

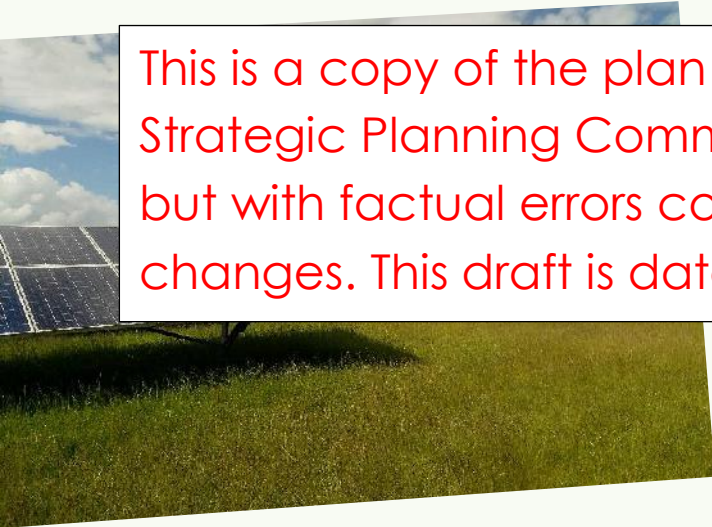


East Devon Local Plan 2020 to 2040

Working Draft
December 2021



This is a copy of the plan that was first presented to Strategic Planning Committee on 14 December 2021 but with factual errors corrected and as tracked changes. This draft is dated – January 2022.





Content – Chapters and proposed policies in the plan

Chapter 1 - Introduction.....	7
Chapter 2 - Vision and objectives of the plan	11
Chapter 3 - The spatial strategy of the plan.....	14
1. Strategic Policy - Settlement hierarchy	14
2. Strategic Policy - Overarching strategy for the distribution of development....	16
3. Strategic Policy - Housing to address needs.....	30
4. Strategic Policy - Levels of future housing development	32
5. Strategic Policy - Employment Provision and Distribution Strategy	53
6. Strategic Policy – Development inside Settlement Boundaries	59
7. Strategic Policy – Development adjacent to the outside edge of Settlement Boundaries.....	61
8. Policy – Development beyond Settlement Boundaries	62
Chapter 4 - How we have assessed the potential suitability of sites for development	63
Chapter 5 - Future growth and development on the western side of East Devon	67
9. Strategic Policy – Development of a second new town east of Exeter.....	70
10. Strategic policy – Exeter Science Park.....	72
11. Strategic policy – High quality employment north of Sowton village	73
12. Strategic Policy – Aviation and aeronautical activity employment provision east of Exeter Airport terminal	74
13. Strategic policy – Exeter Airport and its future operation and development	76
14. Strategic Policy – Green infrastructure and the Clyst Valley Regional Park...79	
15. Strategic Policy – Development next to the M5 and north of Topsham	82
Chapter 6 - Strategy for the development at Principal Centre, Main Centres and Service Villages	86
16. Strategic Policy – Axminster and its future development	88
17. Strategic Policy – Exmouth and its future development	92
18. Strategic Policy – Honiton and its future development.....	99
19. Strategic Policy – Ottery St Mary and its future development	105
20. Strategic Policy – Seaton and its future development.....	109
21. Strategic policy – Sidmouth and its future development	112
22. Strategic Policy – Development at local centres.....	115
23. Strategic Policy - development at service villages.....	132

Chapter 7 - Development in small villages, hamlets and the countryside	178
24. Strategic policy - development in small villages, hamlets and the countryside	179
Chapter 8 - Tackling the climate emergency and responding to climate change .	181
25. Strategic Policy – Climate Emergency	181
26. Strategic Policy – Net-Zero Carbon Development	183
27. Strategic Policy – Promoting renewables and zero carbon energy	185
28. Strategic Policy – Suitable areas for solar energy developments.....	186
29. Strategic Policy – Suitable areas for wind energy developments	186
30. Strategic Policy – Energy Storage.....	190
31. Strategic Policy – Heat Networks.....	192
32. Strategic Policy – Embodied carbon	194
33. Strategic policy - Flooding.....	196
34. Policy – Coastal change management areas (CCMAs).....	197
35. Policy – Relocation of uses affected by coastal change.....	198
36. Strategic Policy – Development affecting coastal erosion	199
Chapter 9 - Meeting housing needs for all	200
37. Policy - Affordable Housing	202
38. Policy - Housing to meet the needs of older people.....	206
39. Policy - Accessible and Adaptable Housing	210
40. Policy - Market housing mix	213
41. Policy – Self-Build and Custom Build Housing.....	216
42. Policy – Residential Sub-division of Existing Dwellings and Buildings and Replacement of Existing Dwellings	222
43. Policy - Residential Annexes, Extensions and Alterations	227
44. Policy - Hostels and Houses in Multiple Occupation (HMOs).....	231
45. Strategic Policy – Provision for Gypsy and Travellers, and Travelling Showpeople Sites	234
46. Policy – Rural Exception Sites and First Homes Exception Sites.....	238
47. Policy – Housing for rural workers.....	243
Chapter 10 - Supporting jobs and the economy and vibrant town centres.....	249
48. Policy – Employment development within settlement boundaries and sites in the Enterprise Zone.....	249
49. Policy –Employment development in the countryside.....	256
50. Policy – Farm Diversification	259

51.	Policy – Resisting the loss of Employment sites.....	262
52.	Policy – Employment and Skills Statements.....	265
53.	Strategic Policy - Centre Hierarchy, sequential approach and impact assessment.....	267
54.	Policy - Town Centre development	270
55.	Policy – Local shops and services.....	271
56.	Policy – Rural shops.....	274
57.	Policy – Sustainable Tourism	276
58.	Policy – Holiday Accommodation Parks in designated landscapes	280
Chapter 11 - Designing beautiful and healthy spaces and buildings		282
Chapter 12 - Prioritising Sustainable travel and providing the transport and communications facilities we need.....		286
63.	Policy – Walking, cycling and public transport.....	286
64.	Strategic policy – Protecting transport sites and routes	289
65.	Policy – Travel Plans, Transport Statements, Transport Assessments.....	291
66.	Policy – Residential car parking standards.....	293
67.	Strategic policy – Digital Connectivity.....	295
Chapter 13 - Caring for our outstanding landscape		297
68.	Policy – Landscape Features	297
69.	Policy - Areas of Outstanding Natural Beauty	298
70.	Policy - Coastal Preservation Areas.....	300
71.	Policy – Green wedges	302
72.	Policy – Land of Local Amenity Importance.....	305
Chapter 14 - Protecting and enhancing our outstanding biodiversity		308
73.	Strategic Policy – Protection and enhancement of biodiversity and geological features.....	308
74.	Strategic Policy – Habitat Regulations and mitigation of adverse impacts.....	310
75.	Policy – Biodiversity net gain	313
76.	Policy – Protection of nationally important wildlife sites.....	315
77.	Policy – Protection of local wildlife sites and features	316
78.	Policy – Protected species.....	316
79.	Policy – Trees and development	318
80.	Policy – Jurassic Coast World Heritage site and geodiversity	319
81.	Policy – Incorporation of wildlife friendly features into new developments.....	321

Chapter 15 - Ensuring access to open space and sporting and recreation facilities	323
82. Strategic Policy – Access to open space and recreation facilities.....	323
83. Policy – Retention of land and buildings for sport and recreation use	325
84. Policy – land and buildings for sport, recreation and open space areas in association with development	327
85. Policy – Location of facilities for sport and recreation, open spaces and allotments	329
86. Policy – Avoiding the loss of allotments to other use.....	330
87. Policy – leisure and recreation developments	331
Chapter 16 - Our outstanding historic environment.....	332
88. Policy – Historic Environment	333
89. Policy – Listed Buildings	334
90. Policy - Conservation Areas	335
91. Policy – Archaeology and Scheduled Monuments.....	336
92. Policy – Historic Landscapes, parks and gardens	337
Chapter 17 - Ensuring we have community buildings and facilities	338
93. Policy – new or extended community facilities.....	338
94. Policy – Loss of community facilities.....	340
Chapter 18 - Implementation and monitoring of the local plan	341
Chapter 19 - What happens next	344

Chapter 1 - Introduction

- 1.1 This is a working draft of the East Devon Local Plan to cover the period from 1 April 2020 to the 31 March 2040. However, the end date of the plan is yet to be finally determined – 2040 is a clear option but this would make it tight to have a plan that runs for at least 15 years from the date of plan adoption. A later end date may be appropriate and an amended start date might also be appropriate.
- 1.2 For this working draft an end date of 31 March 2040 provides an operational lifetime for the plan of 20 full years. References are made in the plan, however, to strategic scale development that would extend well beyond this end date.
- 1.3 This working draft document sets out:
 - A proposed structure for the draft local plan – including specific subject based chapters and matters to be addressed by plan policies.
 - Proposed strategic policy subject matters and direction of travel for matters to be addressed (but not suggested final policy wording).
 - Proposed policy content for non-strategic policies.
 - Alternative options, but at present time suggested to be rejected, in respect of strategic and non-strategic policies/policy options.
 - Commentary and justification for proposed policy matters.
 - Proposed or potential areas of land to be allocated for development or to which policy boundaries would apply (and currently suggested rejected sites).
- 1.4 It is important to note that all of the above are based on and informed by the evidence available at the time of drafting we will be gathering more evidence however as plan making progress and this will inform plan refinement or possible changes.
- 1.5 The intent is that a sustainability appraisal (SA) report will accompany papers to the Strategic Planning Committee meeting when a draft plan for consultation is considered in 2022. All recommended policy approaches and the overarching recommended plan strategy will be tested through the appraisal. Reasonable alternative options to the recommended approach will also be tested as will alternative site allocation options. The SA will provide evidence to inform, but not dictate or determine, the preferred policy choices. In this respect the SA will need to be read alongside other evidence documents and assessment work to justify plan policy.
- 1.6 The intention is that committee will consider this document and that it will be refined, taking into account committee consideration, into a draft plan that will

be presented to Strategic Planning Committee in March 2022 with a recommendation that public consultation is undertaken in early summer 2022

- 1.7 A timetable for plan production is set out below:
- Dec 2021 - A working draft plan to committee;
 - March 2022 – a proposed consultation draft to committee;
 - April/May 2022 Early summer 2022 – public consultation in the draft.
 - Oct 2022 – Publication plan approved by Committee;
 - Nov/Dec 2022 – Publication consultation;
 - Mar 2023 – Submission of plan and Examination starts; and
 - 2024 – Plan adoption.
- 1.8 We will, however, need to keep the plan making timetable under review and where relevant update the Council's Local Development Scheme accordingly.
- 1.9 In this document we highlight suggested policy and approaches in green boxes and we show alternative options in yellow boxes. At the beginning of each chapter of the plan we start off with introductory text, then provide suggested policies (In green highlighted boxes) than provide reasoned justification and background material about the policy before concluding with alternative options in yellow highlighted boxes.
- 1.10 All maps included in this working draft plan should be regarded as indicative only of possible proposals and locations for development. More detailed assessment is required before arriving at a draft local plan and in future iterations we will also provide better quality and clearer maps.

East Devon KEY FACTS



146,300 people



72,000 dwellings



Largely rural

180 people per square kilometre, compared to national average of 432



Elderly population

30% of residents aged 65+, third highest of any local authority in the UK - and set to rise



Average house prices are over 10 times average earnings, making them less affordable than both the regional and national average



Earnings are lower than both the regional and national average



Lower proportion of residents with higher level qualifications (33%) compared to regional (40%) and national (43%) average



Among the least deprived local authorities in England (238th out of 317) but rural areas suffer from relatively poor access to housing and local services



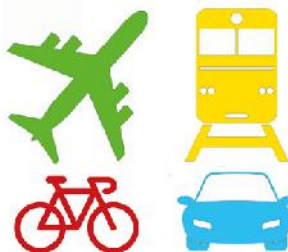
Outstanding natural environment

- Two-thirds of district is designated as AONB
- 'Jurassic Coast' World Heritage Site
- Six internationally protected wildlife sites
- Twenty-six SSSIs



Highly valued historic environment

- Thirty-four Conservation Areas
- Over 3,000 Listed Buildings
- Total of 112 Scheduled Monuments



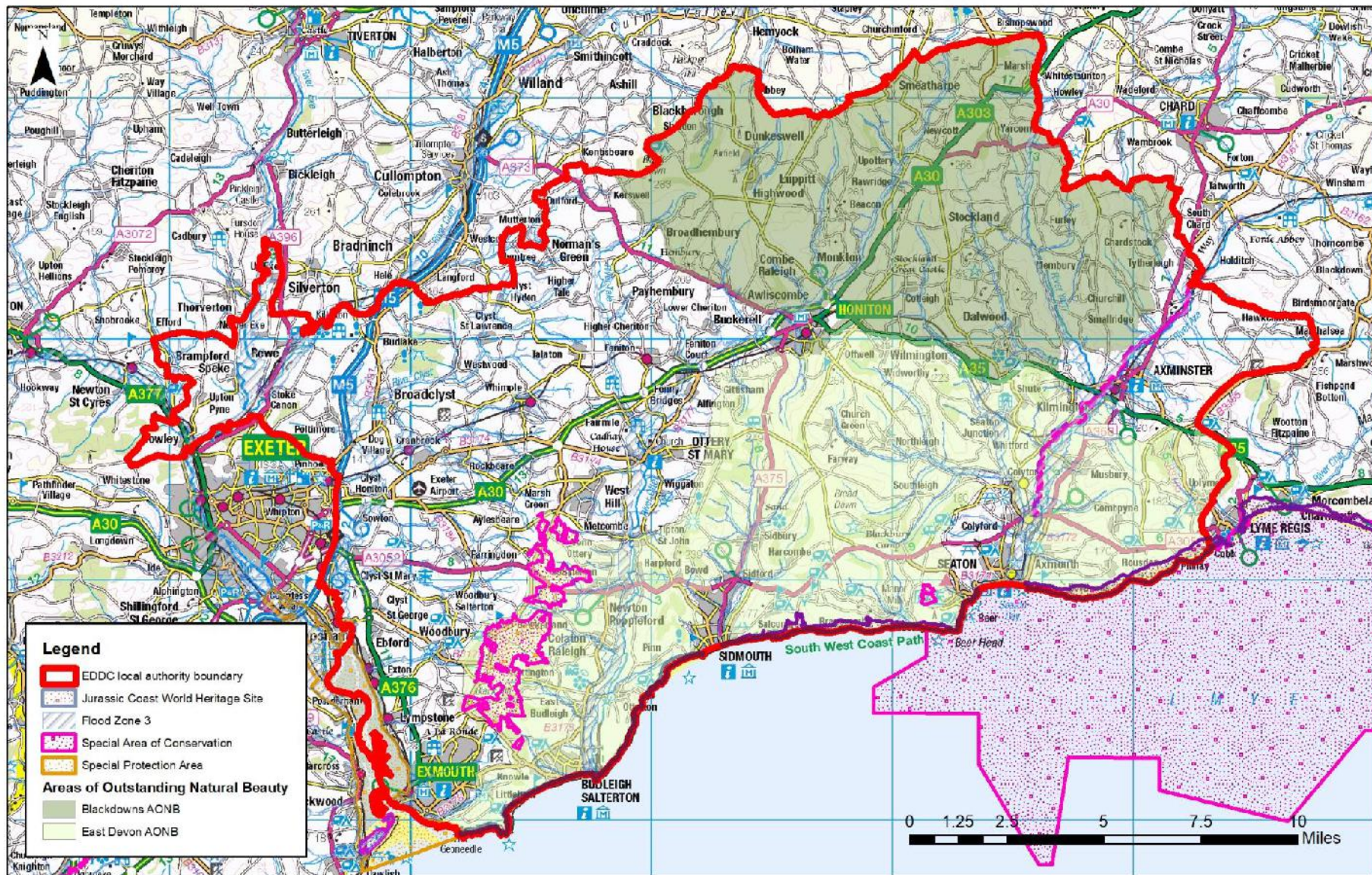
Transport links

- Large number of train stations (9) with usage having significantly increased over the last 20 years
- Main road links - M5, A30/303 and A35
- Exeter Airport
- National Cycle Network, notably the Exe Estuary Trail



Climate change

- The council has declared a 'climate emergency'
- CO₂ emissions per person have been falling over recent years but further reductions are needed to tackle climate change
- Flooding - from rivers, the sea and surface water - is likely to get worse



Chapter 2 - Vision and objectives of the plan

- 2.1 A suggested initial vision for the local plan is drawn directly from the new Council Plan as endorsed by East Devon District Council on the 20 October 2021.
- 2.2 The Council Plan sets out the strategic direction of the council over the next few years and looks at Council priorities and actions to guide the effective use of all council resources. Although the Council Plan looks into the future for a far shorter time period than the new local plan it is of strategic overarching importance for Council work and is therefore seen as appropriate to set the agenda for local plan work.

- 2.3 Drawing directly from the Council Plan the local plan vision is:

To make a positive difference to residents' lives and our environment in East Devon. With three priorities:

Better Homes and Communities for all with a priority on the importance of good quality, affordable housing suitable in size and location.

A Greener East Devon, which prioritises issues arising from climate change and supports our natural environment.

A Resilient Economy bringing prosperity to the district.

An alternative option for the plan vision

The vision above, whilst being drawn directly from the Council Plan, is not spatial in nature. It does not set out a picture of different parts of East Devon, how and why they function and how they may change and develop (or not) in the future. The local plan seeks to address such matters and is explicitly and by design a spatial policy document.

Committee may wish to give consideration to whether they wish to see (and wish to define) a more spatially defined vision for the local plan.

- 2.4 From this starting point vision, and expanding on this to draw out other themes in the Council Plan and early work on local plan making, a series of objectives for this working draft local plan have been defined.
- 2.5 The plan objectives set a framework for the chapters and specifically the plan policies that follow in this working draft local plan. It is stressed that the objectives need to be seen alongside one another and they present an overview picture for the local plan.
- 2.6 The objectives are not in a priority order or ranking and are not structured or presented so that any specifically carry more or less weight than any other. It is also important to recognise that the objectives are by design set at a high level

and do not cover matters of detail or every topic matter that the plan may address or cover.

Designing for health and well-being	Objective 1	To encourage healthy lifestyles and living environments for all East Devon residents.
Tackling the climate emergency	Objective 2	To ensure all new development moves the district towards delivering net-zero carbon emissions by 2040 and that we adapt to the impacts of climate change.
Meeting future housing needs	Objective 3	To provide high quality new homes to meet people's needs.
Supporting jobs and the economy	Objective 4	To support business investment and job creation opportunities within East Devon and support a resilient economy.
Promoting vibrant town centres	Objective 5	To promote the vitality of our town centres, encourage investment, greater flexibility and a wider range of activities to increase footfall and spend.
Designing beautiful and healthy spaces and buildings	Objective 6	To promote high quality beautiful development that is designed and constructed to meet 21 st century needs.
Our outstanding built heritage	Objective 7	To conserve and enhance our outstanding built heritage.
Our outstanding natural environment	Objective 8	To protect and enhance our outstanding natural environment and support an increase in biodiversity.
Promoting sustainable transport	Objective 9	To prioritise walking, cycling and public transport and make provision for charging electric vehicles
Connections and infrastructure	Objective 10	To secure infrastructure needs at an appropriate time to support new development

Objectives of the plan

There may be merit in re-looking at the objectives of the plan, especially if the Vision is amended. As drafted the objectives remain largely unchanged from those in the issues document and some may be read more as aims than objectives, this could also be an area where refinement is appropriate.

Strategic policies and non-strategic policies

- 2.7 In this working draft plan we have differentiated between Strategic Policies and non-strategic policies. The NPPF advises of the need for such a differentiation.
- 2.8 **Strategic Policies** – set out the overarching approach to the plan or sections, chapters or topics matters within or they deal with major subject matters of fundamental importance to decision making.
- 2.9 **Non-strategic policies** – will typically add an extra layer of detail to inform decision making.
- 2.10 In this working draft plan we distinguish between what we consider to be strategic policy, these are denoted with the word 'Strategic' in the title and all other policies where the word is absent. An important consideration is that Neighbourhood Plans and their policies can supersede non-strategic policies but they cannot supersede strategic policies. In this working draft plan, in the policy title boxes, we call proposed strategic policies 'Strategic Policy' and proposed non-strategic policies we just call 'Policy'.

Chapter 3 - The spatial strategy of the plan

- 3.1 The spatial strategy of the local plan is concerned with establishing an overarching picture for the amount and types of development that will be accommodated, where and why in East Devon over the life span of the plan and beyond.
- 3.2 The National Planning Policy Framework (NPPF) states that all plans should promote a sustainable pattern of development that seeks to align growth and infrastructure; and expects strategic policies in a local plan to set out an overall strategy for the pattern, scale and design quality of places.¹ Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This helps to reduce congestion and carbon dioxide emissions, and improve air quality and public health. The NPPF recognises that opportunities to maximise sustainable transport will vary between urban and rural areas.²
- 3.3 With regards to rural areas, which form large parts of East Devon, housing should be located where it will enhance or maintain the vitality of rural communities; and policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.³

1. Strategic Policy - Settlement hierarchy

This proposed strategic policy will set out the following settlement hierarchy, where the principle of development is accepted due to having access to a range of jobs, community facilities and services:

- Tier One – Principal Centre: Exmouth
- Tier Two – Main Centres: Axminster, Cranbrook, Honiton, Ottery St Mary, Seaton, Sidmouth
- Tier Three – Local Centres: Broadclyst, Budleigh Salterton, Colyton, Lymptone, Woodbury
- Tier Four – Service Villages: Beer, Branscombe, Broadhembury, Chardstock, Clyst St Mary, Dunkeswell, East Budleigh, Exton, Feniton, Hawkchurch, Kilmington, Musbury, Newton Poppleford, Otterton, Payhembury, Plymtree, Sidbury, Stoke Canon, Tipton St John, Uplyme, Westclyst, West Hill, Whimple.

¹ National Planning Policy Framework, 2021, paragraph 11a, 20a: [National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/552152/NPPF_2021.pdf)

² National Planning Policy Framework, 2021, paragraph 105.

³ National Planning Policy Framework, 2021, paragraph 79.

- 3.4 A key part of the spatial strategy is to outline the settlement hierarchy, grouping settlements together where they share similar characteristics and placing them in different tiers. Settlements with a higher population and a greater range of jobs, community facilities and services serving a wide area will be placed at the top of the settlement hierarchy; whilst smaller settlements that have fewer jobs and facilities perform a more local, but still important, role will be grouped lower down the hierarchy. We have prepared evidence which considers these factors – ‘The Role and Function of Settlements.’⁴
- 3.5 Exmouth has a significantly higher population, number of jobs, and level of community services and facilities that distinguish it as the ‘principal centre’ in East Devon. The six ‘main centres’ benefit from a range of jobs along with strategic and local facilities, serving both the settlement and wider surrounding area – in Cranbrook’s case some of these facilities are planned to be delivered in the coming years. The five ‘local centres’ perform an important local role, with reasonable levels of population and jobs; and a smaller selection of strategic facilities alongside all or most local facilities. A further 23 settlements have a relatively good range of local facilities either in the settlement or nearby, and are ‘service villages’ for both the settlement and immediate surrounding rural area. Proposed Strategic Policy 10 includes a new settlement – this will feature in the settlement hierarchy in a future Local Plan, when it has developed a sufficient range of jobs, community facilities and services.

Currently rejected alternative options to the proposed settlement hierarchy

Option b – Identify fewer settlements in Tier Four

This would not be fully consistent with national policy which supports housing in rural areas where it will enhance or maintain the vitality of rural communities.

Option c – Identify a higher number of settlements in Tier Four

Other settlements have fewer jobs and facilities, and accepting the principle of development at these other settlements would not be fully consistent with national policy stating that significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.

- 3.6 In proposed local plan policy the approach that is recommended promotes a continued pattern of strategic growth on the western side of the District, close to the City of Exeter, with more modest development elsewhere.

⁴ Available at: [1a. Role and Function of Settlements report v3 final draft for SPC.pdf \(eastdevon.gov.uk\)](http://eastdevon.gov.uk)

2. Strategic Policy - Overarching strategy for the distribution of development

This proposed strategic policy will set out an overarching picture of development in East Devon that will establish, over and above existing commitments:

- A concentration of new development on the western side of East Devon to include an additional new town (an further new town in addition to Cranbrook);
- Major strategic developments close to the city of Exeter;
- Moderate levels of development at the principal and main centres of East Devon;
- Modest growth at service and local centres; and
- Limited development, under exceptional circumstances, in smaller villages, hamlets and the countryside.

Existing commitments to development

3.7 There are already a large number of existing commitments to development in East Devon that set out a strategic pattern of growth that will occur in the District to 2033. The western side of East Devon, close to the City of Exeter, will in this time period continue to be a focal point for development as sites with existing planning permissions come forward and land areas already allocated for development, most notably at Cranbrook, gain planning permission and are developed.

3.8 Most of the already committed new dwellings, to be built over the next decade, will be built at the West End of East Devon, mostly at Cranbrook, with the remainder built elsewhere in East Devon. Commitments are taken to be sites with an existing planning permission, sites allocated in the Cranbrook Plan for development and a small element of projected windfall development. The urban extension to Axminster, as allocated in the existing local plan is, however, currently excluded from this forward looking assessment due to uncertainties about its delivery.

3.9 Employment growth has seen a similar pattern to that for housing growth in the District with much of the new development concentrated on the western side of the District close to the city of Exeter. Key sites that have seen substantive new growth include the Science Park, Skypark and Exeter Logistics Park. The first two of these will see continued development into the late 2020s though the logistic park is likely to be built out sooner.

Distribution of development under this new local plan

3.10 Under the new local plan newly allocated sites can expect to start being built from the mid-point of the 2020s, though perhaps some sooner, and under proposals in this working draft local plan these sites will start adding to the Rest of East Devon part of the supply. Cranbrook is likely to be moving to a position of completion of all sites allocated in the Cranbrook Plan in the early 2030's.

However, by this point residential completions on another new town will be starting and will build up as the decade progresses, there will also be additional provision close to Exeter that will add to supply in the western part of the District. Over the plan period of 2020 to 2040 it is estimated that the western side of East Devon, close to the city of Exeter, will see roughly half of all residential completions with the other half across the rest of East Devon (though as will be noted further in in this working draft plan there is still more work to be done on housing numbers and this split is liable to change).

- 3.11 In terms of employment growth and development there will also be a continued pattern of a large part of the overall land area taken for development to be in the western part of East Devon close to the City of Exeter with existing commitments being built and new land allocations coming on stream.
- 3.12 There is, therefore, a continuity in terms of patterns of development from the existing local plan through into this new plan. Strategic scale development will dominate on the western side of the District with growth and development in and around East Devon towns primarily geared towards meeting local needs and seeking to make these key service centres more self-sustaining. Villages and rural areas will see lower levels of planned growth, with development seeking to help sustain services and facilities without eroding the outstanding open countryside and coastal qualities that characterise much of our District.
- 3.13 The distribution strategy responds to the environmental constraints that exist over many of the eastern parts of East Devon, these designations place constraints on the availability of appropriate sites for development. The western edges of East Devon are typically less constrained. The western side of the District has, however, also been a focal point for past employment growth with many business wishing to be based in this area. There is clear relationship between the availability of employment opportunities and the co-location of housing in close proximity.
- 3.14 There are also high levels of jobs and services and facilities in Exeter that attract many residents of East Devon and this does, therefore, reinforce a logic for building new homes close to the City boundary.

Applying the strategic approach in practice and making land allocations

- 3.15 To support the process of plan making there have been a number of 'calls for sites' under a process known as the Housing and Employment Land Availability Assessment (HELAA). This exercise has allowed land owners to identify sites and land areas that they consider to be appropriate for development. The most recent report on HELAA work went to Strategic Planning Committee on 7 September 2021, see item 28 at: [Agenda for Strategic Planning Committee on Tuesday, 7th September, 2021, 2.00 pm - East Devon](#)

- 3.16 The HELAA work has started to establish a database of sites that can be drawn on to make land allocations for development. It is, however, stressed that at this point in time the HELAA work is ongoing and sites submitted are being assessed by an independent Panel that are assessing their technical suitability for development. The panel do not recommend or advise on which sites should be allocated, this is a separate policy making decision, but rather the panel advise on whether there are constraints or limitations to sites, such as whether highway access can be achieved or there may be flooding or other concerns that would impact on the ability of a land area to be built. The Panel report is expected to be issued and agreed early in 2022.
- 3.17 Ahead of the Panel findings officers of the Council have undertaken preliminary work, reported on in this draft plan, to help inform strategic policy making options and choices. This work has focussed on assessment of sites that are at or close to settlements that fall into Tiers 1 to 4 as identified in this plan and assessment of sites that have been submitted that are at or very close to the edges of the city of Exeter.
- 3.18 The initial site assessment has been undertaken in advance of the HELAA Panel work and other assessment work, most notably Sustainability Appraisal. But it does give a starting point overview of the potential suitability of sites for development and as such has informed strategy development and also initial draft recommendations for the allocation of land for development.
- 3.19 The site assessment work has ranked sites in terms of their potential suitability for development on a scale of 1 to 6, with 6 being very good and 1 being very poor. The site assessment report has looked at sites on a stand-alone basis, through the work we have not sought to consider any possible cumulative impacts of development should a number of sites be built or any issues relating to plan strategy and what a plan strategy might be seeking to achieve. Cumulative and strategy considerations are, however, considered in this working draft plan and have helped inform actual suggested allocations.
- 3.20 In this working plan we are recommending that sites in Tier 1 and 2 settlements that get a ranking of 4 or above are, in most cases, allocated for housing or mixed use housing, employment, commercial and/or community facility development. In villages, some of which actually have a high number of sites that individually performed well, we have suggested that modest development is accommodated, though only where there are sites that perform reasonably well. The assessment work has also helped identify sites on the edges of Exeter, which performed well, that we are proposing as allocations for development.
- 3.21 A spatial representation of the distribution of housing development that is proposed to be allocated in this plan is shown on the map below.

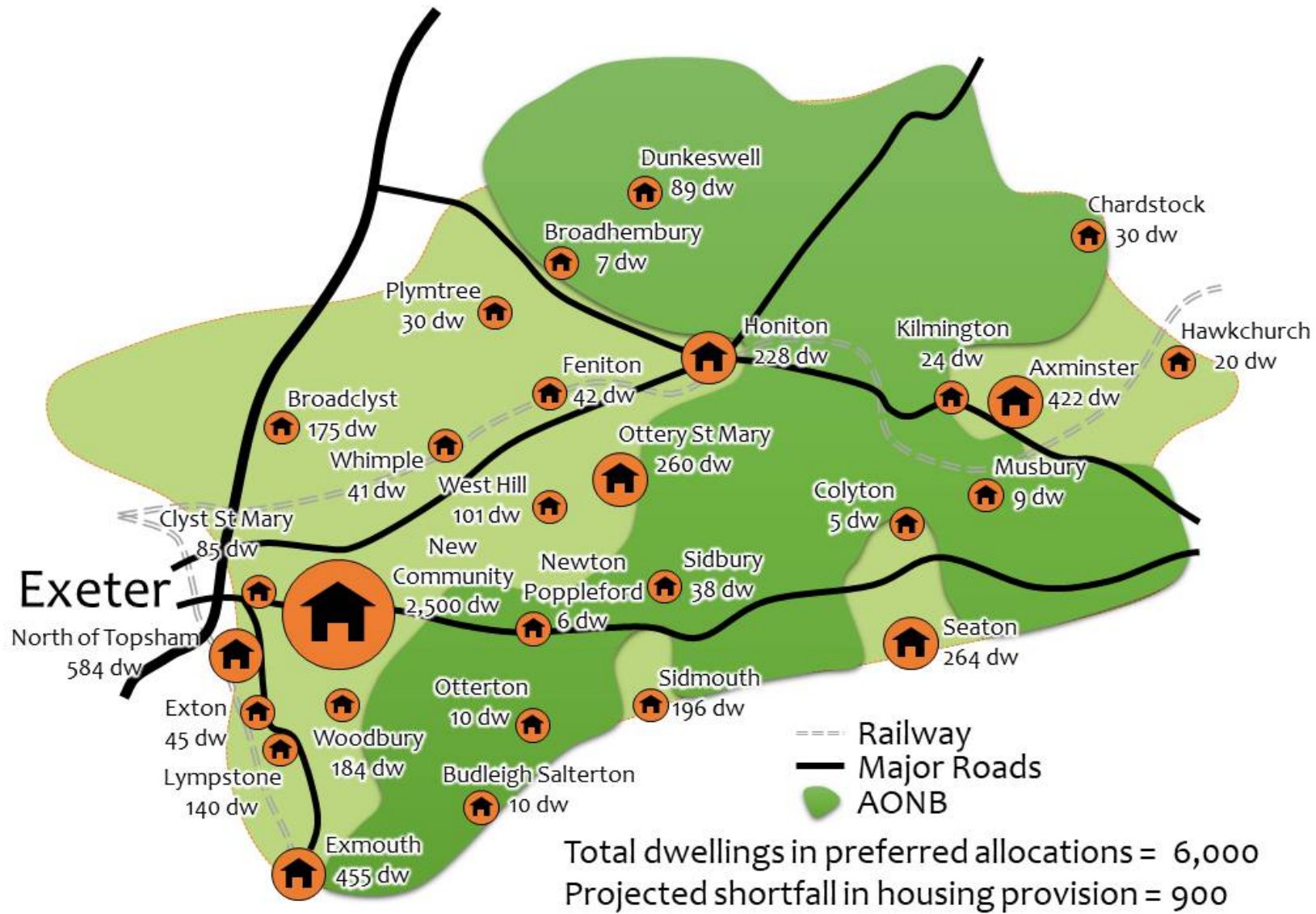


Figure 1: Preferred distribution of development

Currently rejected alternative options to the proposed distribution strategy

There are potential alternative approaches to the above that are highlighted below but at this stage are not the favoured options. These are set out below.

Option b – A greater concentration of development on the western side of East Devon. This approach could take advantage of locational benefits of the western side of East Devon but may not meet the needs of the wider East Devon area.

Option c – A lower level concentration of development on the western side of East Devon. This approach could meet wider East Devon needs but in so doing could lead to adverse impacts particularly in respect of environmental assets.

A projected shortfall in housing provision and how we might address this

- 3.22 The work we have done to date has generated a logical strategy and a range of potentially suitable sites for development. It has, however, generated a fundamental problem in that it does not generate a sufficient number of new homes to meet minimum Government target levels for housing provision.
- 3.23 In order to meet minimum Government levels of housing delivery we will need to allocate sufficient land to accommodate around 6,900 additional new homes in the plan period of 2020 to 2040 (see text further on in this working draft plan for full referencing). At this stage we have identified a range of sites so far that will deliver an estimated 6,000 new homes. We are therefore, and at this stage, identifying an approach that shows around 900 homes for which suitable sites have yet to be identified.
- 3.24 In the context of the above, and particularly if the suggested strategic approach is endorsed – i.e. an approach where around half of the additional new homes are built in the western part of East Devon (including at a new town) and half in the rest of East Devon (mostly to towns but some to the main villages) –there are various options available to provide for extra housing.
- 3.25 These options could, however, also help inform debate around the overall strategy itself. So if, for example, there was a view that there should be less development on the western side of East Devon, perhaps for example there should not be a second new town, then committee may wish to consider if and how they would wish to draw on the options below as a means to secure relevant levels of development to meet the housing needs of the plan.
- 3.26 By way of context setting it should be noted that:

- If the proposals in the draft local plan are endorsed the extra housing that is needed is around 900 dwellings;
- If the proposals are endorsed but a second new town is rejected the extra housing that is needed is more likely to be around 3,800 new homes.

3.27 There are, of course any number of variations that can be tested so members may wish to highlight any preferences and this may involve a more fundamental relook at housing distribution matters. At this stage, however, the options we suggest are highlighted below noting that one or more of the choices listed could deliver all and potentially many more homes than are needed as a minimum.

Location-specific options for addressing the current housing Gap

3.28 The following section sets out a number of location specific options for providing extra housing based on the current information and site details we have available. For each option, on the maps, we identify the number of extra homes, over and above those that this report suggests are allocated for development that the option may deliver. It is stressed that some of the options are overlapping in terms of the homes they could deliver, i.e. in number terms some new home numbers may feature in more than one option.

Option Ref	Summary	Commentary
a)	Allocate more of the fair or better performing sites in tiers 4 and above	There were a substantial number of sites that performed fair or better in assessment and an option would be to just allocate all or many of the better performing sites across all settlements in tiers 4 and above. Doing so could lead to enough housing provision to meet the identified shortfall.

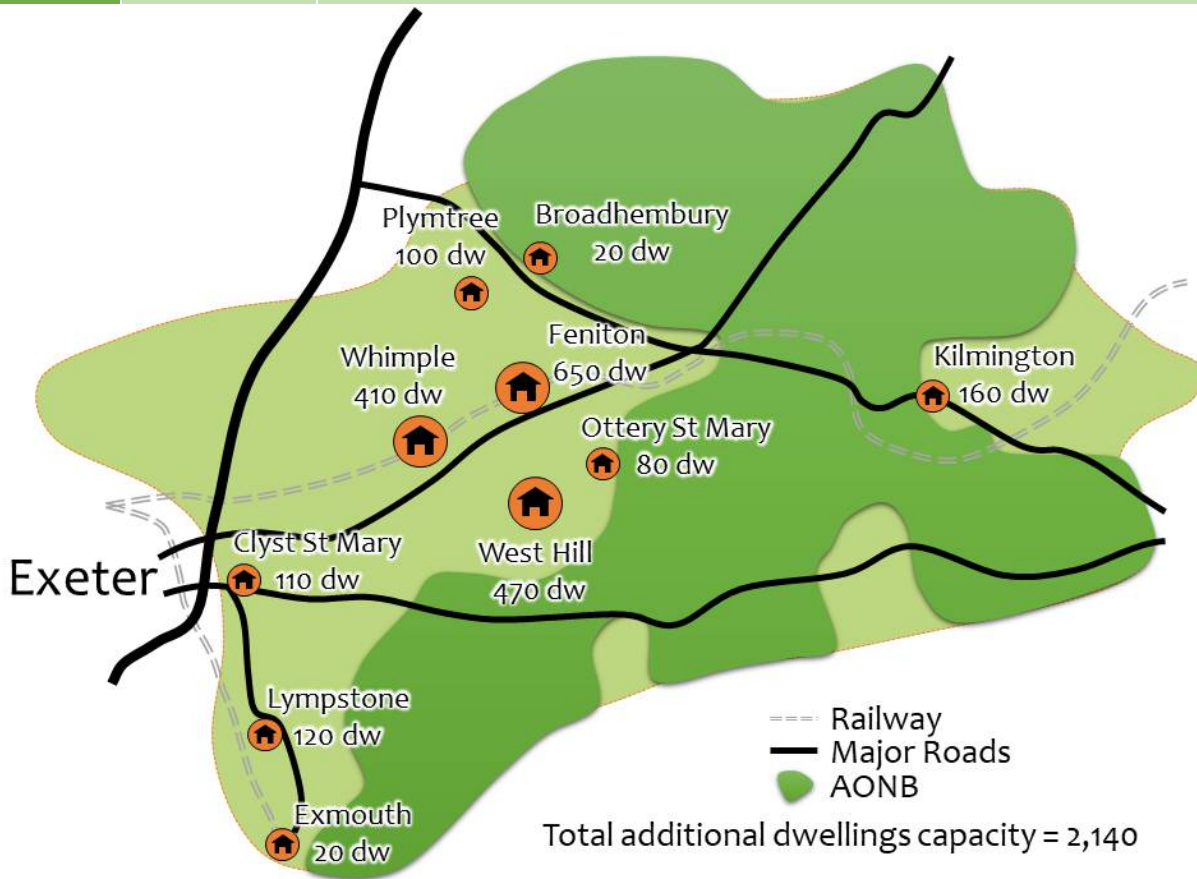


Figure 2: Map illustrating option a

Option Ref	Summary	Commentary
b)	Target more growth to selected tier 3 and 4 settlements	<p>A refinement of a more general approach of non-targeted development at Tier 3 and 4 settlements would be to target growth at selected settlements based on potential planning suitability and logic for growth. The Greater Exeter Strategic Plan had, for example, identified the importance of railways and proximity to Exeter as potentially good measures of suitability for strategic scale growth.</p> <p>If a railway station targeted approach were adopted then larger villages with a good range of services that could offer quite significant potential for growth include:</p> <ul style="list-style-type: none"> • Feniton; • Whimble; and • Lymptstone. <p>If in addition we looked at larger villages (outside of the AONBs) at or towards the western side of East Devon we could also add in:</p> <ul style="list-style-type: none"> • Clyst St Mary; and • West Hill. <p>This approach would add enough housing to address the current shortfall.</p>

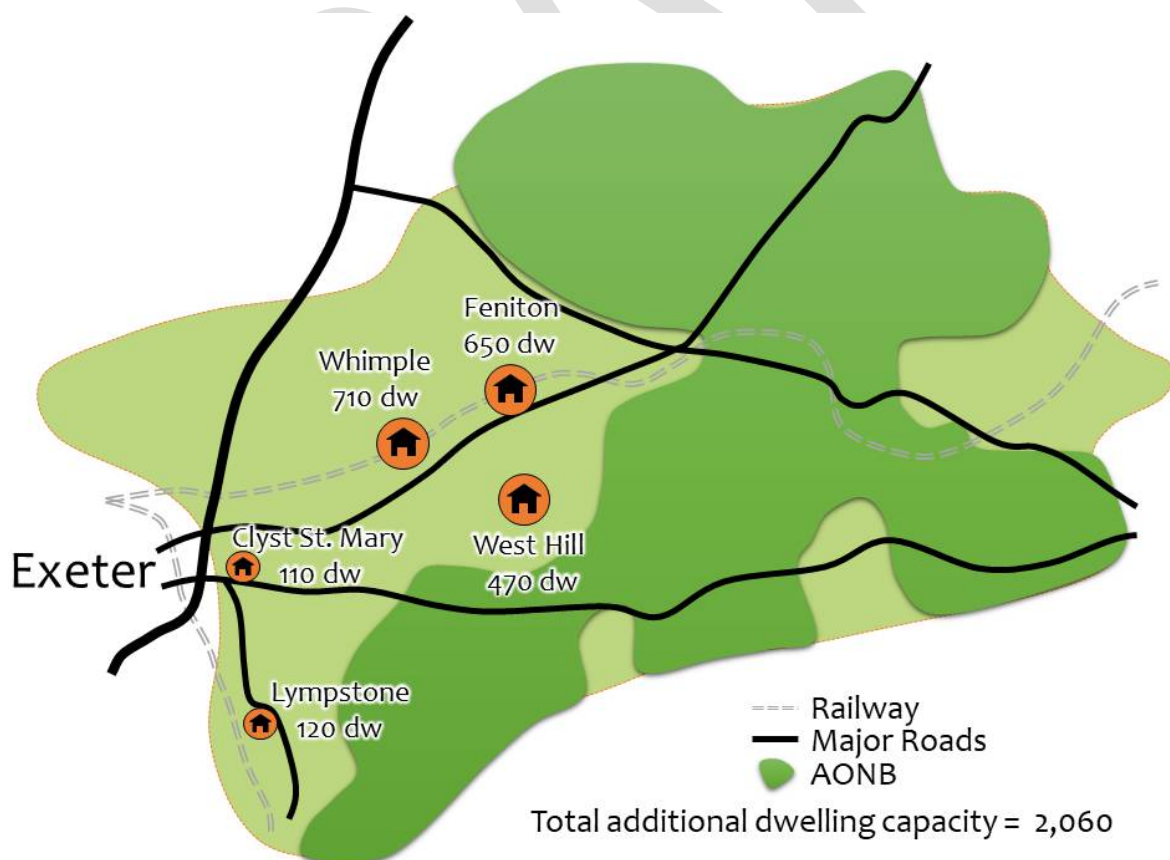


Figure 3: Map illustrating option b

Option Ref	Summary	Commentary
d)	Allocate sites that are assessed as being poor and above	<p>The sites that are recommended for allocation in the working draft local plan are drawn from a preliminary assessment that indicates that they mostly perform as fair or better. We could, however, look to sites that perform less well and in doing so there are any number of variations on options that could generate delivery of substantial dwelling numbers, for example more than sufficient to negate the choice of planning for a 2nd new town and/or in other ways to allow for development of a significantly different distribution strategy. It is also relevant to highlight that the distinction between a 'fair site' and a 'poor site' could in some cases be quite finely balanced and more detailed assessment could tilt the balance and upgrade suitability of some sites (though more detailed assessment may, when carried out, downgrade some sites as well). Furthermore some sites may get a poor rating overall but parts of some sites may be more suitable for development. In some cases we have recommended the allocation of parts of some HELAA sites on this basis though there is scope for more detailed site analysis.</p>

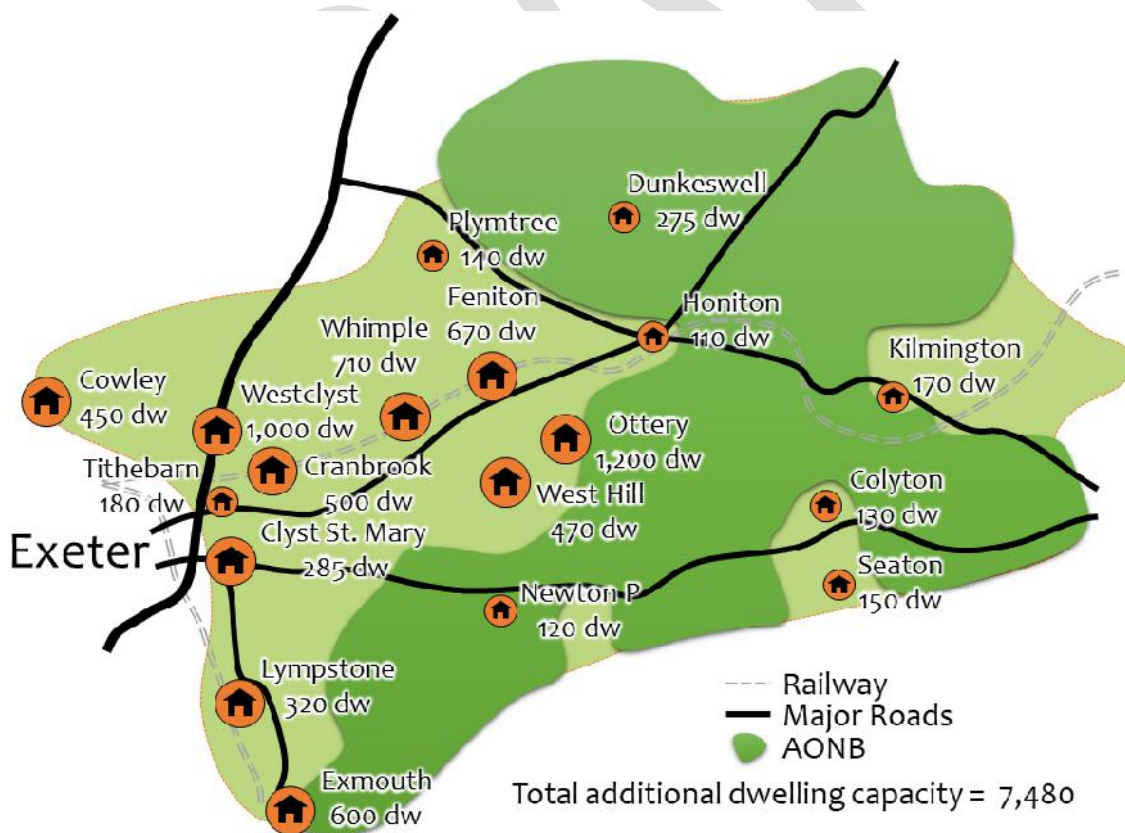


Figure 5: Map illustrating option d

Option Ref	Summary	Commentary
e)	Targeted allocation of sites that perform less well at selected settlements	<p>As a variation on just allocating less good sites we could focus on particular locations for extra development utilising sites that might be classified as poor. It is highlighted that there are arguably good strategic planning reasons to focus development in certain locations, perhaps even if sites in these locations perform less well. It would be likely that if this approach were followed it could be expected to be most applicable to the Tier 1 and 2 towns in East Devon, as noted below:</p> <ul style="list-style-type: none"> • Axminster – Given the difficulties in delivering the relief road the preferred approach would not seek to allocate the land to the east of Axminster in this Plan. Clearly, however, there is an option to reallocate the land and explore further opportunities for funding or other solutions to bring this site forward. Alternatively, there is available land to the south of Axminster which would take the edge of Axminster up to the A35 which could be pursued. • Cranbrook – Some further outward expansion of Cranbrook, beyond the provision made in the Cranbrook Plan may be possible, but there is a lot there that is already planned to be built. • Exmouth – as the largest town in the District there may be seen to be good in principle planning reasons to expand upon modest development proposals at the town. However, potential additional site options typically perform poorly. • Ottery St Mary – whilst there are reasonably good site options to the west of the town there are already reasonably high levels of site allocations recommended at Ottery St Mary. A substantive increase in housing development would be of strategic significance. • Honiton – the town is central to the District and well served by facilities and services. There could be a planning logic for more substantive growth at the town but options for additional strategic scale growth to either the east or west would be on sites that perform poorly, though perhaps if social and community facilities were secured alongside housing growth some mitigation could be built in to plan policy. • Seaton – there are some site options, especially to the north of the town, that perform comparatively poorly

Option Ref	Summary	Commentary
		<p>and given it's location growth would need to enable the town to become significantly more self-contained to be sustainable and there is concern that there is not sufficient sites available to achieve this.</p> <ul style="list-style-type: none"> • Sidmouth – the town has many services and facilities that might point toward it being a sensible location, in principle, for larger scale growth but submitted sites generally performed poorly, Sidmouth is highly constrained and there were few sites actually promoted for development. <p>The potential extra housing under this option, in numerical terms alone, is more than sufficient to ensure needs are met.</p>

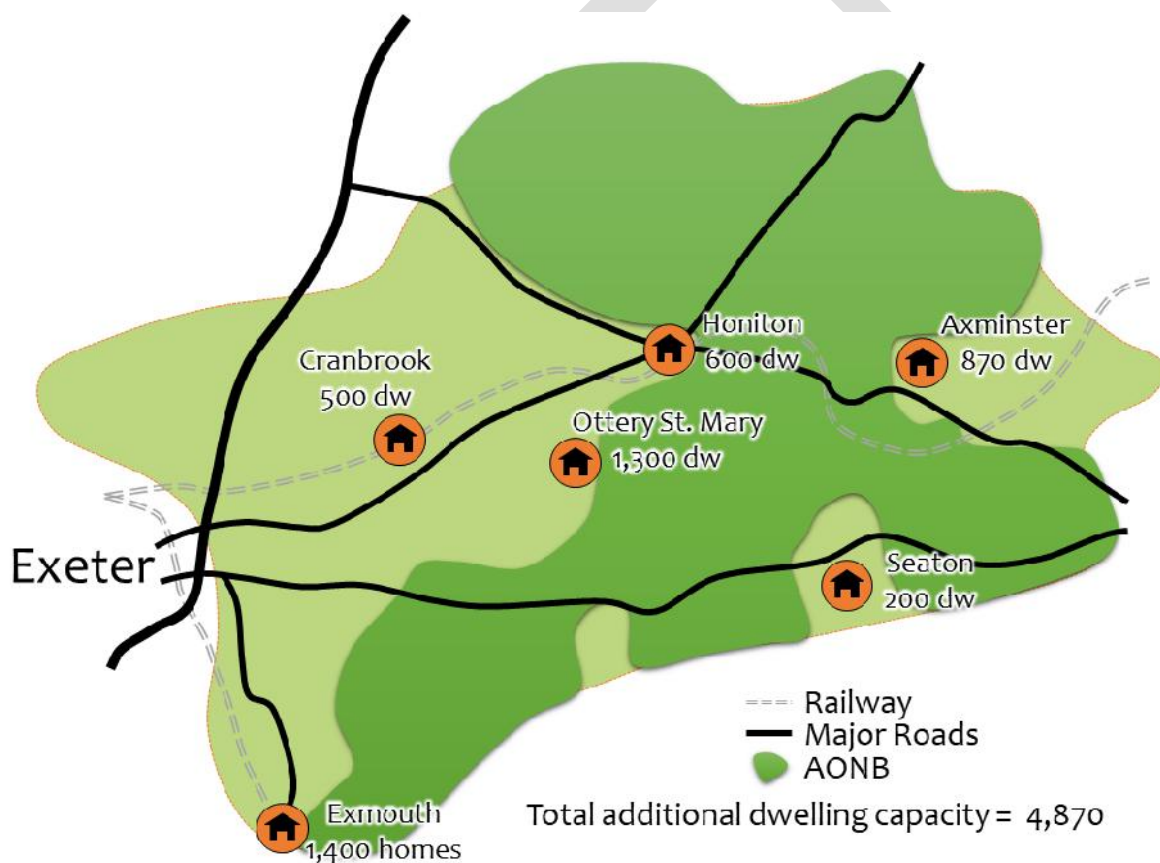


Figure 6: Map illustrating option e

Option Ref	Summary	Commentary
f)	Allocate more than one new town or new village/s	In this working draft plan the officer recommendation is to plan for one further new town (that is one in addition to Cranbrook). There is an option, however, of planning for more than one new town or planning for one or more larger scale urban villages. Such an approach, theoretically at least, could raise housing numbers. Under such an approach the expectation would be that any such additional provision would be on the western side of East Devon (amongst other considerations avoiding AONBs). However, if provided for it could be in direct competition with the proposed new town and this could hamper potential delivery of one or other. Furthermore any new town, or two new towns, are unlikely to deliver much or perhaps any new housing until sometime into the 2030s. A possible danger is that such provision may fail to front-load sufficient housing in the early years of the local plan and as such threaten a five year supply of housing.

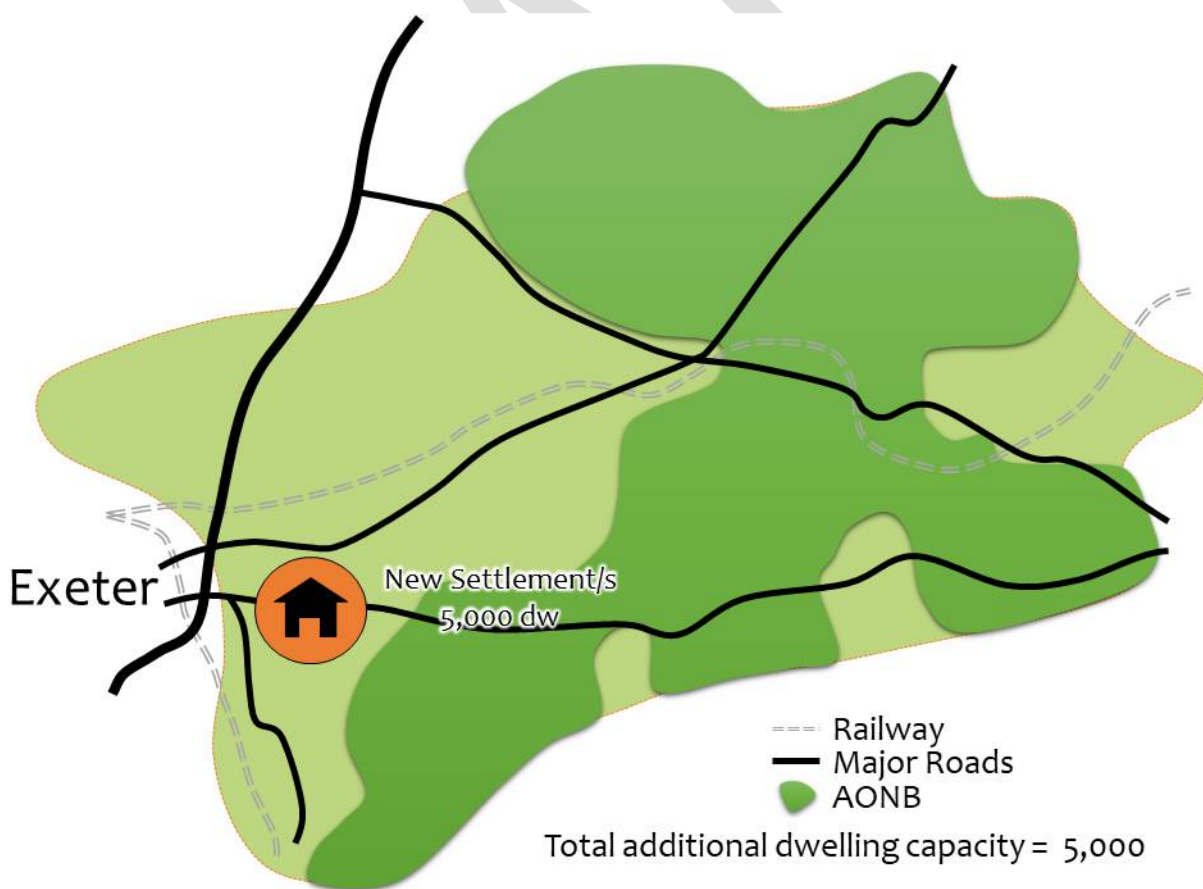


Figure 7: Map illustrating option f

Non-location specific options for seeking to provide more housing

3.29 The following section sets out non-location specific options for potentially providing extra housing.

Option Ref	Summary	Commentary
g)	Search for extra sites	As part of the future plan making work we could look at potential for identifying extra sites that may offer scope for development. It is suggested that we do an additional call for sites in early 2022 and at draft plan consultation it is possible that new or additional sites may be promoted for development.
h)	Not plan for sufficient housing or reduce the flexibility allowance	There is, theoretically at least, an option of not planning for sufficient housing to meet Government expectations. Elsewhere in this plan it is highlighted, however that such an approach comes with significant challenges. Perhaps a more reasonable alternative would be to reduce the level of flexibility allowance built into the overall housing target (10%). This approach, however, may come under detailed scrutiny from a planning inspector at plan examination and puts the housing land supply position at risk if some sites do not deliver.
i)	Be less restrictive to development in the AONBs	In the overall assessment work and in developing a preferred policy approach we have sought to avoid proposing allocations for development in the AONBs. In site assessment work sites falling in AONBs have typically performed less well with the AONB presence weighing against them. Where allocations are proposed in AONBs they are typically smaller scale sites. An approach of not developing in AONBs, and especially not for larger scale development, is seen to accord with national planning policy. However, there is the option of seeking to take a less restrictive approach toward development in AONBs and this could include allocating more sites (larger and/or smaller scale) in what are nationally protected landscapes.

Future housing development in East Devon

3.30 It has always been important to plan for future housing and in East Devon we have seen a population that has grown year on year. Access to good housing, for those with less money, has however become an increasing concern. House

prices, whether to rent or buy, have increased dramatically whilst availability of social and other forms of affordable housing has declined.

- 3.31 Two proposed Strategic Policies address the strategic housing priorities of the area and any relevant cross-boundary issues. They cover housing to address needs, and the levels of future housing development, and they provide a clear starting point for the non-strategic housing policies.

3. Strategic Policy - Housing to address needs

This proposed strategic policy will express the Council's commitment towards achieving housing mix and high quality homes in East Devon and it will:

- Set out the Council's support for delivery of a wide choice of decent, high quality homes in East Devon which meet needs for housing
- Emphasise housing's role in creating sustainable, inclusive, mixed communities
- Encompass market housing for rent and home ownership
- Make clear that a mix of housing sizes, types and tenure appropriate to the area, and supported by local housing evidence, should be provided, to ensure that there is a range of housing, broadening choice and meeting specialist needs
- Address categories of need expected in the plan period
- Highlight which identified needs the plan focuses on, such as:
 - Housing to meet affordable housing needs
 - Housing suitable for households with specific needs
 - Homes to redress an imbalance in the existing housing stock
 - Dwellings suited to households with: younger people; working families; and older people who wish to retain independent living
 - Plots for custom/self-builders
 - Co-housing and communal accommodation
 - Gypsy and Travellers and Travelling Showpeople accommodation

Justification for inclusion of policy

- 3.32 Planning for a sufficient amount of housing growth in East Devon is essential but it is vital that the housing development addresses the needs of the area. The plan therefore includes a strategic policy about achieving housing mix and high quality homes focused on meeting housing needs to support communities.
- 3.33 The policy is strategic because it is a commitment to addressing housing needs. This is a strategic priority of the area, as recognised in the Council Plan. This policy supports Council priority one 'Better Homes and Communities for All', notably:

- The first priority action - to prepare and promote robust policies in the local plan to address the need for more and better quality homes and communities for all.
- The second priority action - to deliver more affordable housing and explore new ways to build more affordable homes.
- The plan's emphasis on ensuring that homes are fit for purpose across all sectors.

3.34 Equally important, this policy also aligns with the national policy in the NPPF which stresses that the local plan should provide a framework for addressing housing needs.

3.35 This strategic policy will be complemented by the second strategic housing policy about the amount of housing to be delivered in the plan period. Together these policies will align with and support the plan's spatial strategy and the economic strategy, as well as strategic policies on climate change, energy efficiency, design and accessibility. In combination, the two policies provide a clear starting point for a suite of non-strategic housing policies.

Evidence

3.36 The key evidence will be provided by the Local Housing Needs Assessment. See evidence listed under the Strategic Policy on the level of future housing development and the Non-Strategic policies.

Currently rejected alternative options to the proposed approach to addressing housing need

There is no reasonable alternative to a Strategic Policy which is focused on addressing housing needs. Without such a policy there would be no commitment to:

- Addressing needs in total, or specific needs, as evidenced for example by the Local Housing Needs Assessment; or
- Aspiring to the delivery of better quality homes

3.37 Definitions of key terms and concepts used in policy are usually set out in either the Plan's glossary or in the plan's Reasoned Justification, not in the wording of the policy. This Strategic Policy depends on the definitions of housing need types. Some of these definitions are set out in NPPF, notably the definition of affordable housing. An alternative definition which omits one or more types of affordable housing identified in NPPF would be inconsistent with the NPPF. There would be a very significant risk that the policy would not meet a test of soundness (policy to be consistent with NPPF) if the plan were to rely on an alternative definition of affordable housing.

Levels of Housing Provision

- 3.38 The local plan aligns with the Council Plan expressed priority for robust policy in the local plan to address the need for more and better quality homes and communities for all. The Council Plan does not determine how much housing growth will be planned for in the District. It is the role of the local plan to determine the amount of housing development in the plan period in East Devon. The plan does this through a policy on the levels of future housing development, covering total provision for the plan period and breaking down that provision.
- 3.39 If the plan is to be found sound it is vital that it is consistent with national policy. 'Delivering a sufficient supply of homes' is an NPPF policy theme. NPPF states the Government's objective for 'significantly boosting the supply of homes' and makes clear that to support that objective, it is important that sufficient amount and variety of land can come forward where it is needed. It also clearly states that a Strategic Policy must make sufficient provision for housing (including affordable housing) in line with the presumption in favour of sustainable development as it applies to plan-making.

