East Devon Local Plan – 2021 to 2040 - Issues and Options consultation for the attention of the Planning Policy team

We would encourage you to complete the on-line response form – see:

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

Please only use this paper version of the questionnaire if you lack internet access. Receiving on-line submissions will help us save time and money and will mean we can be more accurate in our work.

Your Title	Ms	First name or initial	Sue	Surname	Green

Your email address	sue.green@hbf.co.uk
Your telephone number	07817 865534
Your postal address and post code	c/o 80 Needlers End Lane, Balsall Common, Warwickshire, CV7 7AB
Organisation name (if relevant)	Home Builders Federation (HBF)
If you are an agent acting for a client please provide the name of your client	

Your Age Range

- ○ 0-18
- ○ 19-25
- ○ 26-40
- ○ 41-55
- ◉ 56-70
- ○ 70 plus

In what capacity are you responding to this consultation - what most closely describes you or if you are an agent what best describes, in respect of this consultation, what your client does?

- ○ Private individual
- ○ Environmental body
- ○ Government department or agency
- ○ Local authority
- ○ Parish or town council
- ○ Politician
- ○ Religious body
- ○ Cultural group or body
- ○ Education provider
- ○ Amenity group
- ○ Land owner
- ○ Developer
- ○ Private company
- ○ Emergency service provide
- ○ Utility or transport provider
- ○ Community or resident group
- ○ Representative of commercial organisation or business
- ◉ Other – Please specify (in the box below)

Trade Organisation

Guidance notes

We have produced a local plan issues and options consultation document that we are consulting on from 18 January 2021 to midday on 15 March 2021. In the consultation document we include a series of questions. Please note that this questionnaire should be read alongside the full consultation document.

Please respond to this consultation event, on-line, if possible, see:

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

Paper copies of this completed of this questionnaire should be posted to:

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

To arrive no later than 12.00 noon on Monday 15 March 2021.

Data Protection

Any personal information which you provide will be held and used by East Devon District Council for the purpose of local plan production. Your information may also be shared within East Devon District Council for the purposes of carrying out our lawful functions. Otherwise your personal information will not be disclosed to anybody outside East Devon District Council without your permission, unless there is a lawful reason to do so, for example disclosure is necessary for crime prevention or detection purposes. Your information will be held securely and will not be retained for any longer than is necessary. There are a number of rights available to you in relation to our use of your personal information, depending on the reason for processing. Further detail about our use of your personal information can be found in the relevant Privacy Notice which can be accessed at: https://eastdevon.gov.uk/access-to-information/data-protection/privacy-notices

Please note that responses received will not be treated as confidential and they will be published on our council web site along with your name and if relevant the name of the organisation you represent. If you are an agent your name and organisation will be published as well as those of your client. Postal or email address will not be published unless they are embedded in documentation and cannot be readily blacked out.

Question 1 - Local Plan Objectives

In paragraph 2.1 of the Issues and Options report we set out a series of suggested objectives for the future local plan that cover issues like climate change, meeting housing needs and supporting the economy. Question 1 seeks your views on these objectives.

Do you think these are the right objectives for the new local plan, are there any further objectives that you would wish to see added or amendments made?

- ◯ Yes, these are the right objectives
- ◯ No, there are further objectives or amendments I would like to add

Please give details

The HBF have no comments on the Councils 10 Objectives.

Question 2 – The scope of the local plan

In paragraph 2.2 of the Issues and Options report we propose producing a single plan, but it would be possible to produce a series of plans to cover the different issues. Do you think we should?

Which option do you think we should take?

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

Please provide any further comments in the box below

The HBF's preference is Option 1 for a Single Plan covering all policy matters. It is the HBF's opinion that the Council should not pursue Option 2 for Multiple Plans.

Question 3 - Neighbourhood Plans and the new Local Plan

Neighbourhood plans have been agreed for many of our neighbourhoods and more are in preparation. In paragraph 2.11 of the Issues and Options report we explain the role of neighbourhood and their relationship with the local plan.

How do you think we should make best use of existing neighbourhood plans to inform the new local plan that we are producing?

The LPR should set out the strategic context for neighbourhood planning. As set out in the 2019 National Planning Policy Framework (NPPF), Neighbourhood Plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies (para 29).

