pursued following the publication of the national design guide (although we do have a <a href="#">Householder Design Guide</a>).</p> <p>Good design will incorporate the provision of open space and opportunities to improve biodiversity.</p> <p>Good design should help to achieve functional, sustainable and affordable development.</p> <p>Design guidance can promote innovative design, where it complements its setting.</p>

Chapter / Topic / Qu	Summary of main issues	Officer response
<p>Question 18 - Additional design policy objectives</p>	<p>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.</p> <p>Other objectives put forward included:</p> <ul style="list-style-type: none"> <li>• Safe buildings;</li> <li>• Building for life;</li> <li>• Design refuse bins into all new builds;</li> <li>• Joined up rights of way/exercise routes;</li> <li>• Climate and biodiversity;</li> <li>• Green infrastructure;</li> <li>• Secure cycle storage;</li> <li>• Protect from light pollution; and</li> <li>• Allotments.</li> </ul>	<p>It is encouraging that there was strong support for incorporating wildlife friendly elements into development and additional support for sustainable features. These issues will be considered in the appropriate sections of the plan (for example sustainable urban drainage systems fits best with the flooding related issues).</p> <p>It is more difficult to write a policy for innovative design because this is more subjective and divides opinion, as seen in the consultation responses. This may be an area where the local plan needs to allow a more flexible approach so that innovative design can be supported where an individual scheme can be shown to be appropriate for its setting.</p> <p>The other objectives will be considered in the relevant section of the draft plan and possibly through supplementary planning guidance.</p>

## Our outstanding built heritage

Chapter / Topic / Qu	Summary of main issues	Officer response
<p>Conserving and Enhancing Built Heritage/ 19 / Summary</p>	<p>78.6% of respondents said that it is either essential or very important to conserve heritage assets.</p> <p>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.</p>	<p>The overwhelming support for conserving heritage assets is welcomed. The desire to take a flexible approach towards the ‘modernisation’ of heritage assets is reflected in Policy to some extent (non-intrusive environmental measures may be acceptable, for example) however the fundamental policy intent will continue to be one of preserving and conserving the historic fabric of heritage assets in line with legislation and government guidance.</p>
<p>Conserving and Enhancing Built Heritage/ 19 / General Points made by Historic England</p>	<p>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:</p> <ul style="list-style-type: none"> <li>• The holistic nature of the historic environment and links with other issues, including talking climate change;</li> <li>• The importance of all heritage assets, which affects the wording of objective 7 and the approach to historic environment strategy;</li> <li>• 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;</li> <li>• The need for a heritage topic paper and positive strategy for the historic environment to consider: <ul style="list-style-type: none"> <li>o The current state of East Devon’s historic environment;</li> <li>o Key issues in terms of understanding, conserving, enhancing and enjoying East</li> </ul> </li> </ul>	<p>Historic England’s comments are noted and a topic paper addressing the issues raised will be produced.</p>

Chapter / Topic / Qu	Summary of main issues	Officer response
	<ul style="list-style-type: none"> <li>o Devon’s historic environment as well as the wider benefits this brings including for local character and distinctiveness;</li> <li>o How effective the adopted local plan has performed in relation to these issues,</li> <li>o 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</li> <li>o How the new local plan intends to positively respond to these matters.</li> </ul>	

## Our outstanding natural environment

Chapter / Topic / Qu	Summary of main issues	Officer response
Natural Environment / Landscape / 20	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.	Overview of responses is noted.
Natural Environment / Landscape / 20	Neighbourhood Plans need to be taken into account	Once made, NP's form part of the development plan so must be taken into account
Natural Environment / Landscape / 20	We need to maintain green spaces in and around villages	Noted
Natural Environment / Landscape / 20	East Devon should look into national park designation	This is being considered but is beyond the scope of the Local Plan
Natural Environment / Landscape / 20	Brownfield sites should be considered before greenfield	In line with national guidance it is our preference to prioritise brownfield sites where viable/appropriate
Natural Environment / Landscape / 20	AONB boundaries are often arbitrarily drawn and there should be a more nuanced test as to whether development is appropriate.	AONB boundaries were designated by Government and are not in our power to amend. NPPF resists

Chapter / Topic / Qu	Summary of main issues	Officer response
		major development within AONBs but some smaller scale development may be appropriate.
Natural Environment / Question 21 - Net gains in biodiversity	<p>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.</p> <p>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:</p>	Policy is included in the working draft plan on biodiversity net gain.
Natural Environment / Question 21 - Net gains in biodiversity	Protection of existing biodiversity should be considered first and foremost	Agree that we want to avoid existing biodiverse areas and this is something that
Natural Environment / Question 21 - Net gains in biodiversity	Need to work with landowners and farmers.	Landowners and farmer will be a key stakeholder in delivery of biodiversity net-gain.
Natural Environment / Question 21 - Net gains in biodiversity	Biodiversity gain should be legally enforceable	The Government minimum 10% net-gain is proposed to become a legally enforceable requirement. Any policy we adopt will also hold legal weight in decision making.

Chapter / Topic / Qu	Summary of main issues	Officer response
Natural Environment / Question 21 - Net gains in biodiversity	Existing trees need to be protected from development	Tree preservation orders are already a strong mechanism to protect trees from felling. Trees will also form a key consideration in site assessment work.
Natural Environment / Question 21 - Net gains in biodiversity	You can't put a cost on wildlife	Agreed. Whilst the proposed policy does not put a financial cost on wildlife, in order to understand potential losses and gains some system of measurement needs to be deployed. Although somewhat crude, the biodiversity metric will likely achieve much more accurate and effective biodiversity outcomes from development than at present.
Natural Environment / Question 21 - Net gains in biodiversity	Need to spread biodiversity around the district and not focus on one particular area.	Agreed, we will likely require net-gain to be achieved as near to where it is lost as possible.
Natural Environment / Question 21 - Net gains in biodiversity	Plan could also explore opportunities created through green financing	Agreed, this is something that will be explored through net-gain.
Natural Environment / Question 22 – Additional objectives	All new homes should be built with nesting boxes for migrating birds.	We have including this within plan policy
Natural Environment / Question 22 – Additional objectives	Should incorporate wildlife corridors between wild areas including a green bridge over major roads like the A30.	Wildlife corridors will be included. We will be exploring the idea of a green bridge over the A30.
Natural Environment / Question 22 – Additional objectives	Need to include SUDS	SUDS have been included within plan policy

Chapter / Topic / Qu	Summary of main issues	Officer response
Natural Environment / Question 22 – Additional objectives	Should support 25% tree cover	At this stage the plan does not plan or state a proposed tree coverage figure and it is unclear if or how this could be enforced or required through plan policy. However, in principle the plan would accommodate extra tree planting.
Natural Environment / Question 22 – Additional objectives	Nature Recovery Networks will be key to identifying opportunities	Agreed, these have been referred to in net-gain policy and supporting text.
Natural Environment / Question 22 – Additional objectives	Need to consider water quality and rivers	Agreed, this is referred to in policy.
Natural Environment / Question 22 – Additional objectives	Clyst Valley Regional Park will be critical achieving biodiversity objectives	Agree, it is likely this will become a key focus for biodiversity improvements.
Natural Environment / Question 22 – Additional objectives	Expand Cranbrook County Park	The expansion of Cranbrook and its open space provision has largely been dealt with through the Cranbrook Plan.
Natural Environment / Question 22 – Additional objectives	Urban green spaces should be wilder and less manicured.	Significant emphasis is currently being placed on rewilding through both the maintenance of land under the Councils ownership and a review being undertaken identifying future opportunities for rewilding.



Chapter / Topic / Qu	Summary of main issues	Officer response
Natural Environment / Question 22 – Additional objectives	Need to integrate wildlife within new development better.	Agree, this forms part of proposed policy
Natural Environment / Question 22 – Additional objectives	Need to protect existing trees and hedgerows better.	Tree preservation orders are already a strong mechanism to protect trees from felling. Trees and hedgerows will also form a key consideration in site assessment work and we will seek to retain as much as feasibly possible.
Natural Environment / Question 22 – Additional objectives	Green wedge policy needs to be reviewed.	A review is being undertaken
Natural Environment / Question 22 – Additional objectives	Should include timescales for delivery.	This will need to be demonstrated in any planning application.
Natural Environment / Question 22 – Additional objectives	Should mention the south marine plan.	This will be considered in plan production.
Natural Environment / Question 22 – Additional objectives	Create more valley parks and nature reserves and deliver benefits in those areas.	The options will be considered when we formulate a plan for delivery of biodiversity net-gain.
Natural Environment / Question 22 – Additional objectives	Local Plan needs to take a key role in designating and protecting biodiversity areas.	Local Plan will provide some protection for these areas through policy, although designation of biodiversity areas is usually done at County or National level.

Chapter / Topic / Qu	Summary of main issues	Officer response
Natural Environment / Question 22 – Additional objectives	Concern that if a minimum is set this will only ever be what's provided.	Agree, although experience elsewhere does indicate that a minimum target is often exceeded.
Natural Environment / Question 22 – Additional objectives	Pollution in rivers including the Yarty must be tackled	This will be covered in policy.

## Promoting sustainable transport

Chapter / Qu / Topic	Summary of main issues	Officer response
Transport / 23 / General	Support sustainable transport.	Agree – this is something the Local Plan should achieve.
Transport / 23 / General	Guide new development to locations that can be served by a choice of transport modes.	Agree – we should promote walking, cycling and public transport, whilst recognising that opportunities to maximise sustainable transport solutions will vary between rural and urban areas (NPPF 104c, 105).
Transport / 23 / General	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.	East Devon is a largely rural district but there are some larger settlements which can be described as “urban” with access to a range of sustainable transport. Opportunities to maximise sustainable transport will vary, but promoting walking, cycling and public transport should be pursued (NPPF, 104c).
Transport / 23 / General	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.	Noted – the cited document will inform the Local Plan.
Transport / 23 / General	The rise of internet activity reduces the importance of travel.	The rise of the internet has certainly reduced the need to travel. Nevertheless, the Local Plan should support an appropriate mix of uses to minimise travel for work, shopping, leisure, education, and other activities (NPPF 106a).
Transport / 23 / General	Should also consider wheelchair usage.	Agree – national policy makes clear that planning applications should address the needs of people with

Chapter / Qu / Topic	Summary of main issues	Officer response
		disabilities and reduced mobility in relation to all transport modes (NPPF 112b).
Transport / 23 / General	Employment opportunities should be provided alongside new housing, preferably within a specified radius e.g. one mile.	Whilst we should minimise journeys needed for employment by having a mix of housing and employment across the district, and within larger scale sites, it is considered too prescriptive to specify a radius.
Transport / 23 / General	Question is worded very subjectively and not quantified – what is “easy” for one resident is not for another.	Whilst “easy” is an appropriate term to use at this early stage in plan-making, further work is required on how to promote walking and cycling. Issues and Options paragraph 11.6 references guidance which states a reasonable walking distance (800m) and cycling distance (5km).
Transport / 23 / General	Ensure sustainable transport infrastructure is resilient to flooding and coastal change.	Noted – this should be addressed in policies on flood risk and climate change.
Transport / 23 / General	Design residential areas as low-traffic neighbourhoods to reduce cars, increase walking/cycling, and increase use of local services/facilities.	Agree that the Local Plan should include these principles, reflecting the National Design Guide and National Model Design Code (NPPF 110c).
Transport / 23 / General	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.	Agree that the opportunities to walk and cycle to tourism development is likely to be more limited in rural areas, but any opportunities should be identified and pursued.