4. Strategic Policy - Levels of future housing development

Policy will identify the following for the whole plan area and plan period:

- The minimum total net housing provision based on the Local Housing Need Assessment (LHNA) for East Devon [18,360]
- The annual provision rates – these may be stepped (i.e. not a flat rate)
- The total affordable housing provision and total market housing provision
- The proportional mix of types of affordable housing including the proportion of supply from Social Rent, from 'First Homes' and from Affordable Home Ownership
- The sources of housing supply to meet provision
- The forecast supply (with an illustrated housing trajectory) incorporating a degree of supply flexibility (aiming for 10% above requirement i.e. about 20,200]
- The proportion of supply to be met on small sites (sites less than 1 Hectare or less than 30 dwellings)
- The approach to monitoring development, including demonstration of a 5 year housing land supply

Policy should set out the housing provision requirements for designated neighbourhood areas. Otherwise, the local plan's Reasoned Justification will explain why the local plan is not setting out a housing requirement for Neighbourhood Plans.

Where it is not possible to provide a requirement figure for a neighbourhood area, the LPA provides an indicative figure, if requested to do so by the neighbourhood planning body.

Justification for inclusion of policy

- 3.40 NPPF states that the plan should as a minimum apply a presumption in favour of sustainable development when plan-making, where strategic policy should as a minimum provide for objectively assessed needs for housing, as well as any needs that cannot be met within neighbouring areas (as established through Statements of Common Ground), unless circumstances as specified in the NPPF apply.
- 3.41 It is Government policy that the local plan should establish a housing requirement figure for the whole plan area. The Government does not set a mandatory figure for the housing requirements for the local plan but Government provides the standard method for assessing local housing need (LHN). It also provides the policy and guidance for the use of the method. It should be noted that the evidence used to assess the LHN is updated each year.
- 3.42 A key job of the local plan will be to set out the appropriate levels of housing requirement provision to meet the future needs of the District. Setting out the requirement figure in a Strategic Policy expresses the Local Planning Authority's commitment to the level of housing growth to be provided for in the plan period.
- 3.43 This Strategic Policy needs to be consistent with and help deliver the local plan's Vision and Objectives, align with the overall Spatial Strategy and support the plan's economic vision and strategy through delivering housing. It uses the same definitions about affordable and other types of housing need as the Strategic Policy on Housing to address needs.

Justifying the level of East Devon local housing need

- 3.44 NPPF defines local housing need as:

The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 61 of this Framework).

- 3.45 PPG on housing and economic needs assessment makes clear that assessing local housing need is the first step in the process of deciding how many homes need to be planned for. Identifying need is separate from, and therefore independent of, other matters such as land availability and establishing the housing requirement figure.
- 3.46 PPG expects that an LHNA using the Government's standard method set out in PPG will be used. An alternative assessment method would be used only in exceptional circumstances.

- 3.47 There is no robust evidence at this time to conclude that demographic assumptions underpinning the standard method as it applies to East Devon are incorrect, nor is there evidence to demonstrate exceptional circumstances relating to those assumptions.
- 3.48 In the New Year we should have an updated local housing need assessment, though early work suggests it is likely to show an annual need of 918 dwellings per year for East Devon.

Justifying the level of housing requirement for East Devon for the plan period

- 3.49 The Council has to justify the level of housing requirement set out in this local plan policy, informed by the Local Housing Need Assessment. The Council will produce an audit trail document (a Housing Topic Paper) on Housing Needs, Supply and Requirement to explain how the latest Local Housing Needs Assessment has informed the preparation of this strategic policy and why the level of housing requirement is justified.
- 3.50 Based on an annual need of 918 dwellings per year multiplied by the 20 years in the plan period results in a total housing requirement for the plan period of 18,360 net additional dwellings. Consistent with Government policy, the Strategic Policy will express the housing requirement as a minimum.
- 3.51 The level of housing requirement should at least meet the level of housing need identified by the latest LHNA, unless there are reasons to justify why some of that need cannot be met in the District. This would be 'unmet need'. In that event, the Council will need to demonstrate it has engaged constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in relation to the strategic matters in to this policy.

Duty to Co-operate

- 3.52 East Devon District Council has actively and diligently undertaken Duty to Co-operate activities and will continue to do so. Activities include those carried out to identify if there are strategic cross boundary housing matters that the local plan should address.
- 3.53 To date, the Council has not explicitly commented to other authorities that it may be appropriate to accommodate East Devon housing needs in their area or other local authority areas. See alternative policy below for higher housing need and requirement were another LPA to evidence that they have unmet need which should be met in East Devon.

- 3.54 In accordance with NPPF and PPG, evidence to demonstrate how this Duty has been met will be set out in Statements of Common Ground produced jointly by the Council and other Local Planning Authorities.

Neighbourhood plan requirements

- 3.55 To date, through local plan production work, the Council has not received requests from any Neighbourhood Planning Group for a housing provision requirement figure for the designated Neighbourhood Area. The District Council therefore has not at this stage set out any housing provision requirement figure for designated Neighbourhood Areas. The local plan supply forecasts assume nil provision from this supply source for the purposes of plan-making. If sites are allocated in Neighbourhood Plans, they would be additional to the local plan supply forecast for the plan period, though we will provide the opportunity for neighbourhood planning groups in designated Neighbourhood Areas to make requests for housing figures.

Can the scale of housing requirement be met by forecast housing supply?

- 3.56 The policy has to be aspirational but deliverable. The Council needs robust evidence which forecasts the delivery of housing over the plan period. Work on this is in progress. The Council uses this evidence to compare forecast supply with the scale of housing requirement. If the forecast supply is not sufficient then either the Council would identify additional supply, or the Council concludes that there is unmet need and then engage with other Local Planning Authorities to identify effective ways to accommodate that unmet need.

Justifying the forecast supply

- 3.57 The plan will include the Council's illustrative trajectory of forecast housing supply to be delivered in the plan period. This 'Plan, Monitor, Manage' graph shows the forecast of net completions each year.
- 3.58 The local plan's housing trajectory is informed by the Council's annual monitoring of housing completions. It also relies on the Council's robust forecasts of future delivery relating to:
- Planning approvals; forecast of windfalls; and
 - Supply from additional housing or mixed use local plan allocations.

Demonstrating flexibility

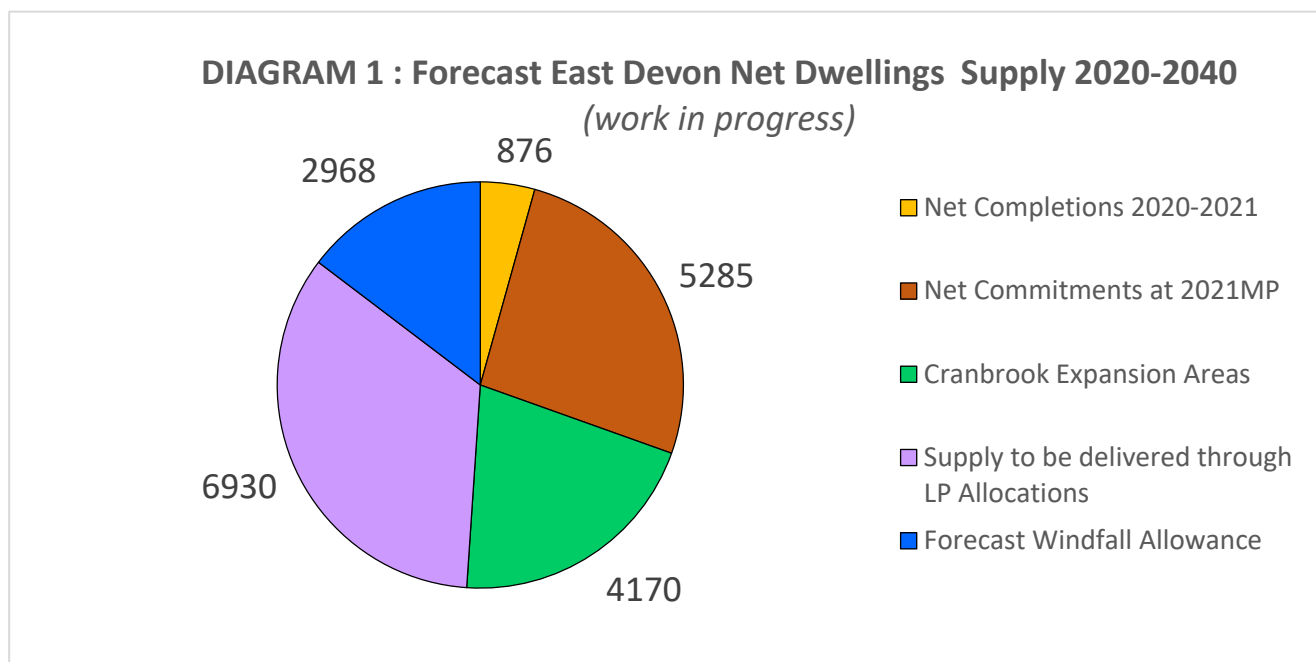
- 3.59 It's not enough simply to identify sufficient housing for forecast supply, including new site allocations, to match the housing requirement. The local plan has to manage the risks relating to the uncertainties of future housing delivery. The Council forecasts supply delivery consistent with the Government's policies about 'deliverable' and 'developable' sites. But to be consistent with

Government policy the plan also has to be prepared positively, in a way that is aspirational but deliverable.

- 3.60 The Council cannot guarantee delivery. It is therefore realistic to acknowledge that some approved or planned sites may not come forward. To reduce this risk means building in a degree of housing supply flexibility, where building in 'flexibility' means that the forecast housing supply is more than the policy provision requirement. This is a very effective way of reducing the risk of undersupply. It means:
- Allocating sufficient housing and mixed use sites in the local plan to ensure that identified total supply meets the requirement and an appropriate degree of flexibility; and
 - Demonstrating that the degree of flexibility is sufficient to manage effectively the risks of supply uncertainty.
- 3.61 The degree of risk rises as the flexibility percentage falls. The Council has already experienced the consequences of delays in strategic site allocations coming forward, notably that of Axminster Eastern extension, as well as the delays to the Cranbrook Expansion areas. Therefore, as a minimum, a prudent 10 per cent degree of flexibility is recommended for the total housing supply forecast to come forward in the plan period. This is about 1,800 dwellings and equates to 2 years of supply. The total supply potential would be about 20,200 dwellings. This supply forecast is a work in progress. It is subject to the scale of new allocations to be included in the local plan. It is also subject to current work on supply elements, including the forecast allowance for delivery of housing from future windfalls. If supply from windfalls is lower than currently forecast, then this would add to the amount of housing to be identified from new allocations in the plan.
- 3.62 The Council can then consider whether it is necessary to provide further policy about when sites can be delivered, as an additional way to manage the risk of under-supply and at the same time manage the potential risk of accommodating housing pressure that is not being met in adjoining areas. This means considering whether to:
- Specifically phase or not phase allocation sites (no phasing is more flexible); or
 - Categorise or not categorise some allocations as 'reserve sites' (these are sites to be held back and not to be delivered in the plan period unless monitoring identifies that specific circumstances have been met justifying their release).
- 3.63 By accommodating the scale of housing growth in the plan period based on the LHNA and a 10% supply flexibility, the local plan provides a balance between addressing future needs, whilst resisting over-development and over stretching infrastructure capacity, and aiming to protect and not erode the outstanding environmental qualities of East Devon.

Scale of forecast supply

3.64 Work is in progress on forecasting the scale of housing delivery over the plan period. Diagram 1 shows the latest supply forecast of net dwelling completions for the plan period 2020 to 2040. This information will be updated as plan-making progresses.



3.65 Currently the total net supply forecast to be delivered in the 20 year plan period is about net 20,230 dwellings. This includes an assumption that approximately 6,900 dwellings will need to be delivered on additional site allocations to be identified in the local.

3.66 Work is in progress on the supply forecast. Changes to site allocations or site capacities will alter the forecast. The allowance for future windfalls currently reflects the HELAA methodology. However, at nearly 3000 dwellings, windfalls would equate to about 15% of the supply total. Evidence to justify the forecast for the allowance is currently being reviewed.

3.67 About 20,200 dwellings need to be identified to meet the proposed housing provision requirement (18,360) plus the 10% supply flexibility (1840).

3.68 Of these 20,200, there are about 13,300 dwellings identified from actual completions 2020/21, and from forecast completions on commitments at the 2021 Monitoring Point, and the Cranbrook Expansion Areas. Subtracting these 13,300 dwellings from the 20,200 would mean that supply for 6,900 dwellings needs to be identified. The new allocations in the local plan are the means to achieve this.

- 3.69 The current estimated capacity of sites proposed for allocation to date is 5,700 dwellings. The Council still needs to forecast the individual site trajectories and refine the plan's overall housing trajectory, including any amended or additional site allocations. This evidence will inform the preparation of the Regulation 18 draft Local Plan and the decision to approve the plan for consultation.
- 3.70 A gap of 900 dwellings needs to be addressed, if there is to be at least a 10% degree of flexibility in the forecast supply.
- 3.71 For the avoidance of doubt, all the site allocations for housing and mixed use in the new Local Plan, including on all sites on the western side of East Devon are for meeting the identified East Devon local housing need, as evidenced by the LHNA. Part of the second new settlement will deliver in the plan period. Only this part counts towards the 2020-2040 housing provision requirement. The remainder of the second new settlement would deliver dwellings after the end of the plan period and will help to meet the housing need of East Devon in the long term. That remainder does not count towards the 2020-2040 housing provision requirement.
- 3.72 Evidence about supply forecasts and the whole plan trajectory will be updated when the 2022 Monitoring Point data becomes available. The Council will keep the ability of the housing requirement and degree of supply flexibility to be met under review, and may update policy in light of the new evidence.

Monitoring and 5 year housing land supply

- 3.73 Consistent with Government policy, the Council will need to monitor housing development and the achievement of the strategic policy on housing provision. This includes the ability to maintain housing supply. A key indicator is the 5 year housing land supply assessment evidence to demonstrate if there are 'deliverable' sites with realistic prospects of the housing being delivered in the 5 year period.
- 3.74 The LPA will need the local plan examination to confirm the 5 year housing land supply at the point of plan adoption (expected to occur by March 2024). The plan will need to:
- State clearly whether a 5 year land supply is forecast to be achieved at the end March 2024 Monitoring Point
 - Be accompanied by published evidence to justify this conclusion; and
 - It will also be prudent to demonstrate a 5 year supply at the 2025 Monitoring Point in case of any slippage in the plan-making process.

Housing mix including affordable housing

- 3.75 The Strategic Policy will break down the total housing requirement into two types of housing provision requirement which the policy will quantify:
- Market housing
 - Affordable housing
- 3.76 The purpose is to ensure that there is policy commitment towards the amount of these two different categories of housing tenure. It complements the strategic policy on housing to address need, and ensures consistency with both the NPPF and the new Council Plan's ambitions regarding housing.
- 3.77 The scale of affordable housing provision will be justified from evidence about affordable housing need plus a reality check applied by using evidence about the ability of housing development to meet that need. Market housing provision is the remainder of the total housing requirement after affordable housing provision is deducted.
- 3.78 The LHNA will provide evidence about the level of Affordable Housing Need, consistent with Government policy including the definition of affordable housing so that the Policy meets the test of soundness. The 2020 LHNA study by the consultants ORS⁵ indicated
- An Affordable Housing Need (AHN) forecast of about 4,240 dwellings over the plan period, where that need related to:
 - households unable to afford market housing (estimated 2,770); and
 - households who can afford market rent but who aspire to home ownership where there is a realistic prospect of them being able to purchase an affordable homeownership product (estimated 1,470).
 - The AHN figure rises to 9,220 if it also includes households who aspire to home ownership but where there isn't a realistic prospect of them being able to purchase an affordable homeownership product.
- 3.79 That 2020 study indicates that if we were to meet all current and future affordable housing needs there would be a requirement for around an extra 461 affordable homes each year from 2020 to 2040. This is near to double the level of affordable homes that have been built in recent years from all sources of affordable housing, not just housing delivered through development. Evidence

⁵ See:

<https://eastdevon.gov.uk/papers/strategicplanning/201020bpitem9afinalhousingneedsineastdevonappendix%201orsaug2020.pdf>

about the scale of Affordable Housing Need will be updated with data from the latest LHNA when available.

3.80 The Council will need to consider:

- Whether the lower figure of 4,240 is the appropriate minimum affordable housing need on which to base the plan's affordable housing provision policy?; and
- Can the amount affordable housing provision in policy be justified by the potential for affordable housing to be achieved through development: In particular, are there reasonable prospects that the forecast of affordable needs of about 4,240 can be met from development?

3.81 The Council will need proportionate, robust evidence:

- To forecast how much affordable housing supply might be achieved in the plan period through development from the overall net 18,360 dwellings provision. Work is in progress to provide the evidence for this forecast.
- To compare that supply forecast to the forecast level of affordable housing need (particularly the 4,240 level). The question is, can enough supply be identified or is there a gap? and
- If there is a gap, to consider whether any other means to deliver affordable housing can be taken into account to justify the affordable housing provision target. If so, is there sufficiently robust evidence about deliverability on which the plan can rely?

First Homes and Affordable Home Ownership

3.82 To be consistent with current Government policy, the local plan policy will need to address

- The issue of at least 10% all dwellings in the policy provision for 2020 to 2040 being for affordable home ownership (subject to exemptions allowed by NPPF)
- the new issue of providing for at least 25% of affordable housing delivered through planning obligations in the form of 'First Homes'

3.83 That combination will be a significant constraint on the plan's ability to prioritise other forms of affordable housing, particularly those that would depend on a higher financial contribution from the development in order to deliver them.

Small sites

3.84 To be consistent with NPPF about promoting the development of a good mix of sites, the Council will need to consider if it can identify through the

development plan and brownfield registers at least 10 percent of the housing provision requirement to be met on sites no larger than one hectare. If this cannot be achieved, the Council will need to show through the preparation of the local plan policies, that there are strong reasons why this 10% target cannot be achieved from small sites.

Non-Strategic Policies on Housing

3.85 This Strategic Policy will also be supported by the suite of Non-Strategic housing policies set out in Chapter 11, where they guide decisions about development that would deliver additional housing.

Evidence Availability

- 3.86 Detailed evidence about housing need, supply, and requirement (including affordable housing) will be published in:
- The 2021 Housing Monitoring update (and 2022 update when available)
 - The East Devon Local Housing Need Assessment(s)
 - October 2020 Report of Findings ORS (already published)
 - Update of LHNA by ORS – Stage 1 (work in progress)
 - The detailed East Devon housing trajectory (2021 Monitoring Point). This is in preparation, There will be a subsequent update for the 2022 Monitoring Point (when available – not before end July 2022)
 - The 2021 detailed housing trajectory analysis and justification and subsequent update for 2022 when available
 - Local plan site allocation selection informed by other related evidence about sites, including the Housing and Employment Land Availability Assessment (work in progress)
 - More detailed analysis of: the Council's current approach for creating a 'step change' in the output of social and affordable homes; Second homes; Windfalls
 - A Topic Paper on Housing need, supply and requirements (including affordable housing). As an audit trail document this will
 - Provide a detailed narrative, signposting the use of evidence
 - Explain what evidence the Council has accepted and relied on, and how it has been used to justify the Strategic Policy
 - Use 2021 data but will be updated with 2022 data, when available.
 - Duty to Cooperate Statements of Common Ground, when available.
- 3.87 The intention is for the 2021 data to be available in time to inform approval of the draft Regulation 18 local plan and the related public consultation. The 2022

data will be available in time to inform the preparation and approval of the Regulation 19 Publication Plan and the following period for representations.

3.88 Three further evidence documents will also be used to justify this policy.

- The overall plan viability assessment. This will assess the viability of types of housing development sites taking account of the draft local plan policies in combination. It will assess policy options for the percentage of on-site affordable housing sought from development, and therefore provide evidence to justify the forecast of total affordable housing supply. This viability assessment will be available in time to inform the preparation of the Regulation 19 Publication Plan.
- The Economic Development Needs Assessment to include forecasts of employment growth. Work is in progress; and
- LHNA update – Stage 2. This will assess the implications of forecast economic growth for the availability of labour to meet forecast job growth [due to be published in time to inform the Regulation 19 Publication Plan]. This will enable the Council to consider whether housing provision based on the LHN standard method would accommodate sufficient labour locally.

Currently rejected alternative options for levels of housing development

Option b - Provide for a lower level of housing growth

This approach would provide for lower housing growth, below the level of the Local Housing Need. There are two circumstances where Government policy and guidance allows the Council to choose to plan for a level of housing growth lower than the assessed level of Local Housing Need based on the Government's standard methodology. These are where there is technical evidence to indicate that data inputs into the government formula are incorrect and where there is technical evidence to show that the need cannot be met in the district. Neither circumstance apply to East Devon at this time. Therefore this reasonable alternative is rejected.

Option c - Provide for a moderately higher level of housing growth

In the Issues and Options report we highlighted an option of providing around 1,200 new homes per year. Reflecting Government policy and guidance, the Local Plan's policy on total housing provision can exceed the assessed need resulting from Government's LHN standard methodology. The Council needs to consider whether there is evidence to justify planning for higher housing growth. Reasons for doing so could include increasing supply to deliver more affordable housing or to increase labour supply. Although this is a reasonable alternative, in the absence of the EDNA and other evidence it is rejected at this time. When new evidence becomes available the position will be reconsidered.

Option d - Provide for a significantly higher level of housing growth

Again, reflecting Government policy and guidance, the Council can consider whether there is evidence to justify planning for significantly higher levels of housing growth.

In the Issues and Options report we highlighted an option of providing around 1,600 new homes per year. The Council needs to consider whether there is evidence to justify planning for a significantly higher housing growth. Reasons for doing so could include increasing supply to deliver more affordable housing to meet all affordable housing need, or to increase labour supply to accommodate aspirational economic growth or aspiration. Although this is a reasonable alternative, in the absence of the EDNA and other evidence it is rejected at this time. When new evidence becomes available the position will be reconsidered.

Option e- Provide for a higher level of housing growth to meet unmet need from another local planning authority area

At the present time, no Local Planning Authority has identified and evidenced a specific level of need arising in their area which they cannot meet and which they consider could be met in East Devon. Therefore currently this option is not needed, and is rejected

This matter will be kept under review.

It should be noted, in response to the Local Plan Issues and Options consultation there were representations from Dorset Council and Torbay Council indicating that these two authorities may see it as appropriate for East Devon to accommodate housing development that they may not be able to accommodate in their own local planning authority areas.

Other neighbouring local authorities have not, to date, raised such concerns though some respondents to the issues and options consultation did suggest East Devon should accommodate an element of Exeter-related development

Future employment provision in East Devon

- 3.89 The local plan's economic role is one of its three roles focused on achieving sustainable development. Through its economic role the plan contributes to building a resilient local economy aimed at providing economic prosperity for East Devon. It ensures that sufficient land of the right type is available in the right places and the right time to support growth, productivity and innovation. The plan identifies and coordinates development requirements to achieve this, including the provision of infrastructure.
- 3.90 The plan sets out the suite of preferred policies which together provide a clear economic vision and spatial economic development growth strategy for the District. They align with and support the spatial strategy and delivery of the plan's vision and objectives.

- 3.91 The two proposed strategic polices address the strategic employment priorities of the area and any relevant cross-boundary issues. The first covers the amount of employment development provision in the plan period and the distribution of employment development. The second identify strategic site allocations where employment development is part of mixed uses.
- 3.92 These strategic policies provide a clear basis for the non-strategic employment policies set out in Chapter 10. These will inform the determination of planning applications on employment and mixed-use development matters and will cover:
- Employment development in built-up areas and the countryside
 - Farm Diversification
 - Retention of employment sites and premises
 - Employment and Skills Statements
 - Provision and retention of rural services and facilities
 - Town Centres and shopping areas
 - Green tourism
 - Visitor attractions

Preferred Option for the approach to economic growth

The suite of plan policies support development consistent with a resilient, inclusive, green economy, delivering growth and prosperity for the benefit of everybody in the District. They are orientated to meeting the needs for growth and change in East Devon and to ensuring the highest quality development outcomes. This preferred option for economic growth reflects the direction of travel towards delivering productivity through clean and inclusive growth promoted by the Heart of the South West Local Industrial Strategy.

- 3.93 In this preferred approach, economic growth remains coupled with prosperity. This means that the drive to support innovation, greater productivity and investment to deliver economic growth, as measured by GDP/GVA, is also shaped by the opportunity to transform the economy through green and inclusive growth. It incorporates the concept of sustainable development regarding economic, social and environmental objectives, aligned with NPPF.
- 3.94 The economic vision and spatial economic development growth strategy provide guidance to the local plan on the provision of employment land necessary to meet the economic growth opportunities, challenges and options faced by the District. This is distinct from other economic development activities such as inward investment promotion, business support and skills development which, though complementary, would be dealt with through separate work-streams within the District Council and in collaboration with partners.

3.95 The following statements set out the overarching elements of Economic Vision and Economic Strategy which, in combination, the detailed policies convey and support. They align with the plan's preferred approach to economic growth. These statements elaborate on and develop the Plan's overall vision for East Devon, and expand the strategic focus that directs the plan's policies and proposals.

Economic Vision

3.96 Our vision is to develop a resilient, competitive economy where local residents can access a choice of employment providing income comparable with national levels, and afford decent housing that meets their needs. Development will be concentrated at places where jobs and homes can be brought together to improve settlement self-containment. Supporting both established and emerging sectors, the Local Plan enables businesses to have the flexibility to transform and adapt to changing markets and harness new technologies. Strengthening residents' access to high quality education and training provision enables them to have the right skills to access new employment opportunities. Crucially, the policies and proposals in the Plan support our working age population to live and work locally whilst aiding the recovery and transformation of the local economy to a green economy, focused on making a major contribution to the transition to a net zero economy.

Economic Strategy

- 3.97 We will achieve this vision through a spatial economic development growth strategy which
- Creates conditions for a sustainable, inclusive and green economy delivering employment growth
 - Secures high value and higher wage local employment, based on productivity
 - Improves East Devon residents' access to employment

3.98 This will be achieved through:

- 1) Securing and growing transformation sectors, fostering the transition to net zero, by
 - Supporting development of sectors that have a presence in East Devon or are attracted to the wider economic area of which East Devon is a part, and from which the East Devon economy and residents benefit
 - Making flexible provision for development that supports the introduction, expansion and relocation to East Devon of higher GVA sector businesses in identified transformational sectors, mindful of the

- expected benefits they should bring to the District through higher wages and skills development
- 2) Retaining and supporting the existing mix of sectors in East Devon which create a resilient economy, including those that support community well-being
 - 3) Planning to meet identified employment needs in the plan period, quantifying the overall amount of employment development (business uses) provision and retail development provision, expressed as minimum policy requirements
 - 4) Providing the right land and premises in the right location to help businesses start, grow and flourish, by:
 - Identifying a range and choice of employment sites to meet need and providing sufficient flexibility to respond to changing economic circumstances,
 - Making provision for start-up and incubation space, at suitable places to attract and support new sectors utilising new technologies and encouraging research expertise to develop
 - Identifying a new generation of strategic employment sites
 - Allocating sites and supporting the intensification and expansion of existing employment sites
 - Robust testing of the viability of new employment land allocations prior to allocation, to strengthen the likelihood of delivery and new employment
 - Relying on realistic delivery mechanisms, principally private investment but with public sector intervention where this is necessary and can be resourced
 - 5) Securing new employment space, mixed use development and targeted regeneration proposals that will result in greater self-containment of our market and coastal towns
 - 6) Continuing to secure employment development opportunities in the western part of East Devon, reflecting that area's geographical advantages for business, including
 - Supporting the Exeter and East Devon Enterprise Zone designation through to its end date of 2042
 - Allocating more land to support the continued development and success of Exeter Science Park working in conjunction with partners including the City and Council Councils and University of Exeter
 - Making provision for the development of a smart and sustainable aviation cluster centred on Exeter Airport, utilising existing and enhanced facilities, enabling it to act as a test bed for future flight technology and to create new markets in maintenance/repair/overhaul, cargo handling and logistics
 - New communities, including Cranbrook employment and mixed use provision.
 - 7) Retaining employment sites that have good prospects of meeting future needs by:

- Safeguarding employment land allocations, supported by robust, effective mechanisms to deliver development, in order to reduce the demand for development in less sustainable, alternative locations
 - Ensuring that policy designed to safeguard valuable employment provision is robust and clearly expressed
- 8) Ensuring policy makes clear the importance of maintaining adequate supply of employment land to meet the needs of business in the district
- 9) Ensuring policies seek to secure the timely delivery of new infrastructure to support new development and a growing population, and address potential barriers to investment, including:
- Enhanced digital connectivity and the roll out of ultra-fast broadband networks
 - Making provision for increased, installed renewable energy capacity, to support decarbonisation of the grid and roll out of decentralised energy networks alongside smart grids, energy storage, hydrogen-based infrastructure, and new charging infrastructure
- 10) Ensuring policies designed to provide flexibility for employment-led uses can support established sectors to adapt to changing markets, including our High Streets
- 11) Sustaining and regenerating the town centres as priority areas for investment and for retaining retail and leisure spending in East Devon
- 12) Making provision for the development of tourism accommodation, attractions and businesses appropriate to the environmental qualities of the area, which support a more diversified, green tourism sector that draws on the key strengths such as the food, drink and cultural offer, and retains spend in the area
- 13) Supporting flourishing rural economies by
- Focusing employment development at settlements where dwellings, services and facilities support the local labour supply
 - Ensuring that policy designed to enable land based sectors to diversify, supports future farming resilience and rural businesses' ability to adapt to agricultural transition, changing markets and regulations, whilst also being consistent with the spatial strategy and supporting the role of settlements
 - Ensuring that policy recognises the importance of supporting local supply chains and improving the resilience and flexibility of the rural economy to adapt to changing markets. This might include development of food grade premises for local food and drink producers to expand. Or, accommodating local creative industries and local health and well-being businesses whose products and services complement local tourism, and community support services. Traditional and new businesses add vitality, provided that their development is sympathetic to the rural location.
- 14) Ensuring local residents are able to access and take up increased job opportunities in higher skilled and higher value occupations
- 15) Maximising the opportunity for new residential and commercial development to enable enhanced local education and training, skills and employment provision.

Responding to challenges

- 3.99 The economic vision and strategy encapsulate the plan's response to the current challenges facing the local economy, and the long term challenges it is likely to face over the plan period and beyond. National and local policy is evolving in response to generational challenges such as the climate crisis, biodiversity loss, technological change, low productivity and wage disparities, and a growing and ageing population. The Council Plan's priority for a resilient local economy is driven by these generational challenges but also by the economic shock of the pandemic and by national and global economic uncertainties.
- 3.100 Historically, East Devon has a rich heritage of production which brought wealth and supported the development of our market and coastal towns. This ranged from handmade lace and carpet making to limestone quarrying, farming and dairy produce.
- 3.101 Today, our economy is more diverse, spanning established sectors such as tourism and agriculture through to world leading climate and data science, advanced engineering and cutting edge science and technology. It is necessary to consider East Devon's role in the wider sub regional economy centred on Exeter, including its transformational sectors.
- 3.102 We continue to broaden local economic and employment opportunities and yet there is no part of our economy that has not been touched by the COVID-19 pandemic. The District lost its largest private sector employer (Flybe) in March 2020 and the Airport continues to rebuild from this. Structural challenges to our economy that existed prior to the pandemic also remain. East Devon is still an area where both resident and workplace wages are lower than regional and national averages whilst house prices are 12% higher than the England average, contributing to a worsening affordability gap.
- 3.103 We are experiencing a period of concerted economic change. There is a significant shift nationally and globally in the structure of employment, in response to generational challenges. As required by NPPF, the plan has had regard to the Heart of the South West Local Industrial Strategy (LIS) 2020. The LIS reflected contemporaneous government policy, set out in the UK Industrial Strategy 2017, and addressed the challenges of
- Artificial intelligence and data revolution
 - Shift to clean growth
 - Shaping the future of mobility
 - Harnessing innovation to meet the needs of an ageing population
- 3.104 In March 2021 Government replaced the UK Industrial Strategy 2017 with its 'Build Back Better - Our Plan for Growth' 2021. This Command Paper continues a

transformational approach towards tackling long term problems to deliver growth. It supports the transition to net zero growth, but has a new focus on 'levelling up' and the Government's vision for 'Global Britain'. Nevertheless, the challenges identified in 2017 remain.

- 3.105 Together, these challenges also provide opportunities for the national and local economy to transform. New ways of working have emphasised the importance of adaptation and a reliance on digital connectivity in the District. The recent increase in home-working due to the pandemic may become a permanent feature for some types of jobs. Work force expectations and needs are evolving. Artificial intelligence (AI) is expected to replace types of traditional jobs that are repetitive and can be systematised. The drive for greater productivity reduces the reliance on labour, but in turn this releases labour for employment in new sectors, if skills can be transferred, and training provided for the labour force to acquire new skills. New sectors are evolving. More flexibility enables new start-ups to grow on and mature. New types of employment requiring specialist workers are emerging. The changes have intensified the challenges experienced by our high streets.
- 3.106 Demand from future industries are expected to depend on new types of working environments, tailored to the industries' needs. There are new opportunities for people to reconnect with where they live, enjoy the outstanding environment and for businesses to access new markets through improved digital engagement. Developments such as Winslade Park are leading the way in terms of demonstrating the appeal of new models of living and working with an increased focus on wellbeing. The full impact and legacy of the pandemic in relation to demand for physical space such as for offices, logistics and retail continues to evolve, as does the impact on the labour market more widely.
- 3.107 Demand for supplies and services is expected to intensify, depending on the level of population growth and the needs of those people. Higher employment levels are needed to sustain the future population which is forecast to grow, and more jobs need to be accommodated locally in expanded or new communities. The plan will reference the new District employment forecasts (jobs-based) that underpin the local plan's employment provision policy, when they are available.
- 3.108 Linked to this, an increasing number of people are retiring to the District, increasing dependency on a shrinking workforce. In just 9 years from 2011 to 2020 we have seen our population of those over 65 grow by 22% while those aged between 16 to 24 have reduced by 6%. The stark reality is that we have seen a reduction in the working age population across more than half of the wards in East Devon. The balancing impact of new settlements cannot be underestimated as the same data shows our population of those 0 to 15 years increasing by 15% due to younger families moving into growth areas such as Cranbrook. As a District with such growing levels of economic inactivity in our

older population, our Local Plan must enable the delivery of affordable housing for key workers and working age residents, to address growing issues about housing affordability in East Devon,

3.109 The impact of the pandemic has been particularly acute for certain age groups, places and sectors. The lowest paid have been badly affected and the Council has launched a Poverty Reduction Strategy to provide a comprehensive package of support to individuals and communities. Alongside our support to transformational sectors, if we are to transition to a higher wage economy, we must ensure that residents can access the right education and training to develop the necessary knowledge and skills to access these new local opportunities.

- From a global perspective, the most pressing challenge is the need to reduce carbon emissions. The evidence from the last United Nation's IPCC report on the global threat presented by climate change is clear. In the context of the Council's own climate emergency declaration the policies and proposals of this Local Plan will, by 2040, need to have made a meaningful contribution to supporting the transition to a net zero economy. This is multi-faceted, spanning transport and supporting zero carbon development to promoting renewable energy generation and innovation. There is no bigger challenge. Transition will be difficult and we've no option but to engage fully and precipitate the shift from awareness to responsibility and positive action.

Currently rejected alternative options for the economic strategy

The preferred approach to economic growth is expressed through the preferred Economic Vision and Economic Strategy. It is aligned with Government policy and the Local Industrial Strategy, mindful of NPPF.

Two potential reasonable alternative approaches to economic growth are highlighted below but at this stage are not the favoured options.

Option b – Doughnut Economy Model approach

The Council Plan includes a priority for exploring use of the Doughnut Economy Model to guide policy and decision-making and ensure that ethical, socially responsible, and financially-sound decisions are made in an open, transparent and democratic manner. This model is a global conceptual framework for sustainable development that explores the challenge of meeting human needs without exhausting planetary resources. It represents this challenge visually as the inner ('social foundation') and outer ('ecological ceiling') rings of a doughnut, between which lies an ecologically safe and socially just space for humanity. The framework uses multiple indicators to provide an integrated assessment of socio-economic conditions and global environmental limits.

There is growing interest in 'downscaling' the Doughnut model to monitor and implement progress towards sustainable development at national, regional and local scales.

The impact of pursuing this approach in East Devon is currently unclear. It is likely that it would combine approaches to a cleaner, greener, circular economy with social inclusion, but unlike national policy, it implies a ceiling on the scale and types of economic growth as social and environmental considerations are given greater priority.

Extensive new evidence would be necessary to provide understanding about and the impact on prosperity and the local economy from applying the model to policy decisions. In particular, the Council would need evidence about the nature and impact of economic transformation, the type and scale of job growth or loss in the long term, wage levels and access to jobs, and how businesses and communities might change.

At this time there is no evidence for this approach. Downscaling the model and gathering evidence would significantly lengthen the plan-making timetable. This option is a reasonable alternative, but is rejected for now. The Council may revise its position in light of new evidence as and when available.

Option c Green growth approach

Green growth is based on economic growth that is environmentally sustainable. As long as economic growth remains a goal then it needs to be decoupled from resource use and adverse environmental impacts. This means the economy grows without increases in environmental pressure. It gives rise to new economic opportunities in sectors such as renewable energy, green agriculture and forestry. This approach invests in scientific and technological progress (such as eco-design, green innovation) directed towards sustainability, fostering economic growth and development.

Green growth is not a replacement for sustainable development. Rather, it is a practical and flexible approach for achieving concrete, measurable progress across economic and environmental objectives. At the same time it takes full account of social consequences. It considers benefits and costs for long term growth from greening the economy.

The approach recognises that focusing on Gross Domestic Product (GDP) as the main measure of economic progress generally overlooks the contribution of natural assets to wealth, health and well-being. It therefore relies on a broader range of measures of progress, encompassing the quality and composition of growth, and how this affects people's wealth and welfare. Whether it is sufficient to address the climate crisis, the biodiversity crisis and environmental degradation whilst addressing the other challenges faced by East Devon is unclear.

A 'green growth' option has some parallels with the Council Plan. Council priority 3 promotes the green economy. Council priority 2 for a greener East Devon includes placing the highest emphasis on the natural capital of our stunning environment – coast and countryside – and the value and importance of biodiversity within it. Aspects of 'green growth' are already in the Local Industrial Strategy with which the preferred economic growth option aligns. The LIS concentrates on exploiting strengths in 'clean growth' to position the Heart of the South West as a focus for innovation, and bringing green technologies and approaches to market. But green growth is not the only driver of change. This area needs to adapt in response to the other challenges which are addressed by the preferred option. Therefore the 'green growth' option is a reasonable alternative but is currently rejected.

5. Strategic Policy - Employment Provision and Distribution Strategy

This strategic policy will address the following issues

- The Council's commitment towards achieving high quality, high value jobs in East Devon, close to people's homes.
- Making provision for a net increase of at least (number still to be defined) sq.m of new employment floorspace within the plan period (1 April 2020 to 31 March 2040) to meet need and ensure that appropriate land is available in sufficient quantity, and of the right quality, to drive the economic growth of, and support prosperity in, East Devon.

The employment land distribution strategy will:

- Identifying the existing employment areas that will continue to be the primary locations for industrial, warehousing, offices, distribution development and other B Class Uses (to be listed in this policy, dependent on the updated EDNA information)
- Allocating additional land to provide sufficient land to meet East Devon's requirements
 - on the western side of the District, including the Exeter and East Devon Enterprise Zone, for high value uses, including those in transformational sectors.
 - at the towns (Tiers 1 and 2 plus the new settlement in the Settlement Hierarchy) to provide jobs and workspace for new and existing residents, to improve settlement self-containment, and to reduce the need to commute to work:
 1. E(g)(i)Offices- number to be defined sqm with town centres identified as the primary location for new Class E office development
 2. E(g)(ii) R& D and E(g)(iii) industrial (which can be carried out in any residential area without causing detriment to the amenity of the area)
 3. B2 Industrial – number to be defined sqm
 4. B8 Storage and distribution- number to be defined sqm
- A requirement for small workspace units as part of mixed-use development allocations in the Tier 3 and 4 settlements
- The Council will monitor the achievement of employment development on existing commitments, from planning permissions and on site allocations in the development plan.
- The scale of new windfall employment development will be also be monitored, regarding its support for and consistency with the economic vision and strategy, and the plan's vision, objectives and spatial strategy
- Support for sustainable green rural tourism and leisure development, which respect the character of the countryside and coast, across the District.

Justification for inclusion of policy

- 3.110 The Council Plan recognises that a resilient economy will promote prosperity and reduce hardship for residents and this is a strategic aim of the local plan. Planning for a sufficient amount of employment growth in East Devon is essential but the new jobs must meet local needs. This strategic policy is focussed on raising the quality of jobs and locating them close to residents meeting housing needs to support communities. It is a commitment to the provision of employment land development over the plan period, and considers the new supply sources to deliver the provision. This policy will ensure that the needs of new and growing businesses are met, and the Council will work with businesses and other partners to ensure the sufficient supply of quality employment floorspace.
- 3.111 Strategic policy in the plan should make sufficient provision for employment development. This means that the local plan provides an employment provision requirement figure for the whole plan area for the plan period. This accords with NPPF. This states that the plan should as a minimum apply a presumption in favour of sustainable development when plan-making, where strategic policy should as a minimum provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas (as established through Statements of Common Ground), unless circumstances as specified in NPPF apply. Strategic policy should make sufficient provision for employment development. This means that the local plan should establish an employment provision requirement figure for the whole plan area for the plan period.

Forecast of employment needs

- 3.112 Unlike housing, the Government does not provide a standard methodology for assessing employment development need. However it requires the LPA to prepare a robust evidence base to understand business need through a Housing and Economic Needs Assessment (HENA). The 2019 PPG on HENAs provides guidance about the approach to take on Economic Development Needs Assessment (EDNA). PPG makes clear that EDNA evidence will help to provide an understanding of the underlying requirements for office, general business and distribution space, and (when compared with the overall stock of employment sites) can form the context for appraising individual sites. The EDNA will therefore forecast the need for land for offices, industry and warehousing. It doesn't specifically forecast need for development regarding other employment uses.
- 3.113 Previous evidence on need in the 2011 Housing and Employment Study informed the adopted Local Plan, but that evidence is now out of date. Likewise, evidence underpinning the Greater Exeter Economic Development Needs

Assessment March 2017⁶ is out of date because of the Covid-19 pandemic, Brexit and evolving national economic and fiscal policy.

- 3.114 East Devon District Council together with Exeter, Mid Devon and Teignbridge Councils are to commission consultants to undertake an updated Economic Development Needs Assessment (EDNA). It covers the Exeter Functional Economic Market Area (FEMA) which encompasses the four authorities' administrative areas. This recognises that East Devon is functionally part of a larger sub-regional economy.
- 3.115 The purpose of the EDNA is to objectively assess and evidence the need for economic development in each district during the period 2020 to 2040. It will be able to take account of latest national and local policy on Covid recovery and Build Back Better, and latest evidence on the state of the national and local economy. It will be informed by the latest available District level forecasts of growth in employment (jobs-based) for the plan period.
- 3.116 The task of the EDNA is to understand current and potential future requirements. Based on PPG 2019, it will assess the stock of employment land, pattern of supply and loss, market demand, wider market signals and any evidence of market failure, in East Devon district. The EDNA will translate employment and output forecasts into related offices, industry and warehousing land need. Then by taking account of existing supply, it can identify any shortfall in supply compared to District need. It may highlight specific needs, such as providing a range modern good quality floorspace for one or more of the employment types, or in particular locations. It will consider the issue of providing sufficient supply flexibility to allow choice and enable businesses to respond swiftly to changing circumstances.
- 3.117 The results of the EDNA may identify potential shortfalls or surplus of employment land supply compared to need. It will be for the Councils to engage actively, constructively and in an on-going way to identify effective responses to resolve any strategic cross-boundary issues relating to meeting need, necessary to pass the Duty to Co-operate legal test.
- 3.118 The EDNA is expected to be available in time to inform the preparation of the Regulation 19 Publication Plan. The employment (jobs-based) forecasts will be available prior to the draft EDNA report, in time to inform the consultation on the Regulation 18 draft plan.

⁶ Greater Exeter Economic Development Needs Assessment March 2017
[https://devoncc.sharepoint.com/sites/PublicDocs/Planning/Planning/Forms/AllItems.aspx?id=%2Fsites%2FPublicDocs%2FPlanning%2FPlanning%2FGESP%2FEvidence%2FEDNA Final Report](https://devoncc.sharepoint.com/sites/PublicDocs/Planning/Planning/Forms/AllItems.aspx?id=%2Fsites%2FPublicDocs%2FPlanning%2FPlanning%2FGESP%2FEvidence%2FEDNA%20Final%20Report)

Total employment provision requirement

3.119 It is the LPA's role to identify and justify the amount of employment development provision required in the plan policy to meet the future needs of the District. The Government does not set a mandatory figure for the District's employment requirement. Setting out the requirement figure in the Strategic Policy expresses the LPA's commitment to the level of employment development to be provided for in the plan period.

Employment land (or floorspace) supply

- 3.120 To meet the District's employment floorspace requirement, the Council will need to identify suitable sites that provide a realistic chance of delivery and provide for flexibility and choice. The EDNA assesses the existing supply and indication of any supply shortfall.
- 3.121 The Council needs to assess the quality and quantum of employment floorspace which could be delivered in the plan period to fill any forecast supply shortfall and allow for an appropriate degree of supply flexibility. This includes sites put forward through the HELAA call for sites. It also includes assessing whether any of the employment allocations in the adopted local plan but as yet undeveloped remain viable and attractive sites, and can be reallocated. The employment elements within the mixed use allocations in the Cranbrook plan have been tested recently at Examination.
- 3.122 Informed by the EDNA, the floorspace requirement identified in Policy 5, identifies the need for 'office' and 'industrial' and 'warehousing' employment uses. Policy reflects the latest national Use Classes Order (1st September 2020 and 2021). The UCO included a new E class combining commercial, business and services uses such as shops, financial and professional services, cafes, offices, research and development, clinics and health centres, day centres and gyms. Further changes to permitted permanent change were introduced in August 2021. Use Class E(g) has replaced the previous B1 Use Classes. Use Classes B2 (General Industry) and B8 (Storage and Distribution) remain.
- 3.123 This has impacted on local plan policies on employment, commercial and retail development. The change in use classes, is meant to provide a more flexible approach to uses such as industrial and storage and distribution operations. This can be beneficial allowing businesses to respond more swiftly to changing circumstances. Allocating sites for E(g), B2 and B8 class uses will need to consider which sites are suitable, depending on how similar the site requirements are, and the potential impact on the mix of uses and adjoining uses. Some uses such as general industry and warehousing/logistics generally cannot be carried out in a residential area without detriment to its amenity.

Distribution of employment development

- 3.124 The local plan determines how to balance the supply of employment land and floorspace across East Devon. To deliver the economic vision, the local plan will need to make new employment provision to meet the future needs of the District. The policy therefore addresses the distribution of additional employment provision across the District, focused on scale and type of employment allocations disaggregated to settlement categories.
- 3.125 The plan is an opportunity to support transformational sectors focused on emerging technology, building on the inherent strengths of this part of the District. The western side of the District contains particularly advantageous locations for businesses; not least proximity to concentrations of higher education, businesses, services, consumers and labour supply at Exeter, and the proximity of the M5 providing access to the strategic road network for transporting materials and products. The concentration of a range of employment sites in that location is a unique asset for the District. Not only can these sites accommodate new and expanding businesses. They also allow policy to place emphasis on providing high value jobs with particular focus on encouraging strategic inward investment and the transformational sector. The role of the Enterprise Zone is fundamental to the economic performance and well-being of the District. The Science Park is already positioned to attract knowledge based sectors, and to support new start and scaling up of businesses, with the potential to provide acceleration and innovation services for high tech firms.
- 3.126 The new settlements' locations and role are integral to supporting the economic strength of this part of the District. The role of Cranbrook regarding employment land provision is set out in the Cranbrook DPD, and it is guided by the Cranbrook Economic Development Strategy. Further policy on employment development on the western side of East Devon is set out in the Policies in Chapter 6. For the avoidance of doubt, all the site allocations are intended to meet the identified East Devon employment need, being evidence by the EDNA.
- 3.127 Elsewhere in the District employment will mostly be geared to serving local needs with a view to securing jobs close to existing and proposed homes. These are locations where the demand for services is a key part of the economy. Employment growth at existing settlements is essential to support them and to improve their self-containment. Through allocations, the plan provides opportunities to build on the economic links between settlements and businesses, with the potential to encourage the spin-out of higher value employment and new sectors to more of the District. This gives more people the option of not needing to commute long distances to work. On larger development allocations, new jobs will be required to be provided alongside new housing. Work is in progress to evidence the amount of employment, and how this relates to the scale of planned housing growth.

- 3.128 This policy establishes the amount and location of additional employment land to be distributed through local plan site allocations in accordance with the strategy established in Strategic Policy 5. It is the summation of the sites allocated in the plan. The allocations within the Enterprise Zone make provision for knowledge and data-driven, creative or high technology industries, as well as airport use. This means that the Cranbrook Plan allocations are also counted for the purposes of this policy, subject to the adoption of that DPD. Most of the allocation sites in settlements in the rest of the settlement hierarchy are in tiers 1 and 2 settlements. A small amount of mixed used development, including employment development, is proposed to be allocated at a few settlements in Tiers 3 and 4.
- 3.129 Work is in progress for gathering evidence through the EDNA and to inform the Council's site selection and site capacity estimates, to justify the amount of employment land sufficient to meet the need for employment land provision and the degree of supply flexibility in order to ensure sufficient choice in the range, types and sizes of sites for the mix of employment uses over the plan period.
- 3.130 The delivery of employment development on those allocations is vital to achieving the Economic Vision and Economic Strategy. The Council will also monitor the delivery of windfall employment land development to complete the evidence about employment land delivery over time.
- 3.131 There will be potential alternative strategic approaches to the level and distribution of employment development such as providing for a lower or higher level of employment growth. These will need to be identified, assessed, and conclusions reached about whether they are reasonable alternatives or not, and reasons set out for accepting or rejecting them. At this stage we do not have sufficient evidence to make even an initial recommendation and so it is not considered appropriate to consider alternative approaches at this stage.

Settlement Boundaries

3.132 Settlement boundaries (referred to as Built-up Area Boundaries in the adopted EDLP) are a fundamental policy tool for determining areas and locations that are generally suitable for development. Boundaries are drawn around settlements that are identified as appropriate for growth and they serve three primary functions:

- a) They define (within the boundary) where many development types, in principle, will be acceptable because they will complement objectives of promoting sustainable development.
- b) They set limits for outward expansion of settlements and in so doing control the overall scale and location of development that occurs in order to ensure implementation of the plan strategy;
- c) they prevent unregulated development across the countryside and open areas;

A Principles of Settlement Boundaries Topic [Paper](#) (which was prepared for consideration by Strategic Planning Committee) sets out the relevant background and issues in more detail. It should be noted that boundaries are still to be defined and are not included in this working draft local plan.

6. Strategic Policy – Development inside Settlement Boundaries

Proposed policy will explain that Settlement Boundaries will be defined on the policies map around the Tier 1 to 4 settlements and that these boundaries will establish the types and forms of development that will be permitted within them and broad standards and approaches to development (see also separate policy for development outside boundaries).

Policy will also explain that a Neighbourhood Plan may specifically allocate sites and/or include criteria based or other policies for promoting development/land uses beyond settlement boundaries. Such 'outside of boundaries' policy provision must be justified and be shown to deliver objectives around promoting sustainable development and may supersede relevant constraint considerations set out in this and other local plan policies.

Justification for inclusion of policy

3.133 Settlement Boundaries will be drawn around our Tier 1 to Tier 4 settlements (large strategic development sites may also have such boundaries or otherwise have a clear allocation for development). Policy will establish the types of development that will be permissible inside boundaries (separate policy talks about development beyond boundaries).

- 3.134 Settlement boundaries are proposed to be drawn relatively tightly to indicate the areas that are generally appropriate for development and will include sites that are allocated for development. Settlement boundaries may exclude some areas that are already 'built-up', but nevertheless would not be considered appropriate locations for additional development (as in the current development plan). Outside of boundaries, development in the countryside is more restricted, under separate plan policy.

Currently rejected alternative – approaches to defining settlement boundaries

Option b – Using a criteria based policy to determine where development is likely to be acceptable rather than defining settlement boundaries

A criteria based policy could be used to guide development. An example of the wording that could be used is "Small sites that are physically very well related to the built form of any Tier 1 to Tier 4 settlement will be acceptable for the following uses if it can be demonstrated that the following criteria are met". This approach is rejected because it is open to differing interpretations and would give less certainty to local communities, developers and landowners on where development is likely to be acceptable.

Option c –Using a criteria based policy to define what a settlement is rather than defining settlement boundaries

This option is a variation of Option b where the policy would refer to the types of development that would be acceptable in settlements and include criteria to interpret what constitutes a settlement. For example "A settlement is considered to be a distinct group of buildings that includes 40 or more homes". This option is rejected for similar reasons to option b and in addition it does not reflect the work undertaken on the role and function of settlements, which demonstrate why some development in the Tier 1 to 4 settlements ought to be encouraged compared with other locations.

Option d – Looser Boundaries

Rather than having relatively tightly defined boundaries, as proposed, they could be defined more loosely and as such have more land within them on which development could be accommodated. This option is rejected because we are proposing a separate policy to allow development on the outside edge of settlement boundaries in some limited circumstances to encourage some types of development only.

7. Strategic Policy – Development adjacent to the outside edge of Settlement Boundaries

Policy will set out the circumstances in which applications for sites immediately adjacent to a settlement boundary may be acceptable for specified types of development/housing (community facilities, and housing for affordable, community build, older persons or self-build). Any application would need to provide statements of impact on landscape, biodiversity, flooding, heritage assets and neighbouring amenity. Development would be restricted in scale – sites no larger than can accommodate up to five modestly sized homes (of up to 100 square metres floor area). Also criteria to control cumulative scale of growth as a percentage in relation to size of related settlement – this could also be related to the settlement hierarchy (where more development could be allowed around higher tiered settlements and less around lower tiers). We may also wish to consider relating this policy to proven local needs and restricting initial occupation to those with a local connection.

Justification for inclusion of policy

3.135 Allowing some development adjacent to the outside of a settlement boundary will help to provide additional opportunities for certain types of development that we want to encourage. This approach combines the clarity of drawing a boundary with the flexibility to allow some additional development in limited circumstances where it is demonstrated that it would be appropriate.

Currently rejected alternative – approaches to development adjacent to the outside edge of settlement boundaries

Option b – Different criteria

We could choose to set different criteria to determine what may be suitable adjacent to a settlement boundary. For example a different mix of uses, a larger footprint or no cumulative impact. This option is rejected as the proposed criteria provide a good balance between providing flexibility for some kinds of development without allowing unrestricted development.

Option c – No policy

We could choose not to have a policy of enabling development on the outside edge of settlement boundaries (except under the 'Development Outside Settlement Boundaries' policy). If this approach is taken the settlement boundaries could be drawn more 'loosely' to provide development opportunities on smaller sites around the settlement. This would help to provide a supply of smaller sites that would be too small to consider specifically allocating for development. This option is rejected because it does not differentiate between the types of development we want to encourage on the outside edges of settlements.

8. Policy – Development beyond Settlement Boundaries

Proposed policy will set out that development beyond Settlement Boundaries will be far more restricted and only permitted where it is in accordance with a specific Local or Neighbourhood Plan policy that explicitly permits such development and where it would not harm the distinctive landscape, amenity and environmental qualities within which it is located. This will be a key strategic policy that seeks to accommodate development with locations that will promote objectives of sustainable development.

Justification for inclusion of policies

3.136 Land that falls outside settlement boundaries is not identified as suitable for the range of uses that will be accommodated inside settlement boundaries. This 'outside' land will be treated as 'countryside' in planning policy terms, even though some of it will comprise built-up areas. Such areas of 'countryside' will not be considered to be suitable for development unless a policy in this plan explicitly provides for that type of development. However, there will be some flexibility to allow affordable housing, older persons housing, community build, self-build or community facilities on sites that are directly adjacent to the settlement boundary as set out in separate policy.

Currently rejected alternative options for development beyond settlement boundaries

The same options set out for the 'development within settlement boundaries' policy apply to this policy and in addition

Option b – Additional development outside settlement boundaries

The strategic approach could allow for more development on the 'countryside' (although this would probably be expressed through additional policies rather than changing the wording of this policy). This option is rejected as the approach proposed is consistent with national planning policy

Option c – Less development outside settlement boundaries

The strategic approach could allow for less development on the 'countryside' (although this would probably be achieved through reducing the number of 'exception' policies rather than changing the wording of this policy). This option is rejected as the approach proposed is consistent with national planning policy.

Chapter 4 - How we have assessed the potential suitability of sites for development

Assessment of sites

- 4.1 To assist with preparation of this working draft local plan officers have undertaken an initial assessment of the suitability of potential sites for development. This work has specifically concentrated on suitability for housing development though for bigger sites, in particular, it will also pick up on ability to accommodate mixed uses. Same reference is also, however, made of possible site suitability for employment development.
- 4.2 In line with the recommended strategic approach to development, and specifically the approach of establishing Tiers 1 to 4 to establish suitability for development, the key settlements of East Devon and sites with and abutting them have been evaluated. Assessment has also been undertaken of sites on the western edges of East Devon where close to the Exeter City Boundary.
- 4.3 It should be noted that sites in locations that do not come into the Tiers 1 to 4 have not been assessed (at least not to date) as they would not align with the proposed emerging plan strategy and as such, and on this basis, would fail to be appropriate, in principle, for development. We have also not assessed sites that are clearly remote or some distance from settlements that do fall into Tiers 1 to 4 as they would fail to meet pedestrian accessibility considerations.

The Housing and Employment Land Availability Assessment (HELAA)

- 4.4 We have used the HELAA and sites submitted through this work as a basis to establish sites to assess. The HELAA is a process for land owners (or their agents) to identify and promote for development land that they own or control and that they consider has scope for building on. A number of 'calls for sites' have been undertaken in East Devon that have helped establish a database of sites that potentially offer scope for development and as such could potentially be allocated or identified in the local plan for development.
- 4.5 A formal process of assessing technical suitability to accommodate development is being undertaken in respect of these sites by an independent panel. Early outputs and findings from this work may be available in late 2021 with complete outputs scheduled to be available in early 2022. This assessment will help inform local plan decisions on sites to allocate for development but it is important to stress that the HELAA work does not determine allocations or for that matter plan policy or strategy. The HELAA is primarily concerned with technical considerations around whether sites could be developed and not choices around whether development would actually be a good, desirable or

appropriate outcome in planning terms, or in contrast represent a bad or negative outcome.

- 4.6 The HELAA sites have formed the essential 'bottom-up' element of possible site provision that feeds into development plan policy. It should be noted that whilst the HELAA forms part of the work that feeds into plan making there is a critical element that is 'top-down' in nature which is around where and why, in principle, it is desirable to accommodate development and what positive benefits (and avoidance of harm) such development will help deliver. The working draft local plan has been written to take account of both the 'bottom-up' site work and 'top-down' consideration.

Officer assessment of HELAA submission sites

- 4.7 Initial officer assessment work has examined HELAA submissions sites, drawing on information presented to the HELAA Panel, to give an indicative ranking of the potential suitability of sites for development. Features of particular importance which have been factored into officer judgement on sites include (but are not strictly limited to):
- Landscape and topography – Sites located within the AONB typically have a maximum rating of 4.
 - Biodiversity- Impact on wildlife features located on the site.
 - Heritage- The proximity to and potential for impact upon listed features and scheduled monuments.
 - Access- In particular whether a suitable one can be achieved.
 - Flooding- Whether the site is liable to flood.
 - Location- In particular the ease of access to nearby facilities and existence of pedestrian footpaths.
 - Other amenity considerations, including noise.
- 4.8 It is very important to stress that this testing has been undertaken at a higher level, it does not go into detailed concerns and it has typically not, at this stage, benefitted from inputs from technical experts, or technical assessment process for example heritage impact assessment or formal landscape sensitivity testing.
- 4.9 The conclusions drawn from the testing and policy recommendations arising from the work need, therefore to be considered in this specific context. As plan making progresses sites will be tested and examined in far more detail and views on potential suitability for development may change. As a consequence early policy and allocation observations are liable to be subject to amendment and refinement and all documents need to be read bearing this consideration in mind.
- 4.10 Notwithstanding caveats highlighted sites have been assessed on the basis of how good or bad they are considered to be for development. Assessment is based on officer judgement and on the strength of available evidence. Sites have been assessed on a stand-alone basis and the work has not sought to

consider any possible cumulative impacts of development if a number of sites come forward for development. Furthermore, and very importantly, the stand alone site assessment has not given consideration to or applied any weight to issues of plan strategy and what a plan strategy might seek to achieve.

The full assessment work is shown in three separate supporting documents which accompany the draft. In this work, sites are colour coded and ranked as follows:

6 - (darker green) - Excellent site, no real constraints or sensitivities and limited infrastructure costs.

5 - (lighter green) - Good site, minor constraints or sensitivities and limited infrastructure costs.

4 - (yellow) - Fair site, Moderate constraints or sensitivities and any infrastructure costs can likely be overcome.

3 - (pink) - Poor site, Has large constraints and sensitivities but with high quality development these perhaps can be overcome. Infrastructure costs may be high but potentially could be deliverable.

2 - (Red) - Very poor site, highly constrained or sensitive. Might have major infrastructure costs that put the site at particular risk of delivery. At a push can be delivered but not a desirable option.

1 - (Brown) - Undeliverable site, constraints and sensitivities can't be overcome or infrastructure costs are completely prohibitive.

4.11 In chapters of this working draft plan that follow we have included maps for the Tier 1 to 4 settlements and the western side of East Devon. On these maps the submission sites have been shown in greyscale, with preferred allocations shown with a red outline.