Question 4 - Planning for health and wellbeing

In Chapter 3 of the Issues and Options report we set out the health and wellbeing benefits of active lifestyles and the ways in which planning can promote this.

How important do you think it is that we should actively promote health and wellbeing throughout our new local plan?

- ○ Absolutely essential
- ○ Very important
- ◉ Quite important
- ○ Of limited importance
- ○ Not important at all

Please provide comments below on any health and planning matters you consider to be particularly important

The LPR should promote health and well being as set out in the Council's Objectives (1) and (6). The National Planning Practice Guidance (NPPG) confirms that a HIA can serve a useful purpose at planning application stage and consultation with the Director of Public Health as part of the process can establish whether a HIA would be a useful tool for understanding the potential impacts upon wellbeing that development proposals will have on existing health services and facilities (ID 53-004-20140306). Any requirement for a HIA should be

Question 5 - Energy efficiency of new buildings

In paragraph 4.4 of the Issues and Options report we identify ways of reducing carbon emissions from new developments, including setting higher energy efficiency standards for new buildings. Do you think we should?

Do you think we should

- ○ **Option 1 - Plan for net-zero carbon from plan adoption**. This would require all new development to be net-zero carbon upon adoption of the plan. However, it would be at a cost and as a consequence we may see less affordable housing built and maybe fewer other social and community benefits from development
- ○ **Option 2 - Plan for net-zero carbon from a future date**. This would require all new development to achieve net zero carbon from a future date in the plan process. It could allow time for the development industry to adjust to the higher standards and may mean we can secure more affordable housing and community benefits from development
- ◉ **Option 3 - Do neither of the above and not have a policy**. Under this option we could just wait for and apply any Government policy

Please provide any further comments

The Council wishes to ensure all new development moves the District towards delivering net-zero carbon emissions by 2040. The HBF's preference is Option 3, which would apply the Government's national policy approach. It is the HBF's option that neither Option 1- Plan for net-zero carbon from plan adoption, which would require all new development to be net-zero carbon upon adoption of the plan nor Option 2 - Plan for net-zero carbon from a future date, which would require all new development to achieve net zero carbon from a future date in the

Question 6 - Provision of solar arrays/farms and windfarms

Paragraphs 4.5 to 4.7 of the Issues and Options report deals with maximising energy from renewable sources. Question 6 seeks your views on what level of support we should give.

Which option do you think we should take?

- ◯ **Option 1** - Identify suitable areas for renewable energy developments
- ◯ **Option 2** - Not identify areas but offer general support
- ◯ **Option 3** - Take a restrictive approach to renewables
- ◯ **Option 4** - None of these options

Please provide any further comments on wind farms and solar arrays/panels

The HBF have no comments on the provision of solar arrays / farms and windfarms.

Question 7 - Carbon saving measures

Paragraph 4.8 of the Issues and Options report sets out seven policy objectives for helping to achieve carbon neutrality including using 'waste heat', and promoting community led renewable energy schemes.

Do you think we have identified the appropriate carbon saving and related policy matters to be addressed in a new local plan and are there any other policy areas that you think we should be considering?

- ◯ Yes, the appropriate carbon saving policy matters have been addressed
- ◯ No, there are other policy areas that should be considered

Please give details

The HBF have no comments on the Council's proposed carbon saving measures.

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

In Chapter 5 of the Issues and Options report we set out the current Government requirement for us to build at least 928 new homes a year (although this figure can change). Paragraph 5.4 explains that we would need to almost double the number of affordable homes (to 461 every year for the next 20 years) to meet current and future needs. Do you think we should?

Which option do you think we should take?

- ○ **Option 1 - Plan for an average of at least 928 new homes being built each year** – This would accommodate levels of house building that accord with current Government requirements. It may mean, however, that we fall a long way short of meeting all affordable housing needs.
- ○ **Option 2 - Plan for a greater number of homes, for example 1,200** – this may meet more of the affordable housing need but not all of it.
- ◉ **Option 3 - Plan to build considerably more homes each year** - A figure of 1,614 homes would align with Governments previous thinking and would potentially result in all affordable housing needs being met.
- ○ **Option 4** - Select option 4 if you think none of the above are appropriate

Please provide any further comments and justification in the box below, especially if you think a different number of new homes being built each year is appropriate.