Chapter / Qu / Topic	Summary of main issues	Officer response
Transport / 23 / Access to 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.	Issues and Options paragraph 11.6 references guidance stating a reasonable walking distance of 800m. The number and range of services/facilities within a village is an important factor to consider – the Local Plan will set out a development strategy identifying villages that are suitable for small-scale development, as well as policies relating to rural exception sites.
Transport / 23 / Access to facilities	Increase the walking distance from 800m to 2km to improve health and well-being.	2km is at the upper end of walking distances typically travelled (LCWIP – technical guidance, DfT, 2017), with the National Design Guide defining “walkable” as generally no more than 800m. Assuming a walking distance to facilities of 2km could therefore be beyond a reasonable distance for most people, which will either encourage car use, or is too far those without a car. In any case, distance is one of several factors to consider (e.g. topography, surveillance, directness, attractiveness of the environment, destination).
Transport / 23 / Access to facilities	Services/facilities should be provided before new development is built.	Whilst this aspiration is understood, for development sites to be deliverable some housing is usually required in advance of services/facilities to ensure viability and to provide a critical mass to support the services/facilities.

Chapter / Qu / Topic	Summary of main issues	Officer response
Transport / 23 / Access to facilities	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.	Agree with this point as a general principle, although circumstances will vary depending upon the particular village, service/facility, and level of growth.
Transport / 23 / Access to facilities	Avoid dispersing new development to reduce the need to travel and maximise accessibility to facilities and services.	Noted. Significant development should be focused on locations which are or can be made sustainable, but a lower level of housing in rural areas may be necessary to meet local needs.
Transport / 23 / Access to facilities	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.	Points noted. Significant development should be focused on locations which are or can be made sustainable, but a lower level of housing in rural areas may be necessary to meet local needs.
Transport / 23 / Access to facilities	Acceptable walking distances will vary depending the nature and quality of any routes – 800m is not an appropriate measure in itself.	Agree that whilst guidance has defined walkable as generally 800m, distance is one of several factors to consider (e.g. topography, surveillance, directness, attractiveness of the environment, destination).
Transport / 23 / Access to facilities	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.	Development should be located where there is reasonable access to a range of facilities/services. Whilst any amount of development will provide some benefit in helping to sustain existing local services, the level of population growth required to make a difference (e.g. to support a bus service or a new pub or shop) is significant. The Local Plan will set out a development strategy identifying settlements that are suitable for small-scale development, as well as

Chapter / Qu / Topic	Summary of main issues	Officer response
		policies relating to rural exception sites to meet local needs elsewhere.
Transport / 23 / Access to facilities	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.	This is considered in Q23, Option 2 (large scale development to support new services/facilities). A new settlement will be considered in the Local Plan development strategy.
Transport / 23 / Access to facilities	The Paris idea for the '15 minute city' is a great idea to provide all local services within easy reach.	Noted – whilst this should be the aspiration for development in our larger settlements and on larger scale sites, we must also recognise that access to local services is more limited in rural areas.
Transport / 23 / Access to facilities	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.	Agree that we cannot dictate whether a person will work locally or use local facilities, but new development should provide opportunity to do so. The Local Plan will promote walking, cycling and public transport.
Transport / 23 / Access to facilities	Relocate village schools to locations where children live rather than relying on car journeys out to local village schools.	Understand the issue of minimising travel to school, but it is outside the scope of the Local Plan to relocate development, unless climate change is expected to increase flood risk (NPPF 161d).
Transport / 23 / Access to facilities	East Devon's facilities and infrastructure are already insufficient and cannot take any more.	Noted – evidence on infrastructure planning will be prepared to consider this issue.
Transport / 23 / Access to facilities	Allowing more homes on brownfield sites and town centres will support local facilities.	Noted and agree in principle.

Chapter / Qu / Topic	Summary of main issues	Officer response
Transport / 23 / Access to 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.	Agree, this has been considered in evidence on The Role and Function of Settlements, which will inform the Local Plan.
Transport / 23 / Walking/cycling	Ensure safe, attractive, well-lit, and connected walking and cycling routes.	Agree – the Local Plan should include policies to reflect this point.
Transport / 23 / Walking/cycling	Combine walking and cycling routes with green corridors for wildlife to improve access to nature.	Agree – the Local Plan should include policies to reflect this point.
Transport / 23 / Walking/cycling	Reduce conflict between walkers and cyclists by providing separate paths.	Agree – this is a key design principle in national guidance (Gear Change, DfT, July 2020) and should be reflected in the Local Plan.
Transport / 23 / Walking/cycling	Need shared use paths in new housing development, informed by comprehensive plans, to ensure walking and cycling are prioritised	Agree with need to prioritise walking and cycling, but national guidance (Gear Change, DfT, July 2020) states that cyclists must be separated from pedestrians.
Transport / 23 / Walking/cycling	Need to develop walking and cycling routes between existing settlements e.g. between Sidbury and Sidford, from Tipton St John, Feniton to Sidmouth.	In terms of the Local Plan, these routes can be pursued if sites are allocated at these locations, to be delivered alongside new development.
Transport / 23 / Walking/cycling	Encourage people to walk/cycle locally to improve health, live more sustainably, and reduce carbon emissions	Noted and agree – the Local Plan should include policies that address these points.
Transport / 23 / Walking/cycling	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.	Whilst owning a car may be essential for some journeys, the Local Plan should include policies to promote walking and cycling. Many elderly people are



Chapter / Qu / Topic	Summary of main issues	Officer response
		able to make short journeys on foot or by bike (particularly on an electric bike).
Transport / 23 / Walking/cycling	Difficult to encourage sustainable travel from new development on the edge of settlements due to long distance and topography e.g. Exmouth.	Note the challenges relating to topography and distance, but Local Plan policies should promote sustainable travel. Significant development should be focused on locations which are or can be made sustainable.
Transport / 23 / Walking/cycling	Must provide secure cycle parking, including charging points for electric bikes.	Local Plan policies should provide for secure cycle parking (NPPF 106d).
Transport / 23 / Walking/cycling	Co-ordinate walking and cycling plans with the EDDC Clyst Valley plan which is very detailed.	Noted and agree.
Transport / 23 / Walking/cycling	Steep topography and busy, dangerous small roads in East Devon discourages cycling.	Noted, but Local Plan policies should promote walking and cycling. Steep topography can be addressed with electric bikes, and cycle routes should be separated from vehicles where possible.
Transport / 23 / Walking/cycling	Encourage cycle use to help tourism in the area.	Agree that encouraging cycle use can help tourism, and this is evident along the Exe Estuary Trail. The Local Plan will include policies to enable tourism.
Transport / 23 / Walking/cycling	Need to provide changing facilities for walkers and cyclists.	Agree that supporting facilities should be provided and the Local Plan should reflect this (NPPF 106d).
Transport / 23 / Walking/cycling	Ensure aspirations for development accord with latest guidance, including LTN1/20 and Gear Change.	Agree – the Local Plan should reflect this guidance.

Chapter / Qu / Topic	Summary of main issues	Officer response
Transport / 23 / Walking/cycling	The development of new walking and cycling routes should avoid adverse impacts on important sites for nature and priority species and habitats.	Agree, and this will be assessed through the Sustainability Appraisal and Habitats Regulations Assessment that will inform the Local Plan.
Transport / 23 / Public transport	Do not allow development where there is no existing public transport infrastructure.	The Local Plan should promote public transport use.
Transport / 23 / Public transport	The older age profile means that public transport should be prioritised ahead of walking and cycling.	Although East Devon has a relatively old age profile, there are many younger people. Walking, cycling and public transport should all be promoted. Planning applications should actually prioritise pedestrians and cyclists (NPPF 112a).
Transport / 23 / Public transport	The high costs discourage people from using the bus.	Noted, but the cost of public transport is outside the scope of the Local Plan.
Transport / 23 / Public transport	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.	The Local Plan should promote public transport use, including through focusing significant development on locations which are or can be made sustainable.
Transport / 23 / Public transport	Support the principle of a park and ride scheme on the outskirts of Sidmouth.	Noted, this will be considered in preparing the Local Plan.
Transport / 23 / Public transport	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.	The cost of additional train services and new stations required to deliver the Local Plan will be considered through a viability assessment if necessary – Government funding is often available for such things. The Local Plan will promote sustainable travel links alongside new development.

Chapter / Qu / Topic	Summary of main issues	Officer response
Transport / 23 / Public transport	Much easier and cheaper to extend existing bus services rather than provide a new service to a new community.	Noted – the Local Plan will be subject to viability assessment that will ensure development proposed in the Plan is viable.
Transport / 23 / Cars (incl electric vehicles)	Restricting car parking spaces in new development does not encourage walking and cycling.	Noted. Parking standards in the Local Plan will be informed by the issues outlined in the NPPF (107, 108).
Transport / 23 / Cars (incl electric vehicles)	The increase in zero emission vehicles means that car access can continue alongside walking and cycling.	Whilst zero emission vehicles fall within the Government definition of “sustainable transport modes”, and will obviously help in tackling climate change, they may still lead to congestion. Walking, cycling and public transport should be the priority (NPPF 104c, 112a).
Transport / 23 / Cars (incl electric vehicles)	The growth of electric vehicles will not address road safety and congestion issues	Agree that electric vehicles may cause road safety and congestion issues. Therefore, significant development should limit the need to travel and offer a genuine choice of modes.
Transport / 23 / Cars (incl electric vehicles)	Electric car charge points are essential.	Agree, the Local Plan should encourage electric charging points.
Transport / 24 / 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?	The Local Plan should promote public transport, including through focusing significant development on locations which are or can be made sustainable.
Transport / 24 / Public transport	Public transport needs to be cheaper, with improved reliability, routes and times.	Whilst the cost of public transport is outside its scope, the Local Plan should promote public transport in new

Chapter / Qu / Topic	Summary of main issues	Officer response
		development, including through focusing significant development on locations which are or can be made sustainable.
Transport / 24 / Public transport	Smaller frequent "hopper" buses required to outlying villages to reduce reliance on cars.	Noted – the Local Plan should promote public transport in new development, including through focusing significant development on locations which are or can be made sustainable.
Transport / 24 / Public transport	Need to include bus priority measures.	Noted, this will be considered as a way of promoting public transport in the Local Plan.
Transport / 24 / Public transport	Need a 30 minute train frequency on Waterloo line, double track the Exeter to Honiton line, re-establish the old Sidmouth/Budleigh Salterton line.	A passing loop on the Waterloo line is contained in the Infrastructure Delivery Plan to support the current Local Plan (2013-31), which would provide 30 minute train frequency. There is currently a large funding gap, but is hoped that funding can be sought in due course. The Local Plan is able to identify and protect routes that could widen transport choice and deliver large scale development where there is robust evidence (NPPF 106c) – this is not considered realistic for the old Sidmouth/Budleigh Salterton line, much of which falls within an AONB.
Transport / 24 / Public transport	Bus, coach and train travel should be encouraged with clear routes and links for active travel to and from stations etc.	Agree, opportunities to promote walking, cycling and public transport should be identified and pursued in the Local Plan.