4.12 In assessment and commentary in the supporting documents we have in some cases identified that parts of sites might potentially be suitable, or more suitable, for development but not other parts. As a consequence this might have 'bumped-up' development suitability of a site overall, but really the suitability status is only applicable to areas or parts (reflected in commentary) that we may suggest as potentially appropriate for development. In some cases and to some degree the same considerations may work in reverse and sites may score well but there could be particular parts that would be especially sensitive to development.

Use of the site assessments

- 4.13 In making recommendations for sites to potentially be allocated for development we have drawn on the site assessment work. This has however, been just part of the reasoning for the suggested allocations. Very critically the logic for allocations is also based on and informed by establishing a strategic overview and vision for where development should be best and most appropriately located. As a result in some cases sites that have scored highly in terms of the site assessment may not be recommended for allocation. They may either not fit within a logical strategy for growth and/or may lead to levels of growth in a particular location which are potentially excessive for that location or community to sustain.

DRAFT

Chapter 5 - Future growth and development on the western side of East Devon

What the western side of East Devon is like

- 5.1 The western side of East Devon, close to the City of Exeter, has seen considerable levels of growth and development in recent years and in the new local plan the recommended policy approach is to continue with accommodating strategic levels of development in this general area. Projects and schemes that have supported growth and have formed part of the growth and development have included a district heating, considerable levels of high quality green infrastructure, a full Growth Point programme, the Enterprise Zone designation and proactive responses to the climate emergency.
- 5.2 In the existing local plan we define and establish the 'West End of East Devon' as a spatial policy tool. The West End is not a single physically defined zone (i.e. it is not a single area shown with a line on a map), rather it comprises of a series of large scale strategic development sites close to the city of Exeter. The West End has been a focal point for growth and development in East Devon over a number of years. This deliberate policy approach has reflected:
- I. the constraints to development elsewhere in the District, specifically the fact that two thirds of East Devon, including much of the north, west and south of East Devon falls in designated AONBs; and
 - II. in East Devon, close to Exeter and in the City itself, there is a lot of existing built development providing jobs, services and facilities, there is supporting infrastructure and there is a market demand for housing and larger strategic scale development, not the least for employment uses.
- 5.3 Much of what will be built on the western side of East Devon over the years ahead is already committed to development either through Cranbrook Plan policy or through sites that are mostly under construction, though some are not started but they do have planning permission. Some of the West End sites are either built out or nearing completion.
- 5.4 In this proposed new local plan we recognise strategic relevance and importance of development in the west of the district and we are continuing with a strategic approach of promoting large scale strategic development close to Exeter on and close to main travel and through routes.

Key messages from the Neighbourhood Plans for the area

- 5.5 Unsurprisingly neighbourhood planning has been very active in the western part of the district, no doubt partly in response to the adopted local plan strategy for the 'west end' and the significant levels of development that have been seen and are on-going. 'Made' neighbourhood plans in the vicinity cover the

parishes of Bishops Clyst (Clyst St Mary and Sowton), Clyst St George, Farringdon, Rockbeare, and seek to preserve the rural nature of the area, the character of settlements and their remaining countryside setting. Emerging plans at Clyst Honiton and Broadclyst are seeking to bring their own preferred sites forward for development and to ensure all future development meets their local needs and delivers real benefits for their local communities. Emerging plans are also under preparation for Aylesbeare, Whimble and Woodbury, none of which are currently anticipated to be specifically planning for growth.

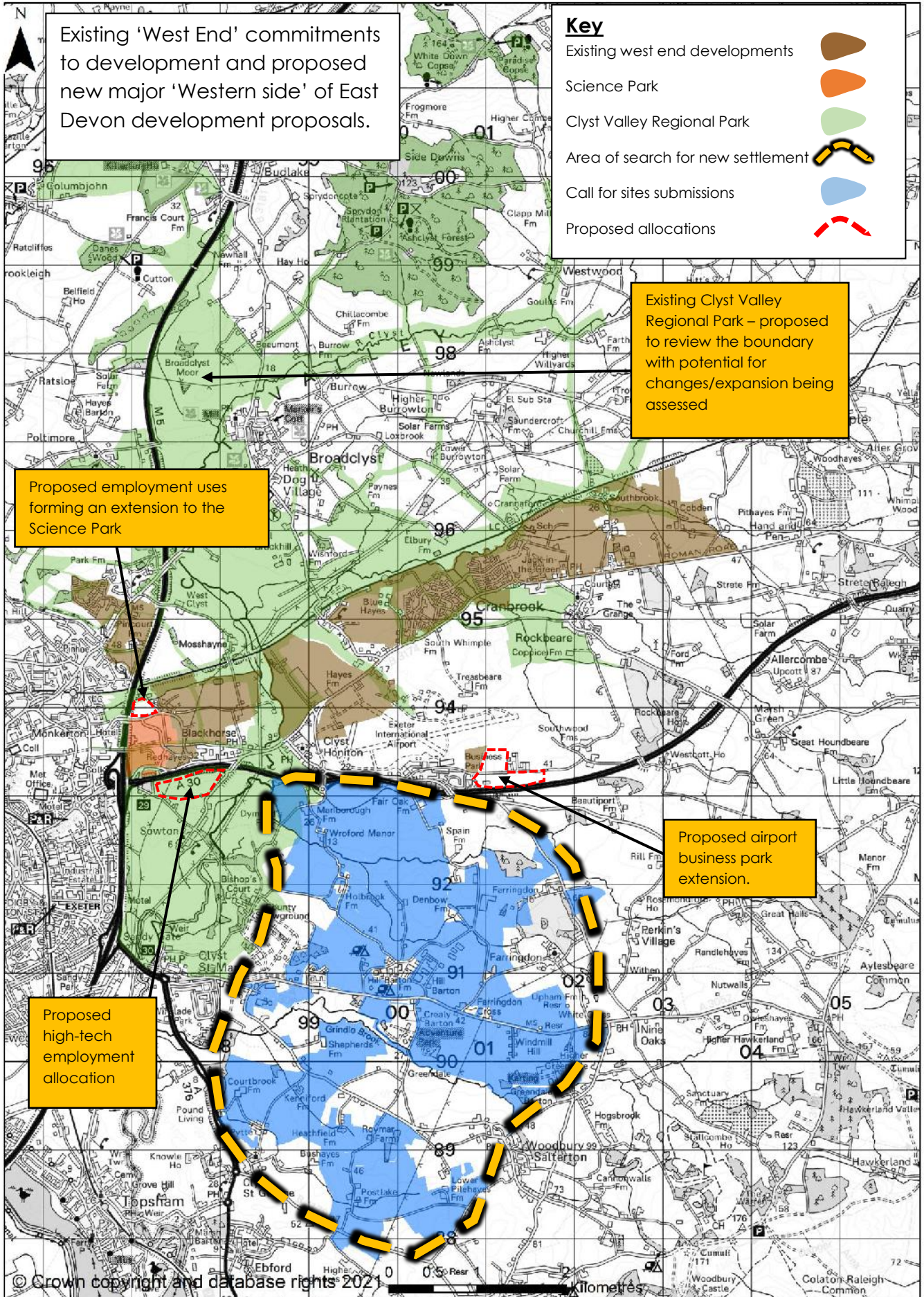
- 5.6 Further significant levels of development, including the potential for development of a new town or significant outward expansion of Cranbrook would clearly have major implications for any Made or emerging neighbourhood plans in the area.

Suitability for development

- 5.7 The work assessing strategic development options points towards the appropriateness of a strategy that majors on continuing with higher levels of development on the western side of East Devon. New development will need to be of the highest quality supported by appropriate facilities and services. The western side of East Devon has seen a considerable amount of infrastructure put in place in recent years to support, promote and facilitate new growth and development. A pattern of on-going growth will be able to capitalise on existing infrastructure provision but will also generate, in its own right, the need for additional provision and facilities, this is especially so in respect of proposals for a second new town.

A spatial picture of committed and proposed development

- 5.8 A spatial overview of current and proposed strategic development on the western side of East Devon is shown on the map over the page. The map highlights the existing committed development, as shown by the linear pattern of development sites stretching eastward from the city boundary; these are the West End sites.
- 5.9 New proposed developments and also reference to the Clyst Valley Regional Park (see the yellow boxes and corresponding policies) are shown on the plan and proposed policies are introduced for key developments and assets in this area.



Proposals for a second new town

- 5.10 It is proposed that policy of the new local plan will provide for a second new town in East Devon, though with a specific site still to be defined, on land in close proximity to the City of Exeter. The area of search illustrated in the previous map shows an indicative boundary for where the second new town may fall as well as land areas that have been promoted by owners for development purposes through the HELAA within that area. Included in the land submissions received there were three that suggested locations for new town proposals (these three fall 'at' the area of search).
- 5.11 The intent is that in the Draft Local Plan, to be consulted on, a specific site (or at least a much more explicit statement on location) will be identified with a proposal that the site is allocated for development.
- 5.12 To help identify the best location and support the development of plan policy the Council have produced a consultant's study brief to assess sites choices, identify infrastructure needs and build up a development strategy and mechanisms to ensure that a new town of the highest quality is built in a timely and positive manner. This work is proposed to be commissioned with a start in early 2022. Outputs from this work will help with making plan policy choices.

9. Strategic Policy – Development of a second new town east of Exeter

Proposed policy will set out that within boundaries to be defined proposals for a high quality new town, to accommodate up to 8,000 (or may be more) net new homes (though this final number will be subject to testing and further assessment and refinement), and supporting and complementary facilities will be allocated for development. During the plan period, up to 2040, it is projected that up to 2,500 homes will be built with the remaining being built after 2040. Plan policy and strategy will need to set out a clear steer and agenda for post 2040 development, i.e. after the proposed plan end date.

- 5.13 This scale of proposed development will help ensure that a wide range of services and facilities will be provided at the new town with sufficient monies generated to support substantive infrastructure provision.
- 5.14 Amongst other key facilities this scale of development will be appropriate to ensure that a secondary school is planned and built to serve the new town with potential capacity to also support needs generated from surrounding areas.
- 5.15 A new town will be a long time in the planning and it is unlikely that any new homes will be built until into the 2030s. On this basis, and at build out rates that if they escalate up to around 300 homes per year, there might be expected to be up to 2,500 new homes built at the new town before the 2040 end date of the

local plan. The second new town will, therefore, see most of its development happening outside of the life of this local plan and potentially running beyond the mid-point of the 21st Century.

- 5.16 There will be a need to build up a long term strategy and vision for the development of this new town.

Currently rejected alternative options to a new town provision

The work on developing a plan strategy (including looking at alternative options) has identified appropriateness of building another new town close to the City of Exeter. For completeness reasons, however, identified alternatives are:

Option b – Not building another new town

There is clearly an option of not planning for a second new town though this would raise fundamental questions about where housing growth in particular would go (the option of not having a second new town and alternative approaches is assessed alongside other options in more detail elsewhere in this document).

Option c – Building a series of smaller scale though still strategically significant development schemes close to Exeter

As a variation or alternative to a self-contained new town there would be the option of planning for a series of separate larger scale new villages in the western part of East Devon. Such villages may have the potential for speedier delivery though are unlikely to secure the range of services and facilities that a new town may provide. Also see further comment elsewhere in this document.

Strategic scale employment provision and job growth on the western side of East Devon

- 5.17 The western side of East Devon, notably at the Science Park, Skypark and Exeter Logistics Park have all seen substantial growth in recent years with a focus (particularly for the first two) on higher value and higher skill jobs. These new developments also sit alongside other important employment and economic assets in this western part of East Devon, notably Exeter International Airport. The proposed employment strategy in the plan places a clear emphasis on a continuation of this pattern of employment concentration and growth playing on the particular strengths of this part of East Devon and market demands. Proposed policies in the plan provide for three new strategic scale employment allocations in the plan on the western side of East Devon.

10. Strategic policy – Exeter Science Park

The proposal is for land to be allocated for Science Park expansion. Policy will explain and expand on:

- The types of uses that will be allowed;
- Any relevant phasing policies;
- Particular design standards and approaches that might be applicable.

5.18 The Exeter Science Park, in East Devon District, has seen substantial investment and growth over the last decade attracting a number of high quality businesses with associated inward investment, skills training and high value jobs. To accommodate future needs for the Science Park and continue with the pattern of accelerating success it is proposed that land is allocated to accommodate future Science Park expansion.

Currently rejected alternative options to proposed Exeter Science Park expansion

Option b – Not expand the Science Park

There is clearly an option of not expanding the Science Park and to take the view that once built out it will have fulfilled its potential and function. This approach would, however, fail to take into account the real positive future value and worth that an extended Science Park will offer and tie in with the proposed strategy for continued high quality economic growth.

Option c – Expand the Science Park elsewhere

There is land to the south of the Science Park (south of the A30) that could offer potential, perhaps on a much bigger scale, for Science Park expansion (and indeed under separate policy this land is proposed as an allocation for development). However, this alternative site is (or at least could be) substantial and it is not clear if land of the scale, specifically for Science Park use, could be justified over the plan period. The A30 also presents a major barrier that would separate it from the existing Science Park and its shared facilities. Given the specific site characteristics for Science Park use there have been no other sites identified that offer reasonable scope for such provision.

11. Strategic policy – High quality employment north of Sowton village

The proposal is for land to be allocated for a high quality business park to the north of Sowton village. Policy will explain and expand on matters to include:

- The types of uses that will be allowed;
- Any relevant phasing policies;
- Particular design standards and approaches that might be applicable.
- Links to the Clyst Valley Regional Park including provision of a green bridge over the A30.

- 5.19 Land to the north of Sowton village, south of the existing Science Park and A30, occupies a visually prominent position close to the M5 Motorway, Junction 29 and the A30. It can be expected to be attractive to potential inward investors and would help carry forward the proposed employment strategy. High quality development will, however, be essential given the sensitive nature of surrounding areas, specifically including Sowton village which is of historic interest, contains a number of listed buildings and much of the village lies within a Conservation Area. It is also the case that some land around and close to Sowton village falls in a floodplain.
- 5.20 It is proposed that land to the north of Sowton village is allocated for a business park to accommodate high quality new businesses and investment.

Currently rejected alternative options to proposed employment land provision north of Sowton village

Option b – Not allocating the land for development

There is clearly an option to not allocate this land for development. This approach would remove possible adverse impacts to heritage assets, however not making provision for employment growth would fail to take account of the value that would be added by new business park development and in particular the role it would play in delivering the proposed employment strategy of the plan.

Option c – Allocate the land for an alternative or any employment use

The expectation of plan policy is to be very explicit in respect of high quality development and the type of uses allowed on this land. However, an option would be to be more flexible of permissible business activities. This approach could see development happen more quickly, and potentially more jobs (though not if it were for low density employment warehousing and distribution uses), however, it is less likely to see the high quality and high value jobs delivered that the employment strategy for the plan aspires to see secured and would be likely to have a greater impact on the setting of Sowton village.

12. Strategic Policy – Aviation and aeronautical activity employment provision east of Exeter Airport terminal

The proposal is for land to be allocated for aviation and aeronautical activity employment provision. Policy will explain and expand on matters to include:

- The types of uses that will be allowed;
- Any relevant phasing policies;
- Particular design standards and approaches that might be applicable.
- Links and justification in respect of the operation of the airport and greening its activities and flying.

- 5.21 Land to the east of Exeter airport buildings is allocated for airport related and aeronautical business and commercial activity. The land comprises of two parcels, one forms an allocation that already features in the existing local plan and forms part of the existing Enterprise Zone. This land is proposed, to be re-allocated in this new local plan. The larger more easterly area that is allocated lies alongside and to the north of the A30. There is currently work to improve the sustainability of these sites with the improvements to Long Lane and use of Silverdown Link as a dedicated bus loop/cycleway for the area. Increasing employment density will improve the viability of public transport provision to the locality.
- 5.22 It is proposed that land is allocated specifically for business uses and activities that will support the role and function of the airport and aviation industry. Land allocations and subsequent development may, in particular, support an increasing transition of aviation away from fossil fuel reliance to less polluting fuel options.

Currently rejected alternative options to proposed allocation of land east of the airport

Option b – Not allocate the land for development

There is clearly an option to not allocate this land for development. This approach would, however, fail to take account of the potential for links to the airport and expanding on and securing a role for a greener aviation industry.

Option c – Allocate the land for an alternative or any employment use

The expectation of plan policy is to be very explicit in respect of aviation related activities required on these proposed allocations. Justification for this includes the proximity of the sites to the airport, noting that they are physically some distance from existing centres of population and housing. However, an option would be to be more flexible of permissible business activities. This approach could see

development happen more quickly, and potentially more jobs, however, it is less likely to promote positive outcomes for the airport and for greener flying.

DRAFT

13. Strategic policy – Exeter Airport and its future operation and development

Proposed policy will address the role of Exeter Airport as a key transport gateway and it will safeguard the airport and its land for aviation uses. Noise sensitive development within the 57db noise contour around the airport will be restricted (in order to ensure future airport operations are not adversely impacted) alongside ensuring that any development proposals do not have a material impact on navigational aids.

The transition to zero carbon operations at the airport will be supported through enhanced public transport surface access and the installation of renewable energy generating capacity.

The role of the Airport as a test bed for new technologies will be supported through the development of a sustainable aviation cluster. Land to the north of the runway is proposed to be allocated to support research and development activity alongside maintenance/ repair/overhaul and new freight/cargo operations. Land to the south is proposed to be allocated for further aviation related, employment and training/education uses.

- 5.23 Exeter Airport plays an important role as a key gateway to the region. This helps to support access to markets and both inbound and outbound tourism as well as providing a home operating base for the Devon Air Ambulance and National Police Air Service helicopters. Passenger numbers have increased steadily over time, reaching a peak of over one million passengers per annum in 2019. The pandemic has though had a dramatic impact. Flybe was headquartered at Exeter Airport and, when the airline went in to administration in March 2020, over 900 jobs were lost locally. This was the biggest economic shock ever experienced in the District. Passenger traffic reduced by over 80% in the following year.
- 5.24 It is estimated that it may take up to 5 years for passenger numbers to return to their 2019 levels. There has though been some positive progress latterly including;
- The majority of domestic routes being operated by alternative airlines
 - The hangars being taken over by Exeter Aerospace to re-provide a maintenance, repair and overhaul operation
 - The purchase of the former Flybe Training Academy by Devon County Council and its relaunch as the Future Skills Centre to provide a specialist facility for the delivery of training for future-facing high-tech jobs in engineering, digital, construction and clean growth.
- 5.25 It is important that the Local Plan sets a policy framework that both safeguards current operations and supports recovery, particularly the potential to pivot towards a more sustainable future. There is a global challenge to decarbonise the aviation industry. There is a particular opportunity for Exeter Airport to act as

a testbed for new technologies and modes of propulsion through the creation of a sustainable aviation cluster. There has already been a test of hybrid electric flight to Newquay Airport through the Future Flight programme. The opportunity to develop this potential is alongside the need to decarbonise existing operations, for example through promoting public transport accessibility and the installation of renewable energy generating capacity.

- 5.26 In addition to the airfield itself there are opportunities to bring forward further development land both to the north and south of the runway to complement the operation of the Airport. To the north there is an opportunity to develop further space to support research and development activity around future flight alongside developing new markets for cargo linking to the nearby presence of Exeter Logistics Park. To the south there is an opportunity to bring forward further commercial development including allowing for the continued expansion of education and training provision.

Currently rejected alternative options to proposed policy for the airport

Option b – Not have a policy

There is clearly an option to not have a policy though in so doing it could leave a void in respect of council decisions on and actions, including scope for proactive support, for the future of the airport and its activities.

Option c – to not allocate development land at the airport

This option would not see land allocated for development. As such it would reduce options for employment growth in this part of the District and in particular uses that might be airport related in nature or function. This could be to the detriment of the long term future of the airport as a valued transport and employment hub.

The ongoing development and potential for expansion of Cranbrook

- 5.27 Cranbrook is a new town under construction on the western side of East Devon, around 5 km from the M5 Motorway and the boundary with Exeter City. From a green field start in 2011 the new town has grown to a town of around 3,000 homes (as at end of 2021). The Cranbrook Plan (a Development Plan Document) for the town is expected to be adopted in early 2022 and it includes policy to expand the town to close to 8,000 homes.
- 5.28 It is **not** proposed that the new local plan will supersede the Cranbrook Plan. The policies of the Cranbrook Plan will remain applicable and will be formally Saved. The Cranbrook Plan does, however, only run to 2031 and this means that the new local plan will need to be revised and replaced before this date to ensure

policy coverage for and at Cranbrook in future years. There are also some existing local plan policies that are applicable at Cranbrook and a view will need to be taken, in due course, on whether these are also saved or whether we supersede them with new local plan coverage that may for selected policies 'sweep-over' and include land in the Cranbrook Plan area.

- 5.29 Whilst the Cranbrook Plan will remain in place for the Cranbrook Plan Area, beyond this defined area (i.e. on land covered by the new local plan), there are land areas on the edge of what is Cranbrook (or will be the edge where planned development occurs) that could accommodate further Cranbrook related development.
- 5.30 However, given the sensitivities of assessed sites for development on the edges of Cranbrook none are proposed for development in the new local plan. The options for outward expansion of Cranbrook were assessed as part of the Cranbrook Plan preparation work and appropriate development areas were identified with a very clear steer, therefore, provided on land that was unsuitable or inappropriate. Furthermore there is already substantial development planned to happen at Cranbrook and it would be far more appropriate to provide for this to come forward, over the years ahead, and then to review any potential for further outward expansion at a much later date through a different plan and its production.

Relationship with Neighbourhood Plans

- 5.31 The Cranbrook plan DPD boundary overlaps to some extent with a number of neighbourhood plan areas, particularly for the parishes of Rockbeare, which has a made neighbourhood plan (2018), and Whimple, where work on neighbourhood plan preparation has recently re-started.
- 5.32 Notwithstanding the identified reasons for not proposing allocation of land for development on the edges of the Cranbrook Plan boundary in this local plan there is and remains the option for Neighbourhood Plans to seek to allocate land and bring it forward for development.
- 5.33 The thrust of the Rockbeare plan (and very early indications from the Whimple plan) are however to ensure a clear separation remains from the development at Cranbrook and that the individual and rural character and identity of their existing villages be maintained. The Rockbeare plan expressly supports the green wedge in the adopted Local Plan. There is also a close relationship with the advancing neighbourhood plan for the parish of Broadclyst, which seeks better connectivity with Cranbrook, to benefit its resident population, and is anticipated to propose several sites for development/regeneration in close proximity to the Cranbrook boundary for housing/employment/mixed use.

Currently rejected alternative options to development at Cranbrook

Option a – to have a local plan policy that supersedes the Cranbrook Plan

We could choose to supersede the Cranbrook plan through new local plan policy. In such an overview we could look at development options again. However with anticipated adoption of the Cranbrook plan in 2022 and noting the detail it goes into and the time and effort that has gone into its preparation there is no identified merit or benefit in seeking to supersede it at this stage.

Option b – allocate land on the edges of Cranbrook that are outside of the Cranbrook Plan area

We could allocate sites for outward Cranbrook Plan expansion. This would provide for future housing growth but sites promoted are for the most part of sensitivity to development, some are remote from proposed Cranbrook building and Cranbrook as currently planned provides for relevant growth in this part of East Devon for the foreseeable future.

Transport and grey infrastructure provision close to Exeter

- 5.34 At this stage detailed assessment work has not been undertaken on transport issues and requirements associated with development for any grey infrastructure needs. These considerations will need to be taken into account as policy options and decision are developed and refined. Work was undertaken on these issues under the GESP, however these needs to be reviewed and reconsidered once Members future growth aspirations for this part of the district are more fully understood.

14. Strategic Policy – Green infrastructure and the Clyst Valley Regional Park

Proposed policy will address green infrastructure in the western parts of East Devon in general and specifically the future of the Clyst Valley Regional Park. Cross reference will be made to the consultancy work on landscape appraisal to inform possible park boundary amendments/extension.

Policy reference will be made to how development schemes should contribute to and complement green infrastructure initiatives more generally and how the park will form a setting and context for future developments. Policy to also note that the park offers scope to accommodate Suitable Alternative Natural Green Space (SANGS) as a means to provide mitigation in respect of adverse impacts on protected habitats and also potentially other green initiatives such as biodiversity off-setting.

With proposed additional development coming forward on the western side of East Devon there is a clear argument for the expansion of the park as a means to provide supporting and additional Green Infrastructure.

- 5.35 The Clyst Valley Regional Park forms an important strategic asset on the western side of East Devon. The park forms a setting for and to major (and smaller scale) developments. The park was first defined and established alongside work on West End developments and it is subject to a detailed masterplan that, amongst other matters, sets out detail on its future delivery and operation. The park plan has a Nature Recovery Network and an 80km traffic-free network diagram.
- 5.36 A landscape consultancy study is now underway considering whether current park boundaries are appropriate. This work will consider, amongst other matters, potential and options for further expansion of the park. With future strategic scale development proposed on the western side of East Devon there could well be a strong case for future park expansion to ensure a greater and accessible green and recreational asset is availed to residents and employees at any new development and also the public, more widely at large.

Currently rejected alternative options to the way we are planning for green infrastructure and the Clyst Valley Regional Park

Option b – To not consider park boundaries and potential for changes (including possible expansion)

There is the option to not consider park boundaries and potential for change, including expansion. However lack of review, and to not address matters in a local plan policy, would mean that we lack current evidence and planning policy to address and meet any future needs or opportunities. Expansion of the park may be particularly important in respect of supporting additional new strategic scale development that is proposed in this working draft of the plan.

Development at Tithebarn/Blackhorse

- 5.37 Integral to the development strategy of the previous Local Plan was delivery of strategic growth in the form of a new 'village' community located in and around Mosshayne Lane and Blackhorse. Alongside new homes, there are now a range of social and community facilities present as well as employment opportunities provided in Exeter and the nearby Science Park and Skypark. The existing Blackhorse settlement does, however, experience considerable noise due to its location on the flight path for Exeter Airport.
- 5.38 Given the existing and expanding opportunities the area, in principle forms an attractive location for further development should suitable sites be found. The plan on Page 97 shows sites that were submitted and that have been assessed at and around Blackhorse and Tithebarn. It is highlighted that most of the 'white land' on the map is already committed to development.

- 5.39 Given the airport noise issues experienced near Blackhorse and the M5, no suitable sites have been identified in the Blackhorse/Tithebarn area for residential development. One site to the north of the Science Park is proposed to come forward for employment, which is policy referenced in this plan chapter.

Relationship with the Neighbourhood Plan for the area

- 5.40 This area falls within the designated Broadclyst Neighbourhood Plan area. This plan is coming forward alongside and ahead of the new Local Plan and is expected to be formally submitted in December 2021. The latest working draft of the Submission Plan (August 2021) is open to some limited development in Blackhorse. It proposes allocation of a site for 2 dwellings and 2 live-work units and supports development of infill plots (specifically for self-build) at Blackhorse and Tithebarn. Policy seeks to address the constraint of airport noise through requiring appropriate mitigation features.

DRAFT

15. Strategic Policy – Development next to the M5 and north of Topsham

Proposed policy will provide for the comprehensive development of land allocated (indicative boundary shown at this stage) for mixed use development with an estimated capacity of around 580 new homes next to the M5 and north of Topsham. Policy will:

- Require a comprehensive masterplan for the whole site to be produced and agreed before specific parcels of land come forward;
- Joint working across the City boundary to align development in East Devon with that in the City;
- A range of facilities to meet and address East Devon and cross boundary needs - needs to be determined in the context of East Devon and Exeter collective needs and provision and capacity in Exeter city (existing and planned) services and facilities.
- Links to the Clyst Valley Regional Park;
- Transport and especially pedestrian and cycle links including potential for a new rail crossing; and
- Require that any development respects the landscape quality of the lower Clyst and provides links with the Clyst Valley Regional Park.

Provision of land, amount to be quantified, for employment uses, any infrastructure needs or other provisions.

Development next to the M5 and north of Topsham

- 5.41 Land at/close to Exeter, to the south of Junction 30 of the M5 offers an exciting opportunity for new mixed use development. This land lies to the east of the M5 Motorway and offers scope to accommodate a suggestion of approximately 580 new homes. Sites suggested for development fall within the red dotted line on the map that follows on after the proposed plan policy. Some land in the red dotted line is not coloured, i.e. it is white and has not been promoted for development by land owners to date. If, however, this 'white' land were also available and credible for development then capacity might increase by 200 or so extra homes. It is noted, however, that capacity could fall with any employment or other necessary uses required to support mixed use development. All figures quoted should therefore be taken as a guide and be considered as indicative only at this early stage of plan preparation.
- 5.42 This land suggested for development abuts, to the south, land in the City of Exeter that is currently being built out for housing development. There are a range of sites and land parcels in the city itself between the city boundary with East Devon and Topsham that are being developed or have planning permission. Any development in East Devon should be seen within, and planned within, the context of city development as well.
- 5.43 There is a need for a comprehensive masterplan to be developed to support the whole of the proposed East Devon development, but this master planning work

should also, ideally, extend across the city boundary and form a wider partnership plan for a bigger area that could come forward for development.

Relationship with the Neighbourhood Plans for the area

- 5.44 The area of search shown in the plan below is covered by the Clyst St George neighbourhood plan which was 'made' in January 2019. The sites under consideration for allocation here lie in the vicinity of an area identified in the plan as a 'small but significant part of the parish', lying to the 'west of the River Clyst and east of the M5, which forms the boundary with Exeter', known locally as the Clyst Road or 'Blue Ball Inn' area. The existing development here is identified as one of three 'settlement areas' in the plan area, after Ebford and Clyst St. George. As noted in the accompanying site assessments, parts of two sites (reference Clg_20 and Clg_24) are within the floodzone. The neighbourhood plan includes policy to highlight and protect the ecological significance of this area and ensure development properly addresses floodrisk.
- 5.45 The plan conveys concern by residents about any significant scale of development and change in the rural nature of the area, particularly in respect of coalescence with Exeter and road safety, and seeks future development that meets local needs only.
- 5.46 The neighbourhood plan did not allocate any sites for development, considering this unnecessary at the time when the newly adopted Local Plan strategy dealt with the entire plan area as open countryside (including this entire 'edge of Exeter area' a designated Green Wedge) such that any development would be appraised as an exception. The plan states that the Parish is "unable to accommodate further major development without significant investment in local infrastructure", citing deficiencies with local community services, recreational facilities and the footpath and cycle network, and includes policy aimed at encouraging improvements. The plan policies do however set out a suite of criteria/requirements/aspirations which could be used to inform any development brief/masterplan if allocations are made.

Currently rejected alternative – approaches to development next to Exeter and near to Topsham

Option b – Not allocate the land for development

There is clearly an option to not allocate this land for development (or to vary allocation boundaries). If this approach were taken there would, however, be the need to identify how and where any housing shortfall generated would or could be accommodated.

DRAFT

Chapter 6 - Strategy for the development at Principal Centre, Main Centres and Service Villages

This chapter of the plan will set out information and proposed policy in Tiers 1 to 4 of the settlement hierarchy.

Axminster

What the settlement is like

- 6.1 Axminster is the fifth largest settlement in East Devon with a population of around 6,800. About 30% of residents are aged 65 or over (the East Devon average), with 16% aged between 0-15. There are some 2,800 economically active people and an employment density of 1.03, which shows that there is a good balance of jobs and workers. In terms of where Axminster residents work, two thirds are within East Devon, 44% of which work in Axminster itself, showing the settlement is relatively self-contained. 11% of workers travel across the border to West Dorset to work, and 10% to South Somerset. Not surprisingly, given its location near to the boundary, these are the highest proportions of people travelling to work in Somerset and Dorset of any of the East Devon settlements, indicating a reasonably close commuting relationship with these counties. The majority (over two thirds) drive a car to work, although walking accounts for a significant proportion (44%) in the town itself.
- 6.2 Axminster is one of only three East Devon settlements that has a full range of services and facilities with a secondary and primary schools, a variety of shops, sports facilities, a library, GP, hospital, railway station and regular bus service The A35 Trunk runs just to the south of Axminster and the A358 runs through the town centre. The routing of heavy goods vehicles through the narrow winding streets of the historic town centre erodes its environmental quality and can cause traffic management issues.
- 6.3 Axminster is set within the beautiful Axe valley, with the East Devon AONB to the south of the town and the Blackdown Hills AONB to the north and west. There is a significant degree of inter-visibility between the town and the AONB landscapes. Land to the west of the town is constrained by a wide floodplain and there are smaller floodplains in the town itself.
- 6.4 Axminster is an attractive and long established market town with an historic core of great architectural value. There are significant archaeological remains to the south of the town that provide evidence of a Roman fort, and the crossroads of strategic Roman roads. There is also a significant group of listed buildings focused to the north of the town around Weycroft Hall.

Key messages from the Neighbourhood Plan for the area

- 6.5 Axminster has a reformed Steering Group which is actively developing a neighbourhood plan for the town and parish. However, this is in the early stages of developing aims and objectives and evidence gathering, with a public consultation run over summer 2021. Previous work on a neighbourhood plan stalled due to uncertainty regarding the proposed eastern urban extension and associated relief road.

Suitability for development

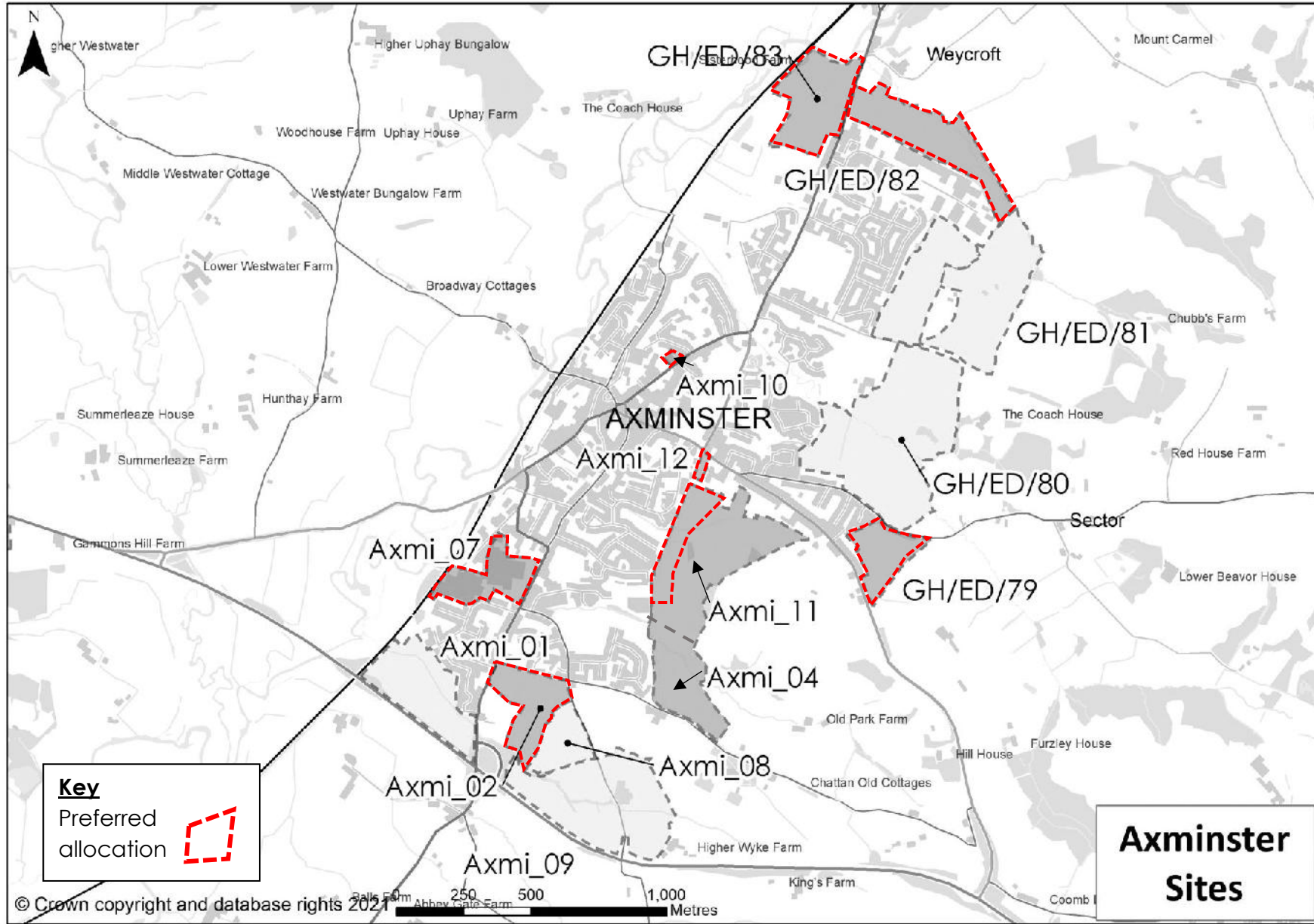
- 6.6 Axminster is one of the main settlements in the east of the District and has been categorised as a Tier 2 settlement, which is suitable in principle for significant growth. It is largely outside of the AONB's, has a train station, good bus links and access to the road network.
- 6.7 These factors suggest it is a good location to consider for growth, but there are also constraints. The River Axe is a Site of Special Scientific Interest and further housing development could exacerbate existing nutrient management issues and may not be acceptable unless it can be mitigated. There is a wide floodplain to the west of the town and an important group of historic assets to the north. To the south there is a further floodplain, the A30 Trunk Road, the East Devon AONB and two Scheduled Ancient Monuments, one of which may mark the site of a Roman fort and crossroads: it is likely that further Roman remains extend beyond the designated area. There is attractive hilly land to the east, some of which has limited potential for road access.
- 6.8 All of the sites considered are constrained in some ways and any development in Axminster will need to be able to mitigate any detrimental impact on nutrient levels on the River Axe. The adopted local plan allocates an urban extension to the north and east of the town, which includes an alternative road to help divert traffic from the town centre. This has not come forward as yet, partly due to the high cost of delivering the road. Alternative options need to be considered for the new local plan, including measures to help with traffic management in the town centre if a relief road cannot be provided to the east.

16. Strategic Policy – Axminster and its future development

Land allocations at Axminster – to support the growth of Axminster it is proposed that land is allocated for development to accommodate approximately 335 additional new homes in the town and through a series of small scale urban extensions. Sites listed below, and shown on the plan of Axminster in this section, are currently seen as offering good realistic potential to provide for future growth in the town.

- a. Axmi_07 – Land at Axminster Carpets for mixed use redevelopment, for employment generating uses and some residential where compliant with flood risk policies (35 homes);
- b. GH/ED/83 – Land north of Axminster for a mix of employment generating and residential development (100 homes);
- c. GH/ED/79 – Land east of Axminster, for residential development to include a road link capable of forming part of a relief road around the town (82 homes);
- d. Axmi_02 – Land to the south of Axminster, subject to archaeological investigation of the extent of Roman remains around the Scheduled Ancient Monument (50 homes)
- e. Axmi_11 – western part of site only, the extent to be determined through further work, for residential development (100 homes).
- f. Axmi_10 – Axminster hospital (5 homes)
- g. GH/ED/82 - Land north of Axminster for a mix of employment generating and residential development (50 homes)

- 6.9 Assessment has been undertaken of HEELA submissions sites to consider their scope for accommodating future development. Sites that were submitted for consideration are shown on the map below/over the page alongside preferred allocations.



Currently rejected alternative approaches to the proposed policy and land allocations for Axminster

Option b – Eastern urban extension

Progressing the eastern urban extension as set out in the Axminster Masterplan. Delivery of this approach would be likely to require significant levels of public sector investment. In the absence of funding for the relief road or alternative solutions the site is currently undeliverable.

Option c – Additional development to the south and/or south east of the town

This would involve development of less suitable sites in more sensitive landscapes than the proposed approach. Additional work would need to be undertaken to assess these options.

Option d – Less development

We could confine development to opportunities for redevelopment in the existing built-up area, possibly with some 'greenfield' allocations. This approach would fail to meet local aspirations for growth and would limit the potential of one of our larger, more sustainable settlements, which is strategically important to the east of the District.

Exmouth

What the settlement is like

- 6.10 Exmouth is by some way the largest town in East Devon with a population of around 35,700 residents and with 28% of the town's residents aged 65 plus it has a very marginally lower age profile than East Devon as a whole. There are around 18,770 economically active residents in the town with an employment density of 0.61. This means that there is a substantial net outflow (around 6,500) of employed residents living in the town commuting to jobs in other locations. Around 3,818 residents of Exmouth travel to jobs in Exeter.
- 6.11 Exmouth grew rapidly in Victorian times as a popular seaside resort and tourism still forms an important part of the town's economy. Water sport enthusiasts are drawn to Exmouth's estuary and coastal waters though its sandy beaches and other attractions also support a more traditional and diverse tourism industry.
- 6.12 Exmouth is very well supplied with services and facilities with a large secondary and primary schools, a variety of shops, sports facilities, a library, GP, hospital, railway station and regular bus services. The town centre, which most facilities are located within or close to, is positioned in a south westerly part of Exmouth. A consequence of this is that towards the outer edges of the town many residents are comparatively remote from services and as such can be car dependent.
- 6.13 The Exe Estuary on the western side of the town is an internationally important wildlife site on account of supporting important bird populations whilst the Pebblebed Heaths to the east of the town are also of international biodiversity importance. Exmouth also has a rich built environment heritage with a conservation area designated around the core commercial centre of the town and many listed buildings.

Key messages from the Neighbourhood Plan for the area

- 6.14 The parished area of Exmouth is covered by a neighbourhood plan 'made' in 2019. A number of the sites put forward for allocation to support the expansion of Exmouth to the north lie within the parish of Lympstone, which has its own 'made' neighbourhood plan (2015).
- 6.15 The Exmouth Neighbourhood Plan highlights concerns that infrastructure provision has not kept pace with housing development and places protection of the natural environment as its top priority, including both the setting of existing development, green corridors/networks and green spaces in the built up area. This includes the proposed Littleham/ Maer Valley Park, in which two

potential sites considered for allocation (below) lie wholly or in part, (Exmo_05 and Exmo_08 respectively). In terms of any new housing generally, the Exmouth Neighbourhood Plan highlights the need to ensure a good mix is made available, including particularly that homes are suitable for older people / as lifetime homes by design.

- 6.16 A high priority is also placed on enabling more and better local employment opportunities, and improvements in a wide range of community facilities and services. The Plan sets out differing community views regarding the regeneration schemes promoted through the adopted Local Plan and 2011 Exmouth Masterplan and includes support for the phased regeneration of Queen's Drive for tourism/leisure uses.
- 6.17 In terms of the **Lympstone Neighbourhood Plan** (2015 to 2026), the key message here is that this seeks to retain the rural identity of the parish and has a key aim to avoid any steps towards coalescence with Exmouth. It furthers this aim with policy that seeks to reinforce the Green Wedge within the adopted Local Plan, and to resist development within it. Key objectives are also to keep agricultural land within the parish available for future food and energy production, and to ensure any development in the plan area bring benefits to the Neighbourhood Area. Sites for possible allocation within Lympstone parish to form part of a potential northern extension to Exmouth are identified below. None of these sites are within the designated green wedge area, although these are greenfield sites, some of which are currently in agriculture use.

Suitability for development

- 6.18 Exmouth is by some way the largest town in East Devon and it contains the greatest number and range of services and facilities, it has been categorised as the only Tier 1 settlement. There are strategically positive reasons why Exmouth could be a good future location for growth and development but it is also greatly constrained by areas of environmental importance and sensitivity.
- 6.19 Exmouth is seen as appropriate for a moderate scale of growth and development with an emphasis on employment related growth.

17. Strategic Policy – Exmouth and its future development

Policy will set out proposals that Exmouth will see a moderate scale of development through the Local Plan and this policy will also set out broad objectives (to be defined) for the town. Sites proposed as allocations for housing development are listed below (and see maps further in this section).

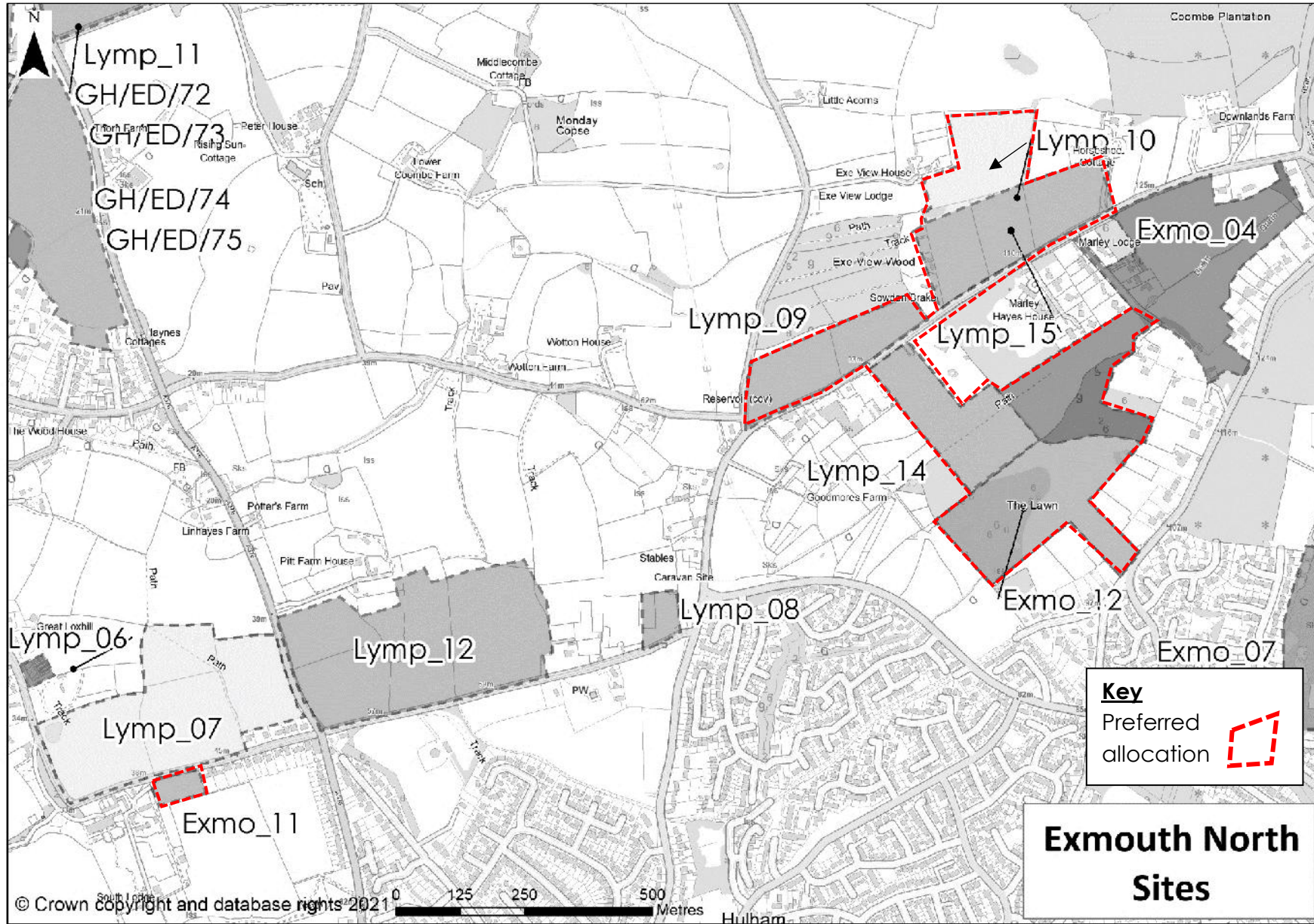
Sites for housing

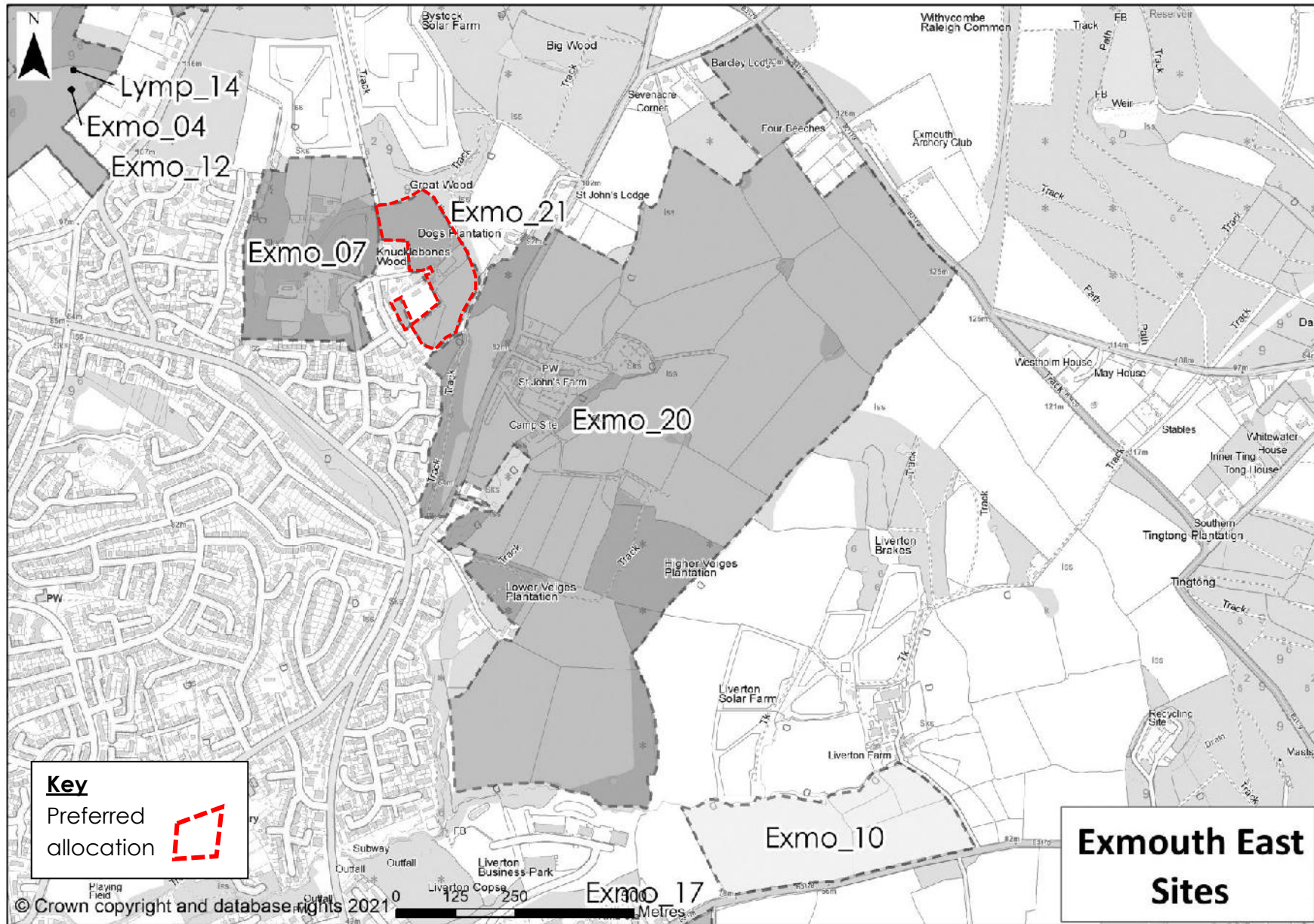
Approx Dwgs

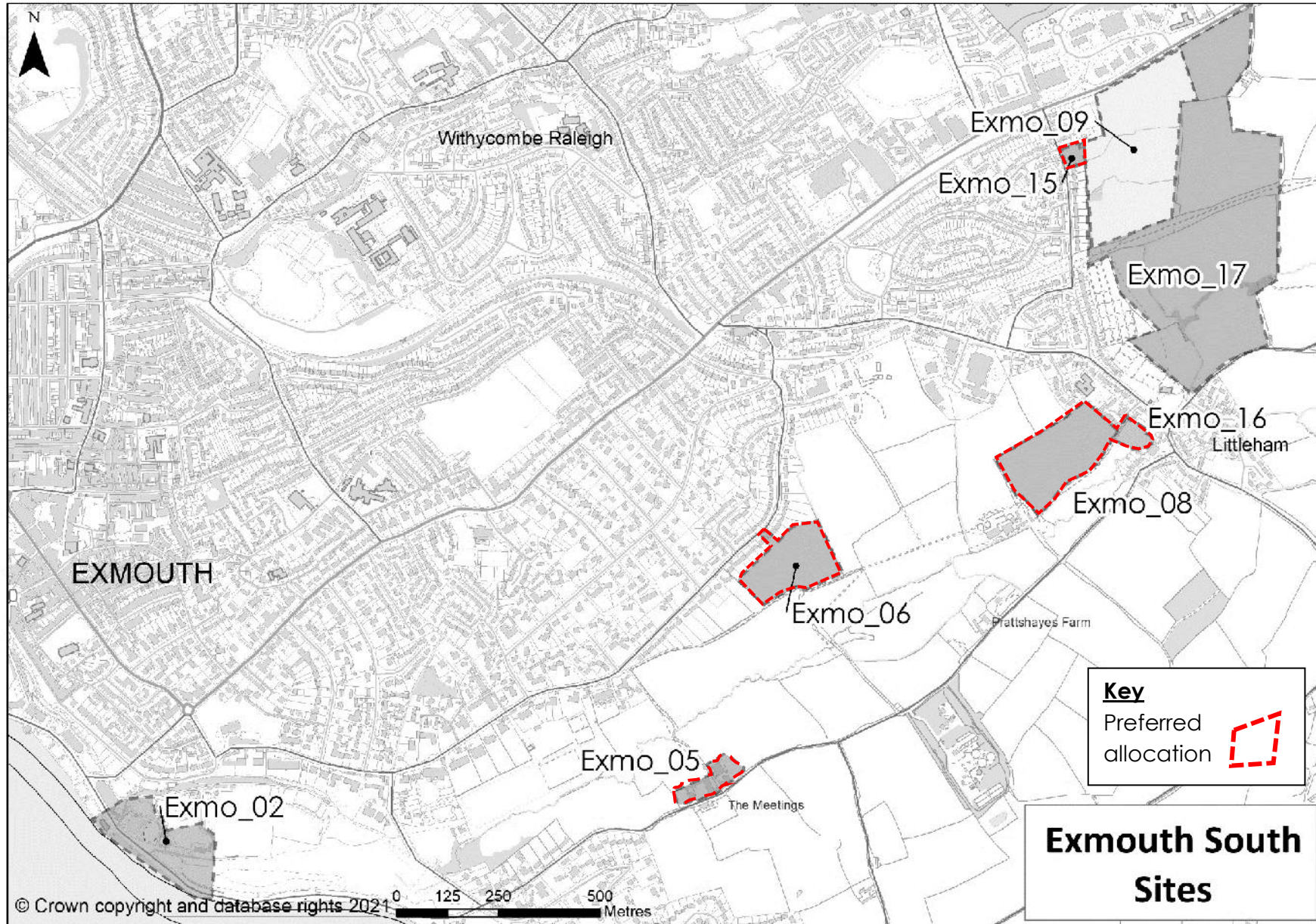
Exmo_12 - Land off Marley Road, Exmouth	30
Lymp_14 - Coles Field, Hulham Road, Exmouth	60
Lymp_15 - Land fronting Hulham Road, Exmouth	74
Lymp_09 - Land fronting Hulham Road, Exmouth	50
Lymp_10 - Land off Hulham Road, Lympstone	35
Exmo_04 - Land at Marley Drive, Lympstone, Exmouth	40
Exmo_11 - Land to the South of Courtlands lane, Exmouth	6
Exmo_21 - Land North East of Old Bystock Drive	40
Exmo_16 - Land to the rear of Elm Lane, Exmouth	5
Exmo_05 - Buildings and land at Maer Farm, Maer Lane, Exmouth	21
Exmo_06 - Douglas Gardens, Exmouth	44
Exmo_08 - Littleham Fields, Exmouth	40
Exmo_15 - Land off Capel Lane, Exmouth	10
Total dwellings at proposed allocations for Exmouth	455

Sites - Lymp_08, Exmo_12, Lymp_14, Lymp_15, Lymp_09, Lymp_10, Exmo_04 are proposed to form a northern extension to the town which should be master planned as a coherent overall development scheme. As this policy develops and is refined work will be undertaken on assessing the need for supporting social and community facilities. Development of sites Lymp_09, Lymp_10 and Lymp_15 lie to the north of Hulham Road which is a busy road and any development of these sites will be contingent upon provision of new and safe pedestrian and cycle crossings for this road.

- 6.20 Assessment has been undertaken of HELAA submissions sites to consider their scope for accommodating future development. Sites that were submitted for consideration are shown on the map below/over the page alongside preferred allocations.







- 6.21 Exmouth sees a significant number of residents commuting out of the town for work purposes, in particular travelling to Exeter. The town is unusual in having a town centre that is very much located in its extreme south westerly corner close to the seafront. One consequence of this is that many of the more recent homes built (including much of the later 20th and 21st century developments) are remote from the town centre.
- 6.22 Scope for development at Exmouth, specifically including any outward expansion, would see development set some distance from the town centre services and facilities but close to nationally important environmental assets. The built up eastern edges of the town are mostly elevated and close to and above lies the East Devon AONB and on the north-eastern side of the town is the biodiversity important Pebblebed Heaths. The western side of Exmouth is flanked by the Exe Estuary which is designated in the highest tier of wildlife sites.
- 6.23 There are therefore significant constraints on scope for development at Exmouth.

Currently rejected alternative approaches to the proposed policy and land allocations for Exmouth

Option b – To not plan for currently proposed development

This option would not see Exmouth grow and expand outward. It would lead to very limited additional housing provision in the town and would also limit scope for new employment land to come forward. It is though noted that there are sensitivities to the land that is proposed for development and a non-development approach would ensure that possible adverse impacts, especially landscape and on biodiversity, are avoided.

Option c – Plan for greater levels of development through further outward expansion of the town.

This approach would offer scope to bring more development forward at Exmouth with the housing and potential social and community benefits that would arise. However sites that have been prompted are sensitive in landscape and biodiversity terms and as such there could be potential for significant adverse impacts arising.

Honiton

What the settlement is like

- 6.24 Honiton is home to around 11,550 people making it the third largest settlement in East Devon. It has an age profile that is very close to the elderly East Devon average, with 29% of residents aged 65 or over. Around 70%, 5,694 residents, of the working age population are economically active though the jobs in the town at 4,766 fall below this level. There are 0.84 jobs per worker meaning that there is a net out-commute of residents to jobs in other locations, most significantly to Exeter.
- 6.25 Honiton has a very good range of facilities and lies in a central part of East Devon with a railway station on the Exeter–Waterloo line. The town is also on the A30 truck road which for the most part forms a northern edge to current built development. The town centre remains vibrant and supports retail and commercial activities as well as a wide range of social and community facilities. The secondary school lies on the edge of the town centre and towards the western edge of Honiton is the Heathpark business and industrial estate. This estate forms a key employment base for Honiton and surrounding areas. There are two smaller supermarkets at/close to Heathpark though the biggest supermarket in the town is a Tesco store on south-western side of the town.
- 6.26 The town centre is dominated by its historic and in parts grand east-west running High Street which forms the central part of a Conservation Area within which there are a number of listed buildings. The town enjoys an outstanding landscape setting with the Blackdown Hills AONB to the north and the East Devon AONB abutting the southern built up edges of the town.

Key messages from the Neighbourhood Plan for the area

- 6.27 The parish of Honiton has been designated as a neighbourhood plan area since 2015. An initial survey of residents and businesses was undertaken in 2017, and there is understood to be some renewed interest in developing a neighbourhood plan, but to date this has not progressed further.

Suitability for development

- 6.28 The well connected and central to East Devon location of Honiton, and the fact that the town has a good range of existing facilities and services supporting a large surrounding hinterland, points to it being a good location in principle for further development. However, the town is heavily constrained by the AONBs and its outstanding landscape setting. A number of the sites promoted for development (specifically on the southern edge of Honiton) fall in the East Devon AONB and sites submitted to the east and west of the town (outside of the AONBs) are nonetheless on land that is sensitive to development in landscape terms, development could adversely impact on AONB setting. Furthermore sites to the east and west of the town (especially to the west) are

quite remote from the town centre, especially so at their outer sides, and fall beyond comfortable walking distance to the centre.

- 6.29 On account of development constraints only modest development at Honiton (at this stage of plan making work) is proposed, though allocation is made (carrying forward an existing local plan allocation) for a substantive (around 15 hectares) area of land for employment uses to the west of the existing Heathpark industrial estate.
- 6.30 It is stressed that proposed allocations, at the time of drafting, are based on currently available evidence and initial site assessment work only. More detailed assessment work and evaluation may lead to amendments and refinement. All boundaries are shown as indicative only at this stage of drafting.

