

East Devon Local Plan 2021 to 2040 Issues and Options consultation - January to March 2021

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If you are an agent acting for a client please provide the name of your client

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?

Parish or town council

2 - Objectives

Question 1

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?

Please give details

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

Please provide any further comments in the box below

A Single Plan could have strategic policies and more local/detailed matters in other policies, as in the current Local Plan. The Cranbrook Masterplan could be incorporated as a section in the Local Plan.

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?

It is essential for the planning policy in Neighbourhood Plans to inform the Local Plan. They are the voice of local opinion – localism is important. They have been subject to extensive consultation at a local level, and nearly all of them have been through consultation and Examination more recently than the current Local Plan. Neighbourhood Plans may need to be reviewed/updated after the Local Plan review

3 - Health and wellbeing

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

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

Planning for Health Services has been neglected in recent planning policy, most notably at Cranbrook. There is pressure on primary health care services, and new development will only add to this. This must be addressed in the new Local Plan. Accessibility of health & wellbeing facilities and services is essential.

We support all the objectives outlined in paras 3.1-3.13. In our community of West Hill there is a shortage of public open space (only a small area of woodland), and facilities for leisure, sport and recreation, and it is an absolute priority for these deficiencies to be addressed.

4 - Climate emergency

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?

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

Please provide any further comments

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 2 - Not identify areas but offer general support

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

The special landscape in most of East Devon makes it difficult to accommodate wind turbines or solar farms without adversely affecting landscape quality. The Ottery St Mary & West Hill Neighbourhood Plan does not identify any sites as suitable for wind energy development. The Otter Valley is considered to be specially sensitive as a landscape feature.

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?

Please give details

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.

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.

The housing number is largely a political decision. There may be little option to ignore the algorithm that is imposed by central government. We would not wish to see more houses than the local need required. However, we acknowledge that there is a need for affordable housing.

5 - Housing

Question 9 - Sites for small scale housing developments

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

Which option do you think we should take?

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.

Please provide any further comments in the box below

The need for smaller sites may vary with the settlement – it would certainly be appropriate for a village such as West Hill, where individuality of style is important. In general we consider that smaller sites improve design quality and support the local building industry. Smaller sites are more likely to maintain the character of the area.

It is important to maintain the distinctiveness of existing areas – e.g. we wouldn't want West Hill to become a suburb of Ottery St Mary.

Larger sites could be split amongst developers.

The capability of infrastructure must be considered alongside site allocations.

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.

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

Housing for older people has been ignored in Cranbrook – there are no bungalows. There needs to be provision for housing for all stages of life within all housing development, not just specialist extra care housing, care homes, etc.

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

Please give details

These are all housing policy areas that need to be addressed.

Accommodation for gypsies and travellers is important, but they should not be given priority over other residents.

6 - Jobs and economy

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

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

Oppose

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

Strongly support

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

Support

12e - Encourage and enable more home working

Strongly support

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

There is a need for emphasis on employment opportunities in rural areas, rural apprenticeships, etc. Fibre broadband is essential to support working from home. Accessibility of employment (travel to work) is important.

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

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

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

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

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

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?

Please give details

7 - Town centres

Question 15 - Town centre uses

Chapter 7 of the Issues and Options report considers options for the roles of our town centres including. 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

To what degree do you support, or not, the following approaches to future jobs or differing types of jobs?

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

Oppose

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

Support

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

Support

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

Support

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

Strongly support

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

Strongly support

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

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?

Please give details

8 - Design

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

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.

Though good design is essential, developing and using design codes and guides is very time-consuming and difficult. Neighbourhood Plans often include design principles which are sensitive to the local issues.

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?

Please give details

9 - Built heritage

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

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.

Good design should incorporate sensitivity to local heritage assets. Heritage cannot be frozen in time – good design should be encouraged to sensitively adapt old buildings for today's needs.

10 - Natural environment

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 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.

Please provide any further comments in the box below

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 4 - A combination of the above

Please provide any further comments in the box below

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?

Please give details

11 - Transport

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 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.

Please provide any further comments in the box below

All types of disabled access should also be considered.

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?

Please give details

12 - Infrastructure/facilities

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

25a - Convenience store / Post Office

Essential

25b - Supermarket

Of little importance

25c - Childcare and nursery school provision

Essential

25d - Primary school

Essential

25e - Secondary school

Quite important

25f - Children's play area

Essential

25g - Sports and leisure facilities

Essential

25h - Healthcare facilities

Quite important

25i - Open spaces

Essential

25j - Easy access to a range of jobs

Very important

25k - Regular bus service

Very important

25l - Train station

Of little importance

25m - Paths for walking and cycling

Essential

25n - Access to full fibre broadband

Essential

25o - Public house

Of little importance

25p - Place of worship (e.g. a church)

Very important

25q - High quality road links

Very important

25r - Emergency services (police, fire, ambulance)

Essential

25s - Community hall

Essential

25t - Youth facilities

Essential

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

We have answered this question with reference to our own settlement of West Hill. Most of these facilities are essential in the wider area, i.e our nearest town of Ottery St Mary

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?

Please give details

13 - Development strategy

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

Please provide any comments below on the potential hierarchy, especially if you do not

support the listed options.

We consider it is important to maintain the existing character of East Devon.

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

Please provide any comments on the above in the space below.

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

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

Please score the services and facilities listed below in accordance with their importance to where you live or would want to live

29a - Infilling in towns and at larger villages

Support

29b - Building one or more additional new towns

Oppose

29c - Planning for new villages

Oppose

29d - Large scale (over 50 homes) urban expansions to existing towns

Neither oppose nor support

29e - Small scale (under 50 homes) urban expansions to towns

Neither oppose nor support

29f - Building houses on the edges of East Devon villages

Oppose

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

Infilling in towns and villages should be focused on using brownfield land, and should not encourage cramming.

Most of the existing towns are constrained, by adjoining AONBs, for example, and large scale development may be difficult. However we agree that smaller scale urban expansion may mean that the necessary infrastructure is not provided.

Large scale urban expansions is only suitable in the larger towns

Building on the edge of villages may make future residents car dependent, and this should be avoided.

It is important to consider the capability of existing infrastructure & services against future need.

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?

It would be a bad thing

Please provide any further comments below

No under any circumstances

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

Please provide any further comments below

14 - Any extra comments

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?

From our local perspective, it is essential that the settlements of Ottery St Mary and West Hill maintain their separation and do not coalesce (Policy NP4 of the Neighbourhood Plan).

Deficiencies in provision of public open space and sport/recreation facilities, and creation of walking/cycling routes are an essential local priority.

At a District level, the Duty to Co-operate with neighbouring authorities is essential.

Call for Sites & HELAA - We are concerned about the composition of the Panel which assesses sites submitted in the Call for Sites. The Panel comprises representatives of the economic and housing industries, but no representatives from conservation bodies or from Town or Parish Councils. We appreciate that this is a technical assessment, but we consider that it would be better

have a Panel with more balanced views.