Chapter / Qu / Topic	Summary of main issues	Officer response
Transport / 24 / Public transport	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.	Opportunities for public transport may be more limited in rural areas, and this will be taken into account when planning for new development. The Local Plan should focus significant development on locations which are or can be made sustainable.
Transport / 24 / Public transport	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.	Agree that the frequency and destination of public transport services are important, and will be considered in the Local Plan.
Transport / 24 / Public transport	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.	The Local Plan is able to identify and protect routes that could widen transport choice and deliver large scale development where there is robust evidence (NPPF 106c) – this is not considered realistic for the old railway lines from Ottery to Feniton, and beyond to Budleigh Salterton and Sidmouth.
Transport / 24 / Public transport	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.	Agree, opportunities to promote public transport should be identified and pursued in the Local Plan.
Transport / 24 / Public transport	Ensure car parking charges are set at levels that do not undermines bus or rail services.	Noted, but car parking charges are outside the scope of the Local Plan.
Transport / 24 / Public transport	Encouraging traffic over any level crossing should be fully assessed and discussed with Network Rail.	Noted – discussions will be held with Network Rail in preparing the Local Plan, as appropriate.
Transport / 24 / Public transport	Need to recognise the importance of cross-boundary bus links, such as route between Taunton and Axminster which provides opportunities for	Noted – such cross-boundary bus links will be recognised.

Chapter / Qu / Topic	Summary of main issues	Officer response
	South Somerset residents to access employment and train station at Axminster.	
Transport / 24 / Public transport	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.	The Local Plan should focus significant development on locations which are or can be made sustainable, and the presence of railway lines are a key consideration. The Local Plan should promote sustainable transport, and will acknowledge it working as a “system”.
Transport / 24 / Public transport	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.	Opportunities to promote sustainable transport modes, which include cycling and car sharing, will be taken up in allocating sites for development.
Transport / 24 / Public transport	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.	The Local Plan will promote walking, cycling and public transport in new development at Exmouth, to minimise trips by car. We will consider the provision of a park and ride at Exmouth.
Transport / 24 / Public transport	Support a park and ride scheme on the outskirts of Sidmouth, provided certain criteria are met.	The Local Plan will promote walking, cycling and public transport in new development at Sidmouth, to minimise trips by car. We will consider the provision of a park and ride at Sidmouth.
Transport / 24 / Walk/cycle networks	Prioritise pedestrians in all road upgrading projects to include provision for pedestrians and cyclist.	Opportunities to promote walking and cycling will be promoted in the Local Plan.
Transport / 24 / Walk/cycle networks	All roads in new developments to have footways for pedestrians.	The Local Plan will promote walking in new development, and planning applications should give

Chapter / Qu / Topic	Summary of main issues	Officer response
		priority to pedestrian and cycle movements (NPPF 112a).
Transport / 24 / Walk/cycle networks	Pedestrians and cyclists to be given greater priority in town centres.	Pedestrians and cyclists should be given priority in development proposals (NPPF 112a), and this will be applied in town centres where linked with new development.
Transport / 24 / Walk/cycle networks	All new residential developments should include secure accommodation for cycles.	This will be considered as a way of promoting cycle use in new development.
Transport / 24 / Walk/cycle networks	There are a lot of hills in East Devon - not everyone can cycle; bicycles and pedestrians don't mix too well in Town Centres.	Appreciate that steep topography may deter some people from cycling, but the Local Plan should identify opportunities to promote cycling, and the growth of electric bikes can reduce the impact of hills. A key design principle for new development is to separate cyclists from pedestrians (Gear Change, DfT, July 2020).
Transport / 24 / Walk/cycle networks	Total waste of time building cycle paths as cyclists don't use them e.g. Trafalgar Way in Axminster and Darts Farm to Totnes.	National policy is clear that we should be promoting cycling. Government guidance explains how to ensure that cycle paths are well-used (National Design Guide, Jan 2021; Gear Change, DfT, July 2020).
Transport / 24 / Walk/cycle networks	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 <a href="http://www.gettingaroundexmouth.org">www.gettingaroundexmouth.org</a>	Local Plan policy should promote walking and cycling, and clear signs and household information are part of ensuring new development achieves this. Whilst designing and mapping an active travel network is beyond the scope of the Local Plan, Devon County

Chapter / Qu / Topic	Summary of main issues	Officer response
		Council can produce Local Cycling and Walking Infrastructure Plans to address such matters. The Exmouth website looks useful.
Transport / 24 / Walk/cycle networks	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.”	The Local Plan will promote cycling alongside proposed new development, but cycle investment more generally is the role of national Government and Devon County Council.
Transport / 24 / Walk/cycle networks	Walking and cycling are not much use to older or disabled individuals.	The Local Plan should promote walking and cycling, and electric bikes now offer potential use for older people.
Transport / 24 / Walk/cycle networks	Designate some minor roads around towns and villages as quiet, shared routes with 20mph speed limit and appropriate signing.	Whilst designating existing roads as quiet, shared routes is outside the scope of the Local Plan, allocated sites should reflect national guidance which addresses these points (NPPF, 110a-c).
Transport / 24 / Walk/cycle networks	Support a shared pedestrian and cycle pathway from Sidbury to Sidford and linking with the Byes, and between the Byes and Port Royal.	Noted, this will be considered if new development is proposed in these locations.
Transport / 24 / Walk/cycle networks	Integrate active travel routes with green infrastructure networks.	Agree, this should be achieved where possible.
Transport / 24 / 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.	The Local Plan should promote sustainable travel, recognising that opportunities will vary between rural and urban areas. Significant development should be focused on locations which are or can be made sustainable.



Chapter / Qu / Topic	Summary of main issues	Officer response
Transport / 24 / Accessible locations	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.	Noted, but the Local Plan should promote sustainable travel, consistent with national policy (NPPF 104).
Transport / 24 / Accessible locations	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.	Noted – these issues will be considered in drafting Local Plan policy.
Transport / 24 / Protecting 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.	Noted – the Local Plan development strategy will consider these issues.
Transport / 24 / 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	Agree – supporting an appropriate mix of uses within larger scale sites is consistent with national policy (NPPF, 106a).
Transport / 24 / Large scale development	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 Local Plan should support an appropriate mix of uses within larger scale sites (NPPF, 106a).
Transport / 24 / Large scale development	The proposed Denbow new settlement will promote walking and cycling, ensuring facilities are accessible, and achieving sustainable transport objectives.	Noted – the Local Plan development strategy will consider these issues.
Transport / 24 / Walking distances	Impracticable to set walking distances - these fixed absolute measures of objective acceptability are often in tension with other elements of policy.	The National Design Guide (2021) defines walkable to local facilities as being generally no more than 800m, but agree that setting a distance in Local Plan policy may be too prescriptive and impractical. In reality, distance is one of several factors to consider (e.g.

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		topography, surveillance, directness, attractiveness of the environment, destination). Nevertheless, it may be useful for supporting text to refer to a reasonable walking distance of 800m in national guidance.
Transport / 24 / Walking distances	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.	Cycling from home would not be affected by setting an 800m walking distance. Bus routes would be designed to be accessible, but also commercially viable, so unlikely to be sent to areas not needed.
Transport / 24 / Walking distances	800m is not far for fitter individuals, but with Devon hedges and narrow lanes, may not be attractive with traffic so need some flexibility.	Noted, it is considered be too prescriptive and impractical to set a distance in a Local Plan policy, although it may be useful to refer to a reasonable walking distance of 800m in supporting text.
Transport / 24 / 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.	Noted, but this is a complex matter and, on reflection, it is not considered that evidence can be prepared within a reasonable timescale to justify differing standards likely to be needed for the various modes, types of development, and location. Therefore, sustainable travel targets will not be set.
Transport / 24 / Travel targets	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.	The variation in targets, which it is agreed would need to be broadly set, means that evidence cannot be prepared within a reasonable timescale to justify differing standards. Therefore, sustainable travel targets will not be set.

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Transport / 24 / Travel targets	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.	It would be challenging to enforce sustainable transport targets once a development is occupied. Alongside difficulties in justifying such targets, means that sustainable travel targets will not be set.
Transport / 24 / Protect sites/routes	Don't allow development on sites which might be used for by-passes or light railway - trams etc.	The Local Plan should protect such sites where there is robust evidence (NPPF 106c).
Transport / 24 / Large-scale 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.	The provision of road side services will be considered in the Local Plan, consistent with NPPF, paragraph 106e.
Transport / 24 / Exeter Airport	We should be looking at less air travel, not more, as it is a big contributor to climate change.	Noted, but national policy makes clear we should recognise the importance of airfields (NPPF 106f).
Transport / 24 / Exeter Airport	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.	Support noted. It is more appropriate for this issues to be included in the economy chapter in the Local Plan.
Transport / 24 / Car parking	Housing density and car parking are fundamental drivers of viable transport services, reducing transport demand and supporting local facilities.	Accessibility and availability of public transport should be taken into account if setting parking standards (NPPF 107a,c).
Transport / 24 / Car parking	Address the need for electric car charging infrastructure - home charging points for electric cars should be provided in all new builds in the district.	Agree, we need to consider this if setting car parking standards (NPPF 107e). In 2019, the Government consulted on proposals to alter building regulations to require electric vehicle chargepoints for new

Chapter / Qu / Topic	Summary of main issues	Officer response
		residential and non-residential development – if this is confirmed, there will not be a need for Local Plan policy.
Transport / 24 / Car parking	Must provide sufficient parking and safe road widths to allow for the flow of vehicles especially emergency access.	National policy identifies the issues to consider in setting parking standards (NPPF 107). Guidance on road widths, including for emergency services, are in the National Model Design Code – we should reflect this Code in assessing sites.
Transport / 24 / Car parking	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.	Noted, we will consider whether to include garages as a car parking spaces, given they are often used for storage rather than to park cars.
Transport / 24 / Car parking	There should be one parking space per bedroom.	We will consider this if setting a policy on parking standards.
Transport / 24 / Car parking	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).	In practice, this is unlikely to be possible as it relies on land ownership likely beyond the site boundary (at least 100m away), and there may be other opportunities to park (e.g. on-street) within 100m. Instead, a range of measures will be require to encourage sustainable travel.
Transport / 24 / Car parking	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).	Local parking standards should take into account local car ownership levels, amongst other matters. We should reflect the National Design Guide and National Model Design Code, which has further detail on this issue.