18. Strategic Policy – Honiton and its future development

Policy specifically for the town will be inserted here. These will focus on town specific matters and key concerns and considerations. Those identified to date include:

- Protecting the important landscape setting around the town (this is a limiting factor on outward expansion of the town)
- A focus on town centre regeneration and building inside the existing built fabric of the town;

Policy will also specify proposed land allocations for development at the town. In this working draft plan these are currently proposed (as identified on the map that follows) as:

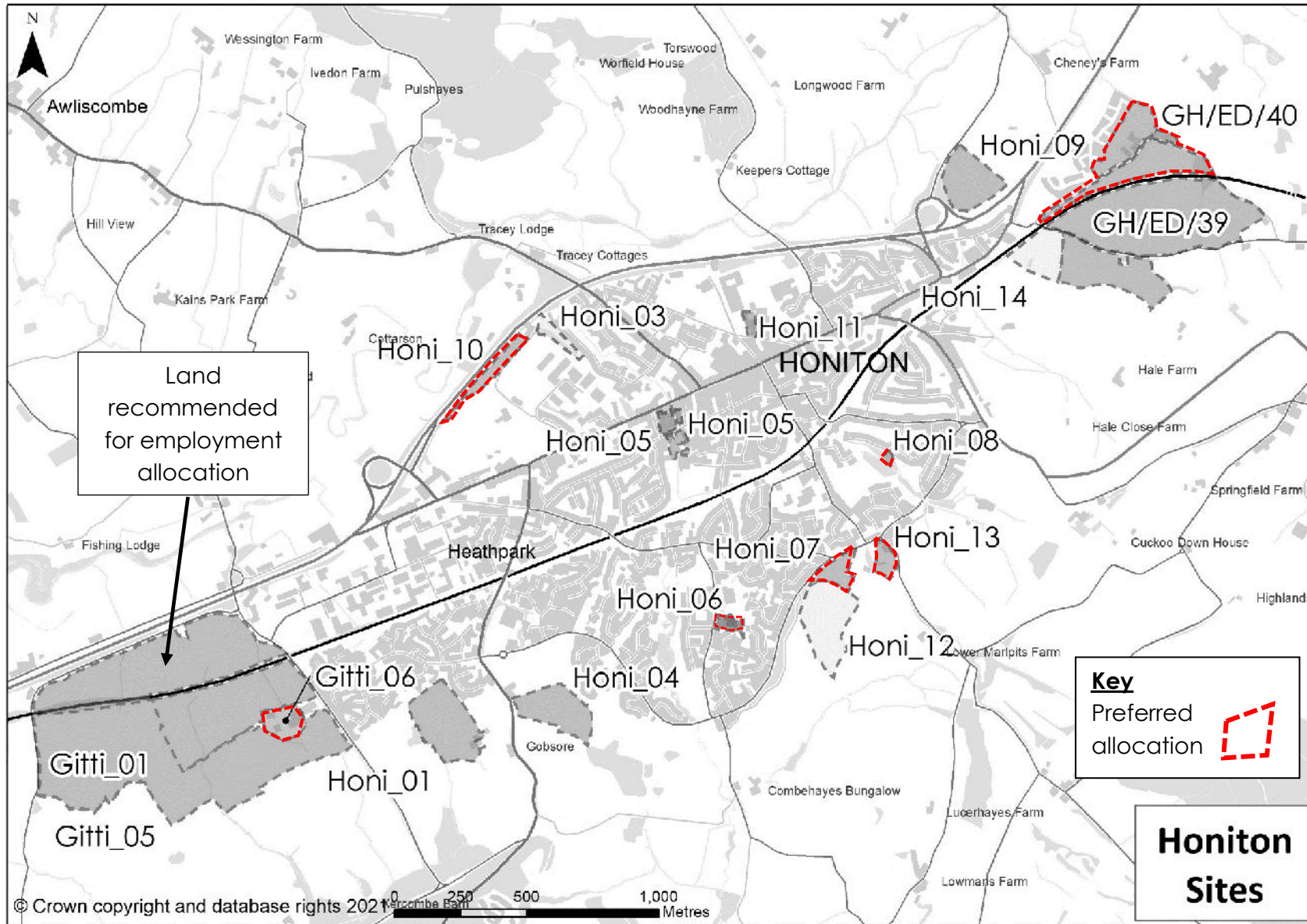
Sites for housing	Approx Dwgs
a. Gitti_06 – Land (existing agricultural buildings) at Hayne Lane Farm	31
b. Part of GH/ED/39 – Land to the east of Honiton north of the railway	100
c. Honi_06 – Former Millwater school site	30
d. Honi_07 – Land south of the town west of St Michael's Church	30
e. Honi_08 – Land east of the Glen	6
f. Honi_10 – Land south of the A30	21
g. Honi_13 - Land to the south of the town east of St Michael's Church	10
Total	228

Preliminary assessment work also informs the allocation of Site Gitti_01 (the part as shown on the map) - for employment development and uses to support future job development and provision at Honiton - around 15 hectares in extent.

- 6.31 Assessment has been undertaken of HELAA submissions sites to consider their scope for accommodating future development. Sites that were submitted for

consideration are shown on the map below/over the page alongside preferred allocations.

DRAFT



- 6.32 Whilst Honiton has many attributes that would point to it being a good location to look for a higher level of growth, particularly for new housing development, there are significant constraints on the outward expansion of the town and many of the submitted sites for development do not perform well through assessment processes. Though the employment allocation for the town, extending to around 15 hectares in extent will offer scope to support growth into the longer term of a more substantive and strategic scale.

Currently rejected alternative approaches to the proposed policy and land allocations for Honiton

Option b – Provide for greater levels of growth with more land allocated for development

This option would promote a more significant role for Honiton in respect of meeting wider East Devon needs and potentially meeting more local specific needs as well. Greater levels of development may also give greater scope for bringing about positive changes in the town with a greater population level, through additional new housing, offering scope to support existing facilities and potentially secure extra facilities. However additional new development would be on land of landscape sensitivity, specifically noting that a number of promoted sites fall in the East Devon AONB and the largest of those sites outside of the AONBs are also sensitive and are remote from town centre facilities.

Option c – Provide for lower levels of growth – specifically excluding some or all of the proposed employment provision

Even under the comparatively modest growth proposals there are still small scale development proposals in the East Devon AONB and the proposed 15 hectare employment land allocation is substantial and of some visual prominence, though it is low lying and falls between a major road and railway. Lower levels of growth would avoid some potential adverse impacts of development but they would downplay the potential role of Honiton in the District and potentially frustrate scope to meet local needs and demands for the town.

Option d – Promote a plan strategy that does not seek to encourage a vibrant town centre and development and regeneration activity at and in the town and its centre

With relatively modest outward expansion for Honiton proposed there is an emphasis on encouraging development within the built fabric of the town and on regeneration activity in the town centre. This approach could result in higher levels of infilling in the town and greater levels of urban intensification. Executed badly such developments could have adverse social and amenity impacts and lead to the potential loss of green spaces. Not planning for or prompting an intensification and regeneration approach could lessen potential for adverse

impacts though it would also fail to realise the positive benefits that such an approach may help deliver.

It is not considered that there are other reasonable alternative options to those set out above. At a future stage of work proposed land allocations will, however, be individually assessed in more detail through Sustainability Appraisal and other work.

DRAFT

Ottery St Mary

What the settlement is like

6.33 Ottery St Mary is located fairly centrally in the District, with good transport links to Exeter. It is outside of the AONB's, and, whilst it doesn't have a train station, it does have good bus links and access to the strategic road network. These factors suggest it is a good location to consider for growth, but there are also constraints. The town has a large Conservation Area and historic centre with narrow roads which create congestion to the north, east and south which would be exacerbated by additional traffic from development in these directions. The River Otter runs through the town and has a wide flood plain, effectively separating the 'old' settlement from the newer housing estates which have evolved over the past 40 years and include the secondary school. New development could offer opportunities to improve pedestrian and cycle links between land to the west and the town centre as well as an employment site to meet the increased need for jobs and enhancement to this 'gateway' to the town.

Key messages from the Neighbourhood Plan for the area

- 6.34 The neighbourhood plan for Ottery, adopted in July 2018, also covers the adjoining parish of West Hill, and therefore includes the identified 'Tier 3' 'Tier 43' Service Villages of West Hill and Tipton St John together with the main town of Ottery St Mary. The neighbourhood plan articulates a community concern about the volume and design of new housing development consented in the period leading up to the adoption of the existing Local Plan, and the need to ensure the response to on-going development pressure is balanced and local character is not eroded. The Plan's vision sets out a desire to ensure any new developments are appropriately sited, well related and contribute positively to the locality, meeting local needs and ensuring delivery of all necessary infrastructure.
- 6.35 The plan is particularly concerned with containing the settlements Ottery and West Hill as separate entities, and includes a policy to resist developments that would compromise this. The plan identifies a 'settlement containment' area under Neighbourhood Plan policy NP4, and seeks to ensure that the settlements would remain physically and visually separate. The southern section of the 'settlement containment' area is of much greater sensitivity, so it is proposed to designate this a Green Wedge in the local plan.
- 6.36 The need to improve, and not exacerbate traffic issues in the town centre, and capacity of health and education provision, are key concerns of the neighbourhood plan. The site adjacent to the King's School is safeguarded for education / community use in the NP plan policy NP24. Devon County Council advise that part of the site may be required for education purposes, and

therefore this is retained in the local plan, but the remainder is available for housing which is understood to be necessary to help fund the education uses.

Suitability for development

6.37 As a Tier 2 settlement Ottery St Mary is considered suitable, in principle, for significant growth. The town lies outside of, but close to, the AONB on the south and west. Expansion to the north, south and east is heavily constrained by the narrow approach roads to the town, the extensive Conservation Area and settings of Grade 1 and 2* listed buildings, and the floodplain of The River Otter. Land to the west of the town is relatively unconstrained and there is potential for westward expansion, recognising that a green wedge has been designated to prevent coalescence between Ottery St Mary and West Hill village.

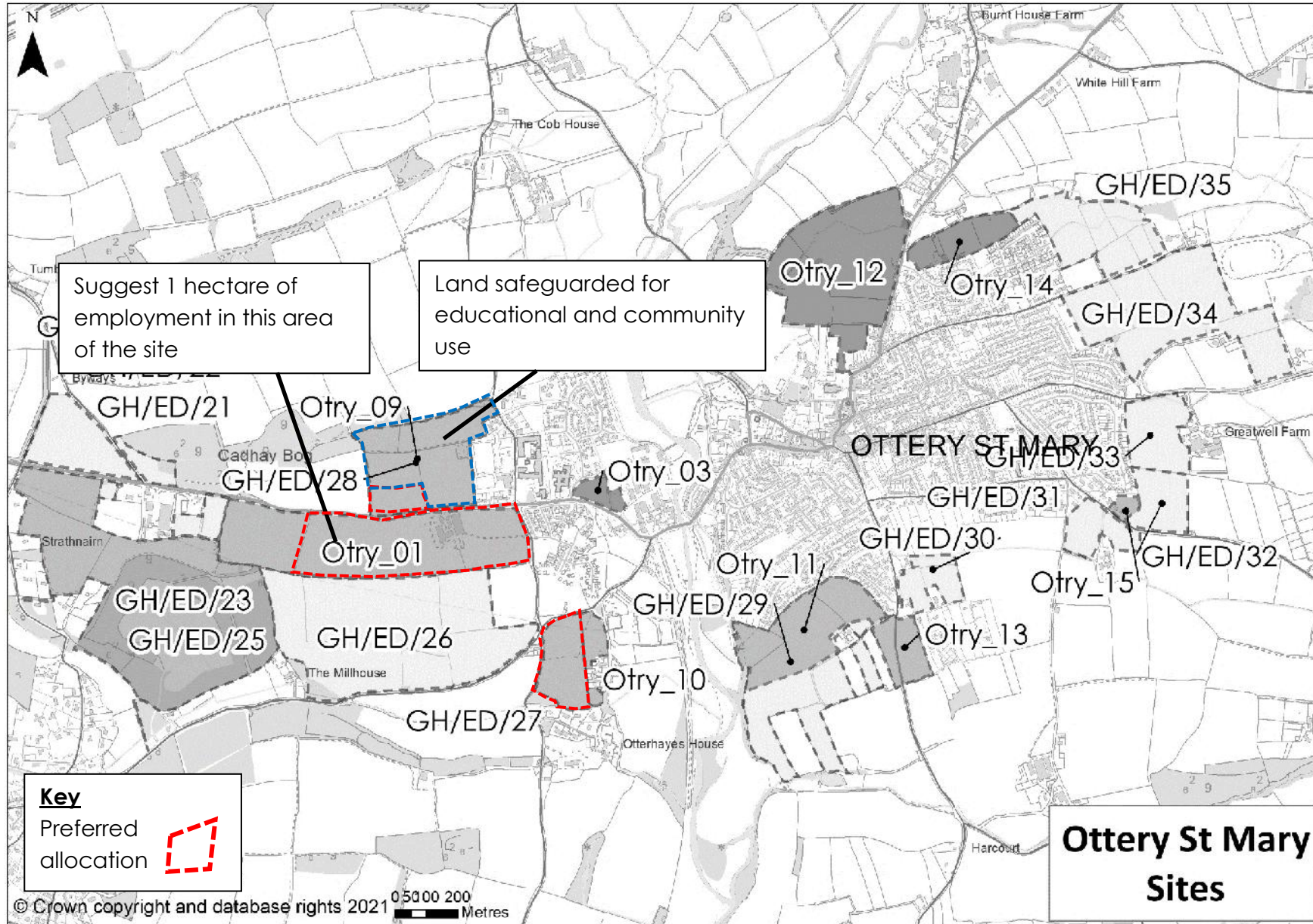
19. Strategic Policy – Ottery St Mary and its future development

To support the growth of Ottery St Mary it is proposed that land is allocated for development to accommodate approximately 250 additional new homes in the town and 1ha of employment land through an urban extension. Sites listed below, and as referenced in the plan of Ottery St Mary in this section of this draft plan (and see the commentary table that follows the plan), are currently seen as offering realistic potential to provide for the future growth of the town:

- I. Otry_01 – Land at Barrack Farm (eastern part only) (200 homes);
- II. Otry_09 – Land at Thorne Farm (southern/western part only) (20 homes);
- III. Otry_01 (central part only) – 1ha for employment development.
- IV. GH/ED/27 - Land south of Strawberry Lane (40 homes).

6.38 The proposed site for 200 homes and 1ha of employment land at Barrack Farm lies wholly within the 'settlement containment' area covered by Neighbourhood Plan policy NP4, however this development would not be seen in the context of West Hill due to topography, and the settlements would remain physically and visually separate.

6.39 Assessment has been undertaken of HELAA submissions sites to consider their scope for accommodating future development. Sites that were submitted for consideration are shown on the map below/over the page alongside preferred allocations.



Currently rejected alternative approaches to the proposed policy and land allocations for Ottery St Mary

Option b – An alternative strategic approach for growth

An alternative approach could be to develop sites on the north, east or south of the town. In all of these directions the road network is such that additional traffic would need to travel along already narrow and congested roads and there are inadequate footpaths or cycle paths to provide a safe alternative to the private car. For this reason, it is considered that expansion to the west of the town is the most appropriate option.

Option C – Plan for less growth – this option would lessen or remove scope for possible adverse impacts from development but would not help deliver houses at a local level or contribute to wider East Devon needs.

Option D – Plan for more houses to the west of Ottery – this option would provide for more houses overall, including in sites that performed well in assessment. However it could have the result of significantly expanding the town and increasingly going westward that would result in houses being increasingly on sensitive landscape areas and remote from town centre services and facilities.

Seaton

What the settlement is like

- 6.40 Seaton is home to around 7,500 people, making it the fourth largest settlement in East Devon. It has one of the most elderly age profiles of any settlement in the district, with 45% of residents aged 65 or over. This is reflected in a relatively low potential workforce in Seaton. Nevertheless, the number of jobs in Seaton is lower than the number of workers (0.73 jobs per worker), meaning that many people have no option but to commute elsewhere to work. Just over a third of residents work in Seaton, with Exeter, Axminster, and Sidmouth being the next most popular places to work.
- 6.41 Seaton has a wide range of community facilities, with a variety of shops, sports facilities, a library, GP, hospital, and regular bus service around the settlement and to areas elsewhere. However, it is missing some of the strategic facilities found in some other larger settlements, such as a train station and secondary school. The A3052 runs to the north of Seaton, with the strategic road network offering wider road links around 5 miles away.
- 6.42 Seaton is set within a stunning natural environment with the coast to the south (including the Jurassic Coast World Heritage Site), Seaton Wetlands along the eastern boundary, and the East Devon AONB located beyond to the east. Two scheduled monuments in close proximity indicate the high historic value in the area, along with a conservation area and several listed buildings in and around the town centre.

Key messages from the Neighbourhood Plan for the area

- 6.43 There is no neighbourhood plan available at the present time. The parish of Seaton was designated as neighbourhood plan area in 2016. There is understood to be some renewed interest in developing a neighbourhood plan but work on the process of plan production has not as yet been progressed.

Suitability for development

- 6.44 The population and range of community facilities and services in Seaton make it an appropriate place to locate a relatively large amount of housing and employment development. The amount of development should be limited to an extent, as new residents will need to travel elsewhere to access some strategic facilities which are lacking in Seaton (train station, secondary school, swimming pool). The environmental constraints around Seaton also limit its growth, with the River Axe and associated flood zone to the east, rising landscape to the west, AONB to the east, and sea to south, all limiting the realistic options for future development.

20. Strategic Policy – Seaton and its future development

New development will continue to support the regeneration of Seaton, consistent with its status as a Main Centre and its suitability for development.

Propose the following development allocations:

- I. Seat_05 – Land east of Harepath Road and west of Colyford Road, for around 150 dwellings and 0.6 hectares of land for employment development.
- II. Seat_02 – Land east of Barnards Hill Lane, for around 60 dwellings.
- III. Seat_07 and Seat_12 – Land east of Colyford Road, for around 47 dwellings.
- IV. Seat_09 – Land at Clay Common, for around 7 dwellings.

- 6.45 Assessment has been undertaken of HELAA submissions sites to consider their scope for accommodating future development. Sites that were submitted for consideration are shown on the map below/over the page alongside preferred allocations.

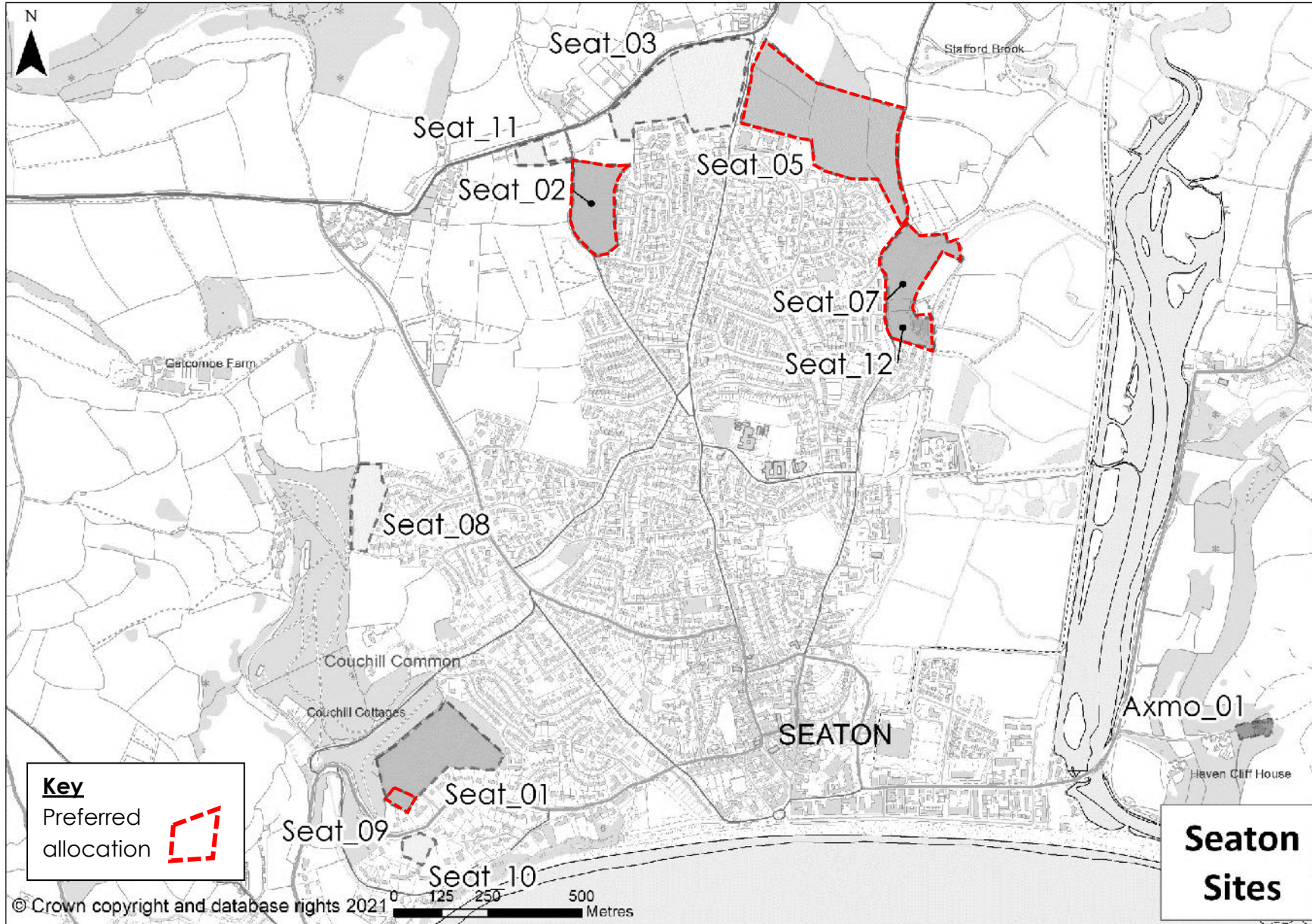
Currently rejected alternative approaches to the proposed policy and land allocations for Seaton

Option b – Allocate additional sites on the edge of Seaton, either/or Seat_03, Seat_11, Seat_08, Seat_01 and Seat_10

For various reasons, these sites are not considered suitable for inclusion as allocations at the current time. In addition, the overall scale of growth at Seaton should recognise its peripheral location and lack of some strategic facilities. However, if there are not enough suitable sites to meet the district-wide housing requirement, these may have to be re-considered.

Option c – Less development

We could confine development to opportunities for redevelopment in the existing built-up area, possibly with some 'greenfield' allocations. This approach would limit the potential of one of our larger, more sustainable settlements.



Sidmouth

What the settlement is like

- 6.46 Sidmouth is the second most populous settlement in East Devon, with around 13,300 people. 43% of residents are aged 65 or over, making it one of the most elderly settlements in East Devon and, consequently, relatively few working age people. There is currently a good balance of jobs to workers in Sidmouth (1 to 1) and, although it is relatively self-contained, there remains a significant number of residents working elsewhere, with nearly one in five workers commuting from Sidmouth to Exeter.
- 6.47 There are a wide range of community facilities and services in Sidmouth, including a secondary school, numerous shops, health facilities, and a swimming pool. There are good bus links to other settlements, including three buses an hour to Exeter. However, unlike several of the other larger settlements, Sidmouth does not have a train station. The A3052 runs along the northern edge of Sidmouth, providing east to west road links; whilst the strategic road network (A30 and A35) can be accessed at Honiton around 10 miles to the north.
- 6.48 The East Devon Area of Outstanding Natural Beauty wraps itself tightly around three sides of Sidmouth, providing a picturesque setting for the town. To the south lies the beautiful beach, part of which is within the Jurassic Coast World Heritage Site. Sidmouth also has an outstanding historic environment, with much of the southern half of the town covered by conservation areas and home to numerous listed buildings.

Key messages from the Neighbourhood Plan for the area

- 6.49 Sidmouth is covered by the Sid Valley Neighbourhood Plan which was 'made' in late 2019. The plan's vision is to maintain and promote the rural and coastal beauty of the setting and local distinctive character of place, whilst encouraging a vibrant and more balanced and self-sustaining community and economy. It supports appropriate change that will bring local benefit and tackle key issues, such as lack of affordable housing.
- 6.50 The Plan generally seeks to prevent unnecessary encroachment of development beyond the settlement boundary. However, in recognition of the shortage of social and affordable homes, particularly for younger people and families, the plan adopts a cautiously positive policy stance to enable small scale 'exception' schemes for mixed affordable and market schemes to come forward. This is limited to such schemes which specifically meet identified local need and tie occupancy of both affordable and market homes to those with a connection to the parish. Notwithstanding this, the plan flags that development adjacent to the built up area at Sidmouth and Sidford in particular would require

careful consideration, primarily in terms of the setting. At Sidford, the neighbourhood plan is also concerned with preventing settlement coalescence with Sidbury and the site considered here for allocation (reference Sidm_06) does fall within the identified "Sidford-Sidbury Non-Coalescence Area". Within this area, plan policy (3) considers development could only be acceptable if it does not impact on the visual and physical separation of Sidford and Sidbury.

- 6.51 On all housing developments of 11 units or more, the Plan is prescriptive about the required make-up of the scheme by number of bedrooms and type of tenure, in order to align to local needs.
- 6.52 On other matters, the plan seeks to retain existing employment sites, support the town centre to thrive and the redevelopment of the 'eastern town'/port royal, facilitate home working, protect designated Local Green Spaces and key views, and support and enhance community facilities, and the built and natural environment.

Suitability for development

- 6.53 Social and economic factors make Sidmouth a suitable place to locate a relatively large amount of development, with a reasonably large population and a range of jobs, community facilities and services in the town. However, the outstanding natural environment – AONB to the west, north, and east, and the sea to south – presents a major constraint to the amount and location of new development.

21. Strategic policy – Sidmouth and its future development

Whilst the Spatial Strategy recognises the importance of Sidmouth as a Main Centre, new development will necessarily be restricted due to its outstanding natural environment.

Propose the following development allocations:

- I. Sidm_01 – Land west of Woolbrook Road, for around 150 dwellings.
- II. Sidm_06 – Land west of Two Bridges Road, for around 30 dwellings.
- III. Sidm_19 – Land north of Dark Lane, for around 8 dwellings.
- IV. Sidm_17 – Land between Cotmaton Road and Peak Hill Road, for around 8 dwellings.

- 6.54 Assessment has been undertaken of HELAA submissions sites to consider their scope for accommodating future development. Sites that were submitted for consideration are shown on the map below/over the page alongside preferred allocations.

Currently rejected alternative approaches to the proposed policy and land allocations for Sidmouth

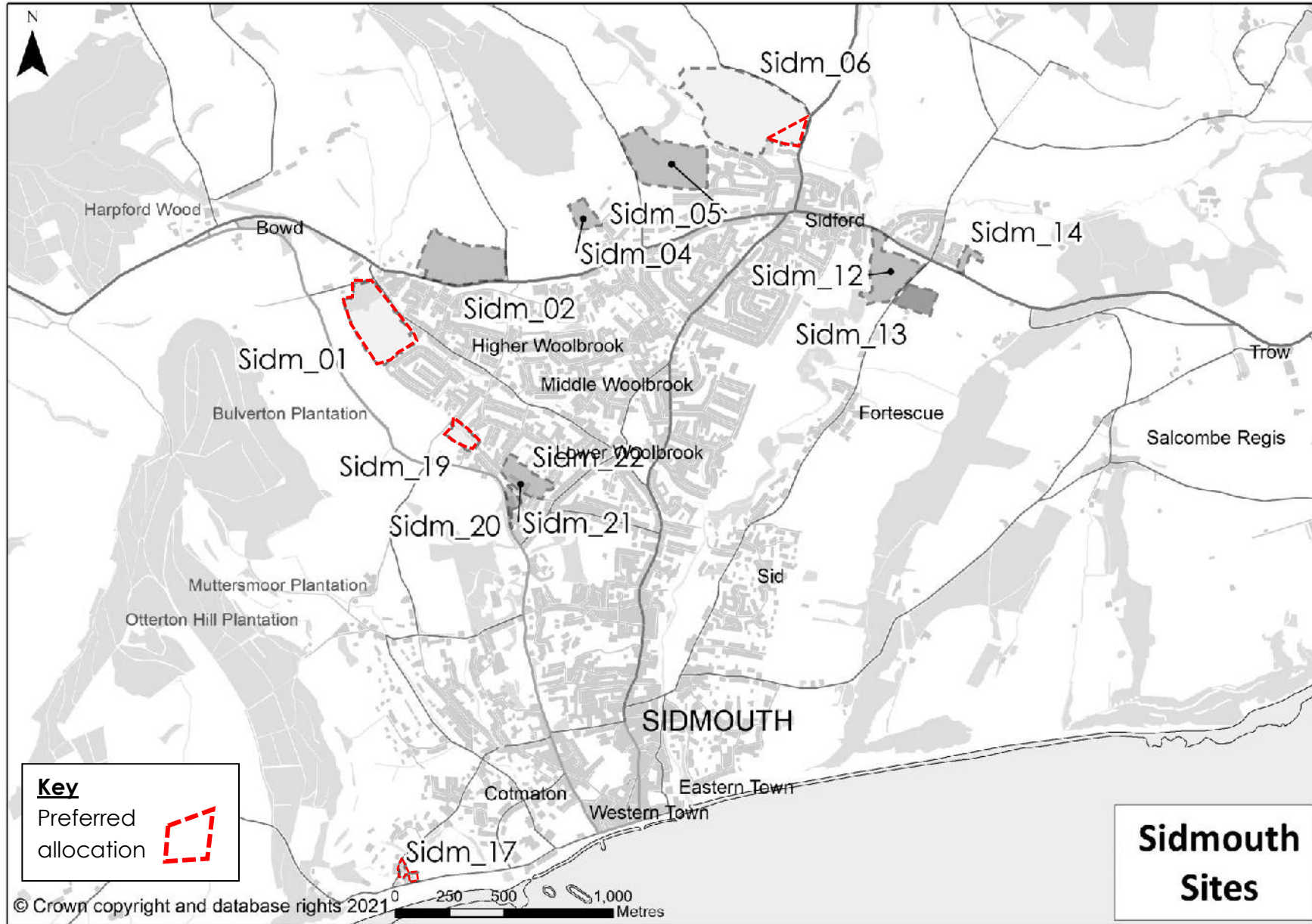
Option b – Allocate additional sites on the edge of Sidmouth, either/or Sidm_02, Sidm_04, Sidm_05, full extent of Sidm_06, Sidm_12, Sidm_13, Sidm_14, Sidm_20, Sidm_22

These sites are all subject to significant constraints, being an existing employment site or subject to environmental constraints. Therefore, these are not considered suitable for inclusion as allocations at the current time. However, if there are not enough suitable sites to meet the district-wide housing requirement, these may have to be re-considered.

Option c – Less development

We could confine development to opportunities for redevelopment in the existing built-up area, possibly with some 'greenfield' allocations. This approach would limit the potential of one of our larger, more sustainable settlements.

DRAFT



Local Centres

6.55 There are five local centres (Tier 3 settlements) that are explicitly identified as offering scope for development in the local plan, these are:

- Broadclyst;
- Budleigh Salterton;
- Colyton;
- Lympstone; and
- Woodbury.

22. Strategic Policy – Development at local centres

This proposed policy will identify the local centres for a modest scale of new development, informed by potential suitability of available sites and will seek to reinforce the service role that these local centres play in respect of serving their surrounding areas. Specific sites are proposed to be allocated as detailed below and as shown on the maps in this chapter of the plan.

Town/village	Site name	Dwellings
Broadclyst	BrcI_09 - Land at Heathfield (Southeast of Woodbury View), Broadclyst	15
Broadclyst	BrcI_12 - Land West of Whimple Road, Broadclyst	160
Budleigh Salterton	BudI_06 - Budleigh Salterton Community Hospital, East Budleigh Road	10
Colyton	Coly_06 – Land south of Ham Lane	5
Lympstone	GH/ED/73 – Land west of Strawberry Hill	40
Woodbury	Wood_16 – Land south of Broadway	65
Woodbury	Wood_10 – Land south of Gilbrook Close	60
Woodbury	Wood_20 and _37 – Land east of Town Lane	54
Woodbury	Wood_23 – Land at Ford Farm	5
Total – at local centres		414

Reasonable alternatives to the approach set out in the above policy are set out through text and options around meeting the housing shortfall in the plan.

Broadclyst

What the settlement is like

- 6.56 Broadclyst is a medium-sized village situated approximately 5 miles to the north-east of Exeter. It is well-known for its rich history being set in the heart of the National Trust's Killerton estate. Much of the village and surrounding land is owned by the trust itself.
- 6.57 The village has a range of services and facilities including a primary, secondary school and regular bus service into Exeter.

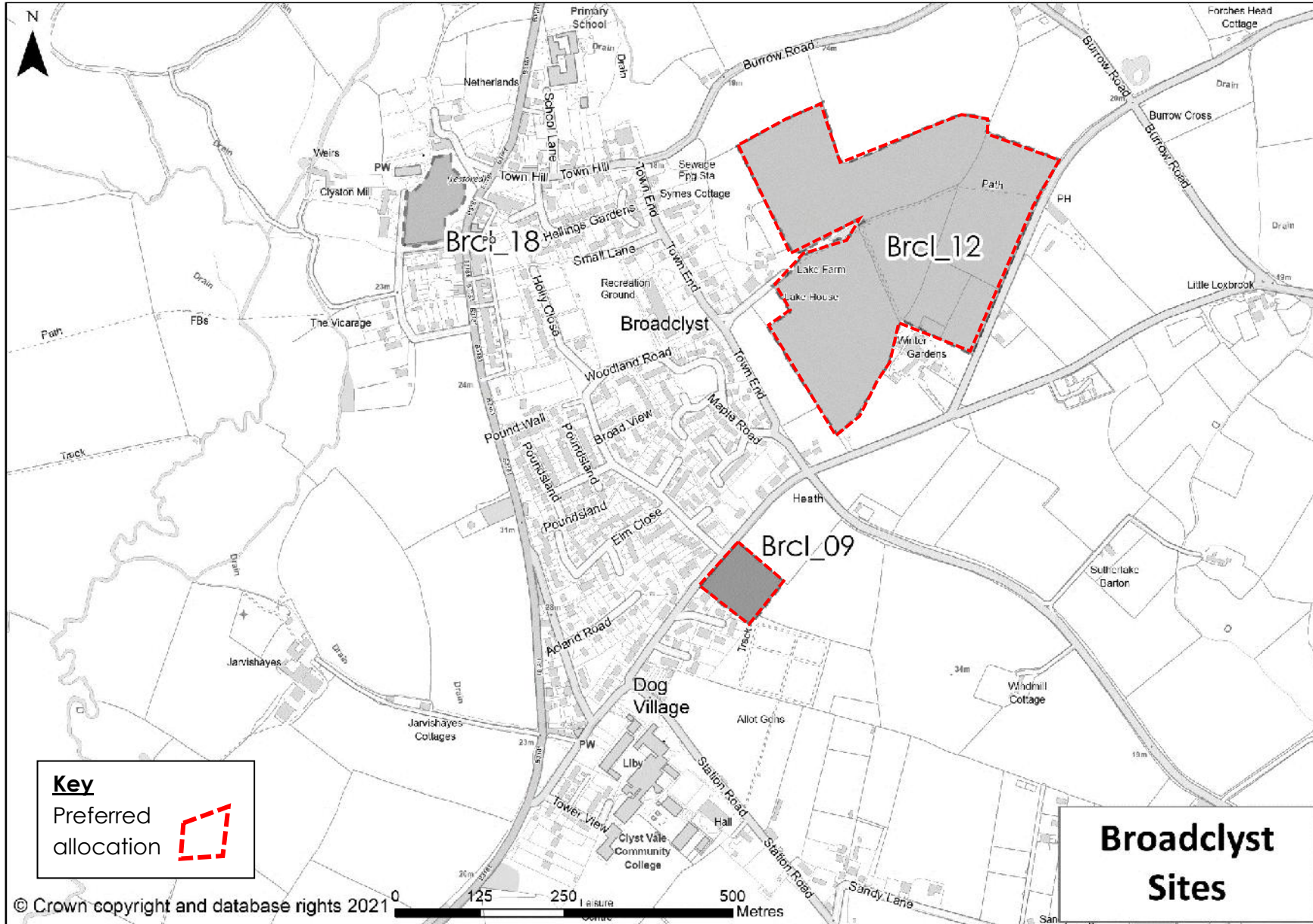
Key messages from the Neighbourhood Plan for the area

- 6.58 The preparation of a neighbourhood plan for the entire parish of Broadclyst has long been under development and is now well advanced. The plan is expected to be formally submitted in December 2021 and will therefore be progressing through the final stages of plan making alongside and ahead of the new Local Plan.
- 6.59 Unlike the majority of our neighbourhood plans, and in addition to the significant strategic growth the area has seen under the current Local Plan, it is anticipated the plan will propose multiple sites for development of various kinds (housing, employment, community facilities, mixed use) in locations across the parish, including at Broadclyst village itself.
- 6.60 Whilst also wanting to see local character and landscape protected, the draft Plan puts continuing to 'develop and thrive' and meet the 'changing and diverse needs' of its 'rapidly growing community' at the centre of its vision. The plan articulates concerns about pressure on services and infrastructure from the level and pace of new development in the vicinity. It is also generally ambitious in nature as it strives to maximise opportunities to address climate change and promote sustainability.
- 6.61 The latest working draft of the Submission Plan available (August 2021) indicates the allocation of a site on the edge of the existing built up area boundary of Broadclyst for residential development (up to 16 dwellings). This site is also proposed here for same (reference Brcl_09) and the relationship between the two plans would need to be explored.
- 6.62 However, the second, much larger site proposed for allocation here (reference Brcl_12) for c.160-180 dwellings is at a scale significantly greater than envisaged and promoted through the emerging neighbourhood plan (to 2031 at least). Adjacent to it, the draft neighbourhood plan proposes to allocate a smaller brownfield site (known as Winter Gardens) for regeneration for commercial (offices and light industrial) uses. The two could therefore come forward in combination, but the neighbourhood plan is seeking to protect the character

and residents of this area, and to prevent loss of agricultural land to development. If this strategic site be allocated in the Local Plan, the neighbourhood plan policies could be utilised in shaping the development, including through any master-planning work undertaken.

Suitability for development

- 6.63 Whilst there are sensitivities to development in respect of Broadclyst, particularly with respect to the historic environment and the Killerton estate setting, Broadclyst is outside the AONB and relatively flat when compared to other parts of East Devon. Given these attributes, its close proximity to Exeter alongside nearby large-scale employment developments in the west-end, the town is considered to be a strategically logical and attractive location to accommodate development in the Local Plan.
- 6.64 However, any future development needs to be balanced to ensure that local services and facilities can accommodate an increased population and the special qualities of the village aren't negatively impacted.
- 6.65 Whilst an allocation of around 175 dwellings would represent a sizeable expansion to the village, this is not considered unreasonable to accommodate given the village's strategically attractive location and relative insensitivity of the sites proposed.
- 6.66 The village currently has approximately one job for every 2 residents of working age and unsurprisingly, a large number of residents of commute into Exeter given its proximity. Whilst this will likely remain an attractive option, if it is considered a reasonable approach to accommodate strategic scale development it will be important for an element of this to be for employment uses, to discourage out-commuting where possible.



Budleigh Salterton

What the settlement is like

- 6.67 Budleigh Salterton is the seventh largest settlement in East Devon with a population of around 5,400. About 45% of residents are aged 65 or over (significantly above the East Devon average of 30%), with 12% aged between 0-15. There are some 1,900 economically active people and an employment density of 0.7, which shows that there are fewer of jobs than workers.
- 6.68 The Town has a limited range of strategic, but a full range of local services and facilities. There is no railway line and road access is via the B3178.
- 6.69 It has an extremely attractive landscape setting, being the only town located within the East Devon AONB. It is located on the World Heritage coastline, with cliffs designated as a Site of Special Scientific Interest, as is the Otter Estuary, which is also a Marine Conservation Area.
- 6.70 Set within a very attractive environment, it has a conservation area around the centre and around 40 listed buildings. Much of its special character derives from its rich and varied domestic architecture. There are many examples of Regency Villas and high quality early Twentieth Century housing, some influenced by the Arts and Crafts movement and many outside of the conservation area.

Key messages from the Neighbourhood Plan for the area

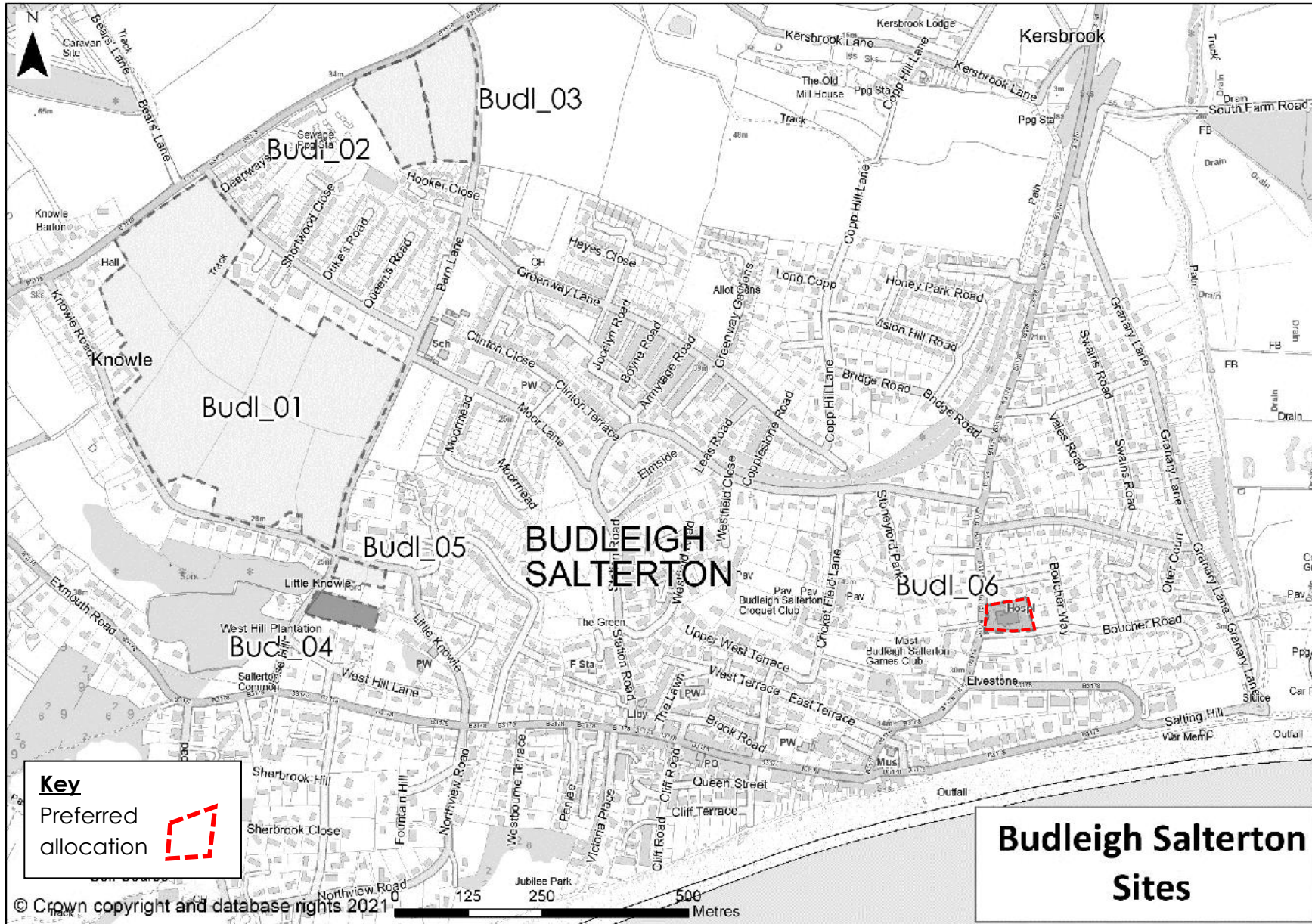
- 6.71 Budleigh Salterton parish has a neighbourhood plan, 'made' in 2017, which focuses on seeking to protect and enhance the existing qualities of the area (both built and natural) and to further improvements in facilities/services and infrastructure to fulfil the wishes, and meet the needs, of the local community (primarily via a suite of identified 'community actions').
- 6.72 The plan supports a 'modest scale' of housing to meet local needs, aligned to the adopted Local Plan strategy for the town (to 2031), but does not make any further allocations itself. It does however designate 10 formal Local Green Spaces for protection, including the hospital garden, which is adjacent to but not the same as the site proposed for potential allocation for residential use (see below). It also seeks to support small businesses to sustain themselves.
- 6.73 Overall, however, the plan focuses on seeking to ensure any development proposed does not have a detrimental impact on the form, character and setting of the area, with a particular focus on heritage and natural environment/green space designations, including the surrounding AONB, and current green wedge.

Suitability for development

- 6.74 The exceptional landscape quality and coastal location of Budleigh Salterton heavily constrains its potential for development. Furthermore, there is limited

potential for employment growth to address the existing lack of opportunities for local employment, although it is close to Exmouth with good bus links. Only one site is considered to be suitable for development (at the hospital) if no longer required for health purposes. This site is already within the Built-up Area Boundary defined in the adopted Local Plan.

DRAFT



Budleigh Salterton Sites

Colyton

What the settlement is like

- 6.75 Colyton is the ninth largest settlement in East Devon with a population of around 2,200. About 36% of residents are aged 65 or over (above the East Devon average of 30%), with 14% aged between 0-15. There are some 900 economically active people and an employment density of 0.63, which shows that there are fewer of jobs than workers.
- 6.76 Colyton has a limited range of strategic, but a full range of local services and facilities. There is no railway line and main road access is via the B3161 from Colyford.
- 6.77 The historic core of Colyton has a very tight grain with over 40 listed buildings in the conservation area, which also includes fields to the north of the town.

Key messages from the Neighbourhood Plan for the area

- 6.78 The parish of Colyton has a recently examined Neighbourhood Plan which is due to go to local referendum in December 2021. The Plan seeks to support sustainable growth in housing and population, including to ensure local needs are met, but does not allocate any sites. Instead, it relies on opportunities within the existing Built up Area Boundary for Colyton, including the redevelopment of the Ceramtec site by Wainhomes, and also on potential rural exceptions sites to deliver affordable housing, within strict criteria. The Colyton and Colyford Community Land Trust is understood to be actively looking for sites to bring forward for affordable housing to meet local needs, and has identified a shortage of suitable sites. The neighbourhood plan has demonstrated strong community support for reinforcement of the Green Wedges to prevent coalescence of Colyton, Colyford and Seaton, together with strong policies to protect and enhance landscape setting, biodiversity, local character, heritage, and to promote development of brownfield sites.

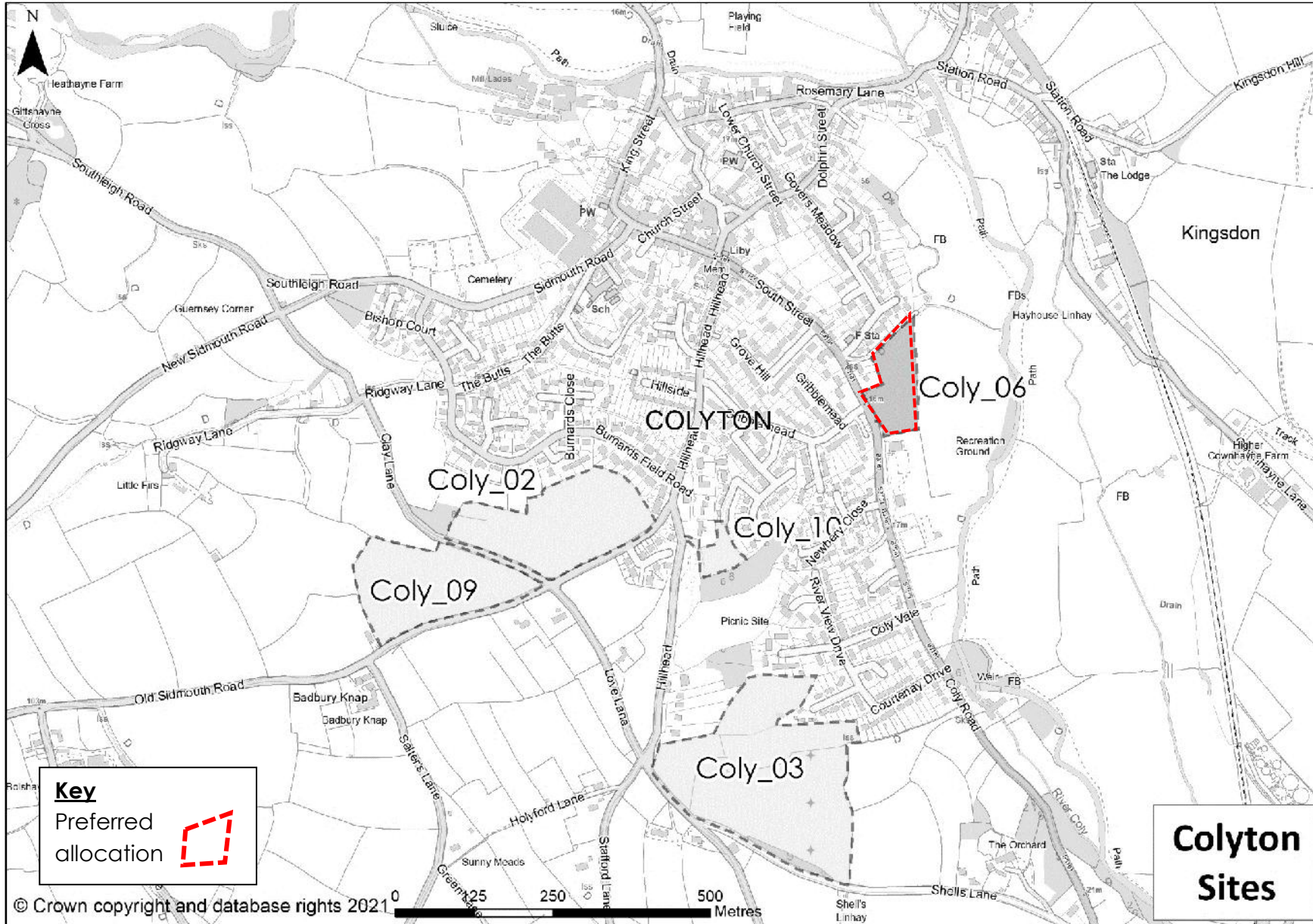
Suitability for development

- 6.79 The good level of services and facilities in Colyton suggest that it would be a good location in principle for some growth, although the majority of sites currently available for development are considered to be unsuitable. There is an outline planning permission for up to 72 new homes on previously developed land to the north west of the town (the Ceramtec site). One additional site is recommended for allocation off Coly Road. It is close to town centre and well related to the existing settlement pattern. An appeal for outline planning permission on this site for 16 homes was refused in 2016, the Inspector finding that to grant planning permission at that time would be contrary to the local plan as it was outside of a built-up area boundary. That appeal decision made it clear that there were no other considerations that would justify refusal of the

application and the site is considered to be the best currently available for allocation in the new local plan.

- 6.80 Assessment has been undertaken of HELAA submissions sites to consider their scope for accommodating future development. Sites that were submitted for consideration are shown on the map below/over the page alongside preferred allocations.

DRAFT



Lympstone

What the settlement is like

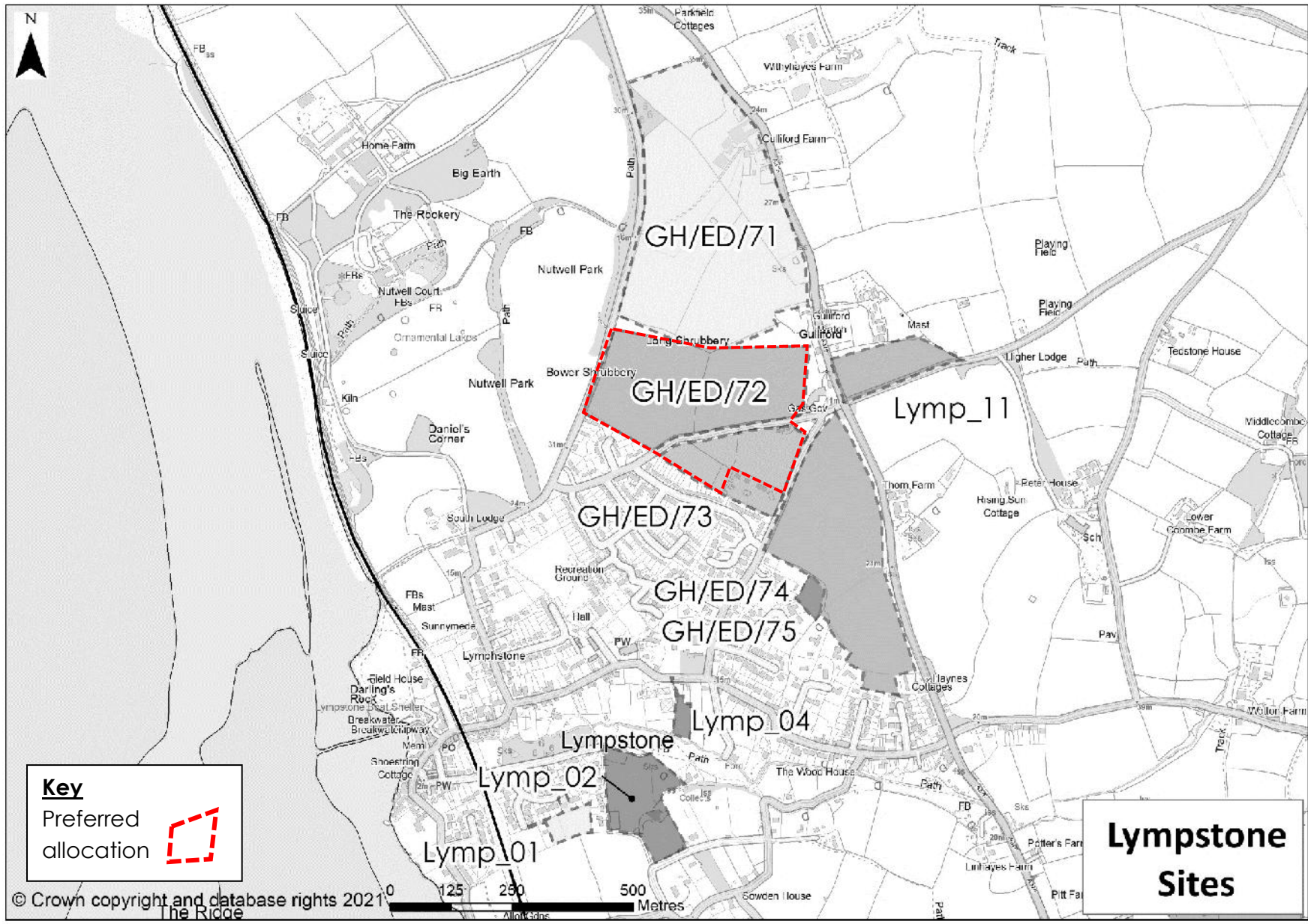
- 6.81 Lympstone is the twelfth largest settlement in East Devon with a population of around 1,900. About 26% of residents are aged 65 or over (below the East Devon average of 30%), with 20% aged between 0-15. There are some 809 economically active people and an employment density of 0.46, which shows that there are fewer of jobs than workers.
- 6.82 Lympstone has a good range of services and facilities including a regular train into Exeter and down to Exmouth.
- 6.83 The historic core of Lympstone has a range of listed buildings covered by a conservation area.

Key messages from the Neighbourhood Plan for the area

- 6.84 The Lympstone Neighbourhood Plan (2015 to 2026) seeks to retain the rural identity of the parish, whilst supporting and furthering a functioning sustainable community. In recognition of local housing need, particularly for smaller homes for downsizers, the plan made its own allocations for 40 dwellings across 4 sites over the plan period, within the Built-up Area Boundary (BUAB) of Lympstone (one of which lies adjacent to an allocation in this document (see site GH/ED/73 below)).
- 6.85 The plan is generally supportive of continued small-scale piecemeal growth only, preferably on smaller sites (less than 10 dwellings), and to meet identified local housing needs. The plan also seeks an increase in workshop and storage space for small businesses, and protection and enhancement of community facilities and services.
- 6.86 Key aims of the plan in terms of consideration of future development include: preventing coalescence with Exmouth and resisting development in the designated Green Wedge and Coastal Preservation Area; keeping agricultural land available for future food and energy production; furthering flood prevention, and; securing high quality, sympathetic and environmentally sustainable design.
- 6.87 Both sites put forward below as preferred potential allocations were also appraised during the process of preparing the neighbourhood plan for allocation within it and were discounted at that time (save for an area already consented within GD/ED/73 for 15 homes). Both are within the Coastal Preservation Area but adjacent to the BUAB.

Suitability for development

- 6.88 Lymptstone is a medium-sized village situated along the Exe Estuary 5 miles to the south of Exeter. It is well-known for its stunning views over the river and rich heritage, with over 70 listed buildings and a little-changed village core.
- 6.89 The village has a range of services and facilities including a primary school, train service and regular bus service into Exeter. It also benefits from being on the route of the Exe Estuary trail. Although these offer opportunities for growth, the Exe Estuary is a particularly sensitive European protected nature site which presents a significant barrier to future large scale development. The A376 also experiences significant congestion at peak times.
- 6.90 Taking into account the opportunities and constraints, the village is considered a suitable location for a low to moderate level of growth in the Local Plan. The assessment identified 140 homes to be allocated which is considered reasonable and consistent with the approach to other villages of a similar scale.



Woodbury

What the settlement is like

- 6.91 Woodbury has a population of around 1,700 people, with an age range that is slightly younger than the district average. This is shown by the relatively high potential workforce in the settlement. However, there are relatively few jobs available in Woodbury compared to the number of workers (jobs to workers ratio of 0.39), meaning that most people have to commute elsewhere to work.
- 6.92 There are a good range of community facilities in Woodbury, with several shops, a GP, and a primary school, along with an hourly bus service. These make Woodbury one of the 10% least deprived areas in terms of access to services, and mean that it plays an important local role for the settlement and surrounding area. The B3179 runs through the settlement, and is well-used by vehicles, including HGVs. The M5, and Exeter beyond, lies just four miles to the west.
- 6.93 Woodbury is located in a wider rural landscape, and is of high historic value. The central part of the settlement is designated as a conservation area, with numerous listed buildings – the most notable of which is the Grade I listed church.

Key messages from the Neighbourhood Plan for the area

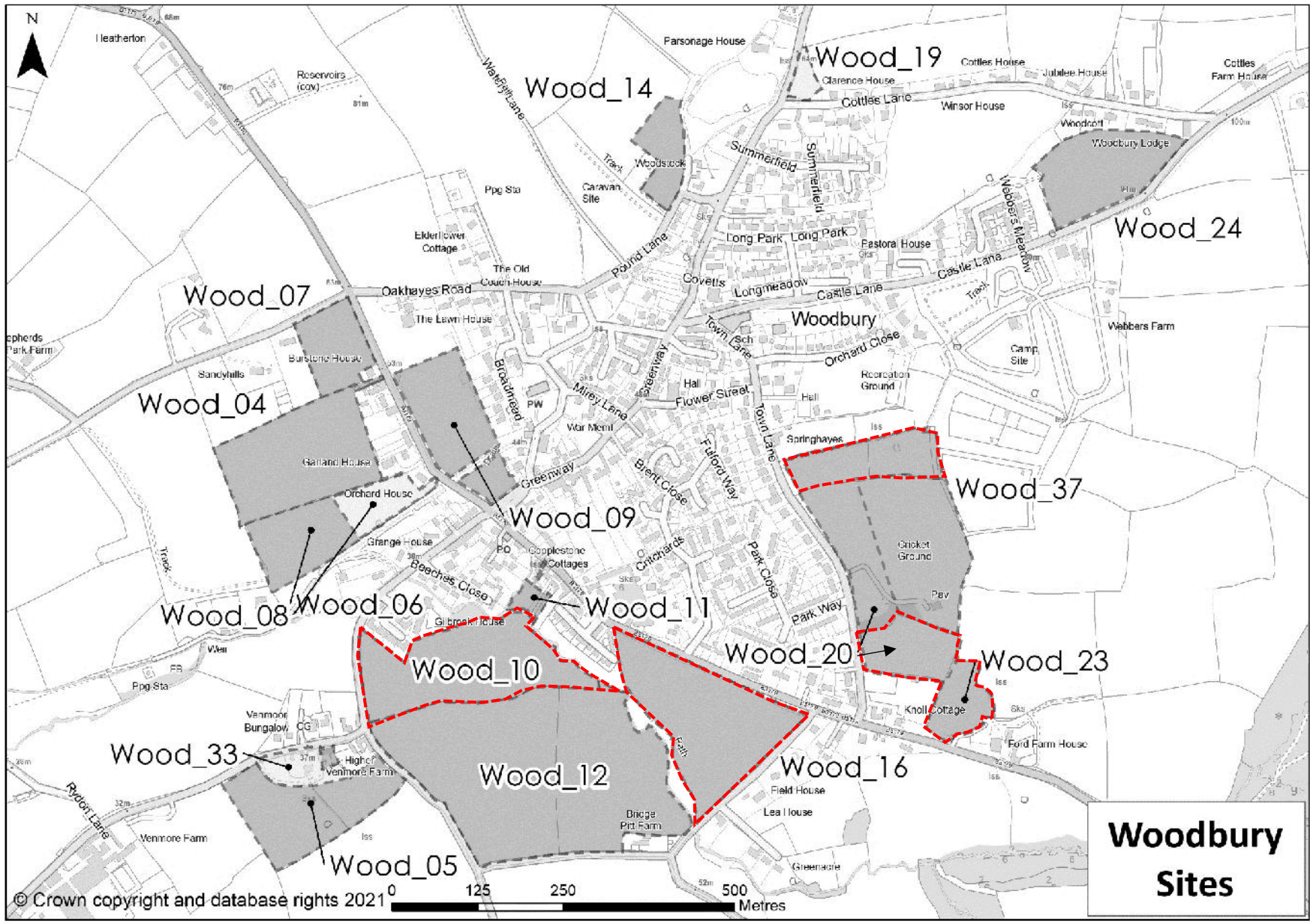
- 6.94 Woodbury parish was designated as a neighbourhood plan area in 2013. The development of a neighbourhood plan has been slow/stalled, although a pre-consultation draft was shared informally with EDDC officers for comment earlier in 2021. This document is not yet published and work by a Steering Group is ongoing. Whilst it would not be appropriate to quote draft content that is not in the public domain, suffice is to say that the plan is not currently anticipated to put forward land for development, and the proposed level of development proposed through potential allocations here (see below) would likely be at odds with the emerging neighbourhood plan vision/strategy.

Suitability for development

- 6.95 The wide range of local facilities and services in Woodbury make it an appropriate place for a reasonable amount of development. The current relative lack of jobs in Woodbury mean that either new housing should be limited to minimise commuting, or employment land should also be delivered. The central part of Woodbury is of high historic value, but there are no landscape or biodiversity designations in the immediate vicinity of the settlement. Beyond this, the East Devon AONB is around 500m from the eastern edge of Woodbury. Further still are the European sites of the Pebblebed Heaths 1,500m to the east, and the Exe Estuary 2,700m to the west.

- 6.96 Assessment has been undertaken of HELAA submissions sites to consider their scope for accommodating future development. Sites that were submitted for consideration are shown on the map

DRAFT



Service Villages

6.97 There are 23 'service villages' that are identified as offering specific scope for development in the local plan, these are:

1. Beer,
2. Branscombe,
3. Broadhembury,
4. Chardstock,
5. Clyst St Mary,
6. Dunkeswell,
7. East Budleigh,
8. Exton,
9. Feniton,
10. Hawkchurch,
11. Kilmington
12. Musbury,
13. Newton Poppleford,
14. Otterton,
15. Payhembury,
16. Plymtree,
17. Sidbury,
18. Stoke Canon,
19. Tipton St John,
20. Uplyme,
21. Westclyst,
22. West Hill,
23. Whimple.

23. Strategic Policy - development at service villages

This proposed policy will identify the local centres for a limited new development informed by potential suitability of available sites that is geared around meeting local needs. Specific sites are proposed to be allocated as detailed below and as shown on the maps in this chapter of the plan.

