

The new emerging East Devon Local Plan – Further Consultation Launch Webinar

Thursday 16th May 2024

Notes:

Emerging Local Plan Presentation (key points in addition to slides):

- Reminder that the Local Plan has to conform to national policy and as such we must find sufficient sites to meet our housing requirement. Conflict to some extent between the new Local Plan and some of our neighbourhood plans is inevitable.
- Local Plan strategy seeks to focus development in the most sustainable locations and where there are existing services and facilities. In smaller villages and the wider rural area beyond the settlements named in Settlement Hierarchy, there is still potential for development to come forward via neighbourhood plans and community-led schemes.
- Regarding the proposed second new town, further to the previous Regulation 18 consultation, members have agreed to pursue work on 'Option 1' (area north and west of the Hill Barton business park between the A3052 and the A30 and the airport junction). Evidence gathering for this is underway, progressing into masterplanning work over the summer, including engagement with those communities affected.
- The timetable for the Local Plan is in part being driven by desire to submit the Plan under the transitional arrangements before the new plan-making system comes into force. Meeting this requires us to submit the Plan for examination by June 2025.

Topics for Further Consultation Presentation (key points in addition to slides):

- **Housing sites** – site assessments have been carried out using this [published methodology](#).
- **Employment sites** – our overall aim with the Local Plan is to enable new businesses to find premises and existing businesses to have the space to expand. Also looking to encourage investment in high value jobs and increase skills and wages. With the new sites submitted (which are generally quite small and extensions to existing sites), together with those we have already consulted on and our existing employment sites, we have a good spread across the district in order to be able to accommodate all scales and types of employment development.
- **Designated Neighbourhood Areas Housing Requirement** – new requirement in national policy for us to set these figures in this Local Plan, but our research shows huge amounts of variation nationally into how this is being approached between different Local Planning Authorities (and Local Plan examiners). We have identified and assessed 9 different options and based on a set of criteria, have reduced this to 2 possible options that we think are most suitable for East Devon. There is no requirement in either of these options for neighbourhood plans to have to plan to meet any of the housing requirement. If we were to use an alternative option that did include housing to come through emerging and future neighbourhood plans to meet the district minimum figures, we would need robust evidence of deliverability within the plan period for testing at the Local Plan examination. An [Executive Summary](#) of the accompanying Technical Report on this topic **is now available** on the Consultation website. There are also figures available for each of the Designated Neighbourhood Areas as part of that technical work on the website. Important to remember that these are draft, illustrative figures, which are subject to change, and it is the method rather than the figures themselves that we are inviting comments on.
- **Local Designations (Green Wedges, Coastal Protection Area, Clyst Valley Regional Park)** – in most cases these boundaries are broadly the same as the current designations, with the CVRP extended. It is the boundaries rather than the associated policy wording that we are consulting on at this second round of consultation.
- **Town Centre Retail Areas** – we are keen to ensure that East Devon communities continue to have access to a range of shops and other facilities in local town centres and that these retain and enhance their vibrancy. Worth being aware that Government policy has recently changed and is far more flexible in its approach to town centre uses. This makes it more difficult for us to protect retail uses and prevent change of use to many other uses, where planning consent is no longer required. Again, the consultation this time is focused on the boundaries as we've already consulted on the policy wording.
- **Responding to the Consultation** –
 - very resource intensive collating and analysing responses to the consultation and this is one of the main reasons we are encouraging responses through the online consultation portal which enables a certain degree of automation.