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Transport / 24 / Car parking	The requirement for car charging points is not necessary as the Government propose to introduce this requirement through Building Regulations.	Yes, in 2019, the Government consulted on proposals to alter building regulations to require electric vehicle chargepoints for new residential and non-residential development – if this is confirmed, there will not be a need for Local Plan policy.
Transport / 24 / Car parking	Overnight parking of commercial vehicles can be a blight on a community and needs to be considered in the plan provision.	Local parking standards should take into account local car ownership levels, amongst other matters. We should reflect the National Design Guide and National Model Design Code, which has further detail on this issue.
Transport / 24 / Car parking	The costs of car charging points should be included in the Local Plan viability assessment.	Agreed, this will be included in the Local Plan viability assessment.
Transport / 24 / Car parking	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.	Noted, we will consider including this detail in Local Plan supporting text.
Transport / 24 / Lorry parking	Agree with the importance of the provision for lorry parking facilities.	Noted, the Local Plan will consider this issue, in line with NPPF 109.
Transport / 24 / Cycle racks/charging	Require cycle racks and electric charging for bicycles.	Noted – we should reflect the National Model Design Code, which has further detail on appropriate cycle parking.
Transport / 24 / Cycle racks/charging	Unnecessary to provide electric charging for bicycles as cyclists can charge up sufficiently overnight.	Electric bikes can be charged from a regular 3-pin socket and offer 25-100 plus miles of cycling (Energy

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		Saving Trust, 2020), so agree it may not be necessary to provide bike charging facilities.
Transport / 24 / Other issues raised	Car pooling could be a solution to reducing emissions.	Agree, car sharing falls within the definition of “sustainable transport modes” (NPPF Annex 2).
Transport / 24 / Other issues raised	Encourage local business development so that people within villages don't have to drive to city hubs.	Economic development in rural areas will be considered in the Economy chapter of the Local Plan.
Transport / 24 / Other issues raised	Exmouth central needs residents only parking permits.	Noted, but this is outside the scope of the Local Plan.
Transport / 24 / Other issues raised	I'd commend to you Exeter City Council's Supplementary Planning Document on Sustainable Transport: <a href="http://www.exeter.gov.uk/stspd">www.exeter.gov.uk/stspd</a> .	This SPD will be reviewed, but it was adopted in 2013 under old national policy and guidance.
Transport / 24 / Other issues raised	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.	During Covid lockdown there were fewer cars, more cyclists, but lower use of public transport. In new development, priority should be given to pedestrians and cyclists, and then high quality public transport (NPPF 112a).
Transport / 24 / Other issues raised	Must consider access for disabled people.	Agree – national policy makes clear that planning applications should address the needs of people with disabilities and reduced mobility in relation to all transport modes (NPPF 112b).
Transport / 24 / Other issues raised	The objectives set out are applicable to urban areas, but a different approach is needed for rural areas.	Agree that opportunities to maximise sustainable travel will vary between urban and rural areas (NPPF 105).

Chapter / Qu / Topic	Summary of main issues	Officer response
Transport / 24 / Other issues raised	Transport-related development should be informed by heritage assessments to ensure harm to heritage assets is considered.	Noted – the Local Plan chapter on the historic environment will address this issue.
Transport / 24 / Other issues raised	Transport policies and infrastructure should take full account of impacts on the natural environment.	Noted – the Local Plan chapter on the natural environment will address this issue.
Transport / 24 / Other issues raised	State that promoting sustainable transport can improve access to nature, which improves mental health and public appreciation of nature.	Agree, for example, green corridors act as a linkage for wildlife and potentially people (National Design Guide, 2021).

## Infrastructure and facilities

Chapter / Topic / Qu	Summary of main issues	Officer response
Infrastructure / Priority facilities / 25	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.	Whilst more facilities will be available in towns than in more rural locations, it is useful to gain an understanding about priorities for securing new facilities and future locations of development.
Infrastructure / Priority facilities / 25	These services and facilities are impossible to assess and prioritise – it depends on size of development, and what is in place already.	Noted – the purpose of seeking views on the facilities was to gain an understanding about priorities for securing new facilities and future locations of development.
Infrastructure / Priority facilities / 25	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.	We should plan for a different groups in the community, so new development should have access to a range of facilities.
Infrastructure / Priority facilities / 25	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.	Point noted, but we should plan for a different groups in the community, so new development should have access to a range of facilities.
Infrastructure / Priority facilities / 25	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.	The settlement hierarchy has been informed on evidence on the availability of community facilities, set out in ‘The Role and Function of Settlements’, which differentiated ‘strategic’ and ‘local’ facilities.



Chapter / Topic / Qu	Summary of main issues	Officer response
Infrastructure / Priority facilities / 25	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.	This has been reflected in evidence that informed the settlement hierarchy, which differentiated 'strategic' facilities and 'local' facilities, as set out in 'The Role and Function of Settlements'.
Infrastructure / Priority facilities / 25	It is difficult to prioritise, say, 'youth facilities' over a 'post office' – ideally, all of the above should be accessible.	The purpose of seeking views on the facilities was to gain an understanding about priorities for securing new facilities and future locations of development, noting that not all facilities will be accessible to all new development.
Infrastructure / Priority facilities / 25	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?	The purpose of seeking views on the facilities was to gain an understanding about priorities for securing new facilities and future locations of development. Distance to services is considered elsewhere (chapter 11)
Infrastructure / Priority facilities / 25	It's not necessary for emergency services to be right next to where I live as long as they have good access.	Noted, we recognise that emergency services are a 'strategic' facility which serve a wider catchment.
Infrastructure / Priority facilities / 25	Youth facilities are important but must reflect modern demands, encourage physical activity.	Noted and agree.
Infrastructure / Priority facilities / 25	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.	Agree, the Local Plan will support high quality communications, making clear the role this plays in reducing the need to travel.

<b>Chapter / Topic / Qu</b>	<b>Summary of main issues</b>	<b>Officer response</b>
Infrastructure / Priority facilities / 25	Public houses are not as essential as a community café which operates at different times of the day than a pub.	Noted, but pubs can also open during the day.
Infrastructure / Added facilities / 25	Add recreational and fitness needs and providing social meeting points with recreational services (coffee shops etc).	This would fall within “sports and leisure facilities” and “paths for walking and cycling”.
Infrastructure / Added facilities / 25	Add facilities for community development e.g. City Farms; nature reserves; cycle repair facilities.	These would fall within “open spaces”.
Infrastructure / Added facilities / 25	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.	It will over-complicate matters to include open space that is nature rich as a separate category. Supporting open space, biodiversity net gain, and children’s play areas in the Local Plan will all assist children’s play.
Infrastructure / Added facilities / 25	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.	The suggested services are noted and will be considered in preparing the Local Plan. However, many of these uses fall within the same class, so there is limited planning control to identify such specific uses in new development.
Infrastructure / Added facilities / 25	Add dentist and hairdresser to the list.	Noted.
Infrastructure / Added facilities / 25	Add allotments.	Allotments are included as a ‘local’ facility in evidence that informs the settlement hierarchy – ‘The Role and Function of Settlements’.

<b>Chapter / Topic / Qu</b>	<b>Summary of main issues</b>	<b>Officer response</b>
Infrastructure / Added facilities / 25	Add fast electric vehicle charging points.	Agree, these are considered in the transport chapter.
Infrastructure / Added facilities / 25	Car parks (to minimise on-street parking) are needed.	Car parking standards are discussed in the transport chapter.
Infrastructure / Added facilities / 25	Public toilets should be available in all communities.	Noted, but public toilets are rarely delivered through new development.
Infrastructure / Added facilities / 25	Need to ensure sufficient mobile coverage is delivered from the outset.	Agree – the telecommunications chapter discusses this issue.
Infrastructure / Added facilities / 25	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.	Agree, community halls are included as a ‘local’ facility in evidence that informs the settlement hierarchy – ‘The Role and Function of Settlements’.
Infrastructure / Added facilities / 25	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.	Agree, libraries are included as a ‘strategic’ facility in evidence that informs the settlement hierarchy – ‘The Role and Function of Settlements’.
Infrastructure / Other issues / 25	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.	Agree, multi-use buildings make more efficient use of space and can support their vitality and viability, and should be encouraged in the Local Plan.
Infrastructure / Other issues / 25	Tipton St John Primary School needs to stay in the village.	Noted – a planning application re-locate Tipton Primary School to Ottery has recently been refused. We will consider whether this issue is within the scope of the Local Plan.

<b>Chapter / Topic / Qu</b>	<b>Summary of main issues</b>	<b>Officer response</b>
Infrastructure / Other issues / 25	We need local hospitals but the policy has been to shut them.	The presence of a hospital has informed the settlement hierarchy. The closure of hospitals is outside the scope of the Local Plan.
Infrastructure / Other issues / 25	Put the infrastructure in place first to allow development.	Whilst it is necessary to deliver some infrastructure ahead of development (e.g. transport, flood risk mitigation, utilities), 'social' infrastructure such as schools, health facilities, and play areas often rely on homes being occupied to provide the users and funds to deliver the facilities.
Infrastructure / Other issues / 25	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.	Agree – Active Design is referenced in the Local Plan transport chapter.
Infrastructure / Other issues / 25	Essential for off road cycle paths to school.	Agree – these are sought in the Local Plan transport chapter.
Infrastructure / Other issues / 25	Childcare and Nursery School provision is required to attract a suitably qualified and skilled workforce to support the populations' health care needs.	The Local Plan will make provision for new homes to meet needs, including to provide homes for workers.
Infrastructure / Other issues / 25	Require health impact assessments for any new development proposed.	Health impacts are considered in the Sustainability Appraisal of the Local Plan. Numerous Local Plan policies will support healthy lifestyles. We will consider whether to require health impact assessments in Local Plan policy.

<b>Chapter / Topic / Qu</b>	<b>Summary of main issues</b>	<b>Officer response</b>
Infrastructure / Other issues / 25	5 bus services a day cannot be considered viable or attractive to use – it is minimal provision for those who have no other option.	Whilst there are five buses plus per day in the larger settlements, frequency is lower in some rural areas, which is one of the reasons why less growth is proposed in rural areas.
Infrastructure / Other issues / 25	In principle, new settlement proposals such as Denbow can deliver the essential and most importance services required in a comprehensive manner from the outset.	Noted – we will consider whether to propose a new settlement in the Local Plan.
Infrastructure / Other issues / 25	Strategic-scale development can provide or contribute towards these facilities, benefitting both new and existing communities.	Agreed, the Local Plan will require facilities in strategic-scale development where appropriate.
Infrastructure / Other issues / 25	The growth of online shopping and use of car to access supermarkets, have together reduced the importance of being close to a supermarket.	Noted, but most people still use supermarkets ‘in person’ and it is considered a ‘strategic’ facility in evidence that has informed the settlement hierarchy.
Infrastructure / Other issues / 25	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.	The data actually shows a 5.1% reduction in annual traffic flows on the A3052 over the period from 2005 to 2014 (Exeter Transport Strategy – Transport Empirical Data Report, Jan 2019, Table 18).
Infrastructure / Other issues / 25	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.	Agreed – the Local Plan spatial strategy ensures new development has access to a range of local facilities.
Infrastructure / Prioritise funding / 26	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.	The Local Plan housing delivery targets will be consistent with national policy requirements.