Village	Site name	Dwellings
Broadhembury	Brhe_04 – Causeway End, Broadhembury	7
Chardstock	Char_04 - Land off Green Land, Chardstock	30
Clyst St Mary	Sowt_09 – Land at Bishops Court Lane, Clyst St Mary	40
Dunkeswell	Dunk_01 - Land at Hutshayes Farm Dunkeswell	53
Dunkeswell	Dunk_05 - Broomfields Dunkeswell	36
Exton	Wood_01 - Field 4583, Exmouth Road, Exton	20
Exton	Wood_27 - Marandor, Exmouth Road, Exton	5
Exton	Wood_28 - Land to the north and east of Exton Farm, Exton	20
Feniton	Feni_05 - Land and buildings at Burland Mead, Feniton	42
Hawkchurch	Hawk_01 - Norton Store, Hawkchurch	20
Kilminster	Kilm_09 - Land east of George Lane, Kilminster	14
Kilminster	Kilm_11 - Land to the east of and off Whitford Road, between Ashes Farm and The Beacon Chapel, Kilminster	10
Musbury	Musb_01 - Baxter's Farm, The Street, Musbury	9
Otterton	Otto_01 - Land at Bell Street, Otterton	10
Plymtree	Plym_03 - Land at Plymtree	30
Sidbury	Sidm_10 – land south of Furzehill	38
West Hill	West_02 - Field at junction of adjacent to Prickly Pear House at junction of B3180 Exmouth Road and Bendarroch Road, West Hill	17
West Hill	West_01 - Land at Westhayes/Hayes End, Eastfield, West Hill	6
West Hill	West_04 - Land adjoining Wind Mill Lane, West Hill	42
West Hill	West_06 - Land north and east of Eastfield, West Hill	31
West Hill	West_17 - WI Building and adjoining land, West Hill Road, West Hill	5
Whimple	Whim_11 – Land north of Station Road, Whimple	27
Total – at service villages		512

Reasonable alternatives to the approach set out in the above policy are set out through text and options around meeting the housing shortfall in the plan.

Beer

What the settlement is like

- 6.98 Beer is an attractive, large, village with around 1300 residents, located on the coast between Sidmouth and Seaton. It has thriving tourist and fishing industries and a vibrant shopping centre. 66% of the population are economically active, and a lot of residents are employed locally. Much of the countryside around the village is designated Area of Outstanding Natural Beauty and/or Coastal Preservation Area (which is an existing Local Plan designation). Beer Quarry Caves (famous for providing the local building stone) is home to several species of protected bat and is designated a County Wildlife Site, Special Area of Conservation and Site of Special Scientific Interest.
- 6.99 The historic core of the village is a designated Conservation Area and there are numerous listed buildings within and around it. Beyond the centre, housing is a mix of cottages, post-war housing and recent development, characterised by its modest form and often terraced layout.

Key messages from the Neighbourhood Plan for the area

- 6.100 Beer has had a 'made' neighbourhood plan in place since January 2019 which seeks to sustain Beer as a vibrant and strong community and included allocation of a site by its Community Land Trust for 31 homes. Whilst the Plan is supportive of community-led development and of small scale schemes to deliver affordable and accessible housing to meeting local needs, it is clear that the unique character, landscape and setting of Beer must not be compromised, including reinforcement of the green wedge to prevent coalescence with Seaton and protection of the undeveloped coast and numerous heritage and environmental assets.

Suitability for development

- 6.101 Beer has a good range of services and facilities and as such it could, in principle, be seen as a positive location to accommodate development. However the steepness of surrounding hills, and those in the village itself place very significant constraints on scope for development.
- 6.102 One site was put forward for residential development at Beer (as indicated on the map). This site is located within the Area of Outstanding Natural Beauty, the locally designated Coastal Preservation Area and in close proximity to the Jurassic Coast World Heritage Site Special Area of Conservation and Site of Special Scientific Interest. Access to this site is very poor and residential development is considered to result in an unacceptable visual impact. Therefore, no sites are allocated for development in the Local Plan although a Built up Area Boundary will be designated around the existing village.

Branscombe

What the settlement is like

- 6.103 Branscombe is a linear village, formed along a valley side, and comprising several small clusters of houses linked by narrow, largely unpaved and unlit rural roads. Most facilities are located in the eastern cluster, which a considerable distance from the westernmost housing (residents of which cannot safely or quickly walk to the village facilities). The surrounding landscape is of exceptional quality and considerable pressure is placed on local infrastructure by tourists, especially those using private cars to access the beach.
- 6.104 Existing housing in Branscombe is of mixed character. There are a number of listed buildings, mainly cottages and farmhouses, which form the core of the village and the linear ribbons of housing which stretch westwards comprise a mix of historic cottages and post-war terraced and semi-detached housing. Despite this mix, the houses share a similar scale and form and the topography creates a regularity of plot size and layout.

Key messages from the Neighbourhood Plan for the area

- 6.105 There is currently no Neighbourhood Plan for Branscombe and no designated Neighbourhood Plan area.

Suitability for development

- 6.106 Branscombe has very limited potential for new development. The topography is steep, with a high degree of visibility and prominence, and the existing development is spread along narrow roads, so that any extension westwards would preclude easy access to facilities which are located in the easternmost section.
- 6.107 Two sites were put forward for residential development at Branscombe (as indicated on the map). Both sites are located within the Area of Outstanding Natural Beauty to the far west of the linear settlement, and both are highly visible in the landscape due to the steep topography and very rural landscape. Access to facilities from both sites is very poor, requiring residents to walk a considerable distance along narrow, unlit, unpaved roads. Therefore, no sites are allocated for development in the Local Plan although a Built up Area Boundary will be designated around the main cluster/s of development which form the existing village.

Broadhembury

What the settlement is like

6.108 Broadhembury is a picturesque, historic village of around 730 residents, situated in the north centre of the District. Compared to other parishes in East Devon, Broadhembury has a high proportion of working age residents, at 72%, although the majority commute out of the Parish for work. It has a small but comprehensive range of facilities and is compact in form. The village is characterised by thatched cottages and numerous listed buildings, set within an extensive conservation area. More modern development is located on the periphery of the village. Approximately half of the village is within the Area of Outstanding Natural Beauty.

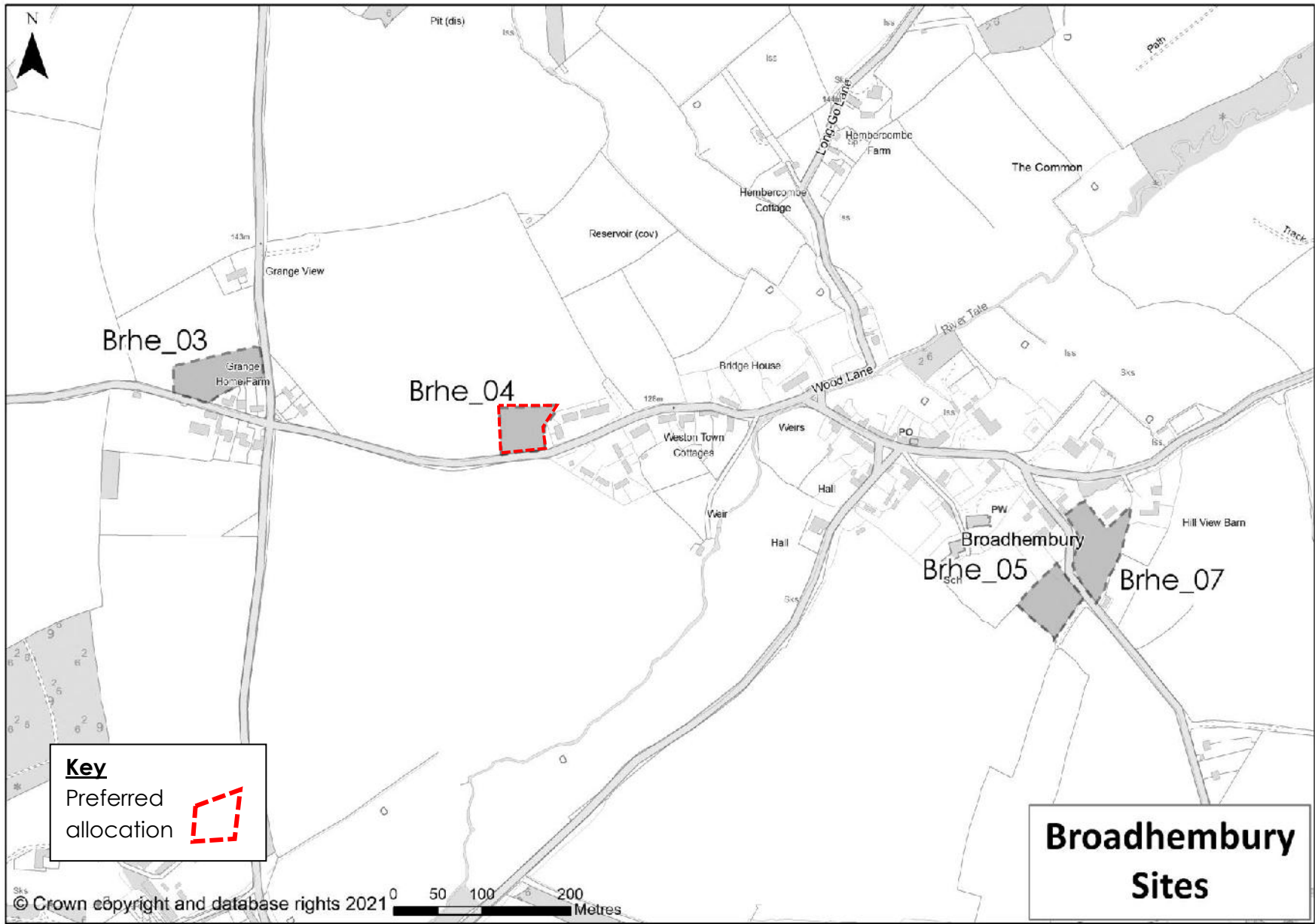
Key messages from the Neighbourhood Plan for the area

6.109 The Broadhembury Neighbourhood Plan is in production but has not yet reached submission stage. Work to support the neighbourhood plan and the Community Land Trust is on-going. Existing consultation suggests that the community would prefer a small, single site for development primarily aimed at meeting the need for several affordable houses.

Suitability for development

6.110 Broadhembury is suitable for limited additional development. Whilst it has a small range of services to meet residents everyday needs most residents are reliant on the private car. The high quality landscape and range of heritage assets mean that any development will need to be of a particularly high quality and small in scale. Of the sites submitted for consideration for residential development, three are located adjacent to the existing settlement and all perform similarly well in terms of access to facilities and visual impact. All are located just inside the AONB.

6.111 Assessment has been undertaken of HELAA submissions sites to consider their scope for accommodating future development. Sites that were submitted for consideration are shown on the map below/over the page alongside preferred allocations.



Chardstock

What the settlement is like

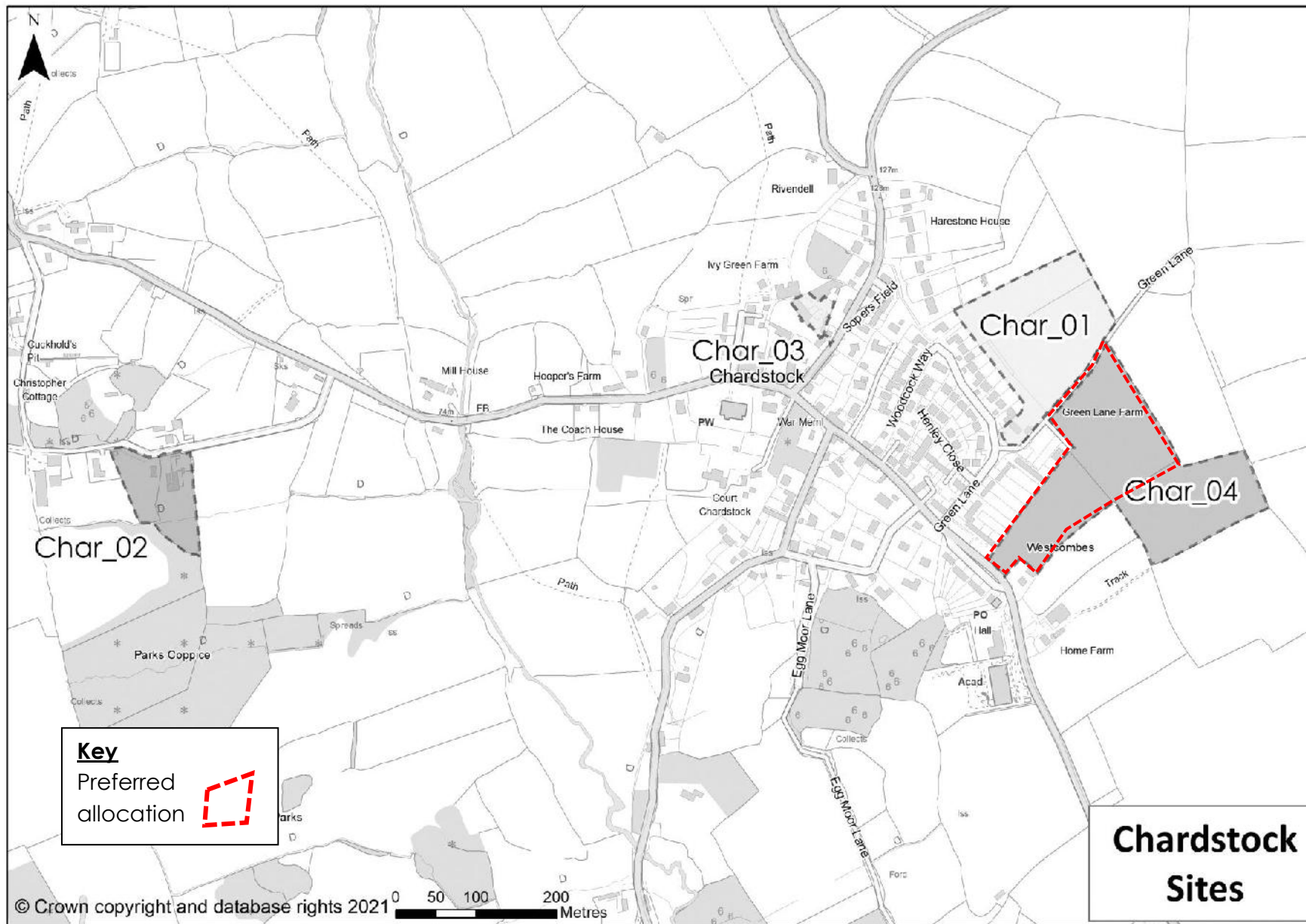
6.112 Chardstock is a small village in a north easterly part of East Devon most of which, the westerly two-thirds, falls within the Blackdown Hills AONB. The historic core of the village is designated as a Conservation Area within which are a number of old listed buildings. There is also more modern development in Chardstock that is concentrated on the east of the village.

Key messages from the Neighbourhood Plan for the area

- 6.113 The parish of Chardstock has a neighbourhood plan, 'made' in 2017. Chardstock did not have a Built-up Area Boundary under the adopted Local Plan, and so the plan was written from the starting point of the area being open countryside in strategic policy terms. The neighbourhood plan gathered further evidence at the time that supported that position, although the vision for the plan stressed that Chardstock is a viable community and that it should protect and maintain what it has, whilst seeking to sustain itself.
- 6.114 The plan articulates that local housing needs and economic welfare are major concerns (although evidence showed no immediate need for additional housing). This is coupled with concern raised about the potential for further development to make unsustainable new demands on infrastructure and to damage the local environment.
- 6.115 Overall, protection of the natural environment, the built heritage and the strong sense of community are all given a high priority, as well as ensuring that there is no further significant stress placed on the parish's road system or compromising of the peaceful rural nature of the area. The plan envisages and focuses on managing development associated with existing premises, rather than any expectation of new build on greenfield sites.

Suitability for development

6.116 Assessment has been undertaken of HELAA submission sites to consider their scope for accommodating future development. Sites that were submitted are shown on the map below/over the page alongside preferred allocations. Chardstock benefits from a range of services and facilities and is suitable for a modest scale of development.



6.117

Clyst St Mary

What the settlement is like

- 6.118 Clyst St Mary is a village comprising approximately 1,000 residents on the western edge of the District, approximately one mile from Exeter. The village is split between the old village north of the A3052 and the newer estate to the south. It has a range of local facilities and is particularly well catered for jobs with the recent employment development at Winslade park.
- 6.119 The settlement has a series of listed buildings located in the core of the village and of particular sensitivity is the old bridge across the Exe, which is a scheduled ancient monument.

Key messages from the Neighbourhood Plan for the area

- 6.120 Clyst St Mary is covered by the neighbourhood plan for the parish of Bishops Clyst (Clyst St Mary and Sowton) which was 'made' in 2017. This recognises the on-going development pressure in the area, as well as the constraints, and seeks to secure a positive impact from any new development.
- 6.121 In respect of Clyst St Mary village specifically, the aim of the plan is to protect the surrounding countryside, green spaces and trees, and retain a village feel and a clear separation from Exeter. Retention of valued facilities/services and improvements to provision, flood prevention and management, alleviating issues associated with traffic and supporting safe walking and cycling opportunities also feature strongly.
- 6.122 A need for smaller homes was identified as a particular need locally, but at the time of plan writing there was no support for further housing development beyond the adopted Local Plan allocation for 150 homes at the Winslade Park site during the plan period to 2031. Similarly, whilst existing businesses uses are supported, commercial development beyond the existing areas and brownfield sites is not, and retention of land in agricultural use is sought.
- 6.123 It should be noted that work has recently commenced on reviewing the plan and it is anticipated this will include consideration of alternative potential sites for development to those submitted to date to calls by EDDC.

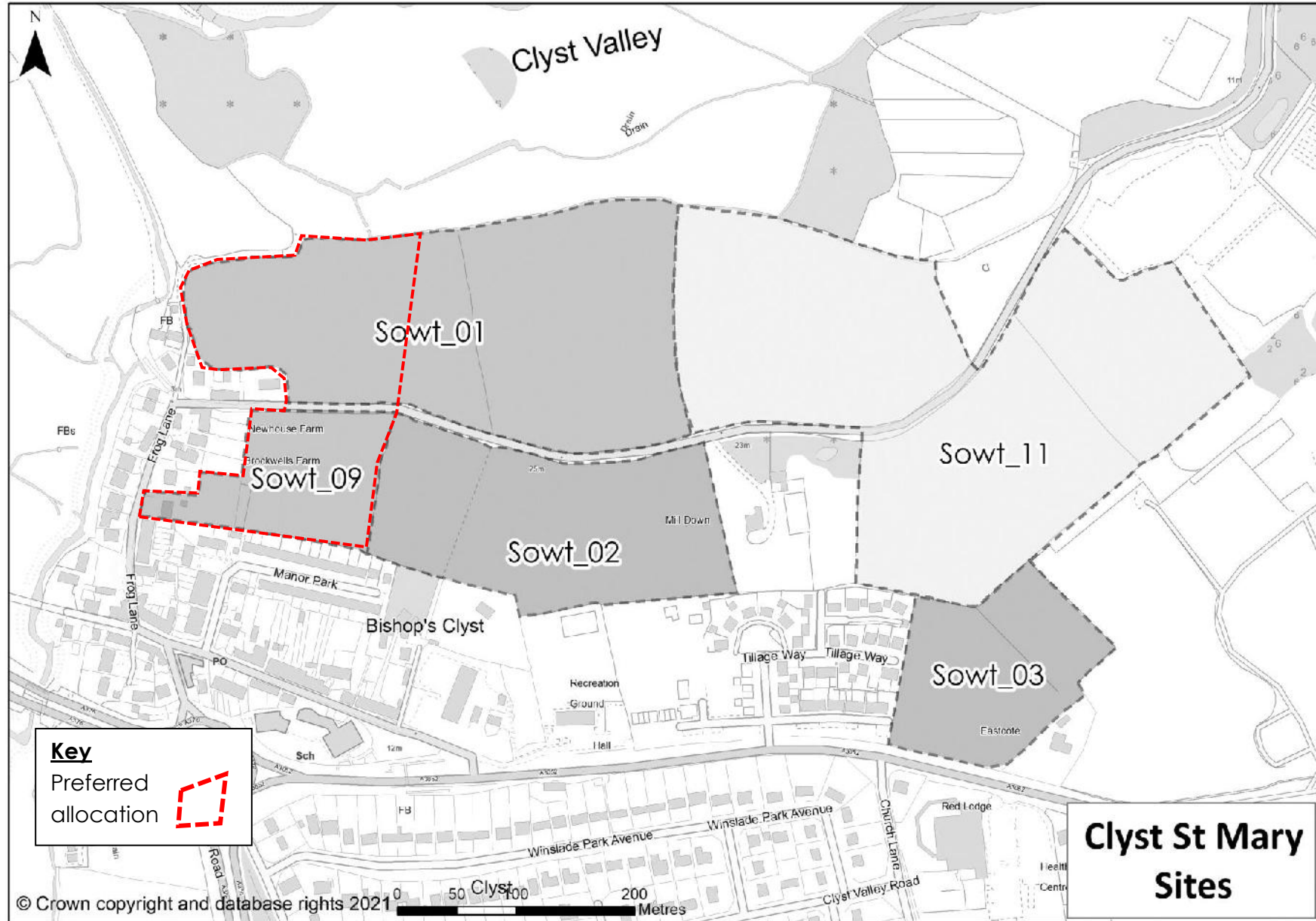
Suitability for development

- 6.124 Clyst St Mary is considered an attractive location to accommodate growth due to the range of services and facilities it offers alongside its proximity to Exeter and other employment opportunities, which could potentially be accessed by sustainable modes of transportation.
- 6.125 However, this needs to be weighed against the development which it has experienced in recent years and is still to come, alongside proposals for larger scale development in close proximity in the form of a potential new town which

could impact upon the village. The A3052 in particular suffers from long tailbacks at peak times to junction 30 and this needs to be considered.

- 6.126 As such, only two sites for approximately 75 dwellings is considered appropriate. These have been chosen to be well integrated within the core of the village, close to the existing services and facilities so as to not extend the village in a ribbon fashion.

DRAFT



Dunkeswell

What the settlement is like

- 6.127 Dunkeswell is a large village located to the north centre of the District. It has nearly 1500 residents, of which 64% are of working age. Perhaps surprisingly, given the large employment site in the village, only 180 of the 571 workforce work locally, with 391 residents out-commuting daily. The parish is wholly within the Blackdown Hills Area of Outstanding Natural Beauty.
- 6.128 Dunkeswell consists of three parts: a modern housing estate (Highfield) with a range of facilities to the south, a central historic core with numerous listed buildings and a designated conservation area, and an employment estate to the north east on a former airfield (some of the original buildings are listed).

Key messages from the Neighbourhood Plan for the area

- 6.129 Dunkeswell is covered by the neighbourhood plan for the Dunkeswell parish, made in 2017. The plan was written in the context of the whole of Dunkeswell parish being considered as open countryside in the adopted Local Plan, with no defined settlement boundary, and new housing limited to exception sites. The plan expressly supported this approach, and the introduction of a settlement boundary would be a key change.
- 6.130 The neighbourhood plan did not identify any sites for housing, and placed emphasis on protecting the character and setting of the area, given its AONB landscape and is largely traditional farmland setting. The built heritage including the historic core of the village and the historic airfield are also valued for their significant contribution to local character.
- 6.131 The plan articulates the mixed reception of the local community to the more modern development in Dunkeswell and aims to secure a higher quality and more sympathetic design to any new development. It also aims to reduce the impact of vehicular traffic and secure more opportunities for walking and cycling including between the old, new and industrial parts of Dunkeswell.
- 6.132 Support for the active on-going use of the airfield site for appropriate uses, subject to impact, is expressed, as well as small-scale employment provision more generally, to enable more people to live and work in the locality.
- 6.133 Support for any new housing development coming forward is limited to that which will meet identified local need, including sheltered housing, shared ownership housing for young people and housing suitable for families wishing to remain in the Parish.

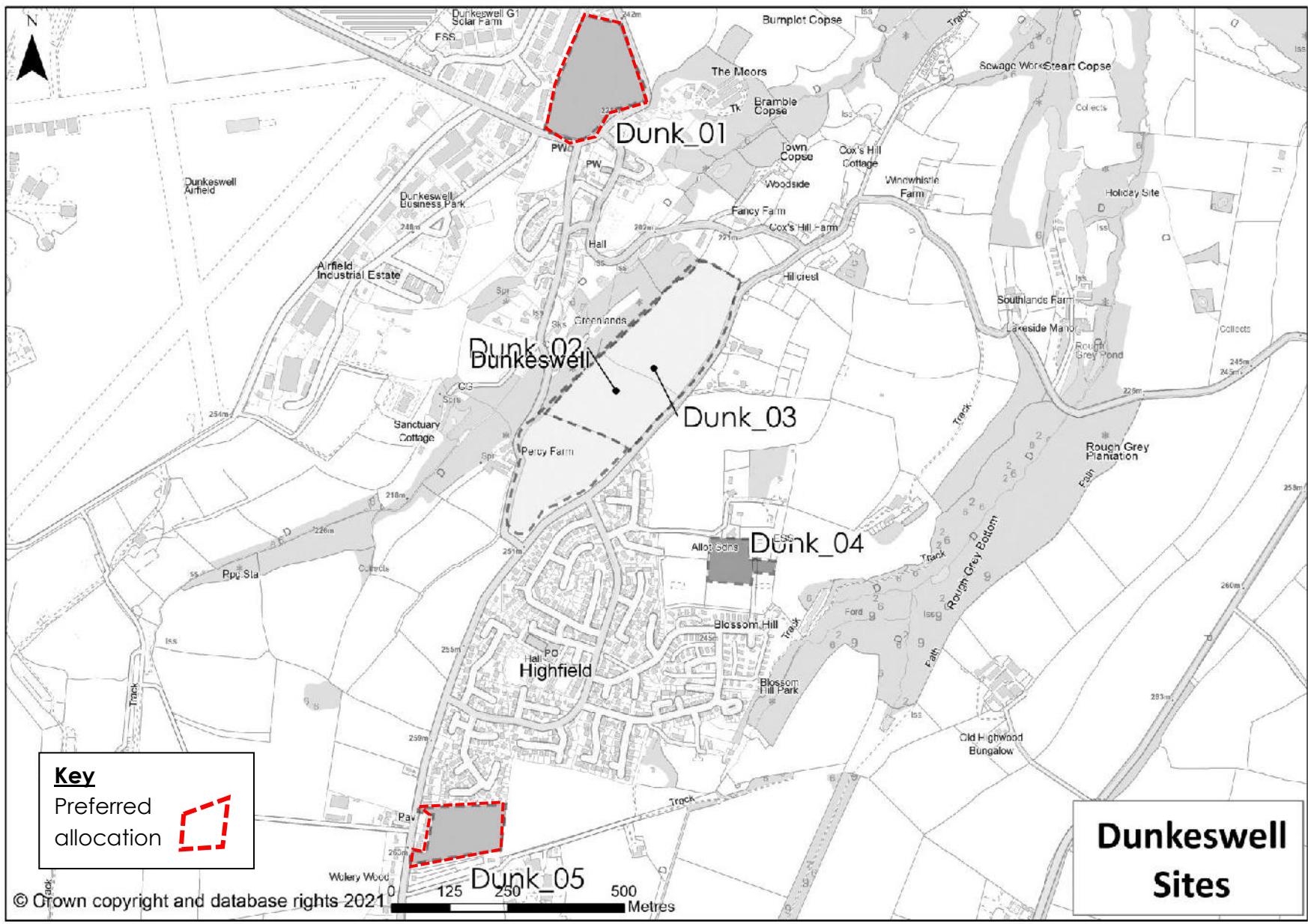
Suitability for development

- 6.134 Despite the AONB location, Dunkeswell is considered to be a good location for some additional residential development, due to the proximity of employment

land and local facilities. Additional development could be accommodated without a significant impact on the landscape or existing development. The village is located some distance away from the nearest town of Honiton, along narrow rural roads, and so the opportunity to increase settlement self-containment and reduce out commuting should be a major consideration in the mix and layout of new development.

- 6.135 Assessment has been undertaken of HELAA submissions sites to consider their scope for accommodating future development. Sites that were submitted for consideration are shown on the map below/over the page alongside preferred allocations.

DRAFT



East Budleigh

What the settlement is like

6.136 East Budleigh is a compact village of around 680 residents (of which nearly half are retired) located to the south west of the District. It is wholly within the East Devon Area of Outstanding Natural Beauty. The village has a historic core with a designated conservation area and numerous listed buildings and a range of facilities. More modern housing has been constructed on the edges of the village but is well integrated. A main road borders the village to the east and development beyond this road forms a loose ribbon but does not read as part of the main village.

Key messages from the Neighbourhood Plan for the area

6.137 East Budleigh is covered by the East Budleigh with Bickton Neighbourhood Plan, which was in 2017. Recognising the setting within the AONB and the significant local heritage, the plan primarily seeks to protect the existing character, and ensure any development respects this and does not detract from it.

6.138 A range of green areas across the village are formally designated as Local Green Spaces for the additional protection that brings from development, and protection and enhancement of the existing community facilities is a key theme to support sustainable living and a sense of community. The constraints of areas prone to flooding and of high grade agricultural land in the immediate vicinity of the village are also highlighted. Following a pilot exercise with EDDC, work flowing from this neighbourhood plan has also seen local heritage assets meeting specific criteria registered on our Local List for additional protection.

6.139 Overall, only small-scale development utilising previously developed land and/or to meet local needs is supported, subject to this being of minimal impact to, or enhancing, the locality.

Suitability for development

6.140 East Budleigh is a self-contained, compact village and the range of services and facilities makes it suitable for small-scale additional development. The village is located in the AONB, and has a considerable number of heritage assets, and so design and scale will be particular considerations.

6.141 The submitted site is not considered appropriate for allocation for several reasons. It does not 'read' as part of the village, lying on the opposite site of a main road, and the impact on the setting of the adjacent listed building and AONB are considered to be unacceptable.

Exton

What the settlement is like

- 6.142 Around 1,700 people live in Exton. ONS population data for Exton includes the adjoining Lypstone Commando, which explains the high proportion of working aged people – at 84%, it is the highest of any settlement in East Devon. On the other hand, Exton has the lowest proportion of 0-15 year olds (just 5%). There are nearly 2,400 jobs in Exton, over twice the number of workers which mean it imports workers. Again, these figures are inflated due to the inclusion of Lypstone Commando in ONS data.
- 6.143 There are relatively few facilities in Exton itself, with a shop, pub, and play area, but it benefits from having a train station, a regular bus service, and being located on the Exe Estuary Trail. These provide sustainable travel links to a numerous jobs and facilities in Exeter to the north and Exmouth to the south. The A376 runs through the village, linking with Exeter, Exmouth and the M5 three miles away.
- 6.144 The Exe Estuary is internationally important for its wildlife, adjoining the western edge of Exton. There are also several listed buildings, mostly located around the A376.

Key messages from the Neighbourhood Plan for the area

- 6.145 Exton lies in the parish of Woodbury which was designated as a neighbourhood plan area in 2013. The development of a neighbourhood plan has been slow/stalled, although a pre-consultation draft was shared informally with EDDC officers for comment earlier in 2021. Whilst it would not be appropriate to cite the document at this stage, suffice is to say it is not currently anticipated to propose any sites for development at the village of Exton, and is likely to raise concerns about traffic and flooding in this location.

Suitability for development

- 6.146 Although Exton has good sustainable travel links to larger places elsewhere, the relative lack of facilities within the settlement itself limits the amount of new housing that would be sustainable at the village. The Exe Estuary Special Protection Area/Ramsar to the west and Lypstone Commando to the south, make the north and east the only realistic potential locations for new development beyond the existing village.
- 6.147 Assessment has been undertaken of HELAA submissions sites to consider their scope for accommodating future development. Sites that were submitted for consideration are shown on the map below/over the page alongside preferred allocations.

Feniton

What the settlement is like

- 6.148 Feniton comprises of two settlements. Old Feniton is small, has buildings of historic significance and lies in wooded setting, it is not identified as a location for growth.
- 6.149 New Feniton to its west is, however, a different type of settlement and with a range of services and facilities does offer realistic development potential. The Exeter-Waterloo railway line runs through new Feniton with a station located in the village.
- 6.150 It was, indeed, the presence of the railway with a now closed branch line running to Sidmouth, and then later a line to Exmouth, that accounted for the historic development of the village in Victorian times. In the later parts of the 20th century the village expanded considerably with new housing and additional services and facilities.

Key messages from the Neighbourhood Plan for the area

- 6.151 The neighbourhood plan covering the whole of Feniton parish was 'made' in 2018 (to run to 2031). The plan highlights a need for consideration of the adequacy of infrastructure, including education and healthcare provision, road network, rail and bus services, and flood alleviation/management, if further growth is proposed. In view of these concerns and a number of developments allowed on appeal, the plan did not allocate any sites for development and expresses support for a modest level of development over the plan period, of less than 50 homes every 5 years.
- 6.152 Overall, the plan supported the principle of small-scale development within the Built-up Area Boundary in the adopted Local Plan, alongside objectives to preserve and enhance the rural character/setting.
- 6.153 It should be noted that one site put forward for development, but not currently proposed for allocation (reference Feni_04), falls partly outside Feniton parish/neighbourhood plan area and instead lies in the parish of Ottery St Mary and is covered by the Ottery St Mary and West Hill Neighbourhood Plan, also 'made' in 2018. In relation to Feniton, the main thrust of this plan is to support the delivery of the Feniton to Sidmouth Cycle Link, identified in this document as a key strategic route.

Suitability for development

- 6.154 The railway station at Feniton and relative proximity to Exeter indicates some reasonable suitability for development. However the villages is accessed by country lanes and has a history of flooding, albeit there has been past alleviation work and there are future plans for future work. In addition, Feniton has the

lowest ratio of jobs to workers of any settlement, and a level of facilities commensurate with its role as a 'service village'. Therefore, adding a significant number of new homes without employment or other facilities will just encourage travel to other places, contrary to sustainability objectives. There were nine sites prompted for development at Feniton on the edges of the built up areas of the village, these are shown on the map below with commentary included on the table that follows. At this stage it is suggested that only one site is allocated for residential development and other sites are not on account of retaining a consistency of distribution approach for villages.

DRAFT

Hawkchurch

What the settlement is like

6.155 Hawchurch is a small, rural village on the far eastern edge of the District. It has around 570 residents, of which 261 are of working age and 109 commute out daily, and a small range of services and school. It is located in an attractive, but undesignated, landscape. Hawchurch is accessed via a network of narrow, unpaved and unlit lanes.

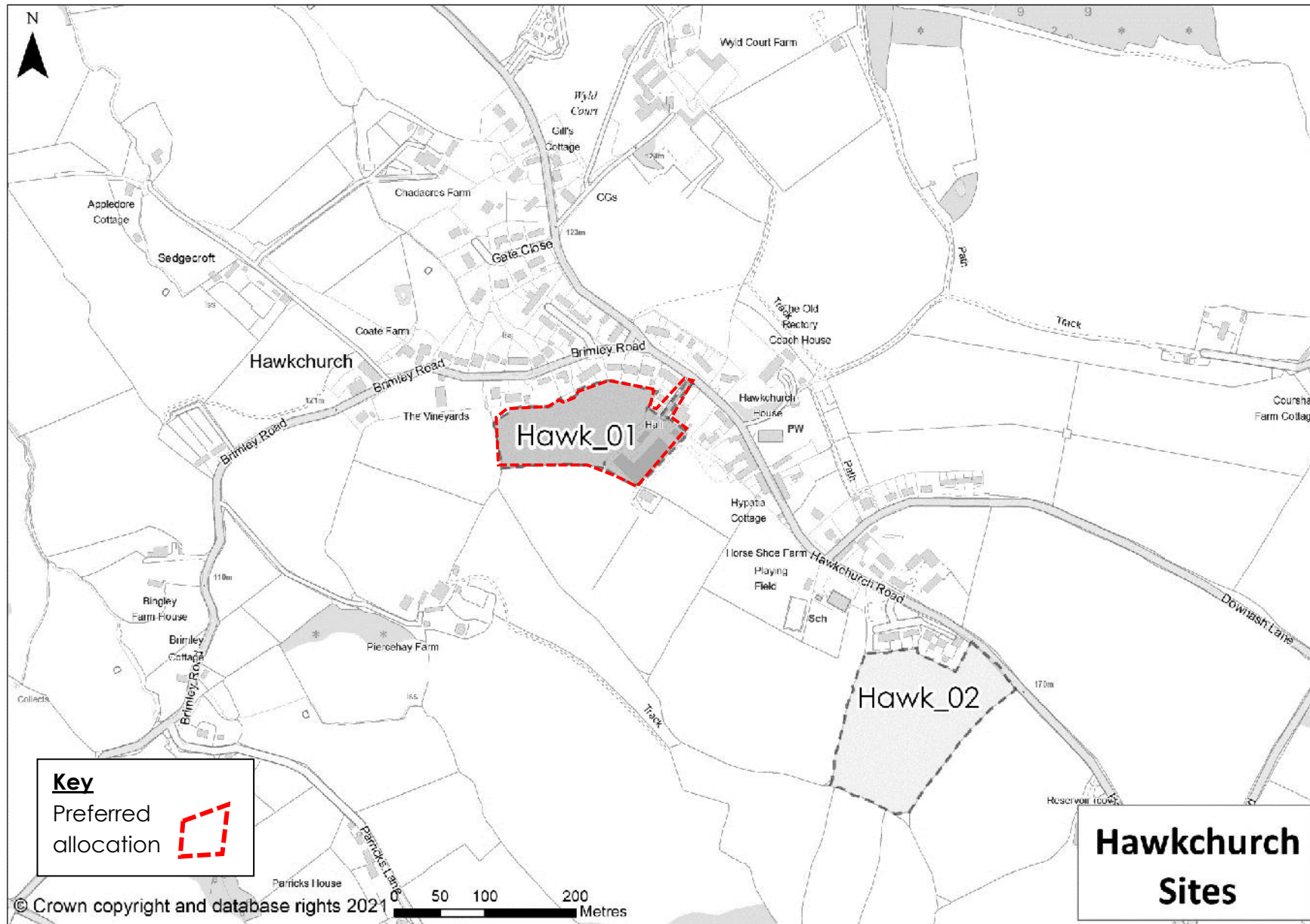
Key messages from the Neighbourhood Plan for the area

6.156 There is currently no neighbourhood plan for Hawchurch. However, the parish of Hawchurch was designated a Neighbourhood Area in 2015 and work has recently restarted with a new Steering Group in place to progress a neighbourhood plan. A community consultation has taken place this autumn, the findings of which are awaited.

Suitability for development

6.157 Hawchurch is a suitable village for small-scale housing and employment development, particularly if this will increase its potential for self-containment given the narrow, very rural nature of the roads between it and Axminster. The village is not located in a designated landscape and the preferred site for allocation is well screened and discreet in the streetscene.

6.158 Assessment has been undertaken of HELAA submissions sites to consider their scope for accommodating future development. Sites that were submitted for consideration are shown on the map below/over the page alongside preferred allocations.



Kilmington

What the settlement is like

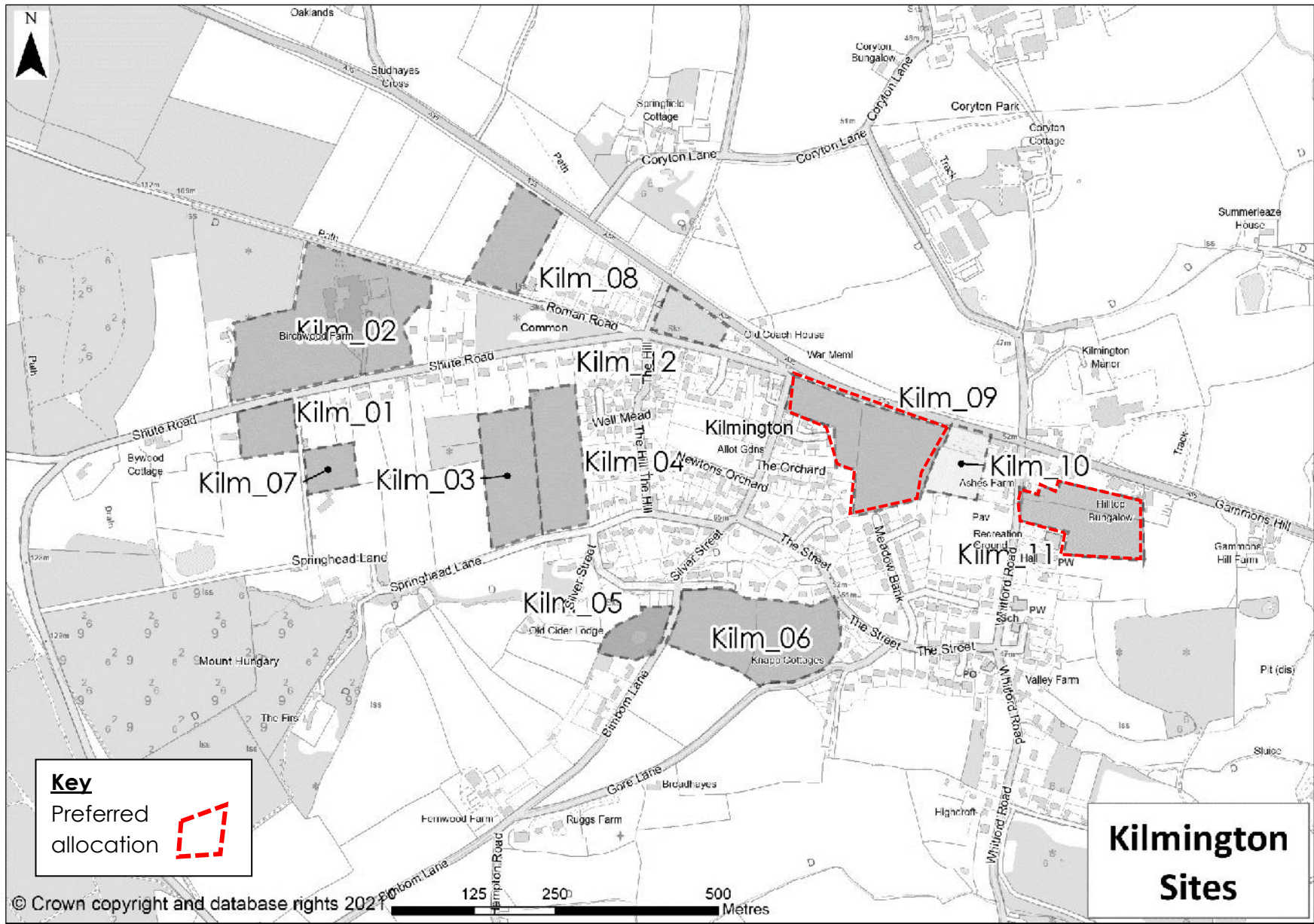
- 6.159 Kilmington is a village with a population of around 930, 38% of the population are 65+, which is higher than East Devon average, and 44% of the population are 18-64.
- 6.160 The village lies south of the A35, the major road running east west that bisects the parish. The main settlement developed on the sheltered eastern slopes of Shute Hill and Kilmington Hill. Most of the parish lies within the East Devon and Blackdown Hills AONBs.
- 6.161 Kilmington has a good range of community facilities for its size, including church, cricket pavilion, village primary school, pub, filling station and farm shop. Hourly bus service available for travelling to Honiton and Axminster.

Key messages from the Neighbourhood Plan for the area

- 6.162 Kilmington is the subject of an emerging neighbourhood plan for the whole of Kilmington parish. This plan went to pre-submission consultation in early 2021 and is expected to be submitted in the near future. Objectives of the draft plan include:
- ensuring housing growth is of a scale that is appropriate to the village's role and function and does not adversely impact upon the ability to accommodate demand on facilities and infrastructure, and;
 - to support housing development which meets the identified needs of the local community across types and tenures, whilst meeting changing demographic and social requirements.
- 6.163 To this end, the plan proposes to allocate two sites for development. These sites both fall within the two sites identified further below as preferred sites for development through this early work on the Local Plan. The neighbourhood plan draft policies include specific requirements for these sites, including to secure accessible housing for older residents and affordable homes, together with enhancements to the green 'buffer' along the A35 and to footpath links within the village, and set out detailed design criteria. The neighbourhood plan is seeking to support continued 'slow, incremental growth', which will support the vitality of the village, whilst not exacerbating traffic issues.
- 6.164 As the neighbourhood plan is coming forward ahead of the Local Plan, further consideration will need to be given to the relationship and the best approach to bringing the land forward in these locations, as well as to any phasing. The emerging neighbourhood plan includes requirements that could be used in any master-planning/development briefs.

Suitability for development

- 6.165 Kilmington has a good range of services and facilities that make it suitable for limited development in principle. However, most of the parish lies within AONBs, which constrained the development options. Most facilities are located to the north and east of the settlement and access is constrained by the very narrow, unlit, unpaved roads to the south and west of the village. Sites in those directions are less accessible and more visually harmful, due to topography and designated landscapes. Two sites are considered suitable/preferred for potential allocation, one of which lies outside the AONB, and another one is located at the edge of AONB and alongside the A35. Notwithstanding suitability, as stated above, the relationship with the emerging neighbourhood plan, and consideration of the evidence underpinning it, would need exploring.
- 6.166 Assessment has been undertaken of HELAA submissions sites to consider their scope for accommodating future development. Sites that were submitted for consideration are shown on the map below/over the page alongside preferred allocations.



Musbury

What the settlement is like

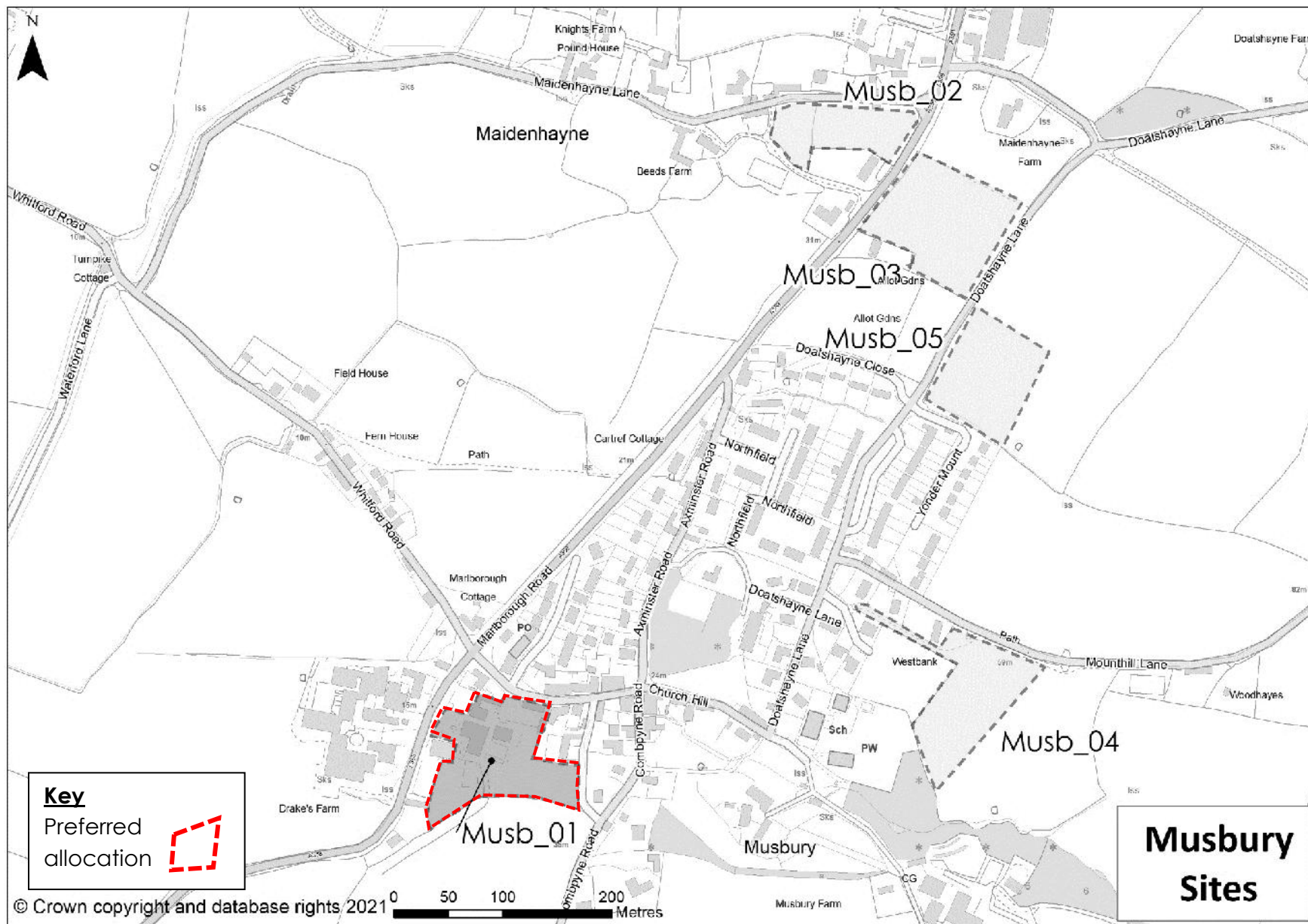
- 6.167 Musbury is a village with a population of around 500. About 37% of residents are aged 65 or over (above the East Devon average of 30%), with 11% aged between 0-15. There are some 230 economically active people and an employment density of 0.81, which shows that there are fewer jobs than workers.
- 6.168 Musbury has a limited range of strategic, but a good range of local services and facilities. There is no railway line and road access is via the A358. The historic core of the village has several listed buildings and is a conservation area. The whole village is in the East Devon AONB.

Key messages from the Neighbourhood Plan for the area

- 6.169 There is currently no neighbourhood plan for Musbury and no designated Neighbourhood Area.

Suitability for development

- 6.170 Although Musbury is quite a small settlement, it has a good range of local facilities that make it suitable in principle for some modest growth. However, its location in the East Devon AONB and the exposed and elevated nature of some of the sites put forward for consideration mean that development options are very limited.
- 6.171 One site is proposed for development, which is already included in the Built-up Area Boundary for Musbury. The site of a farmhouse and associated former agricultural buildings is subject to a draft development brief and is proposed for around 9 new homes and small industrial units fronting Seaton Road. The remainder of the site may be suitable for development, subject to a landscape assessment.



Newton Poppleford

What the settlement is like

- 6.172 Newton Poppleford is the twelfth largest settlement with a population of around 1,800. About 31% of residents are aged 65 or over (similar to the East Devon average of 30%), with 16% aged between 0-15. There are some 800 economically active people and an employment density of 0.35, which shows that there are far fewer jobs than workers.
- 6.173 Newton Poppleford has a very limited range of strategic, but a good range of local services and facilities. There is no railway line and road access is via the busy A3052, which runs through the middle of the village. This carries a high level of traffic, including HGV's and at the western end of the High Street is constricted in width and lacks safe pedestrian refuge. Cycling and walking along this stretch of road is dangerous and there are currently no suitable alternative routes. The existing Built-up Area Boundary does not extend to the west of the village because of the constraints of this section of road (as it was found not to be suitable for development).
- 6.174 There are around 20 listed buildings in the village, but no conservation area. The whole village is in the East Devon AONB. The River Otter floodplain lies to the east of the village and there is a smaller floodplain running through the middle of the village.

Key messages from the Neighbourhood Plan for the area

- 6.175 Newton Poppleford is covered by the neighbourhood plan for the parish of Newton Poppleford and Harpford, which was 'made' in June this year (2021). The plan articulates how flooding and traffic-related matters are key concerns for the local community. It supports the constricted approach to the Built-up Area Boundary (BUAB) in the adopted Local Plan, excluding the western end of the village entirely and seeks to preserve the rural character and heritage, and the AONB landscape setting. Given the number of new homes permitted in recent years (67 since 2013), and the constraints to development identified, the plan finds no need to allocate sites. Instead it supports small-scale incremental development to meet identified local needs, particularly of smaller, affordable and/or accessible homes within or adjacent to the currently approved BUAB, subject to meeting an extensive set of design and other criteria/requirements for new development. The vision seeks a vibrant community and as such it also supports increased employment opportunities locally and retention and enhancement of community facilities and services. In particular, the plan seeks improvement in provision of local healthcare/medical facilities as well as traffic and pedestrian movement, and identifies a number of valued 'assets' for specific protection, including Local Green Spaces, heritage assets, 'cherished public views', and community facilities and services.

Suitability for development

6.176 Newton Poppleford is one of our larger villages, with a good range of local services and facilities and good bus connections. However, it lies within the East Devon AONB, is affected by flooding and a lack of safe pedestrian and cycling routes further limit development options in the western part of the village. Narrow lanes and poor access to the High Street further inhibit development opportunities. No suitable sites have been identified for allocation.

DRAFT

Otterton

What the settlement is like

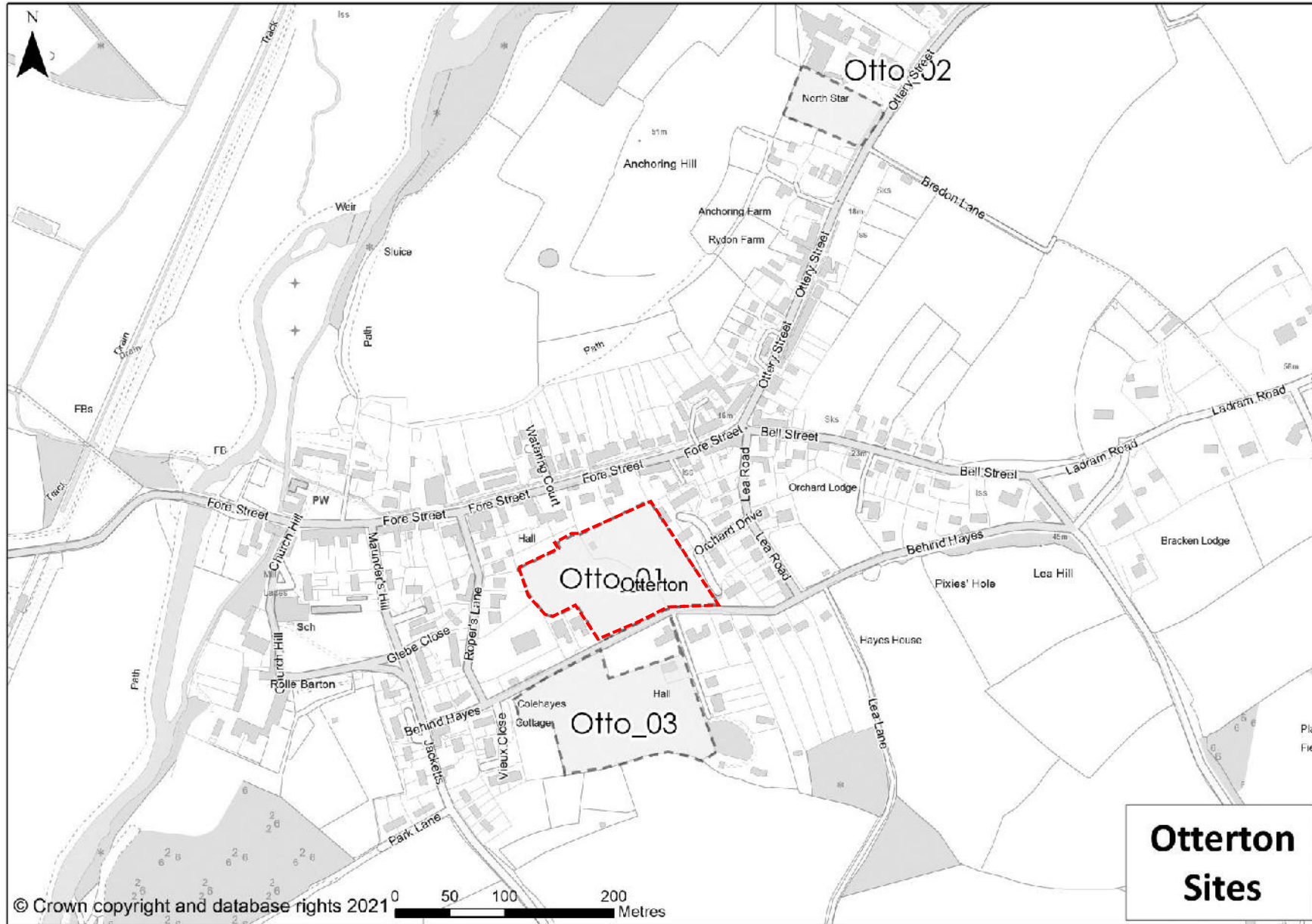
- 6.177 Otterton is a village with a population of around 700. About 30% of residents are aged 65 or over (same as the East Devon average), with 17% aged between 0-15. There are some 320 economically active people and an employment density of 0.75, which shows that there are fewer jobs than workers.
- 6.178 Otterton has a limited range of strategic, but a reasonable range of local services and facilities. There is no railway line and road access is via a short stretch of unclassified road off the B3178. The historic core of the village has numerous listed buildings and is a conservation area. The whole village is in the East Devon AONB.

Key messages from the Neighbourhood Plan for the area

- 6.179 Otterton is covered by the neighbourhood plan for the whole parish of Otterton, 'made' in June this year (2021). The plan focuses on protecting and preserving the natural and built character of the area, including through the designation of formal Local Green Spaces. It acknowledges some development will occur over time as Otterton continues to evolve and thrive. However, the plan expects any new development to be 'measured and careful', of a high design quality and to meet the needs of local residents first. The plan highlights particular concerns about flooding and traffic volumes (particularly in the summer season) in the village.
- 6.180 The plan was prepared in the context of the village being considered as open countryside in the adopted Local Plan, with no defined settlement boundary, so the introduction of a settlement boundary and proposed allocation would be a shift in policy context for the neighbourhood plan.
- 6.181 Should there be a need for further housing at Otterton, the plan seeks that this be small in scale, and comprise affordable homes and those suitable for older people to downsize, for those with a local connection. Similarly, small scale economic development is supported in principle, providing this involves the use of existing buildings/previously development land only.

Suitability for development

- 6.182 Whilst Otterton has some services and facilities that make it suitable for limited development in principle, it is heavily constrained by its high quality AONB landscape and heritage assets. One site has been found suitable to be considered for allocation, but further work will be needed on landscape assessment, impact on the setting of listed buildings and adjacent conservation area.



Payhembury

What the settlement is like

- 6.183 Payhembury is a village with a population of around 750 with a small range of services and facilities. About 26% of residents are aged 65 or over (below the East Devon average of 30%), with 21% aged between 0-15. There are some 329 economically active people and an employment density of 0.52, which shows that there are fewer jobs than workers.
- 6.184 Payhembury has a limited range of strategic, but a good range of local services and facilities including a shop and primary school. Although rural and attractive including a number of listed buildings, it is outside the AONB.

Key messages from the Neighbourhood Plan for the area

- 6.185 Payhembury is covered by the neighbourhood plan for the parish of Payhembury, which was 'made' in mid 2019. The vision is for Payhembury to retain its peaceful rural character, whilst continuing to offer a good range of facilities to serve the local community.
- 6.186 Whilst the plan was prepared in the context of the village being considered as open countryside in the adopted Local Plan, with no defined settlement boundary, the community chose to introduce their own settlement boundary. This was defined using EDDC criteria and with reference to an earlier boundary that had existed. The intention being to support development of a small number of smaller/more affordable homes within the boundary, close to the existing village centre/services. The plan also identified a brownfield site adjacent to boundary as a preferred location for any future development, as an exception to policy, which is now coming forward for residential use (see paragraph 7.136 below).
- 6.187 The proposed introduction of a settlement boundary within the new Local Plan for Payhembury would therefore appear to align to the neighbourhood plan, although the identification of Payhembury as a named settlement in the Local Plan settlement hierarchy, potentially goes a step beyond.
- 6.188 On other matters, the neighbourhood plan seeks to support small businesses through some changes of use to meet their needs and protecting current employment space, as well as various other strands of policy to support more sustainable and connected living, and to address specific issues including high levels of on-street parking.

Suitability for development

- 6.189 Although fairly small and rural in nature Payhembury has a range of key services and facilities and is consequently considered appropriate to accommodate a small level of growth in the Local Plan.
- 6.190 Given the fact that the southern section of Payh_01 has already been permitted for 9 dwellings it is not considered appropriate to make any further allocation in the village.

DRAFT

Plymtree

What the settlement is like

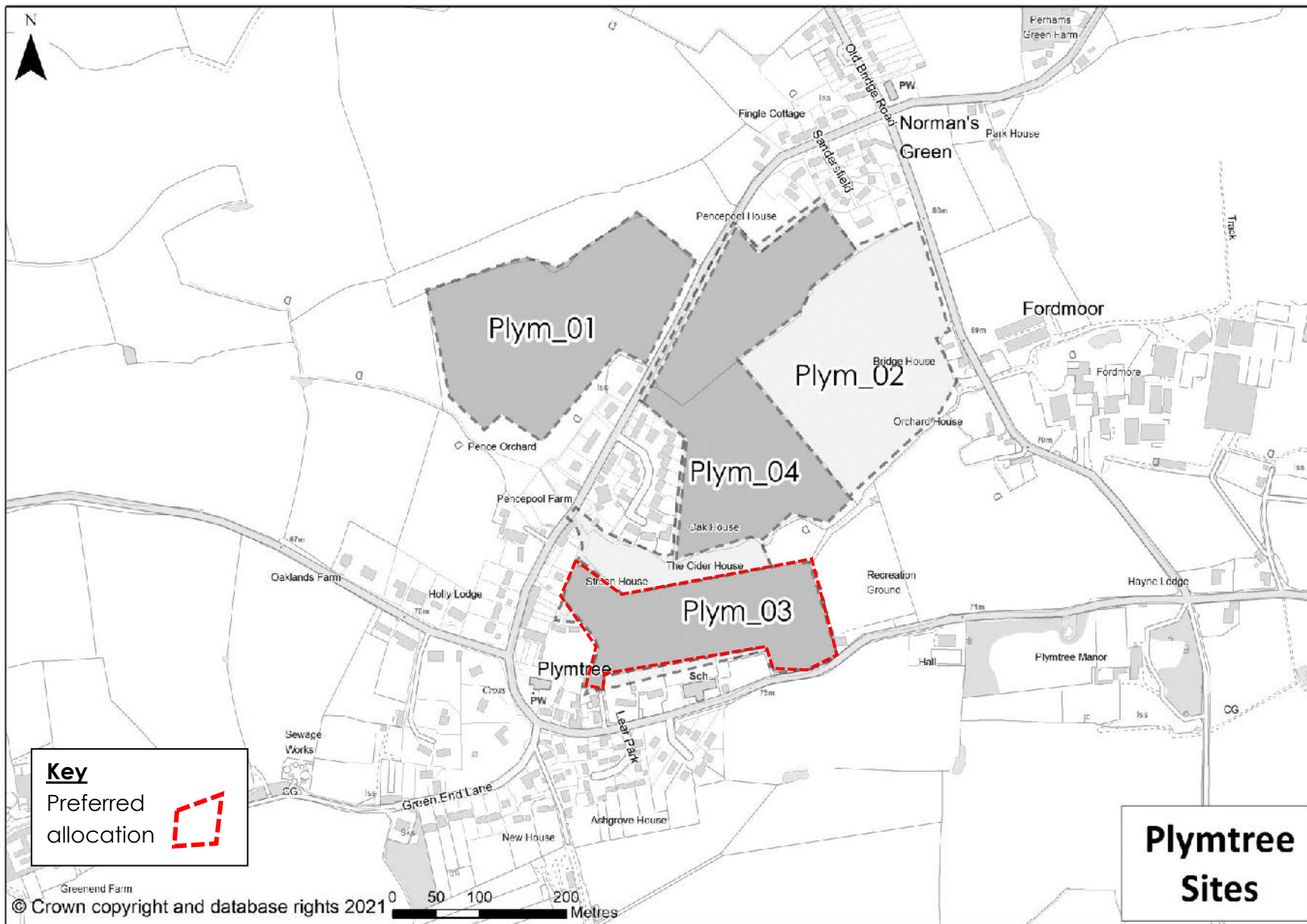
- 6.191 Plymtree is a village with a population of around 650 with a small range of services and facilities, situated some 5 miles to the north-west of Honiton. About 26% of residents are aged 65 or over (above the East Devon average of 30%), with 19% aged between 0-15. There are some 343 economically active people and an employment density of 0.42, which shows that there are fewer jobs than workers.
- 6.192 Plymtree has a limited range of strategic, but a good range of local services and facilities including a shop and primary school. Although rural and attractive including a number of listed buildings, it is outside the AONB.