- Responses from the previous rounds of consultation and to this latest round will all be considered to feed into recommendations that go forward for Member decisions on the final draft Plan, including what changes we have made in response to the comments we have received.
- Should communities wish to hold their own local events/meetings, we are unable to provide an officer presence but we will assist with requests for supporting materials, and any advice needed. In the first instance, we would direct you to review the material available online on the consultation website.
- Shortcut web address to find this is: www.eastdevon.gov.uk/local-plan
- Respondents can answer as many or as few questions as they wish, **BUT to successfully submit their answers, they must click “Next” all the way through the last page on each topic that they are responding to.**
- **Update since presentation: There are now responsive/interactive maps available for all the boundary-related consultations in the relevant topic ‘pages’ on the online consultation:**
 - New housing and mixed use sites
 - New employment sites
 - Green Wedges
 - Coastal Preservation Area
 - Clyst Valley Regional Park
 - Town Centre Retail Areas
- Although email address is taken, responses made through CP are anonymous. We can group the responses by respondent but not by name/email. Therefore, if you wish to highlight through response in Commonplace that the comment is being made by the Town / Parish Council, you would need to make this clear within the comments.
- It is possible to return to the consultation to submit comments at different times for different topics, but you would need to submit comments on the topic you are on before exiting the site.

Question and Answer Session Discussion Summary

Question: Why are some sites being promoted within the Green Wedge between Exmouth and Lympstone when they are remote from services and facilities?

Answer: Access to services has been considered as part of the assessment of all sites. These sites are on the very edge of Exmouth, and it is acknowledged that they are some distance from a neighbourhood centre, and in particular the town centre because of the way that Exmouth has grown outwards from the estuary and coast. We are not re-consulting on sites that were already consulted on in the previous consultation, only on whether the Green Wedge boundary should be redrawn around them or contain them. We have heard what has been said about these sites already and this is being factored into our further assessment work to inform our final recommendations. We acknowledge that some of the sites that we will need to bring forward in order to meeting the housing requirement that is set by Government may not be in the best of locations and may not be “ideal sites”, but we are seeking to allocate the best sites that we have, given the constraints we have to contend with in the district, e.g. to ensure protection of our highest designated areas.

Question: What provision is being made for supporting infrastructure (health services, schools, transport etc.) for the new housing proposed through the Local Plan and where are you with this work?

Answer: We are working on an “Infrastructure Delivery Plan” (IDP) that sets out the infrastructure that would be required to support the growth coming forward in the plan and as part of this we are looking to work with stakeholders and infrastructure providers about how that infrastructure could be delivered, alongside development coming forward. It is always a challenge to deliver the infrastructure that is needed and doing that in sequence with the housing. We cannot make any definitive statements about this currently, but we are looking to have a much better understanding on what and how as we develop the plan this year, so that before anything is finalised our members have this information.

Question: How soon can we see the Infrastructure Delivery Plan and will we be consulted on it? (Specifically regarding Axminster and the large volume of housing proposed there again in the draft new LP, it is unclear with the IDP how the town can be expected to accommodate this, given the traffic issues in the town centre in particular).

Answer: Work on the IDP is still at a relatively early stage so there is not a draft available at this point. There is an existing IDP that dates back to 2017 so that can be [viewed on our website](#) to see what an IDP looks like. This will be refreshed to support the new Plan and we are keen to engage with stakeholders in the process, including the County Council and other infrastructure providers as well as the relevant Town / parish councils as we move that work forward over the coming months. We acknowledge the traffic and transport issues at Axminster and the context of the inability, despite much work, to deliver a bypass in tandem with the urban extension planned under the current local plan. We are in discussion with Devon County Council to work out what the solutions might be. As with the previous relief road proposals, there is expected to be a need for some development to help fund solutions. We need to make sure that they are delivered if we are going to look at significant levels of growth.

Question: What are you hoping to get out of the consultation in terms of people's opinions on the Designated Area Housing Requirement, and whether the windfall allowance is included or not?

Answer: We would stress that we are not (in either option) looking for neighbourhood plans to allocate more housing. The options seek to effectively summarise the housing expected to come forward through the various sources of housing supply, including what has been built or granted planning permission in the plan period and what is proposed in the new Local plan allocations. We are therefore not putting any pressure on neighbourhood plans to provide for more. The proposed approach means they will be under no obligation to do so, although they can if they want to. This applies whether or not we include windfalls.