Chapter / Topic / Qu	Summary of main issues	Officer response
Infrastructure / Prioritise funding / 26	Need a better district-wide plan for spending CIL and related funds.	The Councils' current approach is for CIL to be spent on "priority one" projects in the Infrastructure Delivery Plan. This will be revisited as the emerging Local Plan progresses, to reflect updated infrastructure evidence and priorities.
Infrastructure / Prioritise funding / 26	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.	S.106 must only be sought where they meet three legal tests (necessary, directly related, fair and reasonable in scale and kind) – other uses can be included if they meet these tests. The Local Plan will include a policy on infrastructure delivery.
Infrastructure / Prioritise funding / 26	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.	Facilities must be proportionate to new development proposals, so it will not be possible to provide facilities in <u>all</u> new developments. Nevertheless, the Local Plan will support new facilities where appropriate.
Infrastructure / Prioritise funding / 26	Building a community life and cohesion for well-being and mental health is important, including community initiatives to encourage a more sharing society.	Agree – the Local Plan will support delivery of community facilities, consistent with the scale of development.
Infrastructure / Viability / 26	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.	Agree – the Local Plan will be informed by a viability assessment to ensure it is viable.

<b>Chapter / Topic / Qu</b>	<b>Summary of main issues</b>	<b>Officer response</b>
Infrastructure / Viability / 26	Early collaboration on infrastructure requirements is essential to achieve a viable and deliverable new settlement.	The Local Plan will consider whether a new settlement is appropriate – if so, agree that early collaboration on infrastructure requirements is essential.
Infrastructure / Viability / 26	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 in principle, but this issue is related to land ownership – if land is in public or community ownership, bought at close to existing use value, then the uplift in value from development can be retained for community use.
Infrastructure / Viability / 26	Agree with objective 10 that infrastructure needs should be secured at an appropriate time to support new development.	Support noted.
Infrastructure / Viability / 26	Although infrastructure will require capital funding, should also mention need for revenue funding so public transport is provided on an ongoing basis.	Agree, the Local Plan should mention revenue funding may be required for public transport, particularly in the early years of a development when the route is being established and there are fewer customers.
Infrastructure / Viability / 26	Clarify developer contributions/mechanisms for securing highways infrastructure funding in a single overarching infrastructure policy rather than individual plan objective or site policies.	Whilst an overarching infrastructure policy can set out the approach for securing highway infrastructure, allocation policies will also need to include site-specific highways infrastructure for delivering the site.
Infrastructure / Viability / 26	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.	Noted and agree.
Infrastructure / Viability / 26	S106 agreements for education are preferred to CIL, as they provide greater certainty that funding will be available.	Noted – this will be reflected in the Local Plan.

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Infrastructure / Viability / 26	Focusing new development on larger sites rather than piecemeal development is beneficial to securing necessary infrastructure improvements.	Agree in principle, but we should also provide 10% of the housing requirement on sites of 1 hectare or less (NPPF 69a).
Infrastructure / Viability / 26	Objective 10 could be improved by reflecting strategic needs as well as those required to support new development.	Agree, re-word objective 10 to state “To secure infrastructure needs at an appropriate time to support new development, <u>along with strategic infrastructure serving a wider area</u> ”
Infrastructure / Viability / 26	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.	The Local Plan will be subject to a viability assessment to ensure proposed facilities can be delivered.
Infrastructure / Govt funding / 26	Funding from the Government should be explored as it can assist in deliverability of large projects.	Agree, the council will explore Government funding opportunities as they arise.
Infrastructure / Govt funding / 26	If Government is driving high levels of growth then it must properly fund infrastructure.	Sometimes the Government makes grants or loans available to fund infrastructure, and these will be explored as they arise.
Infrastructure / Community / 26	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.	Noted, we have held two ‘virtual’ meetings with neighbourhood plan groups and town/parish councils in 2021, and will continue to do so as the Local Plan progresses.
Infrastructure / Community / 26	One problem with establishing a new community is there are no residents to consult.	We will use a range of consultation methods in preparing the Local Plan, consistent with our Statement of Community Involvement.



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Infrastructure / Community / 26	The views of local communities and organisations must be listened to.	We will identify the main issues raised in public consultation and provide a council response at each stage of public consultation (as shown in this table).
Infrastructure / Rural facilities / 26	Increased housing can improve the sustainability of villages and rural areas through more people supporting local services.	Increased housing in villages will support local services through additional residents to some degree, but the scale of development required to make a meaningful difference is likely to be so large that it would not be consistent with their rural character.
Infrastructure / Rural facilities / 26	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.	Agree with the principle of this issue.
Infrastructure / Rural facilities / 26	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.	The Local Plan should guard against the unnecessary loss of valued services and facilities (NPPF 93c).
Infrastructure / Rural facilities / 26	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.	The Local Plan should guard against the unnecessary loss of valued facilities and services, and identify opportunities for villages to grow and thrive, especially where this will support local services (NPPF 93, 79).
Infrastructure / Rural facilities / 26	Preventing small villages and hamlets from growing consigns them to stagnation and their eventual demise.	Noted – the Local Plan should identify opportunities for villages to grow and thrive, especially where this will support local services (NPPF 79); alongside minimising the number and length of journeys needed for employment, shopping, leisure, education and

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		other activities (NPPF 106). The Local Plan spatial strategy seeks to deliver this.
Infrastructure / Rural facilities / 26	Parking for residents in local villages needs to be a priority especially during weekends and holidays.	This issue is not within the scope of the Local Plan.
Infrastructure / Transport / 26	Does not mention additional rail infrastructure in the Honiton or Axminster areas.	The Local Plan has been amended to include reference to the proposed railway passing loops at Honiton and Axminster, with a preferred policy safeguarding land for these proposals.
Infrastructure / Transport / 26	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.	Noted, planning obligations can be sought for such infrastructure items where the three legal tests are met.
Infrastructure / Transport / 26	Does not emphasise the importance of bus provision in East Devon, with significantly more people moved by bus than rail.	Reference has been added to the high frequency bus routes linking to Exeter, and a preferred policy to secure access to high quality public transport.
Infrastructure / Transport / 26	Transport is a key issue in the scale and location of development to ensure sustainable lifestyles and modal shift.	Agreed – the Local Plan spatial strategy and preferred transport policies recognise this issue.
Infrastructure / Transport / 26	The NW quadrant of East Devon on the A3052 corridor has transport constraints particularly in terms of public transport.	Transport evidence will need to justify any development allocations within this quadrant.
Infrastructure / Transport / 26	Refer to the high quality active travel corridors (Exe Estuary and Clyst Valley).	Reference has been added to these active travel corridors.

<b>Chapter / Topic / Qu</b>	<b>Summary of main issues</b>	<b>Officer response</b>
Infrastructure / Transport / 26	Need a robust transport evidence base to consider the transport impact of planned growth, identifying suitable phasing and mitigation where required.	Agree – transport evidence will be prepared to inform the Local Plan.
Infrastructure / Transport / 26	More Park & Ride in larger towns.	We will consider opportunities for Park and Ride in the Local Plan, where justified.
Infrastructure / Other issues / 26	Provision for the homeless are very important services and are missing from the listed facilities.	Noted.
Infrastructure / Other issues / 26	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.	We will consider the economic role of Dunkeswell Airport in preparing the Local Plan.
Infrastructure / Other issues / 26	The emerging plan should consider facilitating and supporting the production of locally produced foods and renewable energy.	Yes, the Local Plan preferred policies support renewable energy. Allotments are a way of supporting locally produced goods, and these can be required on large scale allocations, where justified.
Infrastructure / Other issues / 26	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.	Agree, Local Plan Objective 10 is to secure infrastructure needs at an appropriate time to support new development.
Infrastructure / Other issues / 26	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.	Agree, and this evidence will be reflected in an Infrastructure Delivery Plan prepared to inform the Local Plan.

<b>Chapter / Topic / Qu</b>	<b>Summary of main issues</b>	<b>Officer response</b>
Infrastructure / Other issues / 26	Second Homes are missing from this policy – they stifle the lifeblood of a community, and result in loss of housing for the young,	Restricting new housing to a ‘principal residence’ has been included in neighbourhood plans where there is evidence of high second home ownership. This will be considered in preparing the Local Plan.
Infrastructure / Other issues / 26	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.	Noted, we will consider this in preparing the Local Plan.
Infrastructure / Other issues / 26	The text on digital communications should emphasise the role it has in reducing the need to travel, therefore responding to the climate emergency.	Agree, this will be reflected in the Local Plan telecommunications section.
Infrastructure / Other issues / 26	Include more detail on flood and coastal risk management infrastructure, recognising there is often a significant funding gap.	Local Plan allocations will require appropriate flood risk infrastructure where appropriate. The Local Plan section on flooding considers this in more detail.
Infrastructure / Other issues / 26	Consider foul drainage infrastructure requirements.	Local Plan allocations will require appropriate flood risk infrastructure where appropriate. The Local Plan section on flooding considers this in more detail.
Infrastructure / Other issues / 26	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).	S.106 planning obligations must meet the three legal tests. The Infrastructure Delivery Plan will provide evidence on the infrastructure requirements as a result of development proposed in the Local Plan – if there is a need for police infrastructure, then this will be reflected in the Local Plan.

<b>Chapter / Topic / Qu</b>	<b>Summary of main issues</b>	<b>Officer response</b>
Infrastructure / Other issues / 26	NPPF para 8, 20, 26, 32, 91, 92, 95, 127 support need for police infrastructure.	NPPF references are noted.
Infrastructure / Other issues / 26	Police infrastructure should be defined in the Local Plan to include buildings, vehicles and equipment.	The Infrastructure Delivery Plan will provide evidence on the infrastructure requirements as a result of development proposed in the Local Plan – if there is a need for police infrastructure, then this will be reflected in the Local Plan.
Infrastructure / Other issues / 26	Consider how the proposed Infrastructure Levy will change the funding of infrastructure.	We are awaiting the Government to confirm or otherwise the introduction of the Infrastructure Levy.
Infrastructure / Other issues / 26	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.	Noted, this will depend upon the specific location of development, and any potential impacts upon the historic environment. CIL must only be spent on infrastructure.
Infrastructure / Other issues / 26	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.	Evidence on open space needs is being prepared to inform the Local Plan.