Key messages from the Neighbourhood Plan for the area

- 6.193 There is currently no neighbourhood plan for Plymtree and no designated Neighbourhood Area.

Suitability for development

- 6.194 Although in a rural location, Plymtree contains a range of services and facilities and is consequently considered appropriate to accommodate a small level of growth in the Local Plan.
- 6.195 Given the range of services Plymtree a small scale development of 30 dwellings is considered an appropriate and reasonable expansion of the village.
- 6.196 Assessment has been undertaken of HELAA submissions sites to consider their scope for accommodating future development. Sites that were submitted for consideration are shown on the map below/over the page alongside preferred allocations.



Sidbury

What the settlement is like

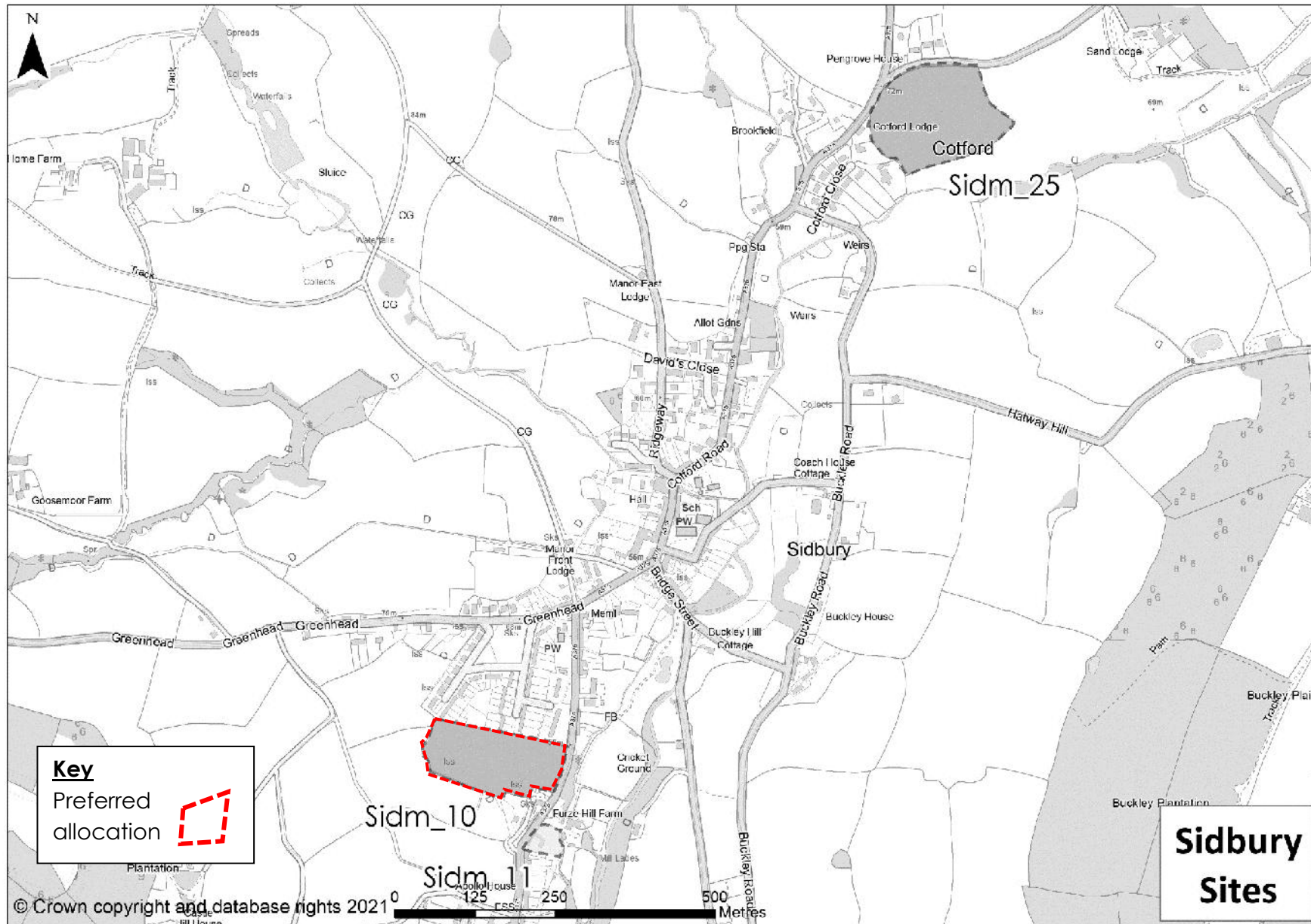
- 6.197 Sidbury is home to around 500 people, and has a slightly older age profile than the district average (35% are aged 65 plus). The number of jobs within Sidbury is relatively low, less than half the number of workers, meaning most people have to commute elsewhere to work.
- 6.198 Sidbury has a reasonably good range of community facilities for its size, including a primary school, shop, pub, and sports pitch. There is also an hourly bus service running to the larger settlements of Honiton to the north and south to Sidmouth. The A375 runs through the centre of the village.
- 6.199 The East Devon AONB washes over Sidbury, and the floodplain associated with the River Sid runs along the east. A conservation area, with numerous listed buildings, covers a large part of the centre of Sidbury.

Key messages from the Neighbourhood Plan for the area

- 6.200 The village of Sidbury is covered by the Sid Valley neighbourhood plan, for the parished area of Sidmouth, 'made' in late 2019. The plan's vision is to maintain and promote the rural and coastal beauty of the setting and local distinctive character of place, whilst encouraging a vibrant and more balanced and self-sustaining community and economy, and supporting appropriate change that will bring local benefit and tackle key issues such as lack of affordable housing. In respect of Sidbury specifically, the plan is concerned with preventing settlement coalescence with Sidford and identifies a "Sidford-Sidbury Non-Coalescence Area". The possible site for allocation (overleaf) is not within this area.

Suitability for development

- 6.201 The availability of a decent range of community facilities and services make Sidbury an appropriate place in principle for a reasonable level of development. However being located entirely in the AONB limits the potential for new development. In addition, the lack of dedicated footpaths in the village make it challenging for pedestrians, particularly along the A375 which gets busy at times and can be a safety hazard for walkers. The lack of jobs in the village mean the scale of housing should also be limited to minimise the potential for unsustainable commuting patterns.
- 6.202 Assessment has been undertaken of HELAA submissions sites to consider their scope for accommodating future development. Sites that were submitted for consideration are shown on the map below/over the page alongside preferred allocations.



Stoke Canon

What the settlement is like

- 6.203 Stoke Canon is a village with a population of around 670 with a small range of services and facilities. About 29% of residents are aged 65 or over (below the East Devon average of 30%), with 13% aged between 0-15. There are some 337 economically active people and an employment density of 1.76, which shows that there are more jobs than workers due to the nearby water treatment works.
- 6.204 Stoke Canon has a limited range of strategic, but a good range of local services and facilities including a shop and primary school. Although rural and attractive including a number of listed buildings, it is outside the AONB.
- 6.205 Despite this, it suffers from considerable flooding issues from the River Exe, with the entirety of the village covered by flood zones 2 or 3.

Key messages from the Neighbourhood Plan for the area

- 6.206 There is currently no neighbourhood plan for Stoke Canon and no designated Neighbourhood Area.

Suitability for development

- 6.207 In principle, Stoke Canon is a reasonable location for a small amount of development given it contains a range of services and facilities.
- 6.208 However, no suitable sites have been found in Stoke Canon and given the flooding issues experienced in the village it is unlikely that a suitable site can be identified.

Tipton St John

What the settlement is like

- 6.209 Tipton St John is located between Ottery St Mary and Sidmouth and has a linear form, having grown up around a crossroads. The southern half lies within the East Devon Area of Outstanding Natural Beauty. The River Otter has a wide floodplain at this point and the village school lies within it, and so is liable to flood. The County Council are exploring options to relocate it elsewhere in the Parish.
- 6.210 Tipton St John has an older than average population, with around 40% of residents being retired and 289 residents of working age.

Key messages from the Neighbourhood Plan for the area

- 6.211 The village of Tipton St John is covered by the neighbourhood plan prepared jointly for the parishes of Ottery St Mary and West Hill, which was made in 2018. Given the level of residential development consented in recent history, the plan did not seek to make any allocations in the majority of the settlements it covers. In respect of Tipton, the stated rationale was that housing needs were already met and exceeded through the grant of permission for a significant development there, and this provides an element of future proofing. The plan was also prepared in the context of the village being considered as open countryside in the adopted Local Plan, with no defined settlement boundary, so the introduction of a settlement boundary would in itself be a key shift.
- 6.212 The plan does, however, recognise Tipton as one of 2 'principal villages' within its area, alongside Alington, and as having 'good local facilities'. Several green spaces at Tipton are included in areas formally designated by the plan as Local Green Spaces to give a high degree of protection from development, none of which under consideration for potential allocation. Flooding issues including those affecting the school, and also the playing fields, are highlighted. The anticipated relocation of the school is also noted and allowed for, and support is expressed for the implementation of the strategic foot/cycle route from Sidmouth to Feniton, via Tipton St John.

Suitability for development

- 6.213 Tipton St John is a settlement which is suitable for a very small scale of additional development due to its rural location (accessed along unlit, unpaved rural lanes), topography, tendency to flood and high landscape quality. However, no suitable sites have been submitted at this time.

Uplyme

What the settlement is like

- 6.214 Uplyme is a quite substantial village on the south easterly edge of East Devon abutting the Dorset and its town of Lyme Regis. Whilst Uplyme itself is home to a good range of services and facilities the neighbouring centre of Lyme Regis, which is an important coastal tourism town, has a far greater range of services.
- 6.215 Uplyme is set in a dramatic valley and hillside setting and is washed over by the East Dev AONB. This AONB also abuts the Dorset AONB which washes over Lyme Regis and is also of national landscape importance.

Key messages from the Neighbourhood Plan for the area

- 6.216 Uplyme is covered by the neighbourhood plan for the whole parish of Uplyme, 'made' in 2017. The plan seeks to preserve and enhance the assets and qualities of the area, whilst also responding to community support for some development to meet identified needs and further its sustainability. In supporting a 'modest' level of housing development, particularly affordable housing, the plan includes allocations for three sites for rural exception schemes (for a combined total of up to approximately 20 dwellings), adjacent/close to its built up area boundary. The plan seeks to benefit the local economy, including through support for live-work units and conversions for business use, as well as being encouraging of the expansion of community facilities, new and improved recreational and educational provision, and community-scale renewable energy. A range of schemes are also supported to address issues highlighted with pedestrian and traffic movement.
- 6.217 Overall, in the context of a desire to maintain the character and setting of Uplyme, the plan seeks development at a scale which reflects incremental historical levels of growth. As part of this, local green spaces/corridors within Uplyme are identified for special protection and support lent to the designation of a conservation area here..

Suitability for development

- 6.218 The range of services and facilities in Uplyme and close by in Lyme Regis point to potential good in-principle reasons for the village to accommodate development. However, landscape constraints are significant and there is very little land in and around the village that would naturally lend itself to being built on. Indeed, no suitable sites have been submitted in the village at this time.

Westclyst

What the settlement is like

6.219 Westclyst is a settlement on the western edge of the district. Although within East Devon, it is situated adjacent to Pinhoe in Exeter and therefore has access to the wide range of facilities located there alongside a new primary school. The area has experienced significant development in recent years and formed an important feature of the development strategy in the previous Local Plan.

Key messages from the Neighbourhood Plan for the area

6.220 Westclyst and immediate surroundings fall largely within the parish of Broadclyst, the whole of which is the subject of an emerging neighbourhood expected to be formally submitted in December 2021. This plan is therefore likely to be progressing through the final stages of plan making alongside and ahead of the new Local Plan.

6.221 The latest working draft of the Submission Plan is available on the Parish Council website (dated August 2021). It refers to the significant and rapid strategic growth the area has seen under the current Local Plan, which will make Westclyst a larger settlement than Broadclyst Village. It comments on the pressures on services and infrastructure and changes in nature/feel of the area that this has brought.

6.222 Whilst also wanting to generally see local character and landscape of the parish protected and enhanced, the plan is however anticipated to put forward propose multiple sites for development of various kinds (housing, employment, community facilities, mixed use) in locations across the parish. This strategy furthers the vision to continue to 'develop and thrive' and meet the 'changing and diverse needs' of its 'rapidly growing community' at the centre of its vision.

6.223 Although no development sites are expected to be promoted at Westclyst itself through the plan, the draft Submission version does contain various policy clauses and aspirations relating to the Westclyst area specifically, including:

- Support for provision of active travel links within and beyond the parish connecting to/from Westclyst.
- Support for infill for self-build development in the established settlement
- Protection of several wooded areas as 'green corridors'
- A requirement for development proposals to enhance the urban landscape through greening and biodiversity measures.
- To suggest it might be a suitable location for a workhub development.

Suitability for development

6.224 In principle, given the range of accessible facilities and proximity to Exeter the area would be an appropriate location for future growth.

6.225 However, although development at Westclyst was a feature of the existing local plan and in principal could accommodate further development, no suitable sites have been presented and so it is not considered appropriate to make any allocations at this point in time.

DRAFT

West Hill

What the settlement is like

- 6.226 West Hill is a large post-war village characterised by large, detached houses in spacious plots interspersed with numerous trees and woodland and winding, often narrow, access roads serving small groups of houses. Facilities are limited and are located centrally in the northern third of the village, meaning that some houses are over a km away, along unlit and unpaved roads.
- 6.227 The population of West Hill is around 2000 residents, with 36.5%, a higher than East Devon average, being over 65. Around 2/3 of workers commute out of the village to work.
- 6.228 Many of the houses in West Hill are amongst the most expensive in East Devon and, if new housing is to redress the balance, there is a need for smaller, more affordable dwellings for families and existing older residents wishing to downsize.

Key messages from the Neighbourhood Plan for the area

- 6.229 West Hill is covered by the neighbourhood plan jointly prepared for the parishes of West Hill and Ottery, 'made' in July 2018. The plan articulates a community concern about the volume and design of new housing development consented in the period leading up to the adoption of the existing Local Plan, and the need to ensure the response to on-going development pressure is balanced and local character is not eroded. The Plan's vision sets out a desire to ensure any new developments are appropriately sited, well related and contribute positively to the locality, meeting local needs and ensuring delivery of all necessary infrastructure.
- 6.230 The plan sets an overall objective for West Hill to, "Protect and maintain the unique character and special qualities of West Hill, whilst enhancing the settlement's sustainability." The special qualities are summarised as its 'unique low density wooded character'. To preserve this, the plan seeks to resist infill development that reduces tree coverage and distances between neighbouring properties, applying a criteria-based approach, and includes detailed design policies, informed by the adopted Village Design Statement Supplementary Planning Guidance. It is notable that the first criteria of the West Hill Design Policy is for new development to maintain the existing low density pattern. The plan also designates a number of formal Local Green Spaces at West Hill which provide a high degree of protection from development, and identifies a range of key views for protection in and around West Hill.
- 6.231 Importantly, the plan is particularly concerned with containing the settlements of West Hill and Ottery as separate entities, and includes a policy to resist developments that would compromise this. It specifically cites that land to the east and north of West Hill, beyond the built up area boundary in the adopted

Local Plan, are not supported for development, or at least not without particular prescribed conditions being met.

- 6.232 The plan also seeks the provision of a safe pedestrian/cycle link between West Hill and Ottery and more formal open/recreation spaces to serve West Hill, both of which are evidenced as currently lacking.

Suitability for development

- 6.233 West Hill is a large village, located close to the A30, with easy access to Ottery St Mary. It is a suitable location for additional development and the form and layout offers opportunities for inobtrusive infilling and rounding off. It is located outside any designated landscape but the high numbers of mature trees and hedgerows create a distinct woodland character that would need to be retained in any development. The shops and school are located to the north of the settlement, and for accessibility reasons this is likely to be the focus for new development.
- 6.234 The current style and type of housing is eclectic but characterised by substantial detached houses and bungalows in large plots. New development could offer an opportunity to redress the balance and introduce some smaller, more affordable, houses whilst recognising the importance of new tree planting and screening to retain the 'woodland character'.



Whimble

What the settlement is like

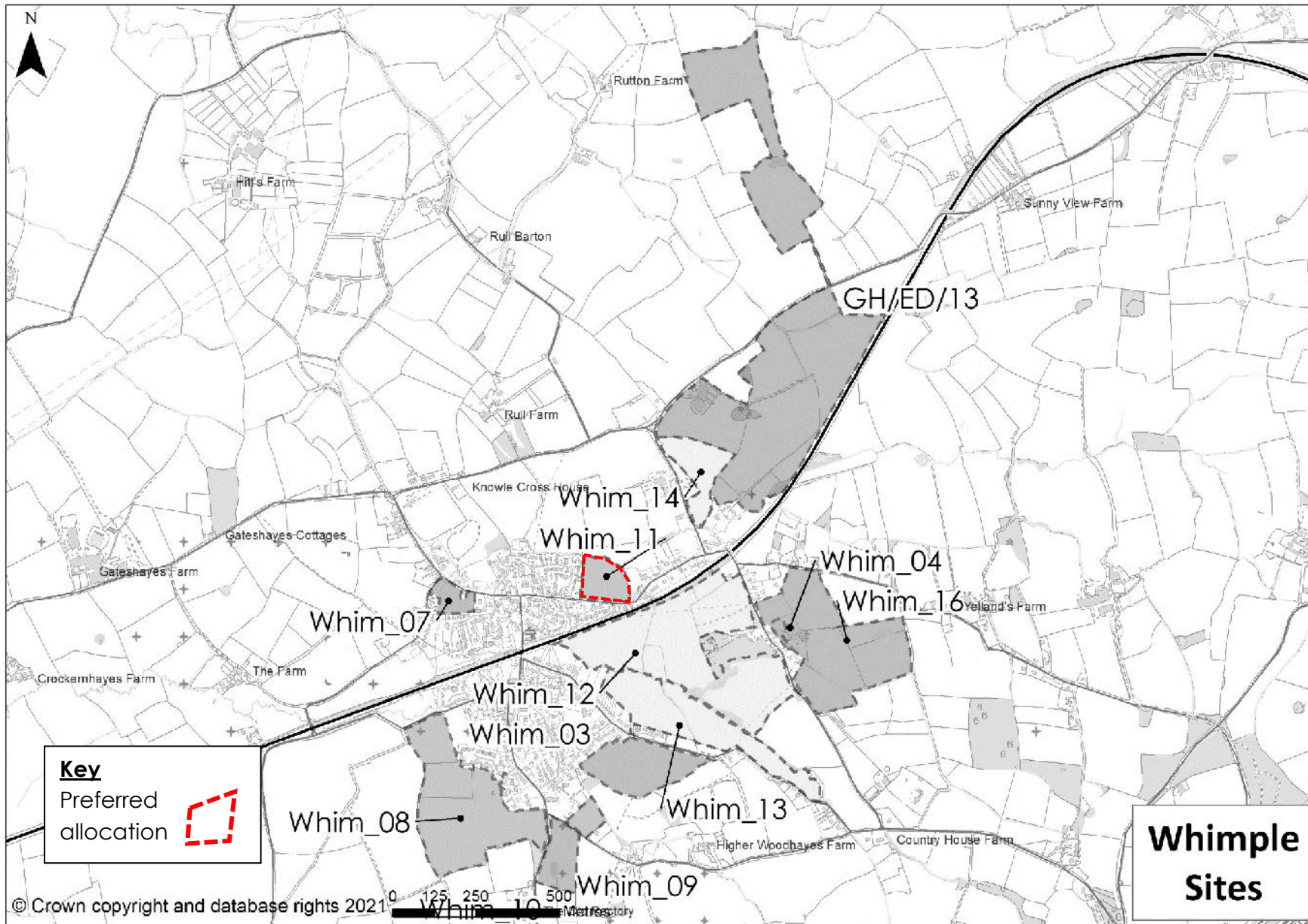
- 6.235 Whimble falls towards the western side of East Devon. The Exeter-Waterloo railway line runs through the village with part of its historic built core, and it's designated Conservation Area, lying to the south of the railway line and a small part to the north. There is a railway station in a north-easterly part of the village.
- 6.236 The village has expanded outward from its historic core over much of the second half of the 20th century to establish what is now a quite large village with a range of services and facilities.

Key messages from the Neighbourhood Plan for the area

- 6.237 There is no neighbourhood plan for Whimble currently. However, the whole parish of Whimble is designed as a neighbourhood area and work has recently recommenced on preparation of a neighbourhood plan. This is picking up from a community survey undertaken in 2018 and with further community consultation taking place in November 2021. The Steering Group has an aspiration for the neighbourhood plan to be in place as soon as possible and to be taken account of in the preparation of the Local Plan.

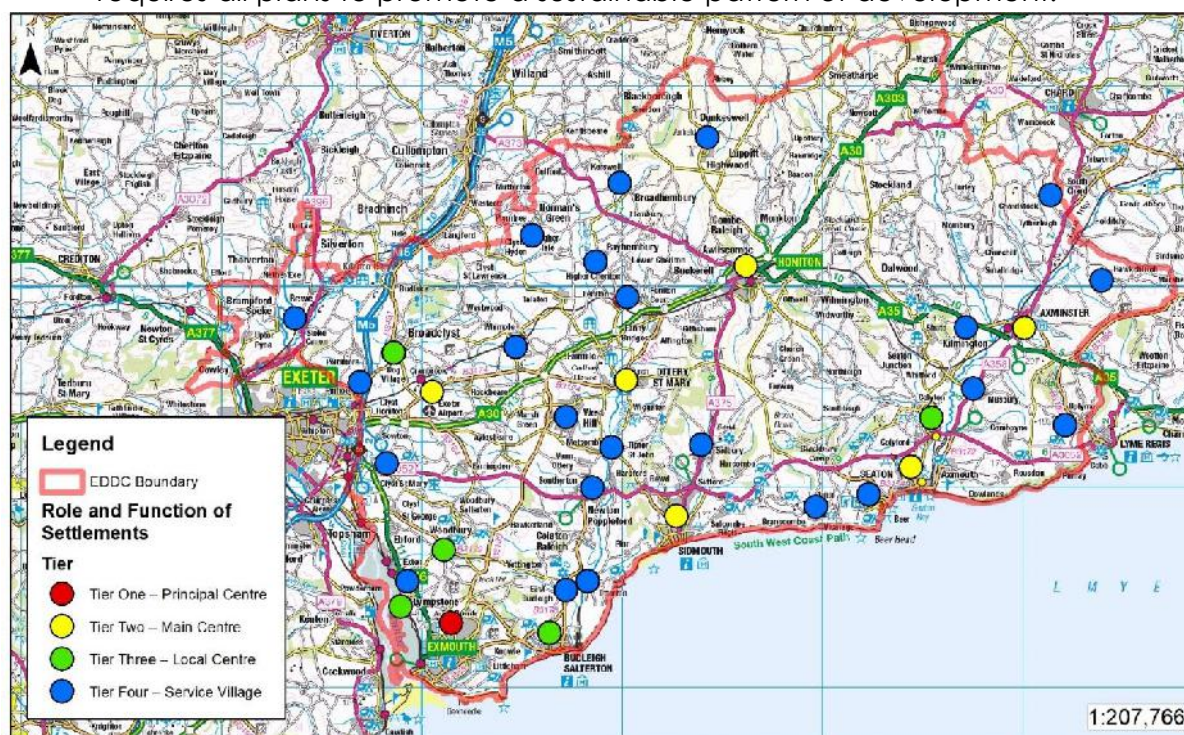
Suitability for development

- 6.238 Proximity to Exeter and the presence of a railway station are positive factors in respect of potential suitability for future development. However there are narrow lanes in and serving the village and also much heritage sensitivities on respect of its historic core.
- 6.239 Assessment has been undertaken of HELAA submissions sites to consider their scope for accommodating future development. Sites that were submitted for consideration are shown on the map below/over the page alongside preferred allocations.



Chapter 7 - Development in small villages, hamlets and the countryside

6.240 East Devon is a largely rural district, noted for its outstanding natural environment. Our plan strategy is to direct growth to the Tier 1 to Tier 4 settlements as indicated on the following map. This is in line with the NPPF, which requires all plans to promote a sustainable pattern of development.



6.241 It can be seen from the map that there is a good 'spread' of tier 1 to 4 settlements in the western half of the District and also in coastal areas and to the south east. In these areas the identified settlements are capable of providing a very local focus for growth for the surrounding areas of 'countryside'. In the area to the east of Honiton there are relatively large areas that are more remote from tier 1 to 4 settlements. Here villages tend to be very small and accessed by a network of single track lanes, notwithstanding the two trunk roads that bisect the area. The character of this area, quality of AONB landscape and lack of services and facilities are good reasons not to direct strategic levels of development to this area.

6.242 In the smaller villages not identified as tier 1 to 4 settlements, the hamlets and areas of 'countryside' development will be limited to what is specifically allowed through policy, such as rural workers dwellings. Additional development may come forward through neighbourhood planning, which is very active in East Devon, with 21 'made' plans and at least 13 more at various stages of plan preparation.

24. Strategic policy - development in small villages, hamlets and the countryside

The settlements identified as tier 1 to tier 4 will provide the main focus for growth in the surrounding areas. Outside of the tier 1 to tier 4 settlements development will be more restricted, but will be allowed in the following circumstances:

- If included in a made neighbourhood plan;
- If it is community led development that can justify how and why, in a local context, it is sustainable development;
- It is considered to be an 'exception' specifically allowed through a policy in the plan. This would cover the circumstances listed in paragraph 80 of the NPPF (an essential need for a rural worker; there are heritage benefits; redundant or disused buildings would be enhanced; the development involves subdivision of an existing residential dwelling; or the design is of exceptional quality)

In addition policies in the plan will allow for some

- diversification of rural businesses
- delivery of affordable housing to meet local needs in certain circumstances
- some tourist related development
- roll back of some houses at imminent risk of coastal erosion
- live work developments in some circumstances

Currently rejected alternative approaches to development in small villages, hamlets and the countryside

Option b – Allowing more development in small villages, hamlets and the countryside

We could take a more relaxed approach to allowing development away from the Tier 1 to Tier 4 settlements, but this would not be supported by the evidence in the 'Role and Function of Settlements' study. It would also be difficult to justify if tackling climate change is at the heart of our plan – we need to be minimising development in locations that would hasten climate change by promoting unsustainable travel patterns

Option c – Allowing less development in small villages, hamlets and the countryside

We could take a more restrictive approach and reduce the opportunities for development away from the Tier 1 to Tier 4 settlements, although we would need to keep the exceptions set out in national policy (paragraph 80 of the NPPF). This approach is not recommended as it could stifle neighbourhood planning and economic opportunities for our more rural communities.



DRAFT

Chapter 8 - Tackling the climate emergency and responding to climate change

"I want you to act as you would in a crisis. I want you to act as if the house was on fire—because it is"- Greta Thunberg.

Reducing emissions and promoting zero carbon development

- 7.1 The climate is in crisis. The latest warnings from the 2021 IPCC sixth assessment report⁷ are stark. Human-induced climate change is already affecting many weather and climate extremes in every region across the globe, the atmosphere and seas are warming at rates unprecedented in human history, and some of the consequences are irrevocable. Time is running out and these trends are set to continue without drastic cuts in carbon emissions in the next decade. **It is clear that now is the time for bold collective action.**
- 7.2 No organisation or individual is exempt from responsibility, and in 2019 the Council declared a climate emergency where it committed to become carbon neutral by 2040. The Local Plan has a key role to play and it is imperative that we go further than ever before by introducing a suite of ambitious and implementable policies which addresses the severity of the crisis that we are all facing.

25. Strategic Policy – Climate Emergency

This proposed overarching strategic policy will bring together the threads of the following policies in the chapter. It will require that developments support East Devon becoming carbon neutral by 2040, through:

1. Delivering net-zero development;
2. Maximising opportunities for delivery of renewable energy, district heat networks, zero-carbon energy and energy storage facilities; and
3. Calculating the impact of embodied carbon and retaining existing buildings where possible.

- 7.3 This is an overarching policy which sets a target of achieving carbon neutrality in the District by 2040, in line with the Council's declaration of a climate emergency. This is an important policy because it provides an overarching target which all subsequent policies are catered towards meeting. The subsequent policies in the chapter provide more specific deliverables as to how the overarching policy will be met.

⁷ IPCC, 2021, Sixth Assessment Report, <https://www.ipcc.ch/report/ar6/wg1/>

Currently rejected alternative approaches to the climate emergency policy

Option b – Don't include a policy

Given much of the content is covered in greater detail a reasonable option would be not to include a policy at all. However, inclusion of a policy with an overarching target follows good practice guidance released by the TCPA and the RTPI⁸. It also allows a fallback position should any subsequent policy be removed at examination.

Option b – Include a different target

More or less ambitious targets were considered, although these were rejected as they were not in line with the overarching climate declaration made by the Council.

DRAFT

⁸ TCPA, RPTI, 2021, a guide for local authorities on planning for climate change, <https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=ebf95a2f-490a-43ce-b2d0-73acb9b8b4fd>

26. Strategic Policy – Net-Zero Carbon Development

Proposed policy will require that all new residential and commercial development will deliver net-zero carbon emissions. Developers would be required to submit a “carbon statement” to demonstrate how this will be achieved, in accordance with the energy hierarchy.

In addition, homes will be required to be future-proofed to avoid temperature discomfort as a result of rising temperatures.

There will also be requirements to maximise opportunities for renewable energy, and ensure that in-use energy performance is as close as possible to design intent.

Finally, there will be a requirement for major development to calculate the whole life-cycle carbon emissions, through a nationally recognised Whole Life Cycle Carbon Assessment.

- 7.4 Perhaps one of the most fundamental and recognisable ways of reducing carbon emissions through planning is to ensure new developments are constructed to be as energy efficiency as possible.
- 7.5 Evidence undertaken to support the GESP suggests that new development should be planned to follow the “energy hierarchy”, which prioritises improvements to the fabric of buildings above off-site or on-site implementation of renewable energy. The logic being that once a building is constructed it becomes much harder and more expensive to improve its fabric, whereas renewable energy generation can be retrofitted much easier.
- 7.6 One issue that has been identified is the “performance gap”, i.e. the gap between designed and actual performance. And policy seeks to address this. One possible way is by requiring 10% of buildings on major developments to send energy performance and carbon emissions data to the local planning authority for a period of 5 years although this requires further investigation.
- 7.7 The energy hierarchy is laid out as follows and forms the basis for interventions that developers will need to prioritise to ensure the net-zero target is met.

Figure xxx: The Energy Hierarchy



Currently rejected alternative approaches to requiring net-zero carbon development

Option b – Require a higher standard

An approach could be taken to require a higher standard of development, conforming for example to the more strictly defined and less flexible passivhaus. However, we have little evidence to suggest that all development could viably meet this standard. This will be explored in viability work going forward.

Option C – Plan for net-zero carbon from a future date

An approach could be taken to require 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 maybe get other community benefits from development. However, it would be difficult to evidence a particular year when these requirements should come into force. In addition, the plan will take a number of years to adopt so there is already a reasonable lead-time built into the policy.

Option D - Leave it to national policy.

A reasonable option could be to leave energy efficiency standards to national policy and the proposed requirements under the future homes standard. This may see these requirements administered through the building regulations. However, there are no guarantees that this will come forward in the timeline envisaged and so this is not the preferred option. Even if they are brought forward through building regulations there may be options to promote enhanced standards through the planning regime and so it is appropriate to continue to pursue these.

27. Strategic Policy – Promoting renewables and zero carbon energy

This policy will support the development of zero carbon and renewable energy schemes within the District. It will also encourage the use of community-led schemes and promote their use within Neighbourhood Plans.

It will only support development of non-renewable forms of energy generation where it can be demonstrated that there are clear and compelling circumstances that generates the need for the proposal and that all reasonable opportunities for using renewables have been exhausted.

Ensuring that as much of our energy as possible comes from zero carbon sources will play a crucial role in achieving climate objectives. Renewable energy makes up an ever-increasing proportion of energy supply and this is a trend which is set to continue. This policy will provide general support for renewable and zero energy schemes across the District and a framework that only allows non-renewable schemes to come forward in exceptional circumstances.

Currently rejected alternative approaches to renewable energy

Option B – a more restrictive approach

Given the potential impacts of these technologies e.g. on landscape we could take a more restrictive approach, however this will likely conflict with national policy and would not reflect the Council's priority to tackle the climate emergency.

28. Strategic Policy – Suitable areas for solar energy developments

Policy will set out areas within the district where solar photovoltaic development would be supported, subject to their being no unacceptable impact on amenity, landscape, heritage and biodiversity.

Proposals will also be expected to demonstrate biodiversity net-gain.

29. Strategic Policy – Suitable areas for wind energy developments

Policy will set out areas within the district where wind energy will in principle be supported, subject to their being no unacceptable impact on amenity, landscape, heritage and biodiversity.

- 7.8 The scale of resource available for solar energy within East Devon is vast and despite some schemes coming forward, remains largely untapped. The intention of this policy will be to create an environment which gives certainty to the industry as to where schemes will be acceptable, which should translate into a greater number of schemes coming forward.
- 7.9 Government guidance also requires that in order for on-site wind energy to come forward at all, suitable areas need to be identified in the development plan. Whilst the scale of development suitable for development is far more constrained than solar, there are still some areas of potential.
- 7.10 The maps below showing suitable areas for solar and wind energy have been produced as part of the Low Carbon Study. They exclude the most sensitive areas of the District, such as AONB, greenspace, heritage and natural features. It should be noted that the proposed maps do not exclude areas on the basis of 2 km proximity to grid connection as connection can be achieved beyond this range. Also not factored into the mapping is agricultural land classification as reliable information does not exist for the vast majority of the district. A full outline of how the layers were formulated can be found in the Low Carbon Study. Further refinement can be made to the mapping as we proceed with the plan and the intention will be to include an interactive map to allow people to zoom in to see certain areas more clearly.
- 7.11 The policy does not intend to cover retrofitting existing residential and commercial buildings with solar panels as this can largely be achieved through permitted development rights. Where there are schemes that fall outside what is allowed under permitted development, these would be covered under policy 27.

Currently rejected alternative approaches to solar and wind energy

Option B – create a presumption in favour of development within identified areas

Given the scale of crisis, a reasonable option could be to create a presumption in favour of wind and/or solar energy which would give greater certainty to the industry as to where schemes would be permitted and therefore would likely result in more schemes coming forward. This was initially officer's favoured approach, although this was rejected following the concerns expressed by councillors about the potential landscape impact of such an approach.

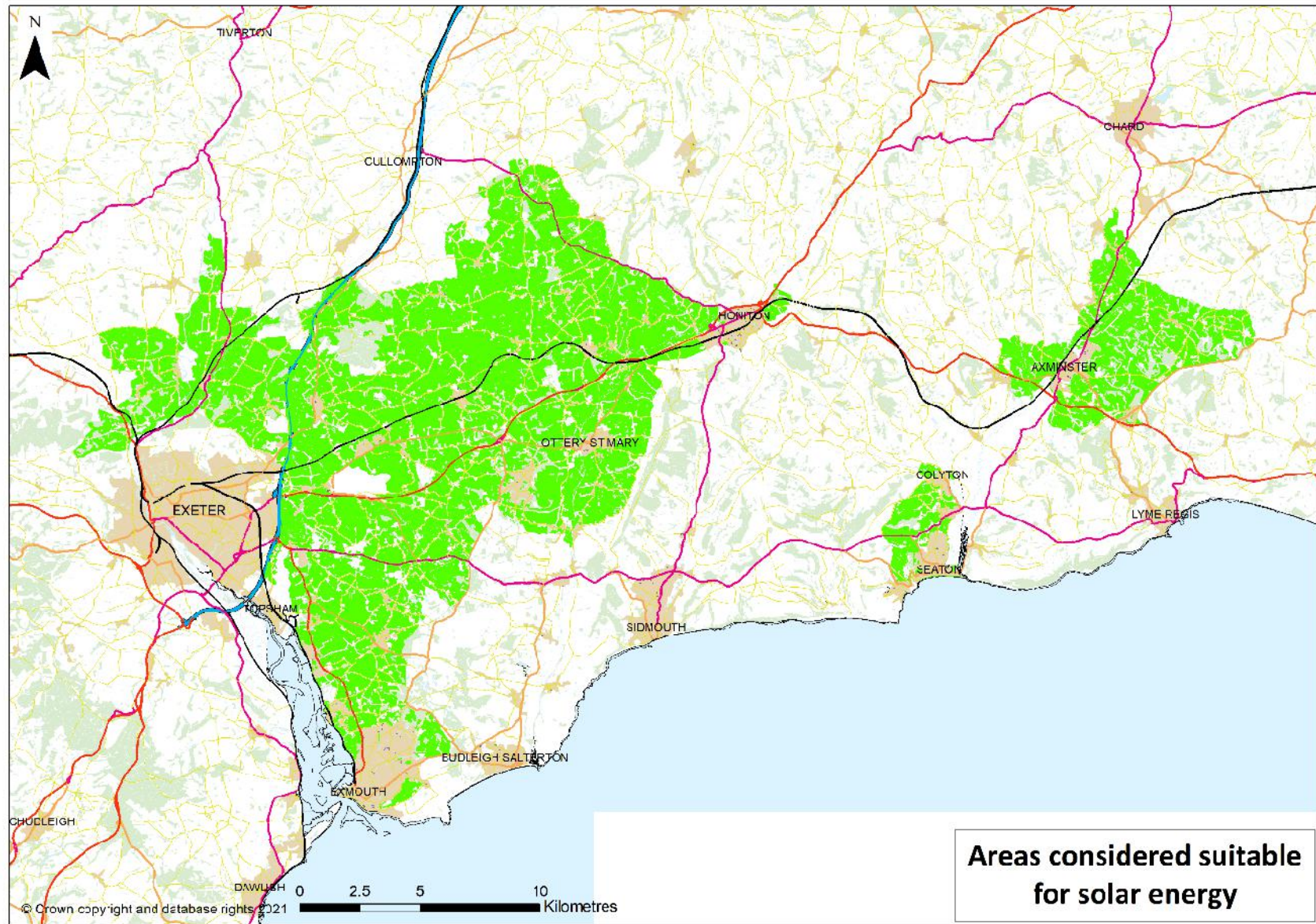
Option B – a general policy of support

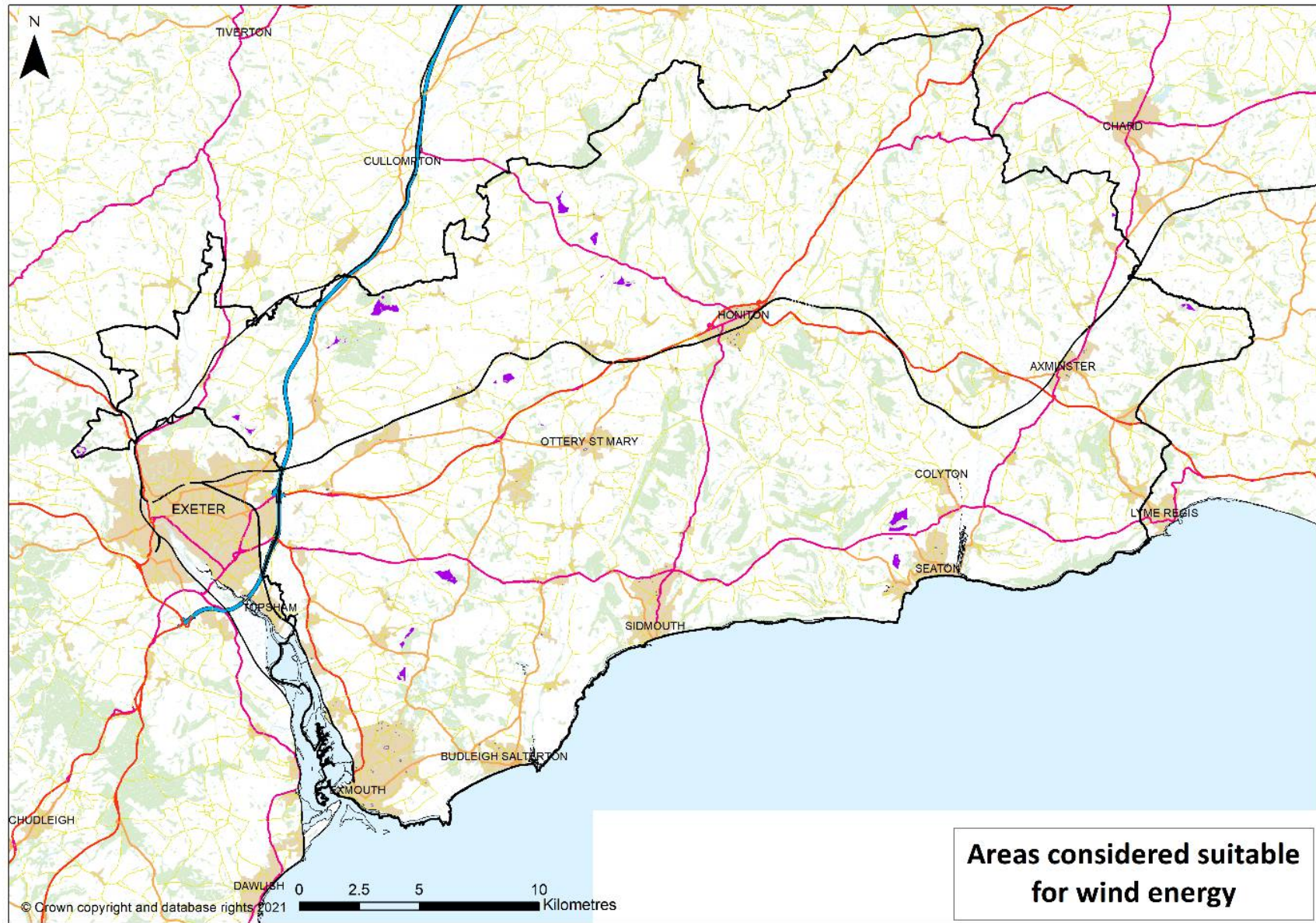
An approach could be taken to have a general policy of support rather than identifying areas. However, it was felt that this would not reflect the ambition to properly tackle the climate emergency or provide enough certainty to the industry.

Option C – Have a more restrictive policy

Given the potential impacts of these technologies e.g. on landscape we could take a more restrictive approach, however this will likely conflict with national policy and would not reflect the Council's priority to tackle the climate emergency.

DRAFT





30. Strategic Policy – Energy Storage

This policy will set out that proposals for renewable and zero carbon energy storage systems will be supported in principle. A certain number of criteria will need to be met with respect to mitigating landscape impacts, not having an unacceptable impact on heritage or Natura 2000 sites and not emitting excessive noise which would harm amenity for nearby residents.

- 7.12 Energy storage will be an essential part of speeding up the replacement of fossil fuels with renewable energy. Battery storage systems will play an increasingly pivotal role in responding to changing electricity demands, particularly as we make the transition from petrol to electric vehicles.
- 7.13 Storage encompasses a wide range of technologies. Lithium-ion batteries and pumped hydro- electric are the dominant technology types for storage schemes at present. Favoured locations have tended to be close to a suitable sub-station in order to provide grid services. In addition, storage co-located with renewables is an emerging business model that may see more uptake in the near future.



Figure 8: Example battery storage facility

Currently rejected alternative approaches to energy storage

Option B – Identify suitable areas

An approach could be taken to identify suitable areas for energy storage facilities to provide greater certainty, however, the impacts of such facilities are more obscure and may vary depending on the proposal and so it is considered more appropriate to have a more general policy of support.

Option C - Have a more restrictive policy

Given the potential noise impacts that the facilities have we could take a more restrictive approach, however this will likely conflict with national policy and would not reflect the Council's priority to tackle the climate emergency

DRAFT

31. Strategic Policy – Heat Networks

This policy will require that where development is proposed within 1km of an existing heat network, connection will be required for major development. In addition, where no new heat network currently exists, a new heat network should be deployed for proposals above 1,200 homes or 10 ha of commercial floorspace.

- 7.14 In Denmark 60% of heating in homes is supplied using district heat networks. These have been remarkably successful in producing a low cost and highly efficient heat supply. In the UK, heat networks are still in their relative infancy and whilst there are currently only a few examples, the Committee on Climate Change (CCC) suggest that 20% of heating will need to come from district heating by 2050 if climate targets are to be met⁹.
- 7.15 East Devon is well placed to embrace this trend, with networks already operating at the west end of the District at Cranbrook and Monkerton in Exeter.
- 7.16 The GESP low carbon study considered the location of many large users of electricity and heat within the district that could potentially present opportunities for matching heat supply and demand, or otherwise incentivise the formation of a district heat network, so that this energy would not be wasted. It also provides an evidence base suggesting that any large scale development over 1,200 or 10ha of dwellings should investigate the potential to deploy a heat network.
- 7.17 The Local Plan will likely be making large scale allocations within the District to meet housing requirements and these will present opportunities to utilise waste heat and connect to existing networks to increase their efficiency and reliability.

Currently rejected alternative approaches to district heating

Option B – Not pursue district heating

We are mindful that there have been a number of issues and negative publicity with district heating systems in the area and an alternative approach could be to not pursue these as a means of heating properties in larger scale developments.

However, this would go against the evidence which suggests that this is the most cost effective and efficient way of heating larger scale developments. It should be remembered that district heating systems are in their relative infancy in the UK and issues with new technologies tend to resolve over time as they become more

⁹ The future of heating in UK buildings, [Infographic - The future of heating in UK buildings \(theccc.org.uk\)](https://theccc.org.uk)

widespread, District heating has been deployed effectively and at scale in other European countries.

DRAFT

32. Strategic Policy – Embodied carbon

This policy will require developers to retain existing buildings, or at least their foundations unless it can be demonstrated that refurbishment is either unviable or impractical. Replacement of existing habitable buildings will only be supported in exceptional circumstances and will need to demonstrate that the full lifecycle carbon emissions will be net-zero.

- 7.18 There is an increasing realisation and awareness of the environmental impact of producing the materials required for construction. Making steel, concrete and bricks for buildings creates a vast amount of CO₂, with concrete alone causing 8% of global emissions. Indeed, The Royal Institution of Chartered Surveyors (RICS) estimates that 51% of the lifecycle carbon from a typical residential dwelling is emitted before the building is even occupied. The figure for office development is 35%¹⁰. Much of that energy goes below the ground into the foundations of the buildings.
- 7.19 A recent report steered by the Royal Academy of Engineering has urged for existing buildings to be left standing rather than demolished¹¹ and the Government has committed to producing a building strategy which will be looking to tackle this issue.
- 7.20 Examples of exceptional circumstance could be that the footprint of the existing building is impractical for the proposed use or the density of development is to be greatly increased as a result of the proposed development.

Currently rejected alternative approaches to embodied carbon

Option B – Do not have a policy

There is an option not to include this policy, given the NPPF does not lay out any specific requirements in relation to embodied carbon and evidence is still emerging. However, given the potential scale of the problem and how it is a marked change from the existing approach it has the potential to have a large impact, and matches the Council's ambition to be forward-thinking and tackle the climate emergency.

¹⁰ Whole life carbon assessment for the built environment, RICS, 2017, <https://www.rics.org/globalassets/rics-website/media/news/whole-life-carbon-assessment-for-the-built-environment-november-2017.pdf>

¹¹ Decarbonisation construction: building a new net zero industry, Royal academy of engineering, 2021, <https://www.raeng.org.uk/publications/reports/decarbonising-construction-building-a-new-net-zero>

Adapting to environmental changes and managing environmental hazards

7.21 Flood risk, coastal change, water supply and pollution are related to dynamic natural systems but can also be affected by human activities. For example, development upstream can increase the likelihood of flooding downstream or industrial processes can pollute drinking water supplies. We need to understand and plan for environmental change, aspects of which are likely to be exacerbated by climate change.

Evidence

7.22 To inform work on the environmental challenges the local plan needs to confront, we are producing evidence that will inform our approach and policies. Work on a level 1 strategic flood risk assessment has started and flood risk has been taken into account when proposing potential allocations. We have undertaken some initial work on the water cycle. This indicates that, whilst there are no overarching water related constraints to the expected levels of development, there are locations where development could be constrained by flood risk, water supply and water quality (in the lower Otter Valley) and potential impacts on the water quality of protected sites (particularly the River Axe).

7.23 We have been working with the University of Plymouth on a way to predict coastal erosion and flooding and have published a briefing [paper](#) and a topic [paper](#) on coastal change. Evidence to show all the areas potentially at risk of physical changes to the coast should be available early in 2022 and will be used to identify coastal change management areas (CCMAs) in accordance with the NPPF.

7.24 This is a highly complex topic and it is recommended that the local plan is supported by supplementary planning guidance to give more details of how the approach would work in practice. Links to the wider marine environment also need to be explored when preparing the local plan. The adopted South Marine Plan is similar to the local plan in terms of enabling sustainable development, but it covers activities within the marine environment such as off shore wind farms, fishing, and submarine cables.

7.25 The intertidal zone between the high and low water marks is where both land and marine planning systems overlap, but developments inland can also have the potential to have an impact on the marine environment. We will consider how the South Marine Plan and its policies can be taken into account in our local plan to identify any synergies or potential conflicts.

33. Strategic policy - Flooding

The policy will require development proposals to

- Meet the sequential and exception tests as set out in the NPPF;
- Avoid land required for flood management, including natural floodplains;
- Be safe over its lifetime, taking into account the increased risk of flooding due to climate change and without increasing flood risk elsewhere;
- Ensure that any flooding measures respond to the specific requirements of the site and respect the character and biodiversity of the area;
- Preferably reduce or at least not exceed existing run-off rates;
- Manage site surface water run-off as close to the source as possible.

7.26 There are areas of the District at risk from flooding from a variety of sources such as rivers and the sea in addition to local sources of flooding such as surface water. With climate change, the risks from these types of flooding are likely to be exacerbated. The NPPF makes clear that development should be directed away from areas at highest risk of flooding now and in the future.

7.27 We will have a strategic flooding policy and are likely to also include a Non-strategic policy to cover Sustainable Urban Drainage Systems (although there is already detailed guidance on this from Devon County Council, as Lead Local Flood Authority). Paragraphs 159 to 169 of the NPPF set out national policies on flooding and the approach that should be taken to flooding in local plans.

Currently rejected alternative approaches to flooding

Option B – Do not have a policy

We could rely on national policy on flooding contained in the NPPF, but it would be better to base our policy on detailed evidence in the Strategic Flood Risk Assessment when it is completed.

34. Policy – Coastal change management areas (CCMAs)

Applications for development within the CCMA would need to demonstrate that it would not result in an increased risk to life or any property. The evidence for this would be provided in a coastal change vulnerability assessment, which would be proportionate to the scale and nature of the development. The policy will also set out which uses will be acceptable within a CCMA – these are likely to be grouped according to the level of risk. For example, land likely to be affected within 20 years would only be suitable for temporary uses like car parks or beach huts, but land that was unlikely to be affected for more than 50 years would support a greater range of uses. There is guidance on this in the national planning [guidance](#)

7.28 The NPPF (paragraph 170) requires local plans to take account of the UK Marine Policy Statement and marine plans. It requires plans to reduce the risk of coastal change by avoiding inappropriate development in vulnerable areas and to identify coastal change management areas, known as CCMAs (paragraph 171). CCMAs are not necessary in areas where the Shoreline Management Plan policy is to 'hold the line' and there is evidence that this can be maintained over the lifetime of the plan. Generally, the centres of our main coastal settlements are defended and we anticipate that we will be able to provide evidence to demonstrate that we can 'hold the line'. The expectation is therefore that we will not need to identify CCMAs for any of our town centres. Paragraphs 172 and 173 of the NPPF set out the circumstances in which development will be appropriate in a coastal change management area. We will have policies that add to national policy and also provide greater detail through supplementary planning guidance.

Currently rejected alternative approaches to coastal change

Option B – have a 'blanket' policy without provision for a coastal change vulnerability assessment

We set out clearly in policy what would be acceptable or unacceptable and apply it without regard to the individual circumstances of an application, but this would be inflexible and potentially unfair.

35. Policy – Relocation of uses affected by coastal change

This proposed policy will enable the relocation of permanent homes, businesses or community facilities to areas where permission would not otherwise be granted, if there is a risk that they could be affected by coastal change within 20 years of the date of the application.

- 7.29 There is a risk that some buildings and uses may be lost to the sea within the plan period, although current evidence suggests that this is not likely to affect large areas. A 'rollback' policy is proposed to provide a flexible approach if the situation arises – it is similar to EN25 of the adopted EDLP.

Currently rejected alternative approaches to relocation of uses

Option B – Do not have a policy

We do not have to include a specific policy to allow 'roll back' as an exception to policy but, if we have reason to believe that significant numbers of uses/buildings will be lost to the sea within the plan period, it represents the simplest and most flexible approach. An alternative could be to 'reserve' land in some allocations to enable 'roll back'.

36. Strategic Policy – Development affecting coastal erosion

The proposed policy will set out that schemes that support sustainable coastal change management will be supported where compatible with coastal policy (as expressed in the SMP or a strategy such as a beach management plan). The impact of any scheme on the integrity of the World Heritage Site must be fully considered and if there is a conflict both the interests of protecting coastal communities and allowing erosion to continue will be recognised and impacts mitigated where possible. Schemes that are incompatible with coastal policy are unlikely to be supported.

- 7.30 The broad national and local approach to coastal erosion (as set out in the Shoreline Management Plan) is to defend the centres of the main settlements and allow natural processes to continue in the more rural areas. Large parts of our coastline are designated as a World Heritage Site, the outstanding universal value of which includes allowing natural processes to continue.
- 7.31 The adopted EDLP has a policy (Strategy 45) which seeks to balance potential conflicts by promoting improvements to coastal defences where compatible with the Shoreline Management Plan (or more detailed strategies such as beach management plans) but ensuring that the World Heritage Site is considered, recognised and any potential impacts mitigated. An example of where this policy would be relevant is in considering any application for rock groynes/islands as part of delivering a beach management plan at Sidmouth).
- 7.32 We propose to use Strategy 45 as the basis of a strategic policy in the new local plan, although it should be made clear that schemes that are not compatible with the SMP or relevant coastal plan/strategy will not be supported.

Currently rejected alternative approaches to coastal erosion

Option B – Do not have a policy

We could rely on national policy but, given the relationship between the world heritage site and coastal erosion it is considered best to address the issue directly through policy.

Other policies

We are likely to include additional development management policies on water supply, water quality and pollution, but will need to consider the emerging evidence base before formulating policy.

Chapter 9 - Meeting housing needs for all

- 8.1 People need homes not just for shelter, but for health and well-being. They need decent housing that they can afford to live in, where they can be warm, safe and secure, that provide stability and meet the household's needs now and as their needs change. The suite of nine preferred Non-Strategic housing policies support the preferred Strategic Policies on housing which address needs and delivery of the levels of future housing development. Those housing policies work in combination within the spatial strategy, focused on:
- Delivering housing provision through a range of dwelling sizes, types and tenures
 - Delivering more affordable homes; and
 - Achieving mixed and balanced places, which have access to services and amenities.
- 8.2 Their purpose is to guide development management decisions on development proposals related to housing uses. The 9 policies cover development, of Residential Dwellings (*Use Class C3*), Residential Institutions (*Use Class C2*), other housing such as Houses In Multiple Occupation (HMO) (*Sui Generis use*), and stationing of caravans for residential purposes for Gypsies and Travellers, and Travelling Showpeople (*Sui Generis use*)
- 8.3 Housing needs are diverse and change over time. The Non-Strategic housing policies are necessarily wide ranging. These policies are preferred because they address local issues relevant to East Devon and they fully reflect national planning policies, mindful of the test of soundness for consistency with national planning policies. They take account of the NPPF and the 24 May 2021 Written Ministerial Statement. Plan policies are also informed by national policy on housing, which is complex, particularly the approaches to widening housing choice across housing tenures. The policies address the Council's aspirations set out in the Council Plan, and the Council's Housing Strategy.
- 8.4 The policy outlines cover the housing matters which national policy requires the local plan policies to address. The intention is for the subjects of the bullet points in the policy outlines to evolve into policy clauses in the Regulation 18 Draft Plan for consultation. Mindful that policies will need to be clearly written and unambiguous, those clauses are the means to make it evident how a decision maker should react to development proposals for housing or loss of housing. The text highlights the matters where the LPA can shape aspects of local plan policy such as thresholds, percentages, locations, criteria, exceptions and exemptions. The text also briefly identifies where further evidence is needed.

Audit trail and use of evidence to justify housing policies

- 8.5 This subject is complex. A full explanation to justify each policy would be too much and too detailed for this document. It will be set out in a Topic Paper on housing policy. That audit trail document will draw on a wide range of evidence.

Affordable housing

- 8.6 Affordability and lack of sufficient affordable housing is a major issue in East Devon. Some people describe it as a housing crisis. We have a combination of high house prices, high private rents and a low proportion of social and affordable rent properties. With a high affordability ratio of 10.0, this is one of the highest in Devon, above the national average of 8.00 and the south west average of 8.76.
- 8.7 Additional affordable housing is needed particularly from newly forming, young households. National planning and housing policy, and the Council Plan are seeking to increase the delivery of affordable housing. The amount of affordable housing changes through losses from Right to Buy and demolitions, but also through stock additions and tenure changes.

37. Policy - Affordable Housing

This proposed Policy will need to address the following issues

Affordable housing required from Use Class C3 residential developments in East Devon, achieved by negotiation, through

- Expectation of on-site delivery, unless exempted by Government policy or guidance, or where offsite provision of equivalent value is justified by circumstances eg no registered provider is willing to manage the affordable units. Exceptional circumstances where a financial contribution to be accepted in lieu of on-site delivery provision
- Specifying site size threshold(s), differentiating between towns and rural areas, and stating where commuted sum is required
- Specifying circumstances where affordable housing provision will be sought
- Specifying percentage(s) of on-site affordable housing provision the Council will seek
- Seeking at least 10 percent of the total number of proposed homes on major housing development to be available for affordable home ownership
- Seeking at least 25 percent of affordable homes delivered through planning obligations to be First Homes (discounted market tenure)
- 20 percent of Build to Rent scheme to be affordable private rent homes provided on site at 20 percent discount, subject to negotiation and viability. All the homes on the scheme to be managed collectively by a single build to rent landlord
- Where proposal does not meet the targets, requirement for independent financial viability assessment to demonstrate why provision is not viable, or evidence why provision is not appropriate
- Overage clause in respect of future profits and affordable housing provision where levels of affordable housing fall below policy targets
- Arrangements to ensure affordable housing remains affordable, or clawback on long term, phased schemes if affordable housing is converted to another tenure
- Consideration of land gifted to the Council in lieu of affordable housing provision (subject to site threshold, equivalence provision, location, infrastructure availability)
- Support for community led housing/CLT/Cooperative proposals subject to criteria
- Use of different local connection tests for sites inside and outside settlements
- Use of parish groupings to assess affordable housing needs in rural areas
- Precluding artificial or contrived site subdivision and fragmentation that would circumvent requirement for affordable housing contribution
- Tenure blind and integrated development
- Commitment to producing a Supplementary Planning Document to set out details about how this Policy will be implemented

- 8.8 This policy focuses on affordable housing delivered through development. It supports the Strategic Policies on addressing housing need and affordable housing provision aligned with the local plan's vision, objectives and strategies. The policy is needed to help deliver at least 4,240 additional affordable dwellings in the plan period. This policy is complemented by policy on the types of 'exception housing' in the countryside aimed at extending the opportunity to deliver affordable housing in rural areas.
- 8.9 Some affordable housing will be delivered by Registered Providers. Currently these are primarily by Housing Associations. The District Council is exploring ways of increasing social and affordable housing. However, contributions from market housing development negotiated through S106 agreements are likely to remain the principal mechanism for delivering additional affordable housing for the foreseeable future.
- 8.10 NPPF defines types of affordable housing. The May 2021 Written Ministerial Statement (WMS) added First Homes as a new type. The preferred policies rely on those definitions.
- 8.11 The complicated plethora of affordable housing products and routes by which households can move from affordable to market housing, has widened and been updated by recent national policy. As well as Social Rent, Affordable Rent, Shared Ownership, Discounted Market Housing, Rural Exceptions, the local plan considers Rent to Buy, Build to Rent, and First Homes Exceptions Homes, as well as Self-Build and Custom Build housing.
- 8.12 All the issues listed in the preferred policy are raised in NPPF, the WMS and related PPG. The broad approaches to affordable housing in the policy reflect national policy. The main matters where the Council relies on a local policy component are:
- Some site size thresholds determining from which sites contributions are sought
 - Percentages of affordable housing sought from development by size and type, which may differ between locations specified by policy
 - Locational criteria, aligned to the plan's spatial strategy, where types of affordable housing will not be sought
 - Exceptional circumstances where proposals departing from policy may be considered
 - Local connection eligibility criteria, including use of parish groupings
 - Council commitment to producing an SPD guiding policy implementation

- 8.13 Justifying those local components relies on local evidence. The chief evidence is the East Devon Local Housing Needs Assessment (ORS 2020¹²). It assesses the scale of affordable housing need over the plan period as: 1,985 households who are unable to afford to buy or rent market housing (so require social rented housing): 515 households unable to afford market rent but who can afford affordable rent; and 1,470 households who can afford market rent but who aspire to and have sufficient resources for affordable homeownership (4,240 in total). Adding in those who aspire to homeownership but would not have sufficient resources would increase the overall housing need to 9,220 households.
- 8.14 Additional analysis and evidence will be required to justify the local components of policy:
- Overall plan viability assessment, testing the percentages, thresholds and site types
 - Updates to the LHNA
 - Assessment how much affordable housing the plan could deliver
 - Analysis of Council proposals for a 'step change' in social and affordable homes
 - Mix of affordable housing products in the District over the plan period
 - Local connection/eligibility criteria for affordable housing product types and locations
 - Historic use of overage clauses – and the outcome of their use
 - Changes to affordable homes as the result of loss through Right to Buy and other existing and new routes for moving from affordable housing to home ownership.
- 8.15 There will be potential alternative approaches to the percentage of on-site affordable housing. At this stage we do not have sufficient evidence to make even an initial recommendation and so it is not considered appropriate to consider alternative approaches at this stage. Options will need to be considered when the evidence is available

¹² East Devon Local Housing Needs Assessment
<https://eastdevon.gov.uk/papers/strategicplanning/201020bpitem9afinalhousingneedsineastdevonappendix%20orsaug2020.pdf>

Currently rejected alternative approaches to level of affordable housing provision and types

Option b – Provide for a different balance of types of affordable housing

Combining the need for at least 10% of all dwellings to be affordable home ownership (subject to exemptions) with at least 25% of affordable housing secured through planning obligations to be provided as 'First Homes', is a severe constraint imposed by Government policy. It constrains the extent to which the local plan policy on affordable housing can prioritise other forms of affordable housing delivered by development in support of the Council Plan.