As set out in the 2019 NPPF, strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period (para 65). The determination of the minimum number of homes needed should be informed by a Local Housing Needs (LHN) assessment using the Government's standard methodology unless exceptional circumstances justify an alternative approach (para 60). In

Question 9 - Sites for small scale housing developments

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

Which option do you think we should take?

- ○ **Option 1 - Allocate or identify land for around 10% of homes to be on small sites** - this approach would meet minimum government standards.
- ○ **Option 2 - Allocate or identify land for around 11% to 25% of homes to be on small sites** - this approach would be higher than Government minimum standards.
- ○ **Option 3 - Allocate or identify land for 26% to 50% of homes to be on small sites** - this approach would be substantially higher than Government minimum standards.
- ○ **Option 4** - Allocate or identify land for 51% or more of homes to be on small sites - with such a high figure this approach could fundamentally change the nature of house building in East Devon.
- ○ **Option 5 - None of the above or an alternative**

Please provide any further comments in the box below

The Council's Housing Land Supply (HLS) should provide a sufficient supply of land to meet the housing requirement, to ensure the maintenance of a 5 Year Housing Land Supply (YHLS) and to achieve Housing Delivery Test (HDT) performance measurements.

As set out in the 2019 NPPF at least 10% of the housing requirement should be accommodated on sites no larger than one hectare or else

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

Paragraphs 5.8 and 5.9 of the Issues and Options report sets out the reasons for building a range of homes that can accommodate different circumstances. What approach should we take to encourage this, or is it not something the local plan should deal with?

Which option do you think we should take?

- ○ **Option 1 - We should explicitly require housing provision for people at all stages of life**. This approach could place demanding standards on developers to provide housing for all stages of people lives. It could though reduce monies available to pay for other wider community benefits from development.
- ○ **Option 2 - We should encourage but not require housing provision for people at all stages of life**. Under this approach we could encourage and support such housing but be less demanding on specific standards to be met.
- ○ **Option 3 - Not set standards for differing types of housing provision**. This approach would leave developers to determining the types of houses that should be built rather than policy seeking to require specific outcomes
- ◉ **Option 4** - None of the above or an alternative

Please provide any further comments in the box below on how we may best plan for housing for all.

All households should have access to different types of dwellings to meet their housing needs. As set out in 2019 NPPF, the housing needs for different groups should be assessed to justify any policies on the size, type and tenure of housing including a need for affordable housing (paras 61 & 62). All policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). The Council's approach to planning for housing for people at

Question 11 - Additional housing policy objectives

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

Do you think these are appropriate housing policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

- ○ Yes, these are appropriate housing policy areas to be addressed
- ◉ No, there are other major policy areas that should be addressed

Please give details

Housing Objective 1 – encouraging more self and custom build housing.

The Council should support Self & Custom Build Housing. The NPPG sets out the key role that the Council should play in bringing forward suitable land for self & custom build housing (ID 57-025-20210508).

Question 12 - Preference for location for future job provision

Paragraphs 6.4 to 6.7 of the Issues and Options report explains why much recent employment development has occurred near to Exeter and where future job growth would best be located. We set out below a number of differing potential areas in East Devon that could accommodate future job growth and development. Please indicate your in principle levels of support for each option

12a - Continued focus on big employment sites in the West End of the District

- ◯ Strongly support
- ◯ Support
- ◯ Neither oppose nor support
- ◯ Oppose
- ◯ Strongly oppose

12b - Encouraging greater business development in other areas close to Exeter (for example expanding Greendale and Hill Barton Business Parks)

- ◯ Strongly support
- ◯ Support
- ◯ Neither oppose nor support
- ◯ Oppose
- ◯ Strongly oppose

12c - Encouraging greater business development at and within the main towns of East Devon

- ◯ Strongly support
- ◯ Support
- ◯ Neither oppose nor support
- ◯ Oppose
- ◯ Strongly oppose

12d - Encouraging business expansion and development in the villages and across the countryside of East Devon

- ◯ Strongly support
- ◯ Support
- ◯ Neither oppose nor support
- ◯ Oppose
- ◯ Strongly oppose

12e - Encourage and enable more home working

- ◯ Strongly support
- ◯ Support
- ◯ Neither oppose nor support
- ◯ Oppose
- ◯ Strongly oppose

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

The HBF have no comment on the Council's preference for the location for future job provision.