We appreciate that some of the draft figures we are publishing may appear high in some cases, because they include all of the potential sources of housing supply, and at this time, no final decisions have been made on any of the allocations to be included in the final version of the Local Plan. At this stage really the figures are there to illustrate and demonstrate the

methodology in action and help consideration of the implications of the choice of methodology. We are keen to know whether people agree with our intention to use a supply-based approach, with our preferred approach not to include windfalls in that (given that although these will come forward, they are hard to predict), and are we right that in general we shouldn't be requiring neighbourhood plans to deliver a particular number of homes? The figures may well change (up or down) as plan production progresses.

Question: Will there be interactive maps available for all the relevant topics in the consultation?

Answer: (Note: At the time of the webinar, there was only an interactive/responsive map available for 'Green Wedges'). Interactive maps are now also live on the website for all the map-based subjects (in addition to the pdfs), i.e. for housing and employment sites, Clyst Valley Regional Park, Coastal Preservation Area and Town Centre Retail Areas. This means you can now scroll around and zoom in much better. These maps are all embedded within the consultation website with the information for each of the relevant subjects, but you can also have a look at them all here in one place on our main EDDC website here: [Further Draft Local Plan Consultation - Responsive Maps - East Devon](#)

Question: Are we consulting on all sites newly submitted or only the preferred choices?

Answer: As before, we are welcoming comments on all the potential new sites which have made it through our initial sift – this includes those we are proposing to reject as well as those we are proposing for allocation. Therefore, if consultees think we are wrong in our assessment of sites, we will consider the reasons and decide whether there is cause to look at our conclusions again. We are very open to this. By structuring the consultation on sites as 'preferred sites', 'second choice sites' and 'rejected' sites, and publishing a summary of our assessments, we hope that this is helpful in giving consultees a flavour of any issues with the sites and where we are with our thinking at this point, in submitting their views. Ultimately, officers will be making recommendations to members at Strategic Planning Committee and that needs to take account of the responses that we've received.

Question: How many replies do you think would make this a successful consultation?

Answer: Not possible to say. This is only a limited consultation this time in terms of the subject matters covered but the important thing is that we engage a broad range of the community and get a good selection of views on the planning merits of what we're putting forward.

Question: With regards to the proposed new community, how will it be ensured that this is not just housing in a rural area given that it isn't mentioned in the draft plan retail and employment policies, and why isn't this new community proposed on the railway line, given the issues with traffic on the A3052 at Clyst St Mary?

Answer: The new community is not part of the current consultation, but we are undertaking work on a masterplan for this via consultant team, headed up by CBRE. We are working on a programme of workshops and sessions over the coming months to engage with the communities and other stakeholders (infrastructure providers etc.) about what that new community should look like, how it should come forward, the infrastructure that's required, and how and when that infrastructure should come forward. This will inform understanding of how we can deliver that new community, learning from our experience at Cranbrook, and ensuring that we deliver a place that is high quality and has the infrastructure that it needs to support it. A clear aspiration/intent is to ensure that this is delivered in step with housing delivery to ensure it is as self-contained as possible and minimises levels of out-commuting.

We know this is going to be very challenging, but to address it we are looking at options for how we deliver the new community. Cranbrook was very much delivered by a consortium of largely private sector developers (mainly house builders), and we are looking at other alternative models, potentially with the Council taking more of a leading role.

Ideally the new community would have a direct rail connection, but there are currently no realistic opportunities identified to do achieve this. We set out an option in the previous consultation about putting significant growth at some of the existing settlements along the railway. That met with significant opposition from those communities and also has other land use planning issues. We will be looking at how we can promote sustainable travel in the round for the new

community. Again, this is a big challenge and relates in part to the timely delivery of services and facilities and the degree of self-containment achieved. We are very much alive to the issue of capacity on the road network and are working in partnership with neighbouring authorities and the County Council on modeling the traffic impacts of the new community and looking at mitigation measures that would be needed. We will need to satisfy Devon County Council as highways authority and also Highways England given considerations of the impact on junction 29 and 30 of the M5 before we can progress the proposal.