Given the higher contributions needed to deliver Social Rent housing, and mindful that the plan should be aspirational but deliverable, then meeting the Council's ambitions towards delivering more Social Rent housing may be achieved:

- But constrained by accommodating other forms of affordable housing for meeting specific Government priorities; and/or
- Reducing the total amount of affordable housing delivered by development

Either way, the Council's aspirations towards affordable housing may be frustrated. The alternative of pursuing different priorities that depart from Government policy is likely to be a high risk approach to plan-making. This option is therefore rejected

DRAFT

38. Policy - Housing to meet the needs of older people

This proposed policy will need to address the housing needs of older people, setting out how the LPA will consider proposals for different types of housing that older people are likely to require, eg.

- Whether the plan should provide indicative figures or a range of the number of units of specialist housing for older people needed in East Devon in the plan period
- Quantifying the scale of provision in specific settlements
- Identifying broad locations at those settlements suitable for the development of C2 accommodation for older people and the criteria to be met
- Are Care/Extra care home proposals acceptable on local plan residential or mixed use site allocations?
- The approach to new specialist older persons housing - meeting identified need and demonstrating how design will address the needs of people including those with dementia and other long term health conditions
- Specifying site size thresholds where suitable on-site provision of C3 housing for older people will be sought as part of the market housing mix and affordable housing mix on proposed residential development
- Requirement for Care Needs Assessment evidence to justify development proposal's scale tenure and accommodation type
- Circumstances for seeking affordable housing accessible homes where there is a mix of C2 and C3 development on a single site and the percentage sought
- Commitment to producing a Supplementary Planning Document to set out details about how this Policy will be implemented

Policy can also support and encourage proposals which provide adaptations enabling residents to live independently and safely in their own homes, subject to policies 37 and 39

Policy should resist loss of existing housing which meets identified needs of older people, unless specified circumstances are demonstrated

Justification for inclusion of policy

- 8.16 Offering older people a better choice of accommodation to suit their changing needs helps them live independently for longer in their communities. Having a policy focused on providing the right type of housing in the right place to meet the needs of older people is therefore essential. This is one of a suite of policies to address the need for more and better quality homes and communities for all, reflecting the Council Plan and complementing the Council's Housing Strategy. The needs of older people are diverse. Their health, lifestyles, income and wealth differs greatly, as will their housing needs. Those needs change over time. Many older people may not want or need specialist housing but prefer to stay or move to general housing that is already suitable, including homes that can be adapted. The policy recognises that a wide range of dwelling types is needed. Much will be general need housing, be it flats, bungalows, smaller or larger

homes, which are accessible and adaptable, where care can be provided in the home. But there will be a need for specialist housing with high levels of care and support.

- 8.17 This policy focuses on types of housing delivered through development that can meet the needs of older people. It supports the Strategic Policies on addressing housing need and mixed communities aligned with the local plan's vision, objectives and strategies. It operates in concert with the policy on accessible and adaptable housing.
- 8.18 Planning for the housing needs of older people is important because East Devon has an ageing population that is growing. Latest national projections predict a rise of 21,300 to 66,500 residents aged 65 and above by 2040 in East Devon. This is nearly 70% of the total population increase 2020 to 2040. Those aged 75 and above increase by 14,700 to 37,200. The LHNA shows that the vast majority of the overall net increase of 13,000 in households to 2040, is in households headed by somebody over the age of 65. Many are already established and living in existing homes but their needs will change over time.
- 8.19 People are attracted to East Devon by its environmental qualities, including those looking to retire here. This increases demand for housing and impacts on local house prices and affordability. The policy on subdivision of existing dwellings and building creating flats therefore works in tandem with this policy, with regard to the development of housing for older people and also changes to the existing dwelling stock.
- 8.20 NPPF specifically identifies older people as one of the groups in the community whose assessed needs should be reflected in planning policy. NPPF defines older people. All the issues listed in the preferred policy are raised in NPPF and related PPG. The broad approaches to housing for older people in the policy reflect national policy. The main matters where the Council relies on a local policy component are:
- District figures for the number of units of specialist housing for C2 and C3 uses
 - Steering housing for older people, particularly C2 use, to particular types of locations, such as larger settlements where the scale of need being met is appropriate to the scale and type of community facilities to support this type on housing need
 - The approach to seeking Care Homes/Extra care on strategic allocations
 - Site size thresholds and percentages sought – focused on major (or larger?) sites
 - Evidence required to demonstrate they meet criteria eg: meeting need; suitable location; suitable sites; and development criteria eg so that accommodation is suitable for the occupiers; high quality

inclusive design relevant to the need; parking; accessibility eg to public transport, community facilities, shops, services, and supporting social networks; mobility scooters/wheelchairs storage

- Council commitment to producing an SPD guiding policy implementation.

8.21 Justifying most of those local components relies on local evidence. Currently the chief evidence source is the East Devon Local Housing Needs Assessment (ORS 2020). The study forecasts an extra 6,412 housing units (sheltered housing and Extra care housing, owned and rented) to meet demand for specialist housing for older people in the plan period. In practice, delivering that amount is challenging as this is a significant proportion of the overall local housing need. Nevertheless, providing dedicated older person housing schemes will be an important part of the overall housing mix.

8.22 Market and affordable dwellings will meet part of the need. Other specialist housing will be needed such as residential care homes and extra care homes (Use class C2 – Residential institution). In line with PPG, the LPA counts housing provided for older people, including residential institutions in Use Class C2, against their housing requirement. This takes into account the Government's formula to convert C2 bed spaces (gains and losses) to C3 dwelling equivalents. The ORS study does not recommend the number of additional bed spaces needed in C2 care homes to meet the needs of elderly people. But it forecasts the overall demand for extra care housing as about 2,500 units to 2040. Nearly all would be C2 accommodation because of the level of care and access to communal facilities required.

8.23 Additional evidence will be needed to justify local components of the policy, regarding:

- Overall plan viability assessment, testing the percentages, thresholds and site types
- Justification of the mix of types of C2 and C3 housing sought
- Analysis of how much housing for older people should be affordable and accessible
- Assessment of the amount of housing for older people that the plan might deliver.

Currently rejected alternative approaches to meet the needs of older people

Option b - Site allocations for older persons C2 and C3 housing

The local plan could allocate sites for older persons' Use Class C2 and Use Class C3 accommodation. This would provide greater certainty, but would need evidence about the specific types of accommodation, suitable locations supported by facilities and services, and the viability of development, as well as the availability of sites and market interest in such development. This could be parts of larger mixed use developments, to support the development of inclusive communities. The current

Currently rejected alternative approaches to meet the needs of older people

lack of evidence to show that this approach is deliverable, means it is not included in the preferred policy. This should be kept under review and revised if robust evidence becomes available.

Option c- Requiring strategic sites to provide even more accommodation for older residents such as retirement apartments or a care home

Larger developments such as Cranbrook can be dominated in their early days by mobile households moving into the area who are likely to be in younger age groups. This policy approach could strengthen the opportunity for strategic sites to improve the demographic mix in the community, where it can be supported by on-site facilities and services or through access to those in the adjoining settlement. However, the need for significant investment and site viability may constrain the type of accommodation for older people to more expensive, higher profit margin housing, and not meet the range of accommodation that other older people need. It would need evidence to demonstrate that this approach is viable.

Option d – restricting accommodation for older residents in locations which are less accessible by public transport and with fewer service and facilities.

This would reduce the risk of higher transport and time cost for visiting services to support a wider dispersal of older people but it could risk lowering the ability for communities in rural areas to be inclusive and mean that more people who are older would have to move away from their current local communities.

DRAFT

39. Policy - Accessible and Adaptable Housing

This proposed policy will need to address the following issues:

- Specifying the site size threshold for sites to include on-site provision and exceptional circumstances where they could contribute to off-site provision of accessible and adaptable housing
- Requiring a mix of on-site accessible housing in new residential developments, to meet need with
 - A specified percentage of dwellings to meet national standards [at least Category 2] for accessibility and adaptability on major sites
 - A specified percentage of dwellings proposed for development to meet national standards for wheelchair accessible homes [Parts M4(3)(1)(A) and (b) and Part M4(3)(2)(b) in Category 3-wheelchair user dwellings of Schedule 1 of the Building Regulations 2010 as amended]
 - If proposal would not meet policy standards, need evidence to demonstrate that meeting the policy is not financially viable or that there is no unmet need for accessible and adaptable housing
- Clarifying whether the provision is part of or additional to the affordable housing sought. If the latter, what minimum percentage of on-site affordable housing is to be nominated by the LPA for M4(3) wheelchair accessible housing and is meeting these needs subject to site viability
- Policy will continue to apply to the nearest equivalent standards in any future modifications to the Building Regulations approved documents
- Need for safe and convenient approach routes in and out of the home and outside areas, suitable circulation space and suitable bathroom and kitchens
- Resisting loss of accessible and adaptable housing
- Commitment to producing a Supplementary Planning Document to set out details about how this Policy will be implemented

Justification for inclusion of policy

8.24 The Government's approach to health and adult social care is underpinned by the principle of sustaining people at home for as long as possible. This is reflected in building regulations relating to adaptations and wheelchair accessible homes, with 3 categories of dwellings:

- I. M4(1) Category 1: VISIBLE dwellings – mandatory, broadly about accessibility to all properties
- II. M4(2) Category 2: Accessible and adaptable dwellings – optional, similar to lifetime homes, and
- III. M4(3) Category 3: Wheelchair user dwellings – optional, equivalent to wheelchair accessible standard

8.25 The policy addresses this need in the plan period. All the issues listed in the preferred policy are raised in NPPF and related PPG. The broad approaches to housing for accessible and adaptable housing in the policy reflect national

policy. The main matters where the Council relies on a local policy component are:

- Percentages of M4(2) and M4(3) housing required from general housing development and from older persons housing
- Locations where this type of housing is preferred, including steering development to larger settlements with the scale and type of community facilities to support this need
- Site size thresholds and percentage of affordable accessible and adaptable housing sought
- Evidence requirements to demonstrate, exceptionally, why need cannot be met or why loss of this accessible and adaptable housing is justified
- high quality inclusive design relevant to the need, internal and external to the housing
- Council commitment to producing an SPD guiding local implementation of the policy

8.26 Justifying most of those local components relies on local evidence. Currently the chief evidence source is the East Devon Local Housing Needs Assessment (ORS 2020). That evidence demonstrates a total need for adapted housing from about **12,500 households** either needing adaptations to their existing housing or suitable new housing to be provided by 2040.

8.27 **M4(2) Category 2:** The study estimates 64% would live in dwellings that can be converted to meet the M4(1) Category 1 standard. This leaves 36% (about 4,800 households) needing M4(2) Category 2 and M4(3) Category 3 housing accommodation standard, which is about 25% of the total housing requirement. The ORS study does not recommend the number of additional bed spaces needed in C2 care homes to meet the needs of elderly people. As this part of the policy applies only to major sites the policy percentage could be more than 25%. However, there is a significant overlap with the 6,400 older persons dwellings need identified by the study. Nevertheless, the requirement for adapted housing would still be high.

8.28 **M4(3) Category 3 wheelchair users housing** The ORS study forecasts a net additional 880 households over the plan period in East Devon will need wheelchair adapted housing. [equates to about 5% of total housing requirement]. The 4,800 net adapted need housing already encompasses households counted as having a health problems or disability that affects their housing need. That figure already includes households with wheelchair users so the latter should not be double counted. There's also a very significant overlap between wheelchair users housing need and the forecast additional 6,400 specialist older persons housing need. The study concludes that it may be appropriate to adopt higher targets for specialist accommodation for older

people that is also wheelchair accessible. This could reduce the proportion of general needs housing that would need to meet the M4(3) Category 3 requirements.

- 8.29 Additional evidence will be needed to justify local components of the policy
- Overall plan viability assessment, testing the percentages, thresholds and site types
 - Justification of the mix of types of M4(2) and M4(3) housing sought
 - Analysis of how much housing for older people should be affordable and accessible
 - Assessment of how much accessible and adaptable housing the plan might deliver.
- 8.30 Whilst building regulations on this matter will apply, not having a policy in the plan is not an option as it would leave a void in local policy to guide the mix of housing types, mindful of the overlap between special needs, accessible and affordable housing. This is not a reasonable alternative.
- 8.31 There will be potential alternative approaches to the site threshold and percentage of on-site special needs and accessible housing. At this stage we do not have sufficient evidence to make even an initial recommendation and so it is not considered appropriate to consider alternative approaches at this stage. Options will need to be considered when the evidence is available.

40. Policy - Market housing mix

This proposed policy will need to address the following issues related to securing a balance of housing types and sizes across East Devon:

- Requiring residential development proposals to include a mix of market housing, informed by evidence of housing need (LHNA)
- Percentage of market housing mix sought ie by dwelling size and type, and tenure type [either specifying this in policy or referring to SPD and LHNA evidence] subject to any other local need evidence?]
- Location criteria – Consistent with settlement hierarchy; the role of strategic sites
- The circumstances when it may not be appropriate to provide the full range of housing types and sizes such as
 - Physical constraints reducing the number of dwellings; cost and design of conversions
 - Locations such as town centres where low density development with larger, higher value dwellings may not be appropriate
 - Severe site constraints and abnormal costs impacting on viability
 - Particular housing types and forms needed to sustain or enhance a heritage asset or its setting
 - Local up to date evidence of housing need in the parish or parish group
- Exceptionally, if a proposal is not meeting policy requirements, applying mechanisms to require robust market conditions evidence demonstrating lack of marketability
- Commitment to producing a Supplementary Planning Document to set out details about how this Policy will be implemented

Justification for inclusion of policy

8.32 This policy complements the policy on affordable housing mix. It helps ensure that the overall policy approach to mix and balance of housing types and sizes across the District can be addressed. It enables a wide choice of homes to address the needs for all types of housing of the plan period, meeting the needs of the whole community. It also contributes towards creating more interesting and diverse environments. The policy takes account of the current housing stock and projected demographic changes which impact on the need to address issues relating to potential mismatches between need and supply with regard to:

- Housing types (eg houses; flats)
- Dwelling size (number of bedrooms)
- Sectors within the private sector market eg private rented, ownership

8.33 Government policy is for local plans to boost housing supply. Delivery of 4,240 affordable dwellings would equate to 23% of the housing requirement to 2040 in

East Devon. The remaining 77% of requirement would therefore be met by market housing for sale and rent, equating to at least 14,100 dwellings in the plan period.

- 8.34 The LHNA will provide evidence about the need for a range of housing types and tenures in the area including provisions for those who wish to rent.
- 8.35 A range of market housing types, tenures and sizes are needed across East Devon, to provide choice for the wide range of needs in this area. The housing markets within this District are traditionally buoyant. Recent housing development has been greatest at Cranbrook and the West End of the district.
- 8.36 Owner occupied housing is the largest tenure type in East Devon, accounting for 76 per cent of dwellings in 2011. This is slightly down on the 78 per cent in 2001. Home ownership remains a keystone policy of Government. The 2019 Government manifesto pledge is to "continue to increase the number of homes being built". The manifesto also referred to a need to rebalance the housing market towards more home ownership: There are a plethora of Government initiatives and housing products aimed at extending home ownership, enabling households who aspire to home ownership to get on to the property ladder.
- 8.37 Government does recognise that the private rented sector is an important and growing part of the housing market in England. Much of the focus is on improving management and maintenance. Private rented housing in 2011 rose to 15% of total stock in East Devon. Private rent levels are high compared to the rest of Devon with average monthly private sector rents almost £700. This policy recognises the role of the private rented sector in making housing available for those who cannot afford or do not want home ownership, but who can afford market rents. Separate local plan policies on design and on conversion of existing dwellings and buildings, and delivery of high quality housing are relevant to private rented housing and market housing.
- 8.38 The policy addresses market housing need in the plan period. All the issues listed in the preferred policy are raised in NPPF and related PPG. The broad approaches to market housing mix in the policy reflect national planning and housing policy. The main matters where the Council relies on a local policy component are:
- The site size threshold and percentage mix of dwelling sizes and types of market housing for sale and rent
 - Locations – consistent with the settlement strategy
 - Evidence required to demonstrate why proposals cannot meet policy requirements.
- 8.39 Additional evidence will be needed to justify local components of the policy

- Overall plan viability assessment, testing the percentages, thresholds and site types
- Justification of the mix of sizes and types market housing sought
- Forecast of how much market housing is expected to be delivered in the plan period.

8.40 Not having a policy on market housing mix is not an option. It would leave a void in local policy to guide the mix of housing types, at odds with Government policy towards market housing.

Currently rejected alternative approaches to market housing mix

Option b Allowing the market to decide the mix of market housing

Under this option, the approach to market housing mix is for policy not to intervene. So the mix is determined by the developer, on the basis of the housing market in the area and the developer's business model and corporate objectives. Evidence is needed to assess the balance on housing mix overall needed by the end of the plan period, and the percentages of dwelling sizes and types to meet the need. That assessment can be made when the updated LHNA is available. For the present, this option is rejected.

8.41 **Build to Rent** The preferred policy does not expressly promote 'Build to Rent'. Government has introduced new planning policy and guidance on Build to Rent (defined by NPPF). Build to Rent and Affordable Private Rent are different from Social and Affordable Rent homes provided by councils and other registered providers specifically for applicants on the councils' housing registers. Build to Rent is a distinct asset class within the private sector. It involves the building of homes specifically for the rental market. These developments are typically owned by companies (such as property companies or pension or insurance investment companies) and let directly or through an agent. Typically 100% rented, but it can be a mix of tenures and flats or houses. NPPF requires that affordable housing on build to rent schemes should be provided by as affordable private rent, a class of affordable housing specifically designed for build to rent. Typically 20% is the level of affordable private rent homes to be provided, and maintained in perpetuity, in any build to rent scheme. NPPF requires a minimum rent discount of 20% relative to local market rents.

8.42 There is a range of demand for purpose built rented housing, mostly flats, in cities such as Exeter and Plymouth, and particularly in conurbations like London, Manchester and Birmingham. But East Devon is much smaller, demand remains focused on owner occupation. Locations suitable for high density, high rise flats are few. To justify a specific policy on Build to Rent housing, the Council would need evidence from stakeholders about:

- What appetite is there from Registered Providers to develop or manage Build to Rent housing (or are they prioritising Affordable Rent)?
- What appetite is there from developers and investors for Build to Rent schemes, including demand appraisal and viability? And can it accelerate housing delivery?
- What kind of products would be delivered? Is the focus on high end projects?
- What is the minimum size of development for the schemes to be viable (50+ units?)
- What is the target market, particularly the age and income group(s)?
- What locations, design/layout and facilities would renters find desirable?

8.43 There is no evidence at this time to warrant including a policy on Build to Rent. If there is evidence of need then PPG requires the local plan to include policy setting out the approach to promoting and accommodating build to rent.

41. Policy – Self-Build and Custom Build Housing

This policy will need to address the following issues relating to the duty set out in Self-Build and Custom Housebuilding legislation, supporting proposals for self and custom build housing through:

- Requiring 5% of dwellings on sites of 20 homes or more, including all local plan housing and mixed use allocations, to be made available as serviced plots¹³ for custom and self builders, to be sought through negotiation, which should
 - Have suitable road access delivered at an early stage in the development;
 - Be provided before 50% of the dwellings on the site have been commenced
 - Provide a range of plot sizes having regard to local demand
 - Be offered for sale with no legal or physical restrictions that would prevent immediate purchase and development
 - Be appropriately marketed for at least 24 months from being fully serviced and developable in accordance with an agreed marketing and pricing strategy; potential cascade approach thereafter if the offer is not taken up
 - On sites of over 250 dwellings must include a proportion of plots as affordable housing, subject to viability.

¹³ A serviced plot is a parcel of land with legal access to a public highway, and at least water, foul drainage and electricity supply available at the plot boundary

41. Policy – Self-Build and Custom Build Housing

- Each self build or and custom build dwelling to be completed within 3 years of the self or custom builder purchasing the serviced and developable plot
- Encouraging communities preparing Neighbourhood Plans to consider identifying sites for custom and self builders
- Providing opportunities to achieve high quality housing whilst still allowing flexibility through: use of design codes; and 'plot passports' set to high standards, providing a simple, succinct summary each plot, providing a reference point for the purchaser
- Commitment to producing a Supplementary Planning Document to set out details about how this Policy will be implemented

Justification for inclusion of policy

- 8.44 Custom and self-build is part of the overall housing supply picture. This is additional to the mainstream supply housing delivered by large house builders and registered providers. Not only is it a route into home ownership, including affordable homeownership, it also enables housing to be tailored to meeting individual needs and specifications. It benefits individuals and communities. Self-build and custom build can lead to savings relative to buying a 'ready-made' product because there is no developer profit (often at least 20% of the cost of a new home). It has the potential to boost and accelerate the supply of housing. It can also diversify the land supply and widen choice.
- 8.45 Communities benefit from homes with a better design, build quality and environmental footprint and a more diverse and resilient housing supply. By using modern methods of construction and build to high specifications self-builders improving the sustainability of the housing stock. Self-build is also good for local businesses and can provide additional employment opportunities. It is an attractive market to small and medium house builders because there is less risk as contracts are settled earlier in the development process. This enables construction to be financed through the customer's mortgage stage payments, which reduces business finance and improves profitability. Supporting smaller builders can help local economies by using more local supply chains than volume house builders and creating opportunities for local tradespeople.
- 8.46 Under the Self Build and Custom Housebuilding Act 2015, the Council is required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. There are also duties to have regard to this and to give enough suitable development permissions to meet the identified demand. The 2015 Act (as amended) contains a legal definition of Self-Build and Custom Build housing.

Need

- 8.47 People wishing to commission or build their own homes are a component of the local housing need. The assessment of housing need by the Local Housing Need Assessment includes this type need. Self-build and custom build housing contributes to meeting the housing requirement identified in Policy 04.
- 8.48 The policy addresses the issue of housing need from people wishing to commission or build their own homes, consistent with national planning policy in NPPF. The plan recognises that self-build and custom build housing have a role to help boost the supply of housing and helping to deliver a wide choice of high quality homes. This type of housing widens opportunities for home ownership and create sustainable, inclusive and mixed communities.
- 8.49 This policy does not apply to off-plan housing, which are homes purchased at the plan stage prior to construction but without input into the design and layout from the buyer.

Supply

- 8.50 To date all self-build plots have been provided through 'windfall' opportunities. Some of the initial owners are self house builders where the individual directly organises the design and construction of their new home. Other delivery models could include independent community collaboration where a group of people acquire a site and split it into plots for self build homes, sharing labour and expertise. Supported community self build is another delivery model where a social landlord or supportive body helps people build a group of homes together. The policy can apply to self-build and custom build development by different organisations such as Community Led Housing Groups, Community Land Trusts, Co-operatives and Cohousing groups.
- 8.51 Evidence in the annual self-build monitoring report indicates that the Council is meeting its legal requirements to provide plots to meet the demand shown on our register.
- 8.52 The District Council has aspirations to do more. It has been supportive of increasing opportunities for self-build and has regularly considered ways to achieve this when reviewing the annual self-build monitoring report. Progress has been made through the self-build policy in the Cranbrook Plan DPD, which is at an advanced stage of preparation. The Council has also made £500,000 available for capital spend from the 2020/21 budget for a pilot project for the direct provision of self-build plots through purchasing suitable land, servicing the land and marketing it for self-build plots. There are specific policies in emerging and made Neighbourhood Plans to help deliver more plots for self-build and the Council supports the Neighbourhood Plan work on this.

- 8.53 The new local plan represents a new opportunity to increase custom and self-build opportunities further across the District. The policy applies across the District, except for the area of the Cranbrook Plan DPD which has its own policy, albeit to 2031. The focus is on sites of 20 or more dwellings including a percentage of custom and self build.
- 8.54 The minimum site size for this policy is 20 dwellings, where a 5% rate can achieve at least 1 custom or self build dwelling. Development of 20 or more dwellings would not count towards the small sites policy target. Policy 41 does not preclude smaller sites from providing self-build or custom build dwellings.
- 8.55 A mix of service plot sizes helps to meet the range of demand and affordability. Larger sites provide the opportunity for affordable dwellings (the SPD will need to provide the definition of affordable for custom and self-build housing and other relevant guidance, including the circumstances when affordable self build is counted towards both Self Build and Affordable housing policy targets), and the early delivery of parcels of self-build plots, through phasing. The expectation is that the development makes provision for on-site service plots.
- 8.56 Policy criteria on Rural Exception and First Homes Exception sites would need to be met if custom or self build housing were to be proposed on those sites.
- 8.57 The issues listed in the preferred policy are raised in NPPF and related PPG. The broad approaches to self-build and custom build in the policy reflect national planning and housing policy, and legislation. The main matters where the Council relies on a local policy component are:
- Justifying the minimum site size threshold and percentage of on-site serviced plots
 - Making specific provision relating to site allocations –
 - Criteria for location types – consistent with the settlement strategy
 - Timescales for making plots available and evidence required to demonstrate marketing and viability if plots are not taken up, applying a cascade approach
 - SPD guidance to support policy implementation.

Evidence

- 8.58 The Council has complied with the 2015 Act, including keeping self-build and custom housing registers. This register helps inform the extent to which policy will need to be in place to reflect this demand; and consideration will need to be given to schemes to determine the extent to which they contribute to affordable housing.
- 8.59 The latest Self-Build Monitoring report published February 2021 shows that in total for the first five base periods from 31 October to 30 October each year to

October 2020 there were a total of 145 on the register¹⁴, (113 on Part 1 (local connection) and 32 on Part 2). The requirement to provide enough serviced plots to meet the demand shown on the register only applies to Part 1, but Parts 1 and 2 are used to assess the general level of demand to inform Council decisions.

- 8.60 Information is provided by the Council's Self-build monitoring report. Self build supply is identified through evidence from Self-build CIL exemption records (by address) and planning approvals data enables the Council to differentiate permissions into new residential sites, conversions and replacement dwellings. Additional data submitted by applicants enables the Council to gain understanding about the demand for serviced plots and the characteristics of those seeking self-build opportunities, and a summary is published in the monitoring report.
- 8.61 Additional evidence will be needed to justify local components of the policy
- Viability study to assess the impact on housing site viability of the percentage of self and custom build on sites above the threshold
 - Justification of site allocations identified to provide serviced plots
 - Annual Self build monitoring.

¹⁴ Please note, the Monitoring report stated that 'there are currently 139 individuals on the register as some asked to be removed after the end of the base period in which they were added to the register'.

Currently rejected alternative approaches to Self-Build and Custom Build Housing

Option b – A lower site size threshold

Policy could reduce site size threshold and as a result more sites would become liable for providing serviced plots. Small sites are less able to benefit from economies of scale and therefore additional costs, or reduced market housing numbers are likely to impact disproportionately on the return on investment. Requiring serviced plots for self build and custom build on smaller sites adds to the risk of making the development unviable and therefore not deliverable. Alternatively it could reduce the contributions to other benefits that the development could otherwise provide.

Option c – A stepped site size threshold

Policy could have a variable site size threshold, with a lower percentage of serviced plots required on smaller sites. This reduces but does not remove the burden on smaller sites. There would still be the potential this might make the development unviable, due to tight financial margins, and therefore not deliverable. This option also potentially risks reducing the mix of housing sites and undermining achievement of the policy for delivering 10% of the housing requirement on sites of less than one hectare.

Option d – A higher percentage of serviced plots

Policy could increase the requirement for more serviced plots for self build and custom build housing. This would reduce the amount of land available for other types of market and affordable housing on the site. It could make the development unviable and therefore not deliverable, or undermine the ability to deliver specific types of affordable housing and/or reduce the contributions to other benefits that the development should provide. Over supply of serviced plots could leave sites unfinished, with uncertainty about when development would be completed and occupied.

42. Policy – Residential Sub-division of Existing Dwellings and Buildings and Replacement of Existing Dwellings

This proposed policy will need to address the following issues

- Ensuring that outside of settlement boundaries or the built form of settlements without boundaries, the sub-division or replacement of a an existing dwelling or dwellings will not result in a disproportionate increase in size of the building

Residential Sub-division of existing dwellings or buildings

- Avoiding materially adverse impact on character and amenities of the surrounding area or on the existing building
- Avoidance of hard surfaced of front gardens if this causes unacceptable harmful effect on flooding or on the appearance of the area
- Adequate space for bicycle/mobility scooter storage
- Adequate external area for waste/recycling storage and car parking, and for any shared use area such as outdoor drying of washing

Replacement of existing dwellings

Exceptionally, where replacement dwellings can be justified, then replacement of existing dwellings by the same number of dwellings are considered where

- A condition is attached to any planning permission granted for the demolition of the dwelling to be replaced, prior to occupancy of the replacement dwelling
- The proposed dwelling is positioned on the footprint of the existing dwelling, unless there is a clear planning or environmental benefit to justify an alternative location within the existing curtilage
- The curtilage of the proposed replacement building is no greater in area than that of the existing dwelling

Commitment to producing a Supplementary Planning Document to set out details about how this Policy will be implemented.

8.62 Self-contained flats resulting from house conversions can be a valuable addition to the housing stock. They can be effective in meeting some households' changing needs for housing. The policy supports the Council's Housing Strategy. The policy is also part of the local plan's strategy for supporting the transition to a low carbon future, in line with NPPF. Reuse of existing dwellings and buildings conversions significantly reduces the embodied carbon footprint of the development, as well as re-using existing resources, and locating development within existing communities.

8.63 For this policy, a dwelling is a building with planning permission for use class C3 (residential) or its residential use is evidenced as lawful; and 'existing' means the dwelling is habitable and permanent (meaning the planning permission is not

temporary, ie the dwelling approved is not conditioned to be removed or subject to a legal agreement requiring removal; or the unit cannot be moved ie not a caravan or mobile home). This avoids creating a new dwelling in a place where a dwelling does not exist, including derelict and abandoned properties.

- 8.64 The policy does not impose a specific restriction on the size of conversion or replacement dwellings within settlement boundaries or the built form of settlements without settlement boundaries. There are dwellings in the countryside, including those isolated from settlements. Government policy towards housing in the countryside has evolved in recent years. The preferred policy proposes restricting the potential increase in dwelling size resulting from conversion or replacement of existing dwellings in the countryside. The purpose of this is to seek to retain smaller dwellings in the countryside, mindful that larger dwellings are generally more expensive and affordability is a significant issue in rural areas due to higher house prices.
- 8.65 The clause in the policy could require that the conversion or replacement will not exceed the size of the original dwelling or dwellings' footprint, including any existing annexes, by a specified amount. This might be of the order of a maximum increase in footprint of 30%.
- 8.66 For the avoidance of doubt, the preferred local plan Policy 46 on Exception sites addresses the specific issue of conversion or replacement of dwellings on Exception sites, to avoid the potential loss of affordable housing to market housing over time.
- 8.67 Some forms of housing development in the countryside such as re-use of redundant or disused buildings in the countryside, and Use Class Q permitted development (for change of use from agricultural building to residential use, covered by GPDO legislation), are not replacement dwellings so are not subject to this policy, although other local plan policies may apply.

Subdivision/Conversion

- 8.68 Part of this policy is subdivision of existing dwellings and conversion of other buildings, to create self-contained dwellings which add to the dwelling stock. There is a separate policy in the plan on multiple occupancy of housing, a type of development which generally does not create net additional self-contained dwellings.
- 8.69 NPPF makes clear that the local plan should promote an effective use of land in meeting the need for homes. This policy aligns with the broader strategy in the plan for accommodating objectively assessed needs in a way that makes as much use as possible of previously developed land, boosts housing supply through sub division, and meets need. Most subdivisions/conversions would be below the one hectare or less than 30 dwellings threshold in NPPF for small sites delivery. So the net increase in dwellings on these sites would count towards the

percentage target for small sites in the Strategic Policy on the Level of housing development.

- 8.70 This part of the policy aligns with Policy 32 on embodied carbon within an existing building, and with NPPF which encourages the reuse of existing resources. By allowing subdivision/conversion, this approach also reduces the risk of dwellings being left vacant, becoming derelict over time, and eventually being lost from the dwelling stock. This helps to avoid the need for additional housing to be built elsewhere to replace that loss.
- 8.71 The policy also supports local plan policy on design. Conversions of buildings through change of use from non-residential use are also subject to other policies in the plan relevant to those uses, including retention of use subject to specified circumstances. Separate local plan policy covers conversions of listed buildings to residential and other uses.
- 8.72 The policy focuses on reducing and mitigating the impact of conversions. For example, conversion to flats can have undesirable environmental effects such as hard surfacing of garden areas, external staircases and unattractive refuse storage areas that can damage the area's character and amenity.

Replacement dwellings

- 8.73 Another part of this policy focuses on replacement dwellings that are an exception to Policy 32 on Embodied Carbon, a policy which generally restricts replacement of existing dwellings. Replacement involves the demolition and removal of one or more existing dwelling and building the same number of new dwellings, not necessarily on the same footprint, but in the same curtilage. NPPF does not define 'replacement' so the policy draws on case-law.
- 8.74 Replacement of a dwelling can be beneficial where it improves the quality of the housing and is sensitive to the area's characteristics and qualities. However, the cumulative impact of development that replaces existing dwellings can lead in the long term to the urbanisation and erosion of the character of countryside areas.
- 8.75 The policy focuses on reducing and mitigating the impact of replacement dwellings, such as the impact on neighbours. Not all replacement dwellings occupy the same footprint as the existing dwelling. Therefore the policy also should ensure there is a mechanism to avoid the risk of creating a second dwelling or planning unit on the site, for example by requiring the existing dwelling is demolished before the replacement dwelling is occupied.
- 8.76 The policy addresses issues related to the conversion of existing dwellings and buildings to residential use and the replacement of existing dwellings. All the issues listed in the preferred policy are raised in NPPF and related PPG. The policy

reflects national planning and housing policy, particularly regarding the opportunity to boost housing supply and mix of housing to meet needs. The main matters where the Council relies on a local policy component are:

- Appropriate locations – consistent with the settlement strategy
- Requiring demolition where replacement dwelling development is proposed
- Avoiding adverse impacts on neighbours and the surrounding environment
- Avoiding creating sub-standard housing in terms of private amenity space and communal areas, such as storage and car parking.

8.77 No specific local evidence is needed to justify this policy, but the plan will need to identify what appropriate evidence will need to be provided by developers regarding the character and amenities of the surrounding area. Detailed guidance would need to be provided in a Supplementary Planning Document, on matters such as layout and density, spacing, scale, massing, form detailing and materials as well as internal space standards, accessibility, privacy, daylight and ventilation, amenity of occupiers, safety and security.

Currently rejected alternative approaches to Residential Subdivision of Existing Dwellings and Buildings

Option b – Not restricting the dwelling size increase

Policy could allow unrestricted increase in the size of the replacement dwelling, both in terms of building footprint and volume. Whilst this would meet market demand, it could also lead to a loss in the stock of dwellings meeting a need for smaller housing. Therefore this reasonable alternative is rejected.

Option c – not supporting conversions/subdivisions outside of settlement boundaries

Policy could be more restrictive, and preclude conversions and subdivision of dwellings and buildings in the countryside. This would constrain the amount of housing in the countryside, thereby reducing the environmental impact including reducing the need to travel and carbon emissions. But this option could lead to vacant and derelict housing, if existing dwellings are not capable of being altered/extended, and additional housing would be needed to replace the loss of dwelling stock. Therefore this reasonable alternative is rejected.

Option d – More policy detail about design and quality

Policy could include more guidance on matters such as layout and density, spacing, scale, massing, form, detailing and materials as well as internal space standards, accessibility, privacy, daylight and ventilation, amenity of occupiers, safety and security. However, these matters are better suited to an SPD which can provide detailed guidance about the implementation of the policy. Therefore this reasonable alternative is rejected.

43. Policy - Residential Annexes, Extensions and Alterations

This policy will address the following issues

Annexes:

- Use as an ancillary and subordinate part of the main existing dwelling (ie not creating a self-contained dwelling and/or a separate planning unit now or in the future)
- Condition to restrict occupancy to ancillary to main building
- Scale, form and mass – subordinate to main building
- Within the curtilage of the main dwelling
- Physical and/or functional link to the main dwelling
- Not causing material consideration issues for the occupants of the main building or of the proposed annexe or neighbouring occupants.

Extensions and alterations:

- Located within the curtilage of the existing dwelling and attached to that dwelling
- Be in keeping with the size, scale, mass, design and materials of the existing dwelling and wider setting
- Avoid overdevelopment of the plot or the curtilage, including the cumulative impacts of extensions
- Not causing material consideration issues for the occupants of the main building or neighbouring occupants

Justification for inclusion of policy

- 8.78 The Council receives many planning applications for residential extensions and alternations, and for annexes. This type of development enables occupiers to meet their changing needs and lifestyles without the need to move.
- 8.79 This policy contributes to meeting the changing housing needs of households. It aligns with NPPF and PPG on making effective use of land. It is part of the local plan's strategy for supporting the transition to a low carbon future, in line with NPPF. Continuing the use of existing dwellings reduces the embodied carbon footprint of the development by avoiding the need for additional new build, as well as re-using existing resources, and locating development within existing communities. The policy also aligns with the approach that all developments should maintain acceptable living standards.

Annexes

- 8.80 Residential annexes can also provide genuinely flexible, accommodation that can be adapted and re-adapted to meet the changing needs of family circumstances over time. Creation of an annexe to an existing dwelling, whether the main dwelling is located inside or outside settlement boundaries, can often create a useful facility for the support and care of family members.

- 8.81 This is a type of residential accommodation which might reasonably be construed as being self-contained and capable of being occupied without undue call upon the principal residence/ host dwelling. An annexe might provide bathroom and kitchen facilities and sufficient space for living and sleeping. To avoid creating an additional dwelling or separate planning unit the use of the annexe needs to be restricted to being an ancillary and subordinate part of the principal residence/host dwelling. The annexe size should not undermine its subordinate role. Nor be so large that it is impractical and is then let separately from the main dwelling, creating sub-standard accommodation with inadequate access, amenity and space.

Residential extensions and alternations.

- 8.82 This type of development adds to diversity and flexibility in the housing stock but it needs to respond positively to the context and character of existing areas. Extensions and alterations are part of the principal residence/host dwelling. Some extensions create ancillary accommodation which provides habitable rooms but does not extend to such an extent that it can be construed as providing facilities that would enable its independent occupation without call upon the principal residence/ host dwelling.
- 8.83 There can be concern that extensions in combination would lead to an increase in the proportion of larger dwellings, reducing the availability of smaller housing and creating an imbalance in the local dwelling stock. There are additional concerns that extensions and subsequent subdivision can create additional dwellings in the countryside, and not be consistent with policy. A further complication can arise with Class Q permitted development, where the approval is implemented, changing the use to residential, swiftly followed by a full application to extend the unit creating a larger dwelling. This can be very difficult to resist.
- 8.84 Permitted development rights allow house extensions without needing to apply for planning permission if specific limitations and conditions are met. This policy addresses the issues for those extensions and alterations that exceed the specific limitations and conditions. In many cases an application for householder planning permission will be required. Occasionally other types of planning permission are necessary.
- 8.85 The policy addresses the relevant issues. All the issues listed in the preferred policy are raised in NPPF and related PPG. The policy reflects national planning and housing policy, particularly regarding the mix of housing to meet needs and housing quality. The main matters where the Council relies on a local policy component are:

- Appropriate locations – consistent with the settlement strategy
- Avoiding adverse impacts on neighbours and impacts of cumulative extensions
- Avoiding unplanned creation of additional dwellings or separate planning units.

8.86 No specific local evidence is needed to justify this policy, but the plan will need to identify what appropriate evidence will need to be provided by developers regarding the relationship with the principal residence/host dwelling and matters related to over-development and impacts on neighbouring uses. Detailed guidance would need to be provided in an SPD. Extensions, alterations and annexes should not cause unacceptable impacts for the occupants in the main building or the annexe, or for neighbours from eg amenity, light, noise, odour, smoke, dust, privacy, visual impacts, overbearing, over-shadowing, scale, form, mass, design, material and any other pollutants. It will need to address layout and density, spacing, detailing and materials as well as internal space standards, accessibility, privacy, daylight and ventilation, safety and security. The physical and functional links between an annexe and the principal residence/host dwelling will also be relevant.

8.87 For the avoidance of doubt, proposals for annexes or residential extensions on Exception sites will be subject to the local plan policy on Exception sites.

Currently rejected alternative approaches to Residential Annexes, Extensions and Alterations

Option b – No policy

Instead of a policy on residential annexes, extensions and alterations, the plan could rely on the design policy, including space standards and amenity issues. However, there are circumstances when creating a second self-contained dwelling is not appropriate and therefore policy needs to ensure that the annexe is ancillary to the principal dwelling. This is not about design but about the principle of creating additional dwellings and the need to restrict occupancy. If there is no specific policy about the relation of the extension/alterations to the existing dwelling, the residential curtilage and impact of extensions/alterations on neighbouring uses and occupants, then the design policy could be amplified to ensure policy coverage. Therefore although the no policy option is a reasonable alternative, it is rejected.

Option c – More policy detail about design and quality

Policy could include more guidance on matters such as layout and density, spacing, scale, massing, form detailing and materials as well as internal space standards, accessibility, privacy, daylight and ventilation, amenity of occupiers, safety and security. However, these matters are better suited to a Supplementary Planning Document which can provide detailed guidance about the implementation of policy. This option is rejected.

44. Policy - Hostels and Houses in Multiple Occupation (HMOs)

This policy will need to address the following issues:

- Development meets an identified local need
- Size threshold is subject to the Use Class Order relating to change of use
- Avoiding loss of housing suitable for occupation by families, with a minimum size (no. of bedrooms) of the existing dwelling being subdivided for multiple occupancy
- Internal standards for living space and good communal facilities are suitable for the intended occupiers, individually and in total
- External communal areas and facilities of sufficient size and standard
- The existing dwelling or building can be converted without harm to the area or amenity of nearby residents
- Need for good standard of management
- Site and location is suitable for the use
- Contribution to creating an inclusive community and avoiding overconcentration of HMOs/hostels in specific localised areas.
- Specifying the circumstances in which a financial contribution towards affordable housing will be sought from large HMO development
- Resisting loss of existing hostels and HMOs, subject to criteria
- Commitment to producing a Supplementary Planning Document to set out details about how this policy will be implemented.

Justification for inclusion of policy

8.88 NPPF does not define Houses in Multiple Occupation or hostels. The definition of HMO used by the plan is listed in the Glossary. HMO development is subject to the use class order:

- *Larger HMOs housing more than 6 people.* These are classified as *sui generis* use and require planning permission.
- *Class C4 (Small houses in multiple occupation).* Small shared dwelling houses occupied by between 3 and 6 unrelated individuals, as their only or main residence, who share basis amenities such as a kitchen or bathroom. Change of use between C3 (residential use) and C4 use classes is permitted development and does not require planning permission (unless an Article 4 direction applies). New build C4 or change of use from non-C3 use to C4 (and vice versa) requires planning permission.

8.89 Hostels are a type of HMO providing no significant element of care. They fall into the *sui generis* use class for the purposes of planning

- 8.90 The LHNA 2020 ORS study does not provide specific evidence on HMOs in East Devon regarding the need for HMOs or the level of stock. HMOs are part of the private rented housing market, so are included within the ORS analysis of private rented housing need.
- 8.91 As well as planning requirements, some HMOs require an HMO licence. The mandatory HMO licensing scheme covers properties occupied by five or more people making up two or more households. The District Council maintains a register of all HMOs in East Devon that are licenced by the Council under the 2004 Housing Act. Licencing relies on a different definition and more details are on the Council's website. There are currently 38 licensed houses in multiple occupation on the Council's register, permitted to house 318 occupiers. HMOs with less than 5 people are not covered by this scheme so are additional. Work is in progress to estimate the number of smaller HMOs, and to understand if there are particular HMO stock condition issues. Licencing of HMOs is not part of the planning regime.
- 8.92 The policy addresses the relevant issues. All the issues listed in the preferred policy are raised in NPPF and related PPG. The policy reflects national planning and housing policy, particularly regarding the mix of housing to meet needs and housing quality. The main matters where the Council relies on a local policy component are:
- Appropriate locations
 - Avoiding loss of family housing
 - Improving the quality of this type of accommodation
 - Avoiding adverse impacts on the neighbouring area and existing communities
 - Locations – eg occupiers' needs for access to services and facilities
 - Retention of HMOs and hostels where there is need
 - Consideration of whether evidence demonstrates the need for an Article 4 direction in specific localities to avoid over concentration of this use
- 8.93 Additional evidence will be needed to justify local components of the policy:
- Are there locations of high demand for shared housing
 - Are there are any existing areas with high concentrations of shared residential properties let to tenants?
 - House condition survey of HMs– any problem of stock in poor condition?
 - What is the impact of high concentration of HMOs?

Currently rejected alternative approaches to Houses in Multiple Occupation and Hostels

Option b – No policy

Instead of a policy on HMOs and hostels, the plan could rely on the policies on subdivision of dwellings and buildings, and design, including space standards and amenity issues. However, the HMO policy can address management issues, and the need to avoid overconcentration in particular localities, Therefore although the no policy option is a reasonable alternative, it is rejected.

Option c – More policy detail about design and quality

Policy could include more guidance on matters such as layout and density, spacing, scale, massing, form detailing and materials as well as internal space standards, accessibility, privacy, daylight and ventilation, amenity of occupiers, safety and security, storage and parking. However, these matters are better suited to a Supplementary Planning Document which can provide detailed guidance about the implementation of policy. This option is rejected

DRAFT

45. Strategic Policy – Provision for Gypsy and Travellers, and Travelling Showpeople Sites

This proposed policy will need to address the following issues

- Making provision for the plan period for Gypsy and Traveller and Travelling Showpeople site accommodation, specifying District targets for: gypsy and traveller pitches, disaggregated into permanent and transit; and for plots for travelling showpeople.
- An identified five year supply of gypsy and traveller pitches on deliverable sites within East Devon to ensure that the predicted need for traveller sites will be met. A further supply of developable sites or broad locations for growth to be identified equivalent to another ten years of predicted growth, meeting need
- Identifying the overall scale of site allocation(s) of Gypsy and Travellers and Travelling Showpeople sites in the local plan if evidence demonstrates a supply shortfall against the need to be met in East Devon

New Sites

- Where there is demonstrable need to be met in the District, specifying the number of gypsy and traveller pitches to be provided, as part of the mixed use development at the New Settlement in East Devon
- Locations for sites (allocated and/or permissible), subject to site suitability, assessed against relevant policies in the plan and satisfying requirements of the following criteria:
 - Suitable location, to be inside or adjoining a settlement boundary, or within 30 minutes travel time by safe, walking, cycling or public transport providing access to a range of services including school and health services
 - Sites proposed in the countryside to require evidence that proven District need cannot be met elsewhere in East Devon
 - Size of site and number of pitches is appropriate in scale and size to the nearest settlement in the settlement hierarchy and its range of services and infrastructure
 - Preference for site expansion and intensification, subject to maximum site threshold. If expansion or intensification is impractical, then take account of the cumulative impacts of additional sites on the character of a local area and on a local community
 - Assimilate sites into surroundings/landscape without significant adverse effect
 - Requirement for acceptable vehicular access, on site turning, parking and servicing
 - Avoid sites vulnerable to flooding or affected by any other environmental hazards that may affect the residents' health and welfare
 - Site to access essential utilities - water supply, sewerage, drainage, waste disposal

Safeguarding Sites

- Safeguard existing authorised sites, new permissions, allocations for Gypsy and Traveller Use and for Travelling Showpeople use for the number of pitches/plots permitted. This includes safeguarding provision already made for serviced

permanent pitches at the Cobdens and Treasbeare Expansions Areas in the emerging Cranbrook Plan DPD

Only exceptionally permitting changes of use or redevelopment to uses other than for residential use by Gypsy and Travellers or by Travelling Showpeople on new, allocated or authorised sites and requiring alternative provision if proven need exists

Justification for inclusion of policy

8.94 National planning policy¹⁵ requires the LPA to assess the accommodation needs of Gypsies, Travellers and Travelling Showpeople and to set pitch and plot targets for Gypsies and Travellers and for Travelling Showpeople that address the likely permanent and transit site accommodation needs of travellers in the District, working collaboratively with neighbouring local authorities.

Need

8.95 Evidence of the needs for Gypsy and Traveller and Travelling Show people accommodation is provided by a Gypsy and Traveller Accommodation Assessment, not by the 2020 LHNA. Previous evidence in the GTAA 2015¹⁶ established that there were existing pitches distributed throughout East Devon, mainly concentrated in western areas of the District, close to main travel routes, particularly the A30. Most of the immediate need arises from overcrowding of, and newly formed families (usually children reaching maturity and having their own children), on existing sites who wish to stay close to their extended family.

8.96 Work is being commissioned to produce a new GTAA. The four Councils of East Devon, Exeter, Mid Devon and Teignbridge are collaborating in producing a joint evidence document to identify the level of accommodation needs for each District, to 2040 and beyond. That evidence will inform the Regulation 19 Publication Plan stage of the East Devon Local Plan. This evidence will enable the Council to reach conclusions about whether there is unmet need for permanent, serviced pitches, transit pitches or stopping places, which the plan can address. Or any related strategic matter raising Duty to Cooperate issues.

Supply

8.97 Work is in progress on the supply assessment. Planning policy requires the LPA, in producing a local plan, to identify and update annually a supply of specific deliverable sites sufficient to provide 5 years' worth of sites against locally set targets; and identify a supply of specific, developable sites, or broad locations for growth for years 6-10. If an LPA cannot demonstrate an up-to-date 5 year

¹⁵ Planning policy for traveller sites 2015 Department for Communities and Local Government [Planning policy for traveller sites - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/414113/Planning_policy_for_traveller_sites_-_GOV.UK_(www.gov.uk).pdf)

¹⁶ INSERT WEBLINK

supply of deliverable sites then this is a significant material consideration in any subsequent planning decision

- 8.98 Existing planning permissions The plan will require up to date evidence about the supply of pitches available from sites with planning permission that have not yet been implemented. It is needed both for plan making and for assessing the 5 year supply position for Gypsy, Traveller and Travelling Showpeople accommodation. The latest evidence is published in “Status of Traveller Sites” March 2019¹⁷ when there were 49 pitches (1 being temporary) on authorised permanent sites, and 5 pitches on authorised transit sites.
- 8.99 Allocations Sites providing pitches for gypsy and traveller and travelling show people use can be allocated in the development plan. The Cranbrook local plan provides for 15 pitches on the Cobdens and Treasbeare Expansion Areas in 2 site allocations on land being made available by the East Devon New Community partnership. These sites would contribute to supply in the 2020-2040 plan period and enable families on the overcrowded Sowton and Broadclyst sites to remain living locally as family groups. 15 pitches would fulfil almost all of the immediate District need for 16 pitches identified by the previous 2015 GTAA. Whilst these sites are available now and offer a suitable location, they do not yet have planning permission. For the present they are regarded as developable. When there is evidence that there is a realistic prospect of delivery in the next 5 years, the Council will count them as deliverable for the purposes of the 5 year supply assessment required by NPPF.
- 8.100 Call for Sites The 2021 Call for Sites for HELAA resulted in only 2 sites being put forward as available for Gypsy and Traveller use. When the GTAA evidence is available, if there is need for additional sites to be identified, the Council will assess site suitability, availability and achievability, and consider whether sites should be proposed to be allocated in the local plan.
- 8.101 Bricks and Mortar housing As well as a need for sites providing pitches and plots for Gypsy and Traveller and Travelling Showpeople, there will be some requirement for bricks and mortar housing to meet their needs. The new GTAA will identify need. The Council considers that this will be met by the provision requirement for general housing in Strategic Policy 4.
- 8.102 Travelling Showpeople sites – supply Prior to 2009 there was one established Travelling Showpeople site in East Devon for a single family which predates the planning system. One site in East Devon close to Exeter and the M5, was granted planning permission for 9 plots in 2011 (09/1486/MFUL at Clyst St Mary). This accommodated three displaced plots in Teignbridge and a further 6 plots for extended family members on other, overcrowded, sites in south west

¹⁷ [monitoring-report-as-at-mar-2019.pdf \(eastdevon.gov.uk\)](#)

England. At the time of the adoption of the East Devon Local Plan 2011 – 2031 the Council considered that East Devon had exceeded the requirement for provision in Devon and would not need to identify any further sites during the Plan period. The new GTAA will reconsider the supply of sites and plots for Travelling Showpeople.

8.103 The policy addresses the relevant issues. All the issues listed in the preferred policy are raised in national planning policy. The policy reflects national planning policy. The main matters where the Council relies on a local policy component are:

- Plan period targets for the scale of provision to be made
- Maintaining a 5 year supply
- Site allocations
- Appropriate locations
- Safeguarding

8.104 Additional evidence will be needed to justify local components of the policy

- GTAA 2022 (being commissioned)
- Supply assessment, including the 5 year supply position (work in progress)
- Site assessments and selection (if allocations are needed).

Currently rejected alternative approaches to Gypsy, Travellers, and Travelling Showpeople sites

Option b – Releasing land solely for affordable traveller sites (Exception sites)

Government policy makes clear that if there is a lack of affordable land to meet local traveller needs, then LPAs in rural areas, where viable and practical, should consider allocating and releasing sites solely for affordable traveller sites. This may include using a rural exception site policy for traveller sites that should also be used to manage applications. A rural exception site policy enables small sites to be used, specifically for affordable traveller sites, in small rural communities, that would not normally be used for traveller sites. Rural exception sites should only be used for affordable traveller sites in perpetuity. A rural exception site policy should seek to address the needs of the local community by accommodating households who are either current residents or have an existing family or employment connection, whilst also ensuring that rural areas continue to develop as sustainable, mixed, inclusive communities. This is a reasonable alternative if there is a need, but rejected at this time due to lack of evidence. This position may change when the GTAA evidence becomes available.

Dwellings in the countryside

- 8.105 The plan's spatial strategy directs most housing development to settlements, based on the settlement hierarchy. Sustainable development should be located where it will enhance or maintain the vitality of rural communities and avoid building new, isolated, homes in the countryside.
- 8.106 Strategic Policy 9 sets out the strategic approach to development outside settlement boundaries. , Two policies set out the circumstances where limited housing development in the countryside would be appropriate. These policies support the strategic policy on development outside settlement boundaries as well as the two strategic policies on housing. One policy is about exception sites which are adjacent to or abutting settlements. The other policy applies to development adjoining settlements but would also be one of the few circumstances where new isolated dwellings in the countryside may be appropriate. It addresses housing for rural workers.
- 8.107 The plan does not propose additional policy regarding the other few circumstances where isolated dwellings in the countryside are appropriate. Instead the LPA relies on national policy, currently NPPF paragraph 80.

46. Policy – Rural Exception Sites and First Homes Exception Sites

This policy will address the following issues

Rural Exception Sites

Only on small sites (site size to be defined)

- Mix of types of affordable housing meeting proven, unmet need of the local community, evidenced by latest Local Housing Needs Assessment, Housing Needs Surveys produced by Devon Communities Together, and other local data such as Neighbourhood Plan, Parish Survey or Parish Plan
- Occupiers to have a local connection with the settlement or group of settlements

First Homes Exception Sites

- Site not in in AONBs, nor at settlements in Designated Rural Areas
- National discount rate (30%)
- Site size is proportionate to the existing settlement
- Affordable housing meeting proven, unmet needs of the District, evidenced by the latest LHNA
- Could include a local connection requirement but this is subject to national policy (reversion back to no local connection test after 3 months)
- Can include a small amount of other types of affordable housing
- Not applied to sites with full or outline planning permissions in place or determined before 28 December 2021 (or 28 March 2022 if there has been significant pre-application engagement)

46. Policy – Rural Exception Sites and First Homes Exception Sites

For Rural Exception Sites and First Homes Exception Sites

Site is not allocated for housing and is beyond, and either abutting or physically closely related to, the settlement boundaries of villages, or physically very well related to the built form of villages where there is no settlement boundary; and evidence demonstrates:

- Secure arrangements ensure the housing will remain affordable and available to meet the continuing needs of local people
- A small element of market housing may be included, to provide sufficient cross-subsidy to enable the delivery of affordable homes without grant funding. At least 66% of dwellings proposed must be affordable dwellings.
- If occupiers meeting the relevant local connection criteria cannot be found then a cascade approach is applied
- The policy applies to conversion or replacement of dwellings on these sites
- Preclude extensions of dwellings on Exception sites where this would result in the affordable housing on the site becoming too expensive compared to disposable incomes in the area, or where proven need exists for smaller affordable dwellings.

Commitment to a Supplementary Planning Document setting out guidance on how the policy will be implemented

Justification for inclusion of policy

- 8.108 Exception sites are sites brought forward outside of development plans, beyond settlements, in order to deliver affordable housing. Exception sites deliver housing as an 'exception' to other policies in the development plan which otherwise restrict development. Following the change in Government policy which came into effect in June 2021, there are now two types of exception sites: 'Rural Exception' sites and 'First Homes' Exception sites.
- 8.109 The policy is essential in this rural area, where affordability is such an issue. It enables the local plan to support the Council Plan's aim to deliver more affordable housing and aligns with the East Devon Housing Strategy, offering new opportunities for the emerging models for affordable housing delivery. As the local plan's response to NPPF 2021 and the Written Ministerial Statement (WMS) of 24 May 2021, the policy supports opportunities to bring forward exception sites providing affordable housing to help meet identified needs. It complements Policy 37 to address affordable housing needs in East Devon.
- 8.110 Government policy towards Rural Exception sites differs from that towards First Homes Exception Sites, and the local plan policy reflects this. They vary in the following matters:
- The type of affordable housing. First Homes Exception sites focus on First Homes which the Government defines as affordable housing, and

only a small proportion of other affordable housing may be included. Rural Exceptions aren't limited although they should include 25% First Homes

- The level of discount for discounted market housing. First Homes are 30% discount, and a maximum £250,000 first sale price. The discount could be 40% or 50% if this is set out in the local plan policy, and can be justified (including viability evidence). The 2020 LHNA indicated that viability may limit discount rates to no more than 40%.
- Location. First Homes exception sites could only be adjacent to Exmouth, Sidmouth, Honiton and Seaton (ie outside the Designated Rural Area), not in the AONB. Rural Exceptions sites are not precluded from the AONB or DRA
- Site size - Rural Exception sites are 'small' (the previous local plan has a 15 dwellings threshold) but First Homes Exception sites are 'proportionate to the settlement size'
- Occupier restriction/Eligibility. There is a local connection test for Rural Exception sites. The Council has previously applied a cascade approach with no time limit. A local connection test can be applied to First Homes Exception sites but only for 3 months, before reverting back to national policy which doesn't have a local connection requirement
- Perpetuity. Use of S106 agreements to retain affordable housing in perpetuity is similar for both sites but mechanisms are available to vary or remove restrictions. Differences are due to the mix of affordable housing. First homes are an affordable home ownership product. On Rural Exception sites the issues of staircasing for example can impact on Shared Ownership if no grant funding occurred.

8.111 National policy allows a small amount of market housing on both types of sites. This acts as a cross-subsidy, enabling affordable housing delivery without the need for grant funding. The proportion of market homes allowed on the site is at the LPA's discretion, and can be specified in the plan policy. The Council has previously applied a minimum 66% affordable housing requirement to Rural Exception Sites and that level of cross-subsidy has been sufficient to meet policy requirement. The proportion of market housing to apply to First Homes Exception Sites will need to be justified, mindful that there could be other affordable housing types on the site. The Council has previously taken the view that unlike Policy 37 (affordable housing), exceptions sites are, by definition, an exception to the standard housing delivery, so the option to make a viability argument in this case does not apply.

8.112 The policy addresses the relevant issues. All the issues listed in the preferred policy are raised in NPPF and related PPG. The policy reflects national planning and housing policy, particularly regarding the mix of housing to meet needs and housing quality.

8.113 The main matters where the local plan provides the local policy components are:

- Defining what is meant by 'small site' (is it a maximum 15 dwellings site threshold?) and what is meant by 'proportionate'
- Setting a minimum percentage of affordable housing on the site
- Specifying criteria for local connection priorities for Rural Exception sites
- Deciding whether a 30% or 40% discount value should apply (current evidence suggests that a 50% discount is unlikely to be achievable, so is not a reasonable alternative)
- Deciding whether a local eligibility criteria should apply, subject to the 3 month limit for reversion to national policy
- Tying the issue of site location to details in an SPD which will make clear what is meant by 'abutting or physically closely related to', the settlement boundaries of villages, or 'physically very well related' to the built form of villages where there is no settlement boundary in East Devon.
- Addressing the issue of retaining affordable dwellings in perpetuity but leaving details of how this is achieved to be set out in the SPD.