Question 13 - Differing jobs sectors in East Devon

Paragraphs 6.8 to 6.10 of the Issues and Options report discuss what sort of jobs the local plan should encourage, including the opportunities to attract new and emerging sectors with highly skilled jobs. To what degree do you support, or not, the following approaches to future jobs or differing types of jobs?

13a - More jobs overall – with an emphasis on attracting new/larger employers and inward investment in any or all sectors

- ◯ Strongly support
- ◯ Support
- ◯ Neither oppose nor support
- ◯ Oppose
- ◯ Strongly oppose

13b - More high technology jobs - focussing on high technology and high skilled jobs (including in the transformational sectors).

- ◯ Strongly support
- ◯ Support
- ◯ Neither oppose nor support
- ◯ Oppose
- ◯ Strongly oppose

13c - Local Entrepreneurs – promoting opportunities for more home/locally based/small businesses.

- ◯ Strongly support
- ◯ Support
- ◯ Neither oppose nor support
- ◯ Oppose
- ◯ Strongly oppose

13d - Traditional Sectors - Focus on growth, resilience and diversification in our traditional sectors - such as agriculture, tourism and care

- ◯ Strongly support
- ◯ Support
- ◯ Neither oppose nor support
- ◯ Oppose
- ◯ Strongly oppose

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

The HBF have no comment differing job sectors in East Devon.

Question 14 - Additional economic policy objectives

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

Do you think these are appropriate economic policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

- ( ) Yes, these are the appropriate economic policy areas
- ( ) No, I think there are other policy areas that should be addressed

Please give details

The HBF have no comment on any additional economic policy objectives.

Question 15 - Town centre uses

Chapter 7 of the Issues and Options report considers options for the roles of our town centres. Question 15 seeks your views on these options. We set out below a number of differing potential uses and approaches to promoting town centre vitality and activity. Please indicate your in principle levels of support for each potential option or approach.

15a - Retail to dominate – support retail uses in town centres and if possible resist other uses.

- ○ Strongly support
- ○ Support
- ○ Neither oppose nor support
- ○ Oppose
- ○ Strongly oppose

15b - Promote mixed commercial uses - support retail as well as other commercial uses such as café's and offices

- ○ Strongly support
- ○ Support
- ○ Neither oppose nor support
- ○ Oppose
- ○ Strongly oppose

15c - Redefine town centres to smaller core areas – concentration on retail and commercial uses in the core and allowing much greater flexibility for other uses in peripheral areas

- ○ Strongly support
- ○ Support
- ○ Neither oppose nor support
- ○ Oppose
- ○ Strongly oppose

15d - Support change of use to housing – allow for any shops or commercial premises to be converted to housing

- ○ Strongly support
- ○ Support
- ○ Neither oppose nor support
- ○ Oppose
- ○ Strongly oppose

15e - Support community uses - promote more community spaces in town centres

- ○ Strongly support
- ○ Support
- ○ Neither oppose nor support
- ○ Oppose
- ○ Strongly oppose

15f - Leisure uses – promote new gyms and sports facilities in town centres.

- ○ Strongly support
- ○ Support
- ○ Neither oppose nor support
- ○ Oppose
- ○ Strongly oppose

If you have any comments on the above or other distribution matters please set these out below

The HBF have no comment on town centre uses.

Question 16 - Additional town centre policy objectives

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

Do you think these are appropriate retail and town centre policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

- ◯ Yes, these are appropriate policy areas
- ◯ No, there are other major policy areas that should be addressed

Please give details

The HBF have no comment on any additional town centre policy objectives.

Question 17 - Designing beautiful spaces and buildings

Chapter 8 of the Issues and Options report explains how attractive places can be planned and Question 17 seeks to find out how important you think it is that this is done.

How important do you think it is that we should actively plan to create beautiful spaces and buildings?

- ◯ Absolutely essential
- ◯ Very important
- ◯ Quite important
- ◯ Of limited importance
- ◯ Not important at all

Please provide comments below on design matters you consider to be particularly important. We would be especially interested in your views on whether we should include design codes in our future local plan for each allocated development site or whether we should make it simpler and just have general guidance.