## Developing a strategy for the distribution of development

Chapter / Topic / Qu	Summary of main issues	Officer response
Strategy / General / 27	Suggest a scoring system based on key facilities/services to rank which villages should be in the hierarchy.	This has been considered, but it is difficult to justify a scoring system. Instead, evidence has considered a range of 'strategic' and 'local' facilities.
Strategy / General / 27	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.	An "open" planning strategy, enabling development proportionate to the size of an existing settlement, would not be consistent with the NPPF which seeks to align growth and infrastructure, and focus significant development on locations which are or can be made sustainable by limiting the need to travel and offering a choice of transport modes (NPPF, 11a, 105).
Strategy / General / 27	The development strategy should be informed by environmental constraints, with an ecological assessment, providing biodiversity net gain.	The development strategy will be informed by environmental constraints, and reasonable alternatives will be tested through the SA process.
Strategy / General / 27	An assessment should be undertaken to consider the settlement hierarchy.	This assessment has now been completed, and a report published on "The Role and Function of Settlements".
Strategy / General / 27	Need to consider roles played by settlements across the border in Mid Devon, Somerset, Dorset.	This has been considered in the evidence document "The Role and Function of Settlements" which has informed the settlement hierarchy in the Local Plan.
Strategy / General / 27	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.	Grouping settlements where they share similar characteristics is useful to inform the settlement hierarchy. The scale and location of development will

Chapter / Topic / Qu	Summary of main issues	Officer response
		be informed by issues such as need, character, infrastructure and environmental constraints.
Strategy / General / 27	The transport impacts of development allocated at each settlement will need to be tested through a robust transport evidence base.	Noted, transport evidence will be prepared to inform the Local Plan.
Strategy / General / 27	Need to ensure that the development strategy does not cause significant harm to the historic environment.	The impact upon the historic environment will be considered when determining the scale and location of development.
Strategy / General / 27	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.	Agreed – environmental evidence will inform the scale and location of development at each settlement.
Strategy / General / 27	<p>A better hierarchy that reflects environmental sustainability would be:</p> <ul style="list-style-type: none"> <li>○ tier 1 - West End, North of Blackhorse, Pinhoe, Cranbrook;</li> <li>○ tier 2 – seven large towns and new town outside AONB if required;</li> <li>○ 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, Whimble, Woodbury.</li> <li>○ Tier 4 – villages in AONB and outside with populations under 1,500 people</li> <li>○ Tier 5 – hamlets/open countryside.</li> </ul>	This has been considered in the evidence document “The Role and Function of Settlements” which has informed the settlement hierarchy in the Local Plan. This evidence takes into account the level of jobs and facilities, as key factors when determining the most sustainable locations for development. It is too simplistic to just rank settlements according to population.
Strategy / General / 27	<p>Prefer the following hierarchy:</p> <ul style="list-style-type: none"> <li>○ Cranbrook</li> <li>○ West End</li> <li>○ 8 Towns (incl. Colyton which has a town character)</li> <li>○ 14 Villages (potentially add Dunkeswell to this list)</li> </ul>	Noted – this has been considered in the evidence document “The Role and Function of Settlements” which has informed the settlement hierarchy in the Local Plan.

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Strategy / Towns and West End / 27	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.	Infrastructure and environmental evidence will inform the scale and location of development at each settlement.
Strategy / Towns and West End / 27	Concerned that Cranbrook could become too large and overrun villages and hamlets nearby.	Concerns are noted – the impact of Cranbrook’s growth upon surrounding settlements will be considered.
Strategy / Towns and West End / 27	Cranbrook is a success and should be turned into a district of Exeter and made the focus of new development alongside infrastructure.	Cranbrook has grown significantly since its inception 10 years ago, and will be considered for further new development in the future.
Strategy / Towns and West End / 27	Exmouth should be considered separately above the other towns as it is much larger with a very broad range of services and railway station.	Agreed – evidence in “The Role and Function of Settlements” concurs.
Strategy / Towns and West End / 27	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.	Noted, evidence on infrastructure will be prepared to inform the scale of development at settlements.
Strategy / Towns and West End / 27	Most development should take place in towns as that is where shops and jobs are, to limit out-commuting.	Agree. The Local Plan should promote development in locations that are, or can be made, sustainable through the availability of jobs, shops, facilities, and sustainable travel opportunities.
Strategy / Towns and West End / 27	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).	Agree. Evidence in “The Role and Function of Settlements” includes the Towns in tiers one and two, apart from Budleigh Salterton which lacks some strategic facilities.



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Strategy / Towns and West End / 27	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.	Evidence in “The Role and Function of Settlements” identifies Sidmouth as tier two (Main Centre) and Budleigh Salterton as tier three (Local Centre), and will therefore grow consistent with the settlements hierarchy and any constraints.
Strategy / Towns and West End / 27	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.	Noted, but meeting affordable housing need and population demographics must be balanced with environmental constraints when considering locations for development. The spatial strategy will consider these points.
Strategy / Towns and West End / 27	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.	An audit of facilities at the settlements is contained in “The Role and Function of Settlements”, which has informed the settlement hierarchy in the Local Plan. New development on the edge of towns is beyond reasonable walking distance in some cases, but cycling may be possible, and the range of facilities on offer make these sustainable locations.
Strategy / Towns and West End / 27	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.	These points are noted and will be considered in developing the spatial strategy.
Strategy / Villages / 27	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.	Noted – the Local Plan will minimise the need to travel. “The Role and Function of Settlements” considers facilities, identifying settlements in tier four

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		where there is a relatively good range of facilities that serve the settlement and immediate area.
Strategy / Villages / 27	Small villages, even without facilities (such as Exton), should be given higher importance to protect the identity of towns.	The availability of facilities is important to limit the need to travel, and “The Role and Function of Settlements” identifies settlements in tier four where there is a relatively good range of facilities, either within the settlement or easy access nearby, that serve the settlement and immediate area. Exton has been identified in tier four.
Strategy / Villages / 27	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.	Noted – “The Role and Function of Settlements” (evidence which has informed the Local Plan) identifies settlements in tier four where there is a relatively good range of facilities, either within the settlement or easy access nearby, that serve the settlement and immediate area.
Strategy / Villages / 27	Adding more houses to villages will not improve the availability of facilities, it will just overpower what is already there.	The Local Plan will reflect national policy that housing should be located where it will enhance or maintain the vitality of rural communities (NPPF 79). Infrastructure evidence will identify if villages could be “overpowered” by housing.
Strategy / Villages / 27	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.	Constraints will limit the scale and location of development, and these will be considered in identifying sites for development.

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Strategy / Villages / 27	Some villages (e.g. Beer and Colyton) are substantially larger than others and can therefore support more house and jobs.	Noted – Colyton has been identified in tier three (local centre) and Beer in tier four (service village) in the settlement hierarchy, both offering a range of facilities that could support housing, subject to environmental and other constraints.
Strategy / Villages / 27	The built-up area boundaries at villages are too tightly constrained and do not allow for expansion to help maintain existing services.	The Local Plan will reflect national policy that housing should be located where it will enhance or maintain the vitality of rural communities (NPPF 79).
Strategy / Villages / 27	Oppose developer proposal for housing at Sherwood Farm, Feniton due to concerns about flood risk, highways, primary school capacity, landscape character, unsustainable location.	Concerns are noted – these will be considered when assessing the site as a potential allocation.
Strategy / Villages / 27	Feniton has the opportunity for strategic expansion given its train station, essential services which could be enhanced, and to address existing flood risk issues.	Feniton has a reasonable range of facilities, and is proposed to be a tier four ‘service village’ in the Local Plan as a result. The scale of growth should be commensurate with the level of facilities and other constraints, noting that Feniton has limited jobs and a likely high level of out-commuting.
Strategy / Villages / 27	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.	A higher number of ‘villages’ are recommended in ‘The Role and Function of Settlements’ compared to the current Local Plan 2013-31, in recognition of national policy being more supportive of rural housing to meet local needs.
Strategy / Villages / 27	The current strategy discounts villages such as Awliscombe and Talaton where there is a desire for sustainable growth and facilities that	Awliscombe and Talaton do not have a sufficient range of services to be a tier four ‘service village’, but

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	would support the village – it does not allow communities to grow as they wish.	can growth is still likely to be possible through community-led development at rural exception sites and neighbourhood plan allocations/policies.
Strategy / Villages / 27	Option 3 for a higher number of villages is most consistent with NPPF paragraphs 78, 11a, 35, 59.	Noted and agreed – a higher number of villages is the preferred approach.
Strategy / Villages / 27	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.	Noted and agreed – this has been considered in ‘The Role and Function of Settlements’ which includes Westclyst and Exton in tier four in the settlement hierarchy partly because they have sustainable travel links to higher order settlements.
Strategy / Villages / 27	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.	All of these settlements have been included in tier three or four in the settlement hierarchy due to their range of services, apart from Offwell which lacks facilities compared to the others e.g. a shop.
Strategy / Villages / 27	In the future all villages will be more sustainable because of more people working from home supporting local facilities and services, without the need to commute.	The Covid-19 pandemic has certainly meant more people working at home but it remains to be seen as to whether this short term trend will continue, mindful of the long time frame of the Local Plan. National policy still seeks an appropriate mix of uses (NPPF 106).
Strategy / Other / 27	New housing is poorly designed, too small and too expensive – bring back council built affordable housing.	National policy (NPPF chapter 12) advocates higher design standards, which will be reflected in the Local Plan. We will consider requiring internal space standards in the Local Plan.

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Strategy / Other / 27	The new Local Plan must support the level of growth that the community at each settlement would like.	We will take account of community opinion on the scale of growth at each settlement, alongside land availability, environmental constraints, and other evidence.
Strategy / Other / 27	Re-use existing buildings rather than building on green belt.	The Local Plan should make as much use as possible of brownfield land (NPPF 119), but the need for housing means development of greenfield sites is inevitable (nb. There is no green belt in East Devon).
Strategy / Other / 27	The need for housing should be evidenced locally and not driven by Government.	Evidence on housing need should use the national standard methodology unless exceptional circumstances justify a different approach (NPPF 61).
Strategy / Other / 27	Exeter should not be the focus as it receives out of proportion investment and benefits.	The numerous range of jobs, community facilities and services in Exeter mean that it has a huge influence upon East Devon, and this should be recognised in determining the scale and location of development.
Strategy / Other / 27	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.	Noted, access to jobs and facilities is considered when assessing potential sites.
Strategy / Other / 27	Focus development along a sustainable corridor such as the railway line.	Noted, access to sustainable travel links is considered when assessing potential sites.
Strategy / Other / 27	There is potential for growth along the A3052 corridor which benefits from proximity to Exeter and existing employment and infrastructure.	Proximity to Exeter, employment and infrastructure are considered when assessing potential sites.