The Council's proposed policy approach to design beautiful spaces and buildings should accord with the 2019 NPPF, the latest NPPG, the National Design Guide and National Model Design Code. The Council's policy approach should provide specific local guidance rather than repeating national policy or guidance.

Question 18 - Additional design policy objectives

Paragraph 8.8 of the Issues and Options report identifies two areas with the potential for additional policy work. These are encouraging innovative designs and incorporating wildlife friendly elements into developments.

Do you think these are appropriate design policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

- ◯ Yes, these are approprate housing policy areas
- ◯ No, there are other major policy areas that should be addressed

Please give details

The Council is referred to the HBF's answer to Question 17 above.

Question 19 - The importance of conserving and enhancing heritage assets

Chapter 9 of the Issues and Options describes our heritage assets and sets out the positive impacts they can have on our quality of life and local economies.

Through a new local plan (and in the work of the council more generally) how important do you think it is that we should conserve and enhance our heritage assets?

- ◯ Absolutely essential
- ◯ Very important
- ◯ Quite important
- ◯ Not really of any importance

Please provide any further comments on heritage asset conservation and enhancement below including on any specific matters you think a new local plan should address.

The HBF have no comments on conserving and enhancing heritage assets.

Question 20 - Development in protected landscapes

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

In considering whether we should allow for development in protected landscapes do you think

- ○ **Option 1 - Place significant restrictions on development.** This approach would apply very tight constraints on development. However, it could mean more development pressure elsewhere in East Devon.
- ○ **Option 2 - Allow for development to meet local needs.** This would allow for limited development, specifically where it will meet smaller scale local social, housing or economic needs, it could still mean more development pressure elsewhere in East Devon.
- ◉ **Option 3 - Allow for greater levels of development.** This approach would allow for much more development in protected landscapes, in so doing it could however reduce the need to build elsewhere.
- ○ **Option 4 - None of the above or an alternative**

Please provide any further comments in the box below

The HBF's preference is Option 3, which would allow for greater levels of development.

Question 21 - Net gains in biodiversity

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

In order to gain biodiversity improvements which option would you prefer?

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

Please provide any further comments in the box below

It is the HBF's opinion that the Council's policy approach to biodiversity as set out in Options 1 - 3 should not deviate from the Government's proposals on biodiversity gain as set out in the Environment Bill. This legislation will require development to achieve a 10% gain for biodiversity. It is the Government's opinion that 10% strikes the right balance between the ambition for development and reversing environmental decline. 10% gain provides certainty in achieving environmental outcomes, deliverability of development and costs for

Question 22 - Additional natural environment policy objectives

Paragraph 10.8 of the Issues and Options report identifies 10 additional themes for the natural environment that may benefit from policies in the local plan.

Do you think these are appropriate natural environment policy issues to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

- ( ) Yes, these are the appropriate natural environment policy issues
- ( ) No, there are other major policy areas that should be addressed

Please give details

The Council is referred to the HBF's answer to Question 21 above.

Question 23 - Promoting accessibility by walking and cycling

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

In order to promote walking and cycling and ensure that facilities are accessible we could adopt the possible approaches detailed below, which one would you favour?

- ( ) **Option 1 - Focus new development as small clusters of growth in locations within easy walking or cycling distance of existing services and facilities** - This will limit the potential location of new development and will require existing facilities and services to have the capacity to cope with extra customers/users
- ( ) **Option 2 - Focus new development on a small number of growth areas where the large scale of development will support the delivery of new accessible services and facilities** - This may require very high levels of development to support facilities, which may overwhelm a small settlement.
- (•) **Option 3 - A combination of options 1 and 2** – This will enable some growth where existing facilities and services are accessible and have capacity with the remainder focused on growth areas to be developed with new services and facilities.
- ( ) **Option 4 - Do not require facilities and services to be within walking or cycling distance of new development but require them to be available within the settlement** - This option would not require access by foot or cycle to facilities and services but would require them to be available locally. It may however encourage car use.
- ( ) **Option 5 - None of the above** - Perhaps you think that accessibility by walking or cycling is not a relevant concern?

Please provide any further comments in the box below

The HBF's preference is Option 3, which is a combination of Option 1 to focus new development as small clusters of growth in locations within easy walking or cycling distance of existing services & facilities and Option 2 to focus new development on a small number of growth areas where the large scale of development will support the delivery of new accessible services & facilities.

Question 24 - Additional sustainable transport policy objectives

Paragraph 11.7 of the Issues and Options report identifies 13 key issues that may need to be considered around the theme of sustainable transport.

Do you think these are appropriate sustainable transport policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

- ◯ Yes, these are appropriate sustainable transport policy areas
- ◯ No, there are other major policy areas that should be addressed

Please give details

Sustainable Transport Objective 11 - considering the need for electric charging for vehicles and Objective 13 – requiring electric charging for bicycles.

The HBF recognise that electric vehicles will be part of the solution to transitioning to a low carbon future. The Department of Transport

Question 25 - Facilities and services that are important

Chapter 12 of the Issues and Options report deals with infrastructure requirements and asks what facilities are important to people to help us prioritise what may be needed and where. Please score the services and facilities listed below in accordance with their importance to where you live or would want to live

Please score the services and facilities listed below in accordance with their Importance to where you live or would want to live?	**Please tick one box only for each item**			
	Essential	Very Important	Quite Important	Of little Importance
Convenience store/Post Office	☐	☐	☐	☐
Supermarket	☐	☐	☐	☐
Childcare and nursery school provision	☐	☐	☐	☐
Primary school	☐	☐	☐	☐
Secondary school	☐	☐	☐	☐
Children's play area	☐	☐	☐	☐
Sports & leisure facilities	☐	☐	☐	☐
Health care facilities	☐	☐	☐	☐
Open spaces	☐	☐	☐	☐
Easy access to a range of jobs	☐	☐	☐	☐
Regular bus service (5 plus per day)	☐	☐	☐	☐
Train station	☐	☐	☐	☐
Paths for walking and cycling	☐	☐	☐	☐
Access to full fibre broadband	☐	☐	☐	☐
Public house	☐	☐	☐	☐
Place of worship (e.g. a church)	☐	☐	☐	☐
High quality road links	☐	☐	☐	☐
Emergency services (police, fire, ambulance)	☐	☐	☐	☐
Community hall	☐	☐	☐	☐
Youth facilities	☐	☐	☐	☐

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

The HBF have no comment on facilities and services.

Question 26 - Additional infrastructure and service provision policy objectives

Paragraph 12.9 of the Issues and Options report identifies five other infrastructure and service policy objectives.

Do you think these are appropriate infrastructure and service provision policy areas to be addressed in a new local plan and are there any other major policy areas that you think we should be addressing?

- ○ Yes, these are appropriate policy areas to be addressed
- ○ No, there are other major policy areas that should be addressed

Please give details

The HBF agree with the Council's Infrastructure & Service Provision Objective 10 that infrastructure needs should be secured at an appropriate time to support new development.

Question 27 - Retaining and refining the existing settlement hierarchy

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

Which of the following options do you prefer for a potential settlement hierarchy?

- ○ **Option 1** - Same hierarchy as current local plan: 7 Towns plus Cranbrook and the 15 Villages
- ○ **Option 2** - A hierarchy that retains the towns and Cranbrook but has a lower number of villages that may accommodate development
- ◉ **Option 3** - A hierarchy that retains towns and Cranbrook but has a higher number of villages that may accommodate development
- ○ **Option 4** - Do something different in terms of a hierarchy or not have one

Please provide any comments below on the potential hierarchy, especially if you do not support the listed options.

Over recent years most development has occurred on the western side of the District. Under the adopted Local Plan for the period from 2013 to 2031, approximately 59% of all new homes will be built in the "West End" close to the city of Exeter at the new town of Cranbrook & other large sites at North of Blackhorse & Pinhoe and 41% elsewhere in East Devon at towns of Axminster, Budleigh Salterton, Exmouth, Honiton, Ottery St Mary, Seaton & Sidmouth and 15 villages of Beer, Broadclyst, Clyst St Mary, Colyton, East Budleigh, Feniton, Kilmington,

Question 28 - Broad distribution of housing development

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

Which broad approach to the distribution of housing development would you favour in a new local plan?