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Strategy / Other / 27	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.	Noted – these locations have been considered in preparing the Local Plan.
Strategy / Existing distribution / 28	Maintain a focus on the West End, in order to capitalise on its inherent attributes and linkages, whilst making careful adjustments to allow for more growth to come from other parts of the district.	The benefits of maintaining a West End focus have been considered in preparing the Local Plan.
Strategy / More West End / 28	West End proportion of development should be 70%, with remainder to three main towns and minor targets for smaller towns and villages.	Noted, we will consider 70% of development in the West End in preparing the Local Plan.
Strategy / More West End / 28	The West End should have 80%+ of new housing, no large development of villages should be allowed.	Noted, we will consider 80% of development in the West End and no large development of villages in preparing the Local Plan.
Strategy / More West End / 28	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.	There are lots of jobs in the West End and Exeter beyond, with allocations in the current Local Plan for even more. The Local Plan should minimise the need to travel to work (NPPF 106a).
Strategy / More West End / 28	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 scale of development will influence the distribution to some extent e.g. whether it is possible to locate new development at existing settlements, or if a new settlement(s) is required.
Strategy / More West End / 28	The West End should include a wider area within which development should be focussed, where there is good strategic access.	We will consider this in preparing the Local Plan.

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Strategy / More West End / 28	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.	Agreed – these benefits of focussing development at the West End will be considered in preparing the Local Plan.
Strategy / More West End / 28	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.	Discussions on whether Exeter can meet its housing need will take place through the duty to co-operate, if required.
Strategy / Less West End / 28	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.	Noted, these issues associated with meeting the needs in the rest of East Devon will be considered in preparing the Local Plan.
Strategy / Less West End / 28	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.	The benefits of meeting housing needs in the rest of East Devon will be considered alongside the constraints (principally environmental e.g. AONB) in preparing the Local Plan.
Strategy / Less West End / 28	Small scale development in villages and towns may help sustain local facilities and high streets.	Agree, but it is important to recognise that a large amount of development is required to make a significant difference in supporting local facilities.
Strategy / Less West End / 28	There are many villages with a primary school and village hall which should be supported with reasonable development.	Agree new development in villages will provide some benefit in supporting local facilities, but a relatively large amount of development would be required to make a significant difference.

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Strategy / Less West End / 28	New housing in villages should accommodate growth to diversify supply, meet local needs and support rural facilities, consistent with NPPF paragraph 78.	Agree, the Local Plan must be consistent with national policy (NPPF 35d).
Strategy / Less West End / 28	The Plan should look to strengthen the Towns and Villages rather than dumping houses to solve the Exeter housing needs.	Discussions on whether Exeter can meet its housing need will take place through the duty to co-operate, if required.
Strategy / Less West End / 28	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.	This issue relating to housing delivery will be considered in preparing the Local Plan.
Strategy / Less West End / 28	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.	Infrastructure requirements alongside Local Plan development will be set out in an Infrastructure Delivery Plan.
Strategy / Less West End / 28	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.	Noted, wildlife impacts will be considered in preparing the Local Plan.
Strategy / Less West End / 28	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.	This issue relating to housing delivery will be considered in preparing the Local Plan.
Strategy / Less West End / 28	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.	The Covid-19 pandemic has certainly meant more people working at home but it remains to be seen as to whether this short term trend will continue, mindful of the long time frame of the Local Plan.



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Strategy / Less West End / 28	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.	Support for development at towns and larger villages is noted, and will be considered in preparing the Local Plan.
Strategy / Alternative distribution / 28	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.	This distribution scenario will be considered in preparing the Local Plan.
Strategy / Alternative distribution / 28	Options 2 and 3 look too extreme – suggest 55% at West End, 25% at Towns, and 20% at villages, especially if more villages are added to settlement hierarchy.	This distribution scenario will be considered in preparing the Local Plan.
Strategy / Alternative distribution / 28	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.	Focussing development near existing rail routes will be considered in preparing the Local Plan.
Strategy / Alternative distribution / 28	Suggest a mix of 50% in West End, 30% in towns and 20% in villages.	This distribution scenario will be considered in preparing the Local Plan.
Strategy / Alternative distribution / 28	To recognise the important role of towns and villages, the pattern should be: West End: 20%, Main Towns: 70%, Villages and rural area: 10%.	This distribution scenario, recognising the important role of towns and villages, will be considered in preparing the Local Plan.
Strategy / Alternative distribution / 28	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.	This 'Town focused' distribution scenario will be considered in preparing the Local Plan.

Chapter / Topic / Qu	Summary of main issues	Officer response
Strategy / Alternative distribution / 28	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.	The Housing and Employment Land Availability Assessment addresses these issues, which informs allocations in the Local Plan.
Strategy / New settlement / 28	New towns with their own facilities and services are the best way of providing housing.	The need, pros and cons of a new settlement(s) will be considered in preparing the Local Plan.
Strategy / New settlement / 28	Suggest a new settlement close to major road and railway located near to Silverton and Cullompton; or near to Crediton.	These locations are not within the boundary of East Devon.
Strategy / New settlement / 28	Suggest a whole new town redevelopment on the Smeatharpe Airfield site.	The need and potential location for a new settlement(s) will be considered in preparing the Local Plan, but Smeatharpe Airfield is unlikely to be a suitable location given its rural location and being within AONB. In addition, the northern part is located in Mid Devon district.
Strategy / New settlement / 28	Cranbrook shows that the new town approach does not work – narrow roads with no parking, and the promised amenities have not happened.	Learning from Cranbrook will be an important part of considering whether a new settlement is included in the Local Plan.
Strategy / New settlement / 28	Support a more West End focussed approach, including a new settlement at Denbow (between A30 and A3052) which could accommodate around 10,000 homes.	Noted – this will be considered in preparing the Local Plan.
Strategy / Other / 28	The broad distribution of housing development is the fundamental initial policy decision for the Local Plan, from which all other policies can flow.	Agreed, the housing development strategy will be an initial chapter in the Local Plan.

Chapter / Topic / Qu	Summary of main issues	Officer response
Strategy / Other / 28	There must be no coalescence of settlements.	The impact upon the character of existing settlements will be considered in locating new development.
Strategy / Other / 28	No housing should be allowed for second home owners.	Restricting new housing to a 'principal residence' has been included in neighbourhood plans where there is evidence of high second home ownership. This will be considered in preparing the Local Plan.
Strategy / Other / 28	Prefer smaller individual developments rather than national house builders.	At least 10% of the housing requirement should be delivered on sites one hectare or lower unless there is strong reasons otherwise (NPPF 69a).
Strategy / Other / 28	Exeter Airport is a prime brownfield site if it goes out of business.	Noted, but this is not an option at the current time.
Strategy / Other / 28	Green corridors are essential between new development to maintain rural character.	Green corridors have numerous benefits (e.g. flood risk, biodiversity, health and well-being) and will be required where possible.
Strategy / Other / 28	The existing Local Plan has not had much time to implement its goals, but that does not mean it should be changed.	The five-year review of the Local Plan (January 2021) concluded that an update was required.
Strategy / Other / 28	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.	Agree, the Local Plan should support this issue, consistent with national policy (NPPF 114).
Strategy / Other / 28	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.	Agree, environmental constraints, including water quality, will be considered in preparing the Local Plan.

Chapter / Topic / Qu	Summary of main issues	Officer response
Strategy / Other / 28	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.	The settlement hierarchy provides an overview of the role and function of settlements; and an assessment of the development potential at each settlement has informed the preferred allocations.
Strategy / Other / 28	Question why we need so much additional housing – the need should be evidenced locally and not driven by Government.	We should use the national standard methodology to determine the minimum number of homes, unless exceptional circumstances justify otherwise (NPPF 61).
Strategy / Other / 28	Stop development on green belts and use existing buildings.	The Local Plan should make as much use as possible of brownfield land (NPPF 119), but the need for housing means development of greenfield sites is inevitable (nb. There is no green belt in East Devon).
Strategy / Other / 28	There should be a size limit on developments in villages and rural areas as they don't have capacity to accommodate significant expansion.	Development at individual villages will likely be less than at larger settlements due to fewer jobs, facilities and services, consistent with the settlement hierarchy. Environmental and infrastructure constraints will be considered in assessing the scale of development.
Strategy / Other / 28	Development to the highest environmental net gain standards should be prioritised.	The Local Plan will reflect a minimum 10% biodiversity net gain, consistent with legislation in the forthcoming Environment Act.
Strategy / Other / 28	Need to ensure sufficient homes and jobs in towns and villages to make them sustainable.	Noted, the Local Plan is informed by evidence in 'The Role and Function of Settlements' and an assessment of the development potential at each settlement has informed the preferred allocations.

Chapter / Topic / Qu	Summary of main issues	Officer response
Strategy / Other / 28	The AONB largely prevents development outside the western part of the district.	Development is not precluded in AONBs, but the scale and extent of development in AONBs should be limited (NPPF 176).
Strategy / Other / 28	Sidmouth should be protected from development as it's surrounded by AONB.	Development is not precluded in AONBs, but the scale and extent of development in AONBs should be limited (NPPF 176).
Strategy / Other / 28	It may be necessary to expand to expand some towns and villages in AONB if there are no alternatives.	Noted – development is not precluded in AONBs, but the scale and extent of development in AONBs should be limited (NPPF 176).
Strategy / Other / 28	Exmouth has been greatly expanded in recent years so should not be expanded further given the surrounding environmental constraints.	There are surrounding environmental constraints at Exmouth (e.g. AONB, European sites), and these have been considered in identifying the preferred allocations.
Strategy / Other / 28	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.	Noted, Exmouth is classified on its own as tier one in the settlement hierarchy, reflecting the far larger population, jobs, and facilities at the town. However, it does have environmental constraints which limit its growth.
Strategy / Other / 28	Specifically research housing demand in the towns and villages to enable a more bespoke approach and meet local needs.	This type of approach is more usually undertaken to investigate rural exception sites, but we will consider this approach in preparing the Local Plan.