○ **Option 1 - As existing**. Continue with a distribution pattern of planned new development that is in line with the current local plan – for 60% of new homes at the West End, 30% in Towns and 10% in Villages and rural areas

○ **Option 2 - More West End focused**. This approach would focus more of the future new house building close to Exeter, perhaps as much as 75%, with the remaining 25% being in town and villages (for example 20% in towns and 5% in villages).

○ **Option 3 - A less West End focused pattern**. This approach would seek to accommodate far less development close to Exeter, maybe as little as 20% of future new homes, with the bulk of new housing, 80% of provision, being dispersed across towns and villages (for example 50% in towns and 30% in villages and rural areas).

◉ **Option 4 - An alternative to the above.** You may consider that there are different ways or approaches to look at development distribution (if so we would welcome your thoughts and comments)

Please provide any comments on the above in the space below

A continuation of the broad distribution pattern of the adopted Local Plan distributes 60% of new homes at the West End, 30% in Towns and 10% in Villages and rural areas (Option 1). The HBF's preference is a more even distribution pattern across the District, which is less extreme than the proposals set out under Option 2 – More West End focused or Option 3 – A less West End focused.

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

Paragraphs 13.15 & 13.16 of the Issues and Options report sets out a range of option for accommodating development. Which do you prefer?

	For each option please tick one box only					
How do you feel about the development types and locations listed below	Strongly support	Support	Neither oppose or support	Oppose	Strongly oppose	None of the options
Infilling in towns and at larger villages	☐	☐	☐	☐	☐	☐
Building one or more additional new towns	☐	☐	☐	☐	☐	☐
Planning for new villages	☐	☐	☐	☐	☐	☐
large scale (over 50 home)urban expansions to existing towns	☐	☐	☐	☐	☐	☐
small scale (under 50 home) urban expansions to towns	☐	☐	☐	☐	☐	☐
Building houses on the edges of East Devon villages	☐	☐	☐	☐	☐	☐

Do you have any further observations on the alternative development options and approaches? Please provide comments below

Future options for the type and location of development should be a combination of infilling in towns and at larger villages, expanding the new town of Cranbrook, large & small scale urban expansions to existing towns and building on the edges of villages.

There should be a short and long-term supply of sites on brownfield and greenfield land. Housing delivery is optimised by the widest possible range of housing site sizes and market locations, which provides suitable land buying opportunities for small, medium and large housebuilding companies. The widest mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather

Question 30 - Establishment of a Development Corporation

Paragraphs 13.17 to 13.19 of the Issues and Options report explain the role that a development corporation could plan in delivering very large scale developments. Question 30 asks for view on how important you consider this would be.

If one or more big strategic sites for housing or mixed use development are allocated in the new East Devon local plan how important do you think the creation of a Development Corporation would be?

- ○ Absolutely essential
- ○ Very important
- ○ Quite important
- ○ Of limited importance
- ○ Not important at all
- ○ It would be a bad thing

Please provide any further comments below

The HBF have no comments on the establishment of a Development Corporation to deliver one or more big strategic sites for housing or mixed-use development.

Question 31 - Planning for development beyond 2040

Paragraph 13.20 of the Issues and Options report considers the timeframe that the local plan should consider.

Do you consider that it would be appropriate to start to plan for development in East Devon for a date well beyond 2040 in this Local Plan?

- ○ Yes it would be very sensible whether a new town is proposed or not
- ◉ Sensible only if a new town is proposed
- ○ It does not really matter what end date is set
- ○ It would be undesirable and the end date should be 2040
- ○ None of these options

Please provide any further comments below

If a new town is proposed, the Council should be planning for development beyond 2040. The Government's consultation on Draft Revisions to the NPPF (ending on 27th March 2021) proposes that "where larger-scale development such as new settlements form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery" (para 22).

Question 32 - And finally...?

Are there any big planning issues that you think we have missed in this report or are there any further comments you would like to make?

At this time, there are no further comments that the HBF would like to make. It is hoped that these responses are of assistance to the Council in preparing the next stages of the LPR. As plan preparation progresses, the HBF look forward to submitting further representations at later consultation stages, in the meantime, if any further information or assistance is required please contact the undersigned.