Chapter / Topic / Qu	Summary of main issues	Officer response
Strategy / Other / 28	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.	Discussions on whether Exeter can meet its housing need will take place through the duty to co-operate, if required.
Strategy / Other / 28	The distribution of housing should have regard to the requirement for appropriate airport safeguarding.	Airport safeguarding will be considered when identifying housing sites.
Strategy / Other / 28	Need to ensure that developers incorporate a high percentage of affordable homes in new development.	The Local Plan will set out an affordable housing target, informed by housing need and viability.
Strategy / Other / 28	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.	The standard local housing need is specific to East Devon. Any unmet needs from adjoining areas will be considered through the duty- to co-operate, if required.
Strategy / Other / 28	Recommend an Appropriate Assessment and additional SANGS to alleviate increase recreational pressure on the SPA and SAC sites.	The Local Plan will be subject to Habitat Regulations Assessment.
Strategy / Other / 28	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?	Noted – the Local Plan preferred approach consultation will include these more detailed figures.
Strategy / Other / 28	Large housing sites and urban extensions should include policies requiring developer-funded police infrastructure.	The requirement for developer-funded police infrastructure will be considered in preparing the Local Plan.
Strategy / Other / 28	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.	As the initial preparation stage, it was appropriate for the Issues & Options consultation to express percentages. More detail is now available on the

Chapter / Topic / Qu	Summary of main issues	Officer response
		number of new homes, and this is reflected in the Local Plan.
Strategy / Other / 28	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.	Housing distribution in the Local Plan will be based upon proportionate evidence, consistent with national policy. The Local Plan will be prepared by the district council in consultation with the community. Town and parish councils can prepare neighbourhood plans to reflect more local needs.
Strategy / Other / 28	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.	Noted – the Local Plan will be informed by evidence on the transport impacts of proposed development, and any accompanying infrastructure requirements.
Strategy / Other / 28	Need to ensure that the distribution of development does not cause significant harm to the historic environment.	Agreed, the impact upon the historic environment will be considered in preparing the Local Plan.
Strategy / Other / 28	The distribution of development must be based upon accessibility, maximising opportunities to travel to jobs via sustainable travel modes.	Agreed, the Local Plan development strategy is informed by evidence on ‘The Role and Function of Settlements’ which considers these issues.
Strategy / Other / 28	Sites on the edge of towns with limited environmental constraints that do not require major new infrastructure should be prioritised.	Evidence on environmental constraints and infrastructure requirements will inform the allocation of sites.
Strategy / Development type and location / 29	Concern about large-scale development that would change the character of East Devon and the importance of the natural environment and AONB.	In developing policy and site allocations the working draft plan is mindful to not accommodate large scale development in the AONB. Protection of the environment is also a key consideration. It does need

Chapter / Topic / Qu	Summary of main issues	Officer response
		to be recognised, however, that there are substantial levels of housing and potentially other developments that do need to be accommodated.
Strategy / Development type and location / 29	Lack of suitable necessary infrastructure to support any extra development allocation.	We will need to do further work to understand infrastructure capacity levels and would seek extra provision to match need generated from new development.
Strategy / Development type and location / 29	Need more affordable housing and housing for young people.	It is recognised that affordable housing provision is a significant matter and as such proposed policy seeks to secure provision.
Strategy / Development type and location / 29	Developing a new town would be more sustainable than infilling in the existing village.	The working draft plan proposes a new town, though this is just a part of total proposed housing mix.
Strategy / Development type and location / 29	Converting vacant retail premises to homes especially affordable home	The plan does provide for/allow conversions to new homes.
Strategy / Development type and location / 29	It should be up to individual landowners to decide on building matters	This would be contrary to the principles of having a plan to guide and regulate development.
Strategy / Development type and location / 29	Leave the villages alone	The intent is to provide for limited development in villages. Some development may help sustain facilities and also provide for need housing. Proposed policy is, however, relatively restrictive of village development.



Chapter / Topic / Qu	Summary of main issues	Officer response
Strategy / Development type and location / 29	A diverse approach to new housing is required, not a single approach	The working draft plan does propose diversity on housing provision.
Strategy / Development type and location / 29	Retaining the identity of existing habitations essential	This is agreed with a policies seek to ensure this approach is taken.
Strategy / Development type and location / 29	The broad distribution of housing development is the fundamental initial policy decision for this Local Plan	This features in the working draft plan.
Strategy / Development type and location / 29	The villages in east Devon usually don't have the roads for many more houses	Road capacity is recognised as a factor to inform policy development.
Strategy / Development type and location / 29	We should preserve community identity. We should not allow villages to merge or allow towns to eat up villages	Policy development seeks to ensure the identity of places is retained.
Strategy / Development type and location / 29	New towns can be planned to reflect the needs of the future	A new town is proposed in the working draft plan.
Strategy / Development type and location / 29	An objective needs assessment should be carried out for of each our settlements	At this stage the onus rests on a District wide assessment and drilling down to town specific levels is not always credible.
Strategy / Development type and location / 29	Buildings should take place close to existing infrastructure and places with potential for jobs creation	This point is noted and it is something that the plan seeks to achieve.

<b>Chapter / Topic / Qu</b>	<b>Summary of main issues</b>	<b>Officer response</b>
Strategy / Development type and location / 29	Villages need to have slower growth over the full length of the planned period, not fast development	The plan provides for lower development levels at most villages.
Strategy / Development type and location / 29	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	Point noted though the issues options sought to give a general steer.
Strategy / Dev. Corporation / 30	EDDC should have more control over the development progress, site provision and the Design Code.	The Council needs to operate within the context of national rules and guidance.
Strategy / Dev. Corporation / 30	Concerned with the structure of Development Corporations, as members should come from different backgrounds.	It is noted that this can be a criticism of Development Corporations.
Strategy / Dev. Corporation / 30	Do not support any large development and believed it is not suitable for East Devon.	Whilst the point is noted it is very challenging to see how development needs can be met without some larger scale development schemes.
Strategy / Dev. Corporation / 30	Just another layer of bureaucrats; it would be another layer to slow down the development process.	Points noted though no further comment is provided.
Strategy / Dev. Corporation / 30	Concerned Development Corporations would be too powerful, and local voice would not be considered.	It is recognised that this is a criticism that is made of development corporations.
Strategy / Dev. Corporation / 30	Do not understand the idea of Development Corporations, thus unable to answer the question.	Point noted and the working draft plan does not refer to a development corporation.
Strategy / Dev. Corporation / 30	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,	The working draft plan seeks to take a positive approach to biodiversity enhancement.

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	that nature-rich greenspace is provided, and that all developments maximise opportunities for wildlife	
Strategy / Dev. Corporation / 30	Development Corporations are part of the problem, not the solution	The observation is noted.
Strategy / Dev. Corporation / 30	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	The observation is noted.
Strategy / Dev. Corporation / 30	Very easy to miss out on key stakeholders and community needs if not having Development Corporations	The observation is noted.
Strategy / Dev. Corporation / 30	This has huge scopes for issues with cronyism. The directors would have to be voted on	The observation is noted, however we are a long way from a corporation being a possible long term solution or even as yet positive option.
Strategy / Dev. Corporation / 30	A freestanding body with broad representation from all interested parties can make a real difference; can attract a range of funding and expertise	The observation is noted and attracting funding would be likely to be an objective if a corporation is pursued.
Strategy / Dev. Corporation / 30	A development corporation would do what it says. Government policy would override any opposition	Concerns are noted.
Strategy / Dev. Corporation / 30	It would develop into a monster, building for the sake of building, anywhere and everywhere	The observation is noted.
Strategy / Dev. Corporation / 30	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)	The intent would be to not ignore public comment. Though this does not mean that every view can be accommodated, noting contrary views on matters can exist.

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Strategy / Dev. Corporation / 30	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	It is agreed that lessons (better and worse) should be learnt from Cranbrook going forward.
Strategy / Dev. Corporation / 30	East Devon is not a Liverpool, Teesside or London Docklands with large tracts of derelict & obsolete industrial sites requiring a comprehensive strategic development agency	Whilst the point is noted there are different versions of corporations and so it would be inappropriate to rule out the option at this stage.
Strategy / Plan period / 31	Sensible to have longer plan period only if a new town is proposed in East Devon.	Agreed with.
Strategy / Plan period / 31	Planning for the long term is essential and sensible especially for climate change and net-zero carbon.	This is recognised as key.
Strategy / Plan period / 31	20 years is a good length for planning for the future, too many variables to consider planning beyond 2040 - more sensible to have regular review and update on the local plan.	Whilst the points made are sensible it is the case that Government require longer term planning on major strategic schemes.
Strategy / Plan period / 31	Focus on the existing challenges, for example, post-pandemic and post-Brexit.	These points are noted, but we do need to have longer term horizons as well.
Strategy / Plan period / 31	Setting an end date is irrelevant as local and national government requirements will change so much.	The plan making rules do require that we set start and end dates for the plan. Though it's appreciated that matters can change and new plans will come through over time.
Strategy / Plan period / 31	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	Every policy in the new Local Plan will recognise that there is an issue or consideration to which the council needs to respond. Accordingly, for each policy the council will set out the intended outcome(s) for its

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		implementation <i>and</i> how the policy's success will be measured.
Strategy / Plan period / 31	We have limited resources; stop wasting them in these endless planning, objectives and theorising	It would be hoped that having objectives will help shape a better end plan.
Strategy / Plan period / 31	Central government changes its mind with each election (particularly with a change in political party)	Whilst this may happen we do need to produce a plan and need to work to Government legislation and policies that are applicable at the time of plan making.
Strategy / Plan period / 31	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	The intent is to have a single plan (though Cranbrook Plan will also remain in place).
Strategy / Plan period / 31	Planning should be a continuous process, but allocating resources now to plan post 2040 would be wasting time and money	Whilst noted Government policy sets a requirement for long term planning on strategic sites that will be developed for many years.

## What happens next

Chapter / Topic / Qu	Summary of main issues	Officer response
What happens next	The potential to be more radical and less traditionalist in approach to plan policy.	In drawing up the working draft plan officers have sought to strike an appropriate balance between addressing the matters that a local plan needs to address (noting legal and procedural requirements and the specific role of the plan in determining applications) whilst being challenging in policy approaches.
What happens next	The uncertainty of Covid and the potential for the plan to be rapidly out of date.	Whilst points are noted we do need to produce a new plan and others will follow in the future.
What happens next	A need for cross-boundary working, especially with Exeter (though there was also opposition to cross-boundary plan making).	We will need to undertake cross-boundary working and have recognised that in draft working plan production.
What happens next	More decision making should rest with local communities and people.	There is the option for neighbourhood planning, though it does also need to be recognised that there is a requirements for a District wide plan and that we do need to be aware of overall District and potentially wider needs.
What happens next	Government changes to the planning system should be more fully referenced.	We have sought to produce a working draft plan that accords with the planning systems and guidance that is in place now.

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What happens next	Need to resist small gas fired electricity generation plants	The plan has a climate change policy that sets out the agenda for future energy efficiency and power generation.
What happens next	Room sizes in new developments need to be given more consideration	In future work we envisage looking at potential planning policy in respect of room sizes.
What happens next	The local plan should be implemented and policies not over-ridden when it comes to decision making	Policies of an adopted plan are taken into account in decision making. Though sometime there can be tensions across different policies and with national policy.
What happens next	Tourism and agricultural matters should be given greater prominence	In the working draft plan these sectors are considered and policy is providing, though relevant provision will be kept under review.
What happens next	Waste management should be covered in the plan	Waste planning is a county matter so it would be inappropriate to address it in this local plan, other than in limited circumstances.
What happens next	The Council's own housing company should be providing more housing	This is a matter that falls outside of the local plan.
What happens next	Concern over levels of second and holiday homes	The point is noted though at this stage it is not conserved that sufficient evidence exists to justify or sustain planning policy. It is also questioned whether policy provision would address concerns that are actually raised.
What happens next	Need for an up to date Playing Pitch Strategy	Agreed and work on production is on-going.

<b>Chapter / Topic / Qu</b>	<b>Summary of main issues</b>	<b>Officer response</b>
What happens next	Should have regard to the South Marine Plan (under the Marine and Coastal Access Act)	Agreed and will seek to ensure alignment as planning policy develops.