8.114 Additional evidence will be needed to justify local components of the policy, notably what is meant by 'small' and 'proportionate', and the level on 'need' for First Homes. The Council can consider whether there should be local criteria relating to First Homes. This would need evidence to justify any higher discounts, higher percentage of First Homes and any local connection criteria.

8.115 The May 2021 Written Ministerial Statement allows LPAs to introduce local requirements relating to First Homes through a policy statement in advance of the local plan. Members' views are to be sought about whether to pursue this approach outside of plan-making. The local plan would supersede any early policy statement by the LPA when the it is adopted.

Currently rejected alternative approaches to Rural Exception Sites and First Homes Exception Sites

Option b Higher percentage of affordable housing on Rural Exception sites

This would deliver more housing that is affordable, but may reduce the viability of the development. Need for viability evidence. For the present, this reasonable alternative is rejected.

Option c Lower percentage of affordable housing on Rural Exception sites

This would deliver less housing that is affordable, but may increase the viability of the development. Need for viability evidence. For the present, this reasonable alternative is rejected.

Option d Apply a higher discount rate (40%) to the First Homes discount market housing on First Homes Exception sites

This would make more homes potentially affordable for first time buyers in areas where house prices are very high. The upper price limit remains £250,000 after the discount is applied. It may still not bring the price down sufficiently in East Devon. Need for viability evidence. For the present, this reasonable alternative is rejected

- 8.116 Current evidence suggests that applying a higher discount rate (50%) to the First Homes discount market housing would not be achievable. This is therefore not a reasonable alternative and so is rejected.

47. Policy – Housing for rural workers

This policy will address the issues for dwellings for rural workers outside settlements:

- Proven and essential agricultural or forestry or rural businesses need for the occupier of the proposed dwelling to be housed permanently on the unit or specific rural location
- Dwelling size commensurate with the scale of the established functional need
- Qualifying tests of occupancy relating to employment in the rural business

Where need is unproven or new agricultural, horticultural, forestry or other rural business is being established:

- consider a 3 year, time limited, temporary dwelling eg a mobile home or caravan until the economic viability of the enterprise is established; and
- the business has realistic prospects of meeting functional and economic tests

Where rural business has been operational for at least 3 years, and meets the functional and economic tests* ie business is commercially viable with clear prospects of remaining viable

- consider a permanent dwelling where:
 - No buildings for conversion on the holding are suitable to meet the residential need
 - No existing dwellings are available within a nearby settlement or location
 - the history of the holding, the recent pattern of land use and building and, recent disposals of land and property, is taken into account
 - Specify maximum net usable floorspace (150 sq.m –*further work need to justify this*), larger property to be justified
 - minimise visual and environmental impact by locating dwelling close to existing buildings /dwellings, where practical for its purpose
 - control dwelling occupancy through planning conditions - ensure that it cannot be sold on or sublet for general accommodation unrelated to the enterprise

Any permission granted is tied through legal agreement to the business holding
Extensions to or replacement of agricultural or forestry or rural business-related dwellings will require a reassessment of need, excluding minor works

Temporary or seasonal accommodation requirements to serve rural enterprises are considered on a case-by-case basis.

Justification for inclusion of policy

8.117 Housing need includes the need for new dwellings for rural workers. Rural workers are those people whose place of work is located in, and related to, the countryside, typically comprising farm workers, forestry workers and others involved in rural-based enterprise. To promote sustainable patterns of development rural workers will usually be expected to find housing in existing rural towns and villages. However, an exception can be justified where it can be

demonstrated that a rural worker has an essential need to be available at most times as part of the operation of a rural business in accord with national policy.

- 8.118 This policy supports enterprises in the rural economy whilst limiting sporadic development in the countryside. From time to time, there may be special circumstances that justify this taking place; for example, it may be essential for a rural worker to live permanently at or very near their place of work. Whether this is essential depends on the needs of the enterprise and not on the personal preferences or circumstances of any of the individuals concerned. Need can include those taking majority control of a farm business. The preferred policy does not set out detailed policy on 'succession' need, and the Council considers this is more appropriate to the detailed guidance on policy implementation that an SPD can provide.
- 8.119 When considering such proposals, the history of the holding, the recent pattern of land use and building and, recent disposals of land and property, will be taken into account. The recent sale of land and property could constitute evidence of lack of need. Any existing or permitted dwelling serving or closely associated with the holding has been sold or changed from residential use, or separated from the holding or agricultural buildings converted to unrestricted residential development (including Use Class Q) within the previous three years will count against the need assessment
- 8.120 Robust evidence will need to be provided by applicants regarding functional and economic tests, and occupancy/eligibility criteria. The plan could set out the tests in an annex or they could be in an SPD. This will require a business plan to set out projected future operations, rural business financial assessment, and demonstrate future operational viability.
- 8.121 The approach of permitting a temporary dwelling on the holding for a limited time allows time for evidence to be gathered to demonstrate the viability of a new enterprise. Renewal of the temporary dwelling is only considered where it would provide continued occupation whilst a permanent dwelling is constructed on the holding.
- 8.122 Temporary or seasonal accommodation proposals would need evidence to demonstrate a proven business case for accommodation; that there is no appropriate accommodation available in nearby settlements; and the mitigation of impacts
- 8.123 The policy addresses the relevant issues. All the issues listed in the preferred policy are raised in NPPF and related PPG. The policy reflects national planning and housing policy, particularly regarding the need to avoid sporadic development in the countryside.

8.124 The main matters where the local plan provides the local policy components are:

- the functional and economic tests of the business
- dwelling occupation criteria
- maximum floorspace of the dwelling (gross internal area) – this would need evidence.

Currently rejected alternative approaches to Housing for Rural Workers

Option B - Rural business succession (transfer of management)

One potential alternative would be to supplement the policy by adding in a clause related to housing to support rural business succession (transfer of management) as highlighted below but at this stage this is not the favoured option. This approach allows an additional new dwelling legally tied to the existing agricultural, horticultural, forestry and rural enterprises to help the business be transferred to the next generation. It is aimed at encouraging younger people to manage farm businesses and promote the diversification of established farms. In this option it is accepted that the existing dwelling could be occupied by a person who would, following the transfer of management responsibilities, no longer play a major functional role in the enterprise, and may progress towards retirement. The main issue is that it could lead to incremental growth of housing in the countryside, as management is transferred, and there may be other means, including Class Q permitted development, that need to be considered before concluding that additional dwellings are necessary.

Option C - Low impact Residential development

This option would supplement the policy by adding policy on Low Impact Residential Development in the countryside, categorising it as a type of housing for rural workers. There is a growing movement of people who genuinely wish to live differently and pursue development and a lifestyle which is far more sustainable and low impact than might otherwise be considered usual at this time in East Devon. Their homes can be unconventional structures, built on-site, of natural materials sourced within the locality. Outside of a settlement, low impact housing would be functionally tied to an enterprise needing a countryside location ie agriculture, forestry and horticulture land use, with the house being on the land directly tied to that use. The Council is mindful that low impact dwellings proposed at locations adjoining or well related to settlements would be competing for sites with other development that is appropriate in the those locations. Development needs to be proportionate in scale to the settlement, making a positive environmental, social and economic contribution. It is vital that there is a legal tie between this type of residential development and evidence of a functional and viable rural business that would substantially meet the needs of all residents on the site within a reasonable period of time and no more than 5 years from first occupation. The number of adult residents needs to be directly related to the enterprise's requirements. Low impact means not only being broadly self-sufficient, but doing so in a way which has no significant environmental impact

Currently rejected alternative approaches to Housing for Rural Workers

and instead brings environmental enhancements. Proposals for low impact residential development would need to demonstrate low impact on environment, landscape and resource use. It may be appropriate to permit a temporary permission in the first instance in order to test or demonstrate policy compliance. Permanent planning permission would only be granted if the LPA is satisfied that policy requirements have been and will continue to be met.

There is a risk that this alternative option would introduce sporadic housing development in to the countryside, and raise issues of precedence for further development, at a scale and impact that would be contrary to the Spatial Strategy. Whilst this is a reasonable alternative, it is therefore rejected.

Other housing matters

8.125 There are three topic areas where the draft plan does not propose a preferred policy and there are no alternative options for additional policy:

Residential Moorings, Marinas and Houseboats

8.126 There is no proposed local plan policy on this matter as this type of development is rare in East Devon, and therefore policy is unnecessary.

Empty Homes.

8.127 Bringing long term empty homes back into residential use is a priority for the Council, but provided the empty home was last used for residential purposes (with planning permission, or lawful use) then further planning approval for it to be used for housing should be unnecessary. Planning approval may still be needed for other reasons. Other policies would guide redevelopment, conversions, extensions and alterations or changes to other uses, enabling buildings to be brought back into beneficial use. Design and heritage policies may also be relevant.

Principal Residence Requirement.

8.128 Parts but not all of the District face high rates of second homeownership. Concerns were raised during the Issues and Options consultation about the extent of second home ownership adversely impacting on the affordability of housing for local residents in East Devon. There were also concerns about the adverse impact of properties left empty for much of the year, reducing the vitality of local communities, with seasonal impacts on the local economy. One policy approach suggested by respondents is to restrict the occupation of new dwellings to 'Principal residence only'. These are those dwellings occupied as the residents' sole or main residence where the residents spend the majority of

the time when not working away from home. The Council would need to consider whether including this type of policy in the local plan for all or parts of the District would:

- i. Reduce second homes demand?
- ii. Lead to a reduction in the high level of second homes?
- iii. Positively or negatively impact affordability in East Devon?
- iv. Shift demand for second homes to alternative locations and onto the existing stock in East Devon?

8.129 Evidence about second homes in neighbouring Dorset¹⁸ concluded that inclusion of a principal residence policy in the Dorset Local Plan could cause many negative externalities which may outweigh the positives.

8.130 The Council Plan identifies the need for a study about second homes in East Devon. This needs to establish whether there is evidence that would

- Lead to conclusions about East Devon that are similar to those for Dorset; or
- Demonstrate that a principal residence requirement policy could be beneficial for East Devon and so justify including a policy in the Local Plan.

8.131 Evidence available at this time confirms that at 3.3 per cent of council tax banded residential properties, second homes are not a high proportion of the District's housing. 23 of the 30 of East Devon wards have less than 5% of council tax banded properties that are second homes. However, that percentage is somewhat inflated, as the council tax data includes annexes and other properties that would not be defined as second homes for planning purposes. A few of locations in the District on the coast are higher:

- The highest rate is in Beer and Branscombe Ward, where 16% of council tax banded residential properties are second homes (22% if self-catering rated properties are added).
- Sidmouth and Trinity Wards each have 10 to 11% (14 to 15% with self-catering rated added)
- 4 wards (Budleigh and Raleigh, Exmouth Town, Seaton and Sidmouth Rural) have 5 to 6% second homes (6 to 7% with self-catering rated added).

8.132 Given the coastal locations, most self-catering rated properties are likely to be holiday lets. On the basis of this evidence, conclusion reached is that this is not a district wide issue, and the scale is not such that it warrants a local plan policy. For some places this may be a local issue which could be addressed through a

¹⁸ Dorset Council Local Plan Second Homes Background Paper weblink [9e6c81c7-b186-cad3-b5c9-99dab34d40f7 \(dorsetcouncil.gov.uk\)](https://www.dorsetcouncil.gov.uk/9e6c81c7-b186-cad3-b5c9-99dab34d40f7)

Neighbourhood Plan including a policy on principal residence, if there is to evidence justifying this.

- 8.133 Including a district-wide policy in the Local Plan to restrict new open market housing to ensure its occupancy as a Principal Residence is therefore not recommended at this time due to the current evidence. If further evidence becomes available, this may change the Council's perspective on this type of policy.

DRAFT

Chapter 10 - Supporting jobs and the economy and vibrant town centres

- 9.1 Chapter 4 of the plan sets out the preferred Economic Vision and Economic Strategy and the Strategic Policy on employment land, address the strategic employment priorities of the area and any relevant cross-boundary issues. They cover the scale and distribution strategy for future employment development in the plan period, and employment site allocations. Chapter 10 includes the Strategic Policy on the town centre hierarchy and retail provision.
- 9.2 Those policies are supported by the following suite of twelve non-strategic policies which provide a clear basis for development management and the determination of employment and other economy related development proposals.

48. Policy – Employment development within settlement boundaries and sites in the Enterprise Zone

This proposed policy will address the following issues

- Supporting employment development on local plan employment site allocations (including mixed use with employment), for the uses set out in relevant policies
- Supporting employment development in Use Classes E(g), B2, B8 for new businesses or relocation or expansion of existing businesses within Settlement Boundaries and part of the Exeter and East Devon Enterprise Zone in the District, on sites not allocated or identified by the plan for other uses, by
 - Concentrating employment development to improve settlement self-containment, with the scale and type of development consistent with the settlement hierarchy
 - Supporting the roles and functions of the Enterprise Zone
 - Restricting use within or adjoining residential areas to Use Class E(g)¹⁹, subject to permitted development rights and impact on amenity; need for appropriate buffer
 - Prioritising re-use of existing buildings and previously development land except where this would result in significant biodiversity loss.
 - Considering new build where there are no available existing buildings, or reuse or extension of buildings is impractical or unviable
- In addition, in the seven coastal and market towns of the district, Cranbrook and the second new settlement, ensuring employment development is consistent with and supports town centre policies,

¹⁹ which can be carried out in any residential area without causing detriment to the amenity of the area

- Locating Use Class E(c)²⁰ in town centres unless it is impractical
- Outside of town centres, class E(g)(i) (office) development will need evidence (sequential testing and market appraisal) demonstrating why development could not be located on more accessible central site within or close to town centre
- Supporting mixed use urban regeneration schemes designed to increase net job opportunities in Use Classes E(g), B2, B8, through integrated, well designed, vertical and horizontal mixed use development, with uses, roles and functions appropriate to the location, guided by master-planning
- Within existing industrial estates and business parks, as well as Use Classes E(g), B2, B8, indicating the following uses are considered appropriate up to a specified percentage of site area or floorspace
 - display repair and sale of vehicles, vehicle parts, boats and caravans
 - indoor sports or recreational uses
 - a limited element of retailing where this is ancillary to another permitted main use (use classes E(g), B2, B8)
- Locating large-scale warehousing and distribution development only at the new settlement and Tier 1 and 2 settlements, and the Enterprise Zone, subject to criteria
 - only on mixed use or employment site allocations or on larger existing employment sites and
 - providing the ability of those sites to deliver significant high value or transformation development is not compromised
- Supporting measures to provide necessary infrastructure and promoting provision of active travel measures to enable employment development proposals to be accessible by walking, cycling and public transport, and
 - Not generate traffic of a type or amount inappropriate for the character of existing or improved access roads
 - Not harm character/setting of local settlements or amenity of nearby residents
 - Not harm sites of nature conservation value or archaeological importance or buildings of architectural or historic interest

Justification for inclusion of policy

9.3 The Council Plan's priority is for a resilient economy. The Council promotes and supports job growth in the District. There are opportunities in the traditional employment land use categories of business use, general industrial use and storage/distribution use and "Sui Generis" industrial uses. Tourism, retailing, health care, education and leisure facilities are significant employment generators and are important to the functioning of the district's economy and the well-being of local communities.

²⁰ Use Class E(c) The following kinds of services principally to visiting members of the public i. financial services ii. professional services (other than medical services) iii. any other services which it is appropriate to provide in a commercial, business or service locality

- 9.4 East Devon benefits from significant employment opportunities in the western side of the district associated with a wider sub-regional economy. This includes the Science Park and at Exeter Airport and related sites. But East Devon is also a rural and coastal district. There are traditional business parks and industrial estates across the district, focused at the towns. Some employment growth has taken place away from traditional business parks and industrial estates, and will continue to do so, for example through the diversification of the rural economy, and the growth of leisure and tourism and increase in home working.
- 9.5 The local plan will provide for new employment provision to meet the future needs of the District. In the western side of the District, the focus will be on providing higher density, high value jobs with particular focus on encouraging strategic inward investment and transformational sectors. Elsewhere in the District employment will mostly be geared to serving local needs with a view to securing jobs close to existing and proposed homes so that people have the option of not needing to commute long distances to work.
- 9.6 The policy focuses on planning for sufficient employment sites for industry, offices and warehousing across the District, with appropriate flexibility through a range of available land and premises that can accommodate the changing needs for business start-ups, expansions and relocations. New supply for the plan period would be achieved from employment development on local plan site allocations, existing commitments not yet delivered and windfall development.
- 9.7 The preferred policy option is to focus employment development within settlement boundaries. The aim is to continue to meet a high proportion of the level of need for employment land (in Use Classes E(g), B2, B8) with sufficient supply flexibility, at locations that support settlement self-containment, consistent with the settlement hierarchy and the network of centres. These are the places with supporting services and facilities. The EDNA and Employment Land Review will provide evidence about the mix of sites needed to support businesses. It is expected that as well as sites suitable for transformation and high value employment, there will continue to be a need for a wide mix of sites in terms of size and quality to suit the needs businesses now and as they change over time. There will still be a need for traditional industrial estates and business parks. There is separate local plan policy on the retention of these sites and existing business parks and industrial estates over the plan period.
- 9.8 **New sites** The ability for new sites to meet need is subject to the Council's evidence (work in progress) to demonstrate that there is a need for specific employment uses and providing this will allow for sustainable growth in suitable locations. The EDNA will identify the scale of need for employment land in East Devon over the plan period. The HELAA will provide further analysis about availability, suitability and achievability of sites put forward for development through the Call for Sites. Employment Land Reviews will provide further evidence about sites' availability and suitability for employment uses. The Council's site selection process identifies potential sites for allocations as employment or mixed use sites.

- 9.9 Policy on employment development at Cranbrook is set out in the Cranbrook DPD, now at an advanced stage of plan-making.
- 9.10 **Office development** is subject to a sequential test, but is primarily directed to the town centres identified on the policies map.
- 9.11 **Warehousing** The plan will make provision for warehousing, informed by the emerging evidence on employment development need. Warehousing for storage and distribution is a part of the economy. Efficient distribution infrastructure is essential, supporting the supply chains of modern manufacturing and retailing through 'just in time' systems. This depends on transporting goods and materials, much of it by road in HGVs and can lead to significant traffic movements in a locality. Good access to the strategic road network is critical for distribution nationally and internationally. Warehousing is a relatively low density use of land, in terms of the number of jobs available for local people, and generally not high wages. Warehouses can be substantial buildings on large plots, with considerable visual impact, particularly if concentrated along roadside locations. The preferred option policy therefore directs warehousing to the allocations and existing employment sites suitable for warehousing to tier 1 and 2 settlements and the new settlement. The policy takes a restrictive approach towards large windfall proposals, and does not support their development elsewhere in the District, particularly in the countryside or if it would reduce the land available for high value and transformational employment development.
- 9.12 **Previously Developed Land** The plan supports the reuse of previously developed land, and opportunities for regeneration within the settlement boundaries. However, at this time the scale, type and areas for potential regeneration is unlikely to be substantial. The plan therefore does not propose significant areas of 'opportunity zones' for mixed use regeneration, with the flexibility to respond to the challenges of attracting businesses to such areas. Where regeneration opportunities arise, they will need master-planning to help integrate new development with the adjoining area, and provide a quality environment, respecting historic assets.
- 9.13 It may be necessary to consider new build development where no suitable buildings exist or reuse or extension is impractical or unviable.
- 9.14 **Changes of use** Some changes between uses can already occur on employment sites, for example if the planning approval includes a range of employment uses, subject to conditions and legal agreements. Furthermore, permitted development rights provide flexibility. For example they allow a unit of up to 500 square metres floorspace in 'General Industrial' use (Use Class B2) to be changed to a 'Storage and Distribution' use (Use Class B8). The Council is also mindful of recent changes to the Use Class Order permitting changes between specific categories of use, allowing sites to be used more flexibly. If a building or other land is being used in a way that previously was in Class A1 (shops), A2 (financial and professional services), A3 (restaurants and cafés) or B1 (business) then it is treated as though it is being used for a purpose specified in the new Class E. Change of use to another use within Class E will be allowed without the need for planning permission. This does not impact on

Class B2 and B8, but could lead to loss of business uses, weakening the mix of employment opportunities. This is exacerbated by the introduction of new Use Class MA which removes the need for planning permission for changes of use of Class E “commercial, business and service uses” which meet certain criteria to “dwelling houses” (superseding the former Class O), subject to legislation details.

- 9.15 **Mixed use within existing employment sites**, focuses on Use Classes E(g), B2, B8, but the preferred policy recognises that a small amount of other employment uses may be appropriate. It will need to indicate the types that are acceptable, and justify any limit on their development. The changes to the Use Class order brings additional flexibility but could potentially result in a broadening of employment mix, reducing the availability of land and premises for Use Classes E(g), B2, B8. This emphasises the need to ensure that the plan ensures sufficient supply flexibility to provide a range of sites and choice for businesses as their needs evolve.
- 9.16 On larger development allocations there are opportunities for mixed use, so that employment development to accommodate businesses and new jobs will be required to be provided alongside new housing. The employment will therefore be Use Class E(g) suitable for location in or adjoining residential areas. Retaining Class E(g) on the site is potentially undermined by permitted development rights. If there is evidence on loss of business uses to resident the Council could consider an Article 4 direction applying to one or more specific sites, to control development by requiring a planning application.
- 9.17 **Other locations generating employment.** It is recognised that in this rural district, modest employment growth will also take place away from traditional business parks and industrial estates – for example through the diversification of the rural economy, and the growth of leisure and tourism and increase in home work. This preferred approach does not support widespread dispersal of large scale employment generating uses in the countryside.

Currently rejected alternative options to employment development within Settlement Boundaries

Option b – Increased flexibility to allow other job generating uses on all or some employment sites, or removing the percentage threshold of these uses on a site

This option would allow other job generating uses on allocations and existing employment sites that are not Use Classes E(g) B2 or B8, to provide more choice and flexibility for other uses in finding sites and premises. There would be no site percentage threshold for these other uses. Unfettered flexibility could reduce the risk of underused employment sites. This could reduce the amount of vacant plots and buildings. Sites and site owners would benefit from increased occupancy.

However, this option reduces the availability of land and premises for Use Classes E(g) B2, and B8. Increasing competition for sites and plots from higher value uses such as retail could drive up site values and rentals, so it is more difficult for traditional and transformational business uses to find suitable sites for start-up or

expansion. If businesses cannot find sites suited to their needs, they may choose to move out of East Devon to find land and premises suitable for their needs. Some may cease to operate, leading to direct loss of local employment, impacting on supply chains, demand for services and jobs. Not all employment uses are compatible. Mix of uses can adversely impact on businesses' operational efficiency and their competitiveness. On balance, and mindful of the Economic Strategy the disadvantages are such that although this option is a 'reasonable alternative', it is rejected.

Option c – Less restrictive approach towards large scale Warehousing and Distribution (B8)

Warehousing for storage and distribution is a part of the economy. Efficient distribution infrastructure is essential, supporting the supply chains of modern manufacturing and retailing through 'just in time' systems.

This option is a more flexible approach to B8 windfalls enabling supply to come forward in response to demand for sites for this type of employment development. It would provide jobs. It would accommodate large-scale, warehousing and distribution development, outside of allocations and existing employment sites at Tier 1 and 2 settlements, at locations outside the AONBs and Coastal Preservation Area. They would need direct access to the Strategic Road Network, but away from areas sensitive to heavy vehicle movements. Access to rail or waterways would be preferred. The western side of East Devon has locational advantages due to its proximity to the Strategic Road Network, which logistic businesses are likely to find particularly attractive. The option would provide greater flexibility.

However, there are disadvantages. Warehousing is an inefficient use of land, when measured in terms of delivering high value jobs. It is unclear how many jobs might be available to a local labour force, as distribution could be national and international. Large sites would be attractive to meeting a wider regional/sub-regional need for logistics sites, not East Devon need. The risk is that this type of development could detract from the ability to transform the economy. It is unclear how well related sites are to local labour supply or help settlement self-containment resulting in need for in-commuting from other parts of the district. The scale of development could be too great for smaller settlements, resulting in unacceptable impact on small rural communities. Warehousing would use large areas of greenfield sites (no large PDL sites available and suitable – subject to EDNA evidence). It is difficult to conceal very large warehouses or reduce the visual impact of rows of big sheds lining land adjoining the SRN would have an adverse impact on the landscape quality of East Devon. The scale of HGV movements would add to HGV use of roads and could impact on SRN junctions.

This is a 'reasonable alternative' because warehousing and distribution is a part of the economy, enabling goods and materials to be stored and distributed to manufacturers and retail outlets. Warehousing/distribution provides jobs. But the

disadvantages are substantial, and the Council considers that they outweigh the advantages. This option is therefore rejected.

Option d – Prioritising Mixed-use Regeneration

This option prioritises more regeneration, with a focus on flexible, mixed use as an alternative to developing greenfield sites. NPPF emphasises that strategic policies should set out a clear strategy for accommodating objectively assessed need in a way that makes as much use as possible of previously developed land (PDL) but it does not prioritise redevelopment of PDL before use of greenfield sites.

Regeneration brings PDL back into productive use. It can and should respect and retain the significance of historic assets, complement town centre uses, and improve the quality of the area. In doing so it can further encourage investment, attracting businesses and occupants. But master planning is essential.

Opportunity Zones, for example, can be successful in regenerating larger, old industrial areas or transition zones between the town centre and the suburbs. They provide a flexible approach, to address a wide range of challenging issues. Regeneration revitalises run-down areas, to overcome dereliction and vacant premises, blight, and lack of investment. This can deal with industrial legacy eg remediating poor ground conditions particularly contaminated or unstable land, and a wide mix of buildings and styles, including historic assets. It can help to create new urban 'quarters' for specific purposes (such as cultural, mixed employment, health/well-being/care, creative and educational quarters). Improved urban permeability can be achieved by improving links between the town centre and surrounding neighbourhoods. At the same time, the approach is flexible, focused on developable sites responding to changing circumstances, the needs of new businesses and occupiers, and the availability of funding.

However, the amount of historic industrial areas in East Devon is limited. The scale and types of regeneration sites in East Devon are unlikely to be sufficient to lend themselves to a large scale, comprehensive approach to regeneration and the creating of new urban 'quarters'. To date the focus has been on modest, town centre schemes in East Devon. Due to costs and lower values, delivering regeneration usually requires funding and intervention. Competing for national funding is difficult, due to the priority towards larger scale proposals elsewhere, particularly under a levelling up agenda. On balance, although prioritising mixed use regeneration is a reasonable alternative, it is unlikely to be the principal source of new land and buildings to meet objectively assessed need for employment development. This option is therefore rejected.

49. Policy –Employment development in the countryside

This policy will address the following issues:

Supporting and encouraging businesses in the countryside, where small scale employment development will not cause

- Unacceptable adverse impact to the safe and free movement of pedestrian, vehicular or other traffic on the trunk or rural road network as a result of heavy vehicle usage,
- Adverse impact on the valued character, qualities and assets of the surrounding natural or historic environment
- Adverse impact on amenity for uses and occupiers in the site or on neighbouring land

Intensification of existing employment sites in the countryside

Where evidenced that the business or employment site or industrial estate in the countryside is at or within 10 per cent of full occupancy

- Within the site, supporting expansion of existing businesses in the countryside through small scale employment development resulting in the intensification of the existing employment site without extending the site, subject to
 - Expansion being proportionate to the existing size and scale of site operations, up to a 10 per cent net increase in employment floorspace within the curtilage in total in this plan period
 - Prioritising reuse or adaptation of existing buildings to reduce the need for additional build development
 - Extending existing buildings only if evidence demonstrates that re-use or adaptation of buildings is not viable or practical

There will be no development leading to the intensification of uses on the existing employment sites at Hill Barton and Greendale Business Parks. Subject to permitted development, for this policy intensification includes

- Development of new buildings for any use
- Spatial intensification through development of extensions to existing buildings increasing the footprint, or vertical expansion from raising the height of the building, or adding floorspace in additional storeys or in mezzanines.
- Development that leads to longer hours or more 24 hours of operation
- Development increasing HGV and other vehicular movements on local roads
- Development through higher density such as replacement buildings extending on to current outdoor storage areas

Extension of existing employment sites in the countryside

Where evidenced that the business or employment site or industrial estate in the countryside is at or within 10 per cent of full occupancy

- Supporting expansion of existing businesses in the countryside through small scale employment development by extending the site, where
 - Evidenced that intensification of the existing site is not viable or practical
 - Expansion is proportionate to the existing size and scale of site operations, by up to a 10 per cent net increase in employment floorspace of the existing employment site, in total in this plan period

- The site extension adjoins the existing employment site, creates a single operational unit, and does not create an additional point access from the road network; and
- Reusing existing buildings; any new buildings to be well designed

There will be no development through site extensions of the existing employment sites at Hill Barton and Greendale Business Parks.

Re-use of existing rural buildings

- Consider re-use or adaptation if the building is a Listed Building or one that is recognised as a locally important building and the proposal is the only reasonable means of securing its retention
- Additional to Policy on farm diversification, supporting proposals for small scale employment development through re-use and adaptation of existing rural buildings not currently used or last used for employment, where the buildings are
 - readily accessible to the level 1 and level 2 settlements via a range of modes of transport
 - of sound and permanent construction, and
 - capable of adaptation or re-use without major re-building, alteration, or extension

Justification for inclusion of policy

- 9.18 Employment needs to be available in the countryside to support rural communities, focused on existing sites, and small scale development. Policy 6 defines the countryside as the areas outside of the settlement boundaries, as defined on the Policies Map. This policy balances protection for the character and qualities of the countryside with promoting appropriate scale employment. There is separate policy on farm diversification.
- 9.19 It is important for East Devon to develop its employment base and where established sites are successful, an intensification of employment uses or extension of an existing employment can be considered if this supports additional employment accessible to local communities. This enables development to make use of existing sites and infrastructure. The scale of site intensification or extension is limited to a maximum of 10 per cent in the plan period, compared to the 2020 baseline (percentage to be justified).
- 9.20 Criteria will prioritise previously developed sites and those sites adjacent, or in close proximity, to a settlement to reduce the need to travel and increase settlement self-containment. Where sites are extended, need to ensure that development is sensitive to its surroundings, is of an appropriate type and scale and will not result in harm to local amenity.
- 9.21 Hill Barton and Greendale Business Parks are large, free-standing, historic employment areas within the countryside, not attached to or directly supporting the self-containment of any particular settlement. Accessing their locations for

employment is primarily by motorised vehicles, with limited opportunity for more sustainable modes of transport. Development leading to intensification of use or site extension is not supported as it would compound and exacerbate the adverse environmental and social impacts. This approach will however need to be kept under review if Members are minded to support the concept of a further new community and while options are assessed as some could see a new community developed close to these sites.

Currently rejected alternative approaches to small-scale employment development in the countryside

Option b Allow significant employment development in the countryside that is not well related to existing Tier 1 and 2 settlements

In this option, the scale of employment development in the countryside is higher and site locations are not well related to existing settlements. Development is on free-standing, greenfield sites with access to the main road network. They provide land for development for employment uses which generate jobs. There are already examples in East Devon where a concentration of employment uses has occurred in the countryside that are not well related to existing towns, not well related to public transport services, and not easily accessible by walking or cycling. They accommodate uses that either cannot afford sites on existing sites at settlements, or where land and premises are not available. However, allowing these sites to expand further or for similar sites to develop in the countryside will have environmental and social impacts. This option is at odds with the policies towards climate change, settlement self-containment, and providing access to employment by active and sustainable means of transport. On balance and for these reasons, although this is a reasonable alternative, this option is rejected.

50. Policy – Farm Diversification

This policy will address the following issues

- Supporting farm diversification through the introduction of new employment onto established farm holdings, preferably a rural business or service or one that supports an established rural business. Consider other uses if evidence shows that employment use would lead to adverse impacts or that employment use is unviable. Tourism, leisure, recreation or locally affordable housing provision may then be appropriate subject to this constituting sustainable development.
- Need for diversification proposals to demonstrate
 - Development is compatible with but evidenced to be subsidiary to the agricultural operations on a farm, and that the development is operated as part of the overall agricultural holding
 - Development in terms of its scale, nature, location and layout does not detract from or prejudice the existing agricultural undertaking or its future operation
 - Adequate foul drainage facilities
 - No adverse impacts arising from vehicle movements, increased noise, smells, or other form of pollution. It may be necessary, for example, to limit the scale of on-farm anaerobic digesters.
 - Scale of activities associated with the proposed development is appropriate to the rural character of the area
 - No adverse impact on the character of surrounding natural or historic environment
 - No adverse impact on protected species; opportunities eg for roost sites
 - Any new building (and parking and other structures/storage) is modest in scale, sited in or adjacent to an existing group of buildings, compatible design and blends into the landscape (design, siting and materials)
 - Re-use of existing buildings within the farm holding, wherever possible, to reduce the need for additional built development
- Where planning permission is required for the residential conversion of a building as part of a farm diversification project, need evidence from a marketing exercise demonstrating that employment, tourism, leisure and recreation uses are unviable

Justification for inclusion of policy

- 9.22 Agriculture underpins the District's rural economy and supports a considerable number of ancillary businesses. The agricultural industry and the rural economy in general have undergone considerable changes in recent years although it remains very important in East Devon. Agriculture not only provides direct jobs but also underpins many other economic activities in rural areas. Agriculture remains the major user of rural land in East Devon and the use that most influences the physical appearance and character of the countryside.
- 9.23 The Council recognises the importance and changing role of agriculture and the need for new employment in rural areas. Changes in agriculture have made diversification increasingly important for the economic viability of farm units.

- 9.24 NPPF doesn't define agricultural diversification. However, as well as alternative agricultural products, increasingly it involves diversification out of agriculture, into non-agricultural business within the holding. This adds business activities to traditional farming to develop new sources of income.
- 9.25 The main driver for diversification is to support farm income. Diversification offers additional income streams and adds variety to current business models. As well as making better use of a farm's physical resources and characteristics; by branching out successfully, farmers can secure the long-term health and prosperity of their farm and their income. This adds stability to a business in times of uncertainty and can also optimise assets and unlock entrepreneurial skills. Many farmers are having to find new and imaginative ways of diversifying their business in order to survive. More entrepreneurial strategies are helping farms face pressures when confronting a decline in core income or changes in the policy landscape. The change in farming, moving away from subsidies, and towards grants could stimulate the drive to add value to the farms' agricultural and forestry products, and tackling climate change. There is considerable potential synergy between a greener economy and farm diversification.
- 9.26 The preferred policy option focuses on development where the scale and type is appropriate to the existing business and the rural character of the area. The priority is for making use of available and suitable buildings on a holding. New buildings, where justified and acceptable, should be well integrated with the existing holding to help them harmonise with the surrounding environment.
- 9.27 The continued viability of farm holdings is important to the rural economy. Diversification proposals should therefore contribute effectively to the farm business and more generally to the rural economy while integrating new activities into the environment and the rural scene. Development proposals needs to avoid conflict with and be well integrated existing farming operations of the farm or estate.
- 9.28 Diversification proposals should be seen within the context of the future business plan for the holding as a whole. Where proposals affect a significant part of the farm holding, information may be requested on its extent, and what is proposed for the remainder of the holding. This may include evidence that, after development, the holding will continue to operate viably.
- 9.29 There is a need to carefully consider the appropriateness of new uses, their impact upon the surrounding area, the implications of public access, and their relationship to continuing agricultural operations. The range of diversification proposals is varied. Initiatives aimed at 'adding value' to food and goods produced on farms through processing and packaging initiatives are encouraged. It can also include tourism accommodation and attractions, events and festivals, distilleries and breweries, farm shops/cafes and specialist outlets, education and training/ experiences. New crops and renewable energy development are other avenues for income streams. Like many other businesses, these new types of diversification have been reshaping their offer to keep the business afloat during the pandemic. These contemporary

approaches to diversification are consistent with Government planning policy and other policies towards farming and the countryside.

- 9.30 Exceptionally, residential conversion of a building may be part of a farm diversification project. The Council is mindful of the flexibility already provided through Permitted Development Use Class Q for the conversion of agricultural buildings to residential use.

Currently rejected alternative approaches to Farm Diversification

Option b Restricting diversification to more limited uses and smaller scale development

In this option, the scale of development is smaller and the range of uses more restricted, to reduce the impact of diversification development on the outstanding natural environment of East Devon. However, this restricts the opportunities for much needed income streams, potentially reducing the economic viability of farm holdings in the District. It also reduces the number of jobs accessible to workers in these rural areas. Whilst this is a reasonable alternative, the potential adverse impacts on the local economy and on rural prosperity are the reasons for rejecting this option.

DRAFT

51. Policy – Resisting the loss of Employment sites

This policy will address the following issues:

- Protecting employment land from loss to non-employment uses, whether it is allocated for development or in use/last used for employment (policy will need to identify existing sites – could reference the list in an appendix).
- Exceptionally, only consider use of employment land for other uses if it can be demonstrated that:
 - Development relates to ancillary services which will support the employment area by making it more sustainable, viable and/or attractive; or
 - The site is no longer suitable or viable for employment uses; or
 - The proposal will not undermine the viability of existing employment uses in close proximity to the site; and evidence of appropriate marketing of the site for a minimum time period (to be specified and justified) and
 - The alternative use is in accordance with or does not undermine the plan's overall Spatial Strategy.
- Marketing test - need evidence demonstrating the site is no longer commercially viable and site has been appropriately marketed
- If an alternative use is acceptable, explore all opportunities to incorporate an element of employment floor space as part of the new development
- Guidance on marketing requirements – Set out in appendix in plan or in SPD

Justification for inclusion of policy

- 9.31 Land is a finite resource and land suitable for employment is a relatively scarce commodity. Competition for land from higher value uses can make delivering employment development very challenging, whether new build or for redevelopment. The plan therefore includes a policy aimed at retaining existing or proposed employment sites provided that they are available, suitable and achievable over the plan period. The EDNA and supporting analysis of employment sites will provide vital information in justifying the identification of existing and proposed employment sites in East Devon.
- 9.32 This policy focuses on protecting employment land in order to maintain sufficient supply of employment land, providing a range and choice of sites over the plan period.
- 9.33 Existing employment sites and proposed employment allocations in East Devon are nearly all in places where housing accommodates or is planned to accommodate much of the labour supply, and where future housing on new local plan allocations will be concentrated. This enables settlements to be more self-contained and better able to support local communities, as well as reducing the need to travel.
- 9.34 The EDNA will provide the evidence about the amount need for employment land. Given the low level of brownfield sites available in East Devon, then the need for additional employment land is likely to be on greenfield sites. To avoid the risk of needing to identify even more sites to mitigate loss of employment land to other

uses, it is essential that existing Employment Areas within the existing settlements are protected to maintain the quantity and enhance the quality of the employment capacity they provide. The plan will need to identify the Employment areas to be protected. They could be identified on the Policies Map and listed as an Appendix in the plan.

- 9.35 Some ancillary uses complement and support employment uses, so may be appropriate on the existing and planned Employment Areas.
- 9.36 As the economy transforms, not all existing Employment Areas will remain viable or suitable for new types of employment uses. Alternative uses of these sites may then be appropriate if there is no realistic prospect of the site being used for employment. Planning applications would need to provide proportionate evidence about viability and suitability, including evidence about site marketing for employment uses. If an alternative use is appropriate then opportunities to include an element of employment provision should be considered.
- 9.37 This policy is consistent with NPPF. The policy is part of the policies package for creating the conditions in which businesses can invest, expand and adapt. The plan places significant weight on the need to support economic growth and to be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices, and to enable a rapid response to changes in economic circumstances. The local components of this policy are
- The identification of the employment areas
 - The marketing test and the commitment to guidance for policy implementation.

Currently rejected alternative approaches to resisting the loss of Employment sites

Option b – Taking a less restrictive approach by allowing a greater mix of uses on existing, permitted and allocated employment sites

This approach would enable more employment sites to be available for other uses. In this option, employment land could be re-used to accommodate more housing that would provide more flexibility to increase housing supply needed to enable the District housing provision target to be achieved. This is an option to be considered particularly if the forecast of housing supply is not sufficient to meet the forecast need and policy requirement, or if the degree of supply 'flexibility (ie above the requirement) is low. Evidence from the housing trajectory for the plan period and the EDNA and HELAA about employment sites' suitability, availability and achievability will inform the Council's position on this alternative.

Likewise, the potential positive and negative impacts of loss to other employment generating uses will be considered by the EDNA.

However, the need for employment sites providing for a range and choice of sites and premises remains, and whilst this is a reasonable alternative, the loss of sites and premises for business type uses to other uses remains a concern, and this option is therefore rejected.

DRAFT

52. Policy – Employment and Skills Statements

This policy will address the following issues

- Requiring developments over a certain threshold to commit to maximising the provision of skills and employment opportunities, to benefit the local population as well as the employer
- Evidencing the commitment through a statement to be submitted with the planning application for development
- Thresholds relating to this requirement - to be determined but could be applied to proposals of 100 houses or more, or employment development of 1000sqm or more (employment meaning Use Classes E(a)(b)(c)(g) B2, B8)
- Exceptionally, making a financial contribution in lieu of the employment and skills obligation (if circumstances justify it),
- Implementation of the commitment to be sought through a planning obligation
- Commitment to producing a Supplementary Planning Document to guide implementation of the policy

Justification for inclusion of policy

- 9.38 Development provides opportunities for employment and improving skills within East Devon, not just in from the building of the development but from the local supply chains, and the opportunity for apprenticeships and extended skills in the local labour supply.
- 9.39 As the economy transforms, development provides an opportunity to improve access to employment and to widen and raise skills in the local workforce. This policy supports the increase employment opportunities by
- helping local businesses to improve, grow and take on more staff
 - helping businesses to find suitable staff and suppliers, especially local ones
 - improving the skills of local people to enable them to take advantage of the resulting employment opportunities
 - helping businesses already located in East Devon to grow and attract new businesses into the area
- 9.40 The workforce in East Devon shows a good level of education with a mix of academic and vocational skills. The proportion of the working age resident population with no qualifications in East Devon is low, compared to national levels. However, the proportion of the working age resident population qualified to NVQ level 4 and above in East Devon in 2018 was 35.8%, lower than the 38.7% in the South West and 39.3% nationally.
- 9.41 The Economic Vision and Economic Strategy support economic growth and prosperity in East Devon, but it also emphasises the need for growth to be inclusive, so that residents can access employment opportunities. Raising skills in the District is part of a wider approach, aligned with the Heart of the South West Local Industrial

Strategy. The LIS supports a skilled workforce through the Skills Escalator to enable a skilled workforce fit for the opportunities of the future. This approach focuses on

- championing STEM courses (including T levels) to increase take-up
- ensuring all residents have the employability skills they need to progress
- increasing the take up of technical qualifications, and improving retention and recruitment of those with technical and higher-level skills
- increasing employer investment in workforce development
- working with institutions to ensure that the Heart of the South West's learning facilities and teaching capacity are fit for purpose and meeting future need; and
- mainstreaming an inclusive approach so all residents can benefit from future prosperity.

9.42 This policy focuses on certain types of planning applications, for larger developments (where the size thresholds will need to be justified) committing the development to employment and skills provision. The pledges would relate to local labour, apprenticeships, workforce training and work experience, and local supply chain contracted in the construction process. The commitment is set out in an Employment and Skills Statement, submitted with the planning application. Once the statement is agreed with the LPA its implementation is controlled through a S106 Agreement.

9.43 An SPD is the appropriate way to provide detailed guidance to aid policy implementation. A mechanism to monitor whether the companies are honouring their commitment would be necessary. This means assessing whether the commitments are relevant, proportionate and measurable, and requiring the provision of data capturing the actions and results.

Currently rejected alternative approaches to employment and skills statements

Option b Not including a policy regarding employment and skills statements

The Council could rely on the assertions in planning applications about the link between employment development proposals and creation of jobs available to local people. It could also rely on a voluntary code which it is understood already has a good take up given the benefits to developers on large and long term projects. But the local plan would then miss the opportunity now available to provide policy introducing a requirement to provide evidence with the planning application and monitoring mechanisms to monitor performance in terms of employment and skills related to the development. This is a reasonable alternative, but is rejected for the reasons above.

53. Strategic Policy - Centre Hierarchy, sequential approach and impact assessment

Proposed policy will explain that the tier one and two town centres will be the preferred location for the development of main town centre uses as defined in the NPPF. Proposals must be appropriate in terms of their scale and design to the centre in which they are proposed, as well as the function of the centre and accord with other policies in the plan.

Settlements will be listed.

Outside of the town centres the sequential test as set out in the NPPF will apply and criteria will require a retail impact assessment for retail proposals greater than 500sq.m and other town centre use proposals greater than 2,500sq.m. In addition, Edge-of-centre and out-of-centre sites, which satisfy the sequential test, will be required to be accessible by public transport, bicycle and foot and well-connected to the centre. In order to ensure that land is retained for the benefit of the local economy, permitted development rights allowing changes to alternative uses will be withdrawn.

Justification for inclusion of policy

- 9.44 East Devon's town and village centres provide more than just retail opportunities, they function as the heart of the community offering a wide range of facilities often including: leisure and entertainment; sport and recreation; offices; cultural spaces and tourism development. The vitality and viability of these centres is fundamental to the support that they provide for local communities in the settlement and in adjoining areas, who rely on those centres. The NPPF is clear that planning policies for town centres should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period.
- 9.45 This is a strategic policy because it establishes the network and hierarchy of centres. Maintaining the vitality and viability of the town centres in East Devon is a strategic priority in the plan. This policy is also the starting point for the suite of non-strategic policies on town centres and primary shop frontages, local shops and services, and rural shops.
- 9.46 The NPPF requires the LPA to define a network and hierarchy of centres that is resilient to anticipated future economic changes. This policy draws on the evidence in the Council's Role and Functions of Settlements Study produced by the Council in July 2021, which categorised the roles of existing settlements in the District by taking into account their differing sizes, offer, functions and accessibility by sustainable transport modes.

Town centre Hierarchy

- 9.47 East Devon contains a number of centres fulfilling residents and visitors diverse leisure and retail needs as part of a wider hierarchy. Village facilities will cater for basic everyday essentials but East Devon residents will use the main town centres to meet their convenience goods shopping needs and to access a wider range of services. None of the towns act as major comparison goods shopping destinations. In general, comparison goods expenditure flows out of the District, mainly towards Exeter but also to Taunton, Dorchester and further afield, as well as a significant expenditure online.
- 9.48 Within the District the settlement hierarchy and centre type is as follows:
- **Tier one:** Exmouth (town centre with an extensive range of shops and services.)
 - **Tier two:** Axminster, Cranbrook, Honiton, Ottery St Mary, Seaton, Sidmouth (town centres with a wide range of shops and services)
 - **Tier three:** Broadclyst, Budleigh Salterton, Colyton, Lymington, Woodbury (local centres with multiple shops and services)
 - **Tier four:** Clyst St Mary, Uplyme, Beer, West Hill, Newton Poppleford, Feniton, Whimple, Kilmington, Otterton, East Budleigh, Stoke Canon, Tipton St John, Musbury, Sidbury, Chardstock, Broadhembury, Payhembury, Branscombe, Plymtree, Dunkeswell, Hawkchurch, Exton, Westclyst (village centres with a limited range of individual shops and services)
- 9.49 As well as encouraging new shops and facilities in these locations it is important that existing provision is retained, especially in the tier three and four and more rural settlements where there are only likely to be one or two of each type of shop or service and total loss would be severely damaging. It should be noted that, in addition to the town centres, the towns may also have neighbourhood shopping parades and individual stores and facilities to serve the local communities on the outskirts. In policy terms, applications affecting these shops and facilities will be treated on the same basis as those in Tier four settlements as they are similarly important in meeting the basic everyday needs of residents. Outside of the settlements listed above, residents have few facilities so are forced to travel elsewhere, resulting in a less sustainable travel pattern. Focussing new development on locations with good access to community services and facilities helps to reduce traffic congestion, reduce carbon dioxide emissions, improve air quality, and improve both physical and mental health.

Sequential Test

- 9.50 The Council must apply a sequential test to planning applications for new retail and retail related development, for example drive-through restaurants. The sequential approach will be applied so that development is located in the centre to which it is most appropriate, with preference being given to those centres higher up the hierarchy, and then identifies preferred locations which must be considered before out-of-centre sites. The first preference is for town centre locations (within the Town Centre Area, as identified on the Policies map), followed by edge-of-centre sites and only then by out-of-centre sites provided that they can be made accessible by a

choice of means of transport and will not adversely impact upon nearby centres. It is however, recognised that existing out of town stores will continue to provide a form of retailing which both adds to local shopping choice and is popular with the public. Proposals for the refurbishment and redevelopment with small scale extensions of out of centre stores may be acceptable where there is insufficient net gain in retail floorspace to have an adverse effect on other established centres.

- 9.51 The NPPF also requires local plans to set a proportionate, locally set floorspace threshold above which planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan should be assessed for their impact. The scope of the Sequential Test and Retail Impact Assessment required to be submitted in support of a planning application should be discussed and agreed between the applicant and the Council at an early stage in the pre-application process. The level of detail included within the assessments must be proportionate to the scale and type of retail floorspace proposed and shall be determined on a case by case basis. The PPG sets out detailed requirements for carrying out such assessments.
- 9.52 In determining the scale at which retail impact assessments are required the Council have taken advice and established a threshold figure of 500 square meters above which assessment will be needed. For other types of development a default threshold of 2,500sq.m. (gross) is identified by the NPPF.

Town Centre Development

- 9.53 With the exception of Cranbrook, where the town centre is embryonic, the District's town centres are compact, have a retail offer that focuses on convenience and service provision, and are characterised by a predominance of independent shops fringed by supermarkets. Regular streetmarkets in Honiton and Axminster, and occasional farmers or artisan markets in all of the towns, draw in trade and along with street performers and other temporary events in the public realm create vibrancy and are to be encouraged. In addition to the town's identified in tier one and tier two, the smaller settlements of Budleigh Salterton, Beer and Colyton contain a similar range of shops and other uses typically found in the larger towns, albeit at a smaller scale, and so Policy 56 will also be applicable to them.

54. Policy - Town Centre development

Under this proposed policy the extent of Town Centre areas will be identified on the proposals map for the tier one and two towns and the settlements of Budleigh Salterton, Beer and Colyton.

Policy will seek to set out expectations for development to improve the quality and/or broaden the range of retail and leisure facilities, to enhance the role of the town centres as sustainable shopping and leisure destinations and strengthen their vitality and viability. Policy will seek to ensure that proposals do not undermine the shopping character or visual amenity of the town centre.

It should be noted that the NPPF requires Primary Shopping Areas to be designated for the town centres, to act as a focus for retail uses. It is intended that these will cover the same extent as the town centre areas

Justification for inclusion of policy

- 9.54 In line with Paragraph 86 of the NPPF, the LPA supports the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. As part of a positive strategy for the future of each town centre, the Local Plan defines their extent and makes clear the range of uses that are acceptable within them.
- 9.55 **Primary shopping areas** are the defined areas where retail will be concentrated. The NPPF requires these to be identified on the proposals map with the intention that retail use and access to convenience goods continue to draw in trade and maintain the vitality and viability of the High Street. The scale of the town centres covered by this policy is such that for each town centre, the Town Centre area and the Primary Shopping Area are one and the same. This means they share the same boundaries for the purpose of the local plan's town centre and retail policies. The Town Centre Areas are to be shown on the Policies Map.
- 9.56 **Historic environment of town centres** The established town centres all contain listed buildings and designated conservation areas, so development proposals will need to be sensitively designed to protect, preserve and where appropriate enhance the character and appearance of any conservation area or listed building affected. Particular care should be given to the design of shopfronts, advertisements and signage. This also helps to create attractive, legible centres that encourage people to regularly use the centres and retain retail and leisure spend within East Devon.
- 9.57 **Town centre uses** All of the town centres contain a mix of town centre uses including retail, leisure, community uses and residential housing, and benefit from public transport services (including rail services from Honiton, Axminster and Exmouth) and bus services to the surrounding areas and to Exeter. The Local Plan provides a positive strategy for the future development of town centres and their health is regularly monitored to ensure that, if evidence suggests that they are in decline, the Council is able to implement further measures, along with relevant stakeholders, to support their vitality and viability.

- 9.58 Although all the established town centres have relatively low vacancy rates, they are some way from meeting their full potential as retail and leisure centres and would benefit from the development of an enhanced offer. To address this issue the Council has produced masterplans for Exmouth and Cranbrook, with the aim of regenerating the former and stimulating private sector interest in both.
- 9.59 Given their close proximity to transport networks and local shops and services, town centre and edge of centre sites may be particularly suited to locating specialist housing for different groups including older people.

Flexibility

- 9.60 Due to competition from on-line retailing and increased flexibilities in changes of use introduced via the General Permitted Development Order (GDPO), there is a risk that the number of retail units within the town centres will reduce. This policy therefore seeks to retain as many retail units as possible within the town centres to ensure they remain attractive destinations. The GPDO allows for change of use of retail units to various other uses. The amount of floorspace which can be changed under permitted development is restricted. Applicants are advised to consult the GPDO prior to submitting a planning application to check whether planning permission is required. For the avoidance of doubt, this policy only applies to proposals which would fall outside the permitted development regime.

Currently rejected alternative approaches to town centre development

Option b Not including a policy regarding town centre development

This option was rejected because the NPPF requires the Council to identify town centres and primary shopping areas to act as a focus for town centre uses, particularly retail use. The primary shopping areas could cover specific areas within the town centres, however the nature of East Devon's towns is such that they are largely the same.

The changes to permitted development rights do lessen the control and effect of policy by enabling changes from one use to another without the need for planning permission. This is likely to impact upon the scale and variety of retail uses in particular (as there is increasing pressure to convert retail units to higher value residential use).

55. Policy – Local shops and services

Proposed policy will seek to ensure that communities are able to meet the everyday needs of residents. Policy will encourage the provision of new community facilities and services and resist the loss of existing ones.

Provision of new shops and services

This Policy will support the provision of shopping and service development (including local shops, meeting places, sports venues, open space, cultural buildings, public houses, places of worship and post offices) in tier 3 and 4 settlements, villages and neighbourhood centres which enhances their retail or service role and is accessible by walking and by bicycle and will not result in excessive traffic generation. Policy will restrict new shops to selling predominantly convenience goods and being of a scale to serve the local area without, alone or cumulatively, impacting on the vitality or viability of any nearby centre. Criteria will protect the amenity of neighbouring residents.

Loss of existing local shops or services

The second part of this policy will address the loss of local facilities or services. Proposals which would result in a significant or total loss of shops, Post Offices, Public Houses or other services to the community will not be permitted except where the existing provision is no longer viable and there is no market for the business as a going concern. This will apply to stand-alone facilities or services and to those operating within or as part of a different use. Evidence will be required to demonstrate that this is the case in accordance with strict marketing criteria that will be defined. This requires the property to be marketed for at least 12 months and should include offering it to the local community for their acquisition/operation. Permission to change the use of a shop will be subject to the retention of the shopfront.

Justification for inclusion of policy

- 9.61 Throughout the District there are small groups of shops and services which are invaluable in meeting the basic, everyday needs of the communities they serve. These vary greatly- from the more comprehensive offer in the tier three and four town and village centres, to neighbourhood shops outside the urban centres of the towns, and village shops in the rural communities. The extent and diversity of provision makes it impractical to define neighbourhood or local centres on the Proposals Map (or provide specific measures that could be used to define them) but these are areas where a group of shops and facilities, typically supplying a range of everyday goods and services is located. There is some scope for improving the local centres and for the provision of new shops, post offices and services in those areas which lack retail facilities. The opening hours of shops and services within residential areas may be restricted to ensure that local amenity is safeguarded.
- 9.62 Given the importance of existing shops and services in providing for the essential day to day convenience shopping needs of the local community it is vital that they are retained wherever possible. They offer important facilities in particular for the elderly and less mobile. Village public houses often provide a focus for community life and shops and post offices enable those without transport to remain living rurally by reducing reliance on the private car, especially as public transport is limited in these areas. The Council will seek to resist the loss of local shops and services where this would result in a significant or absolute loss of facilities to a community.

- 9.63 It is difficult to reinstate shops, in the same or other premises, when they have changed to other uses. It is not however, always possible to prevent their closure when it is uneconomic for their use to continue. Therefore proposals involving the loss of local shops or services will only be permitted where the District Council is satisfied that the existing use is no longer viable and there is no market for the business as a going concern. In order to demonstrate this, the Council will seek information regarding the marketing of the business and its accounts. The Council will seek to retain the shop front in circumstances where permission is granted to enable the premises to be reinstated as a shop should the future opportunity arise.
- 9.64 It is important that the community function and role of shops and services in creating sustainable places is recognised, both by supporting new ones and by resisting the loss of existing ones. This conforms to the guidance in paragraph 84 of the NPPF relating to the rural areas which requires "the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship." This policy takes a cautious approach towards the loss of important shops and services, to ensure that the needs of communities can continue to be met in the future, but allows for change of use when the viability or use of the shop or service to the local community can no longer be demonstrated. Proposals will have to provide evidence that the current use, or an alternative use of similar value to the local community, is not viable through relevant marketing information, and feasibility or viability studies.

Currently rejected alternative approaches to local shops and services

Option B – Do not include a policy

This option was rejected as availability of local shops and services is considered to be essential to the wellbeing of local communities. Access to facilities and services underpins the Local Plan strategy and their availability and accessibility is a key consideration in determining the level and location of future growth. This policy encourages provision of shops and services, and resists their loss. Without such a policy these matters would be left to market forces and it is likely that facilities would be lost to higher value uses even where they are viable and a need can be demonstrated.

56. Policy – Rural shops

This proposed policy concerns shops in the open countryside. Size will be restricted as most users are likely to rely on the private car and these shops should not compete with local town centres or village shops. Rural shops will be required to sell a majority of locally produced products, either as a % of goods sold or as a % of floorspace, and these must be produced on the holding or within xx kilometres. Extensions and additional facilities will be tightly controlled.

Justification for inclusion of policy

- 9.65 Rural shops (including farm shops and plant nurseries) are defined as shops in which the majority of goods sold are produced on the premises. This is suggested as being defined as a minimum 60% to ensure that any shop is reasonably linked to the use of the land instead of forming a general retail outlet. Farm shops can provide a valuable local facility, an additional source of income for farms and can help sustain the rural economy. However, they should not become an alternative to shops which are better located and more accessible and convenient in town and village centres.
- 9.66 Without restrictions on size and the type of goods to be sold, rural shops, garden centres and nurseries can become large commercial enterprises, supplementing food and plant sales with other, related goods such as crafts, sheds, conservatories and furniture. This will be controlled to prevent the sale of unrelated goods and applications for general retail sales and additional services such as cafes will only be permitted where they are ancillary to the sale of gardening or horticultural goods or products grown on the property to which the shop or nursery relates. Rural shops, garden centres and nurseries may develop an urban appearance as they expand and the number and size of buildings increase, hard surfaced display areas are extended and additional car parking is required. Such developments would generally be harmful to the high quality East Devon landscape and would generate additional traffic which may not be safely accommodated on local roads. Any proposals for the provision of new farm shops, garden centres or nurseries or the expansion of existing enterprises will therefore be strictly controlled.
- 9.67 In accordance with paragraph 84 of the NPPF, the Local Plan will promote retail development in rural areas where products are sourced or manufactured locally as this will allow diversification in agricultural businesses and promote local food production, supporting the rural economy. The criteria set out in the policy will aim to restrict the scale of development and range of goods to be sold to reflect the countryside location and ensure that the vitality and viability of town centres in the District is not undermined in line with the Local Plan strategy. This ensures that town centres are the focus not only for retail but service trades, leisure facilities and other public amenities, serving more than just their immediate locality and their protection is important for those accessing services from the surrounding areas.

Currently rejected alternative approaches to rural shops

Option B – Do not include a Policy to address rural shops

This option was rejected as the policy addresses matters that are considered essential. Without such a policy, shops in rural areas could sell a range of goods that could compete with, and affect the viability of, local centres. This policy is intended to support production of local food and goods and enable farms to diversify, therefore it is essential that the range and source of the majority of goods to be sold is restricted. Without such a policy these matters would be left to market forces.

DRAFT

57. Policy – Sustainable Tourism

This proposed policy will seek to ensure that East Devon's tourism industry continues to thrive, this Policy will support the provision of appropriately located accommodation, visitor facilities and attractions. In this Policy "visitor accommodation" means serviced tourist accommodation (Class C1 use) and unserviced tourist accommodation.

In line with the Council Plan's focus on 'green tourism' capitalising on the natural environment, visitor accommodation and attractions will be permitted where visitors will best understand and enjoy the special qualities of the area and reliance on the private car is minimised.

Development proposals will be required to make use of existing buildings wherever possible and, within the protected landscapes designated as Areas of Outstanding Natural Beauty, Coastal Preservation Areas or Green Wedges, outside of the settlement boundaries, new buildings to provide overnight visitor accommodation will not be permitted, although temporary structures such as yurts, glamping pods, towing caravans and tents may be acceptable.

Outside settlement boundaries new development must positively contribute to the natural beauty, wildlife and cultural heritage of the District; and be closely associated with other attractions/established tourism uses, including the public rights of way network; or be a subordinate part of farm diversification schemes. Where visitor accommodation is to be located in the countryside, Policy will require accommodation to be located very close to the main dwelling from which it will be serviced/managed (eg as part of a farm diversification scheme) to avoid the need for a permanent new managers dwelling or multiple daily car journeys to manage the site. Criteria will address matters such as transport, amenity and landscaping.

Policy will support a year-round visitor economy, while ensuring the facility remains for visitor use only.

Loss of Existing Visitor Accommodation

The loss of visitor accommodation will only be permitted in exceptional circumstances. Where loss is proposed, applicants will need to demonstrate that the property has been marketed unsuccessfully for holiday accommodation for at least 12 months in accordance with the criteria in [Appendix xx](#).

Principal Holiday Accommodation Areas

Within the principal accommodation areas of Exmouth and Sidmouth (as identified on the Proposals Map) policy will encourage the provision of additional holiday accommodation in preference to other uses, and will not permit the loss of existing accommodation to other uses. Where loss is proposed, applicants will need to demonstrate that the property has been marketed unsuccessfully for holiday accommodation for at least 12 months in accordance with the criteria in [Appendix xx](#).

Justification for Policy

- 9.68 Tourism is a key part of East Devon's economy and it is important that visitors continue to be drawn by the unique environment and offered good quality accommodation and services to meet their needs and encourage longer stays. Policy aims to secure a high quality, sustainable tourism experience for the wide range of visitors to East Devon, and ensure that proposals benefit local communities and businesses, whilst conserving, enhancing and promoting the natural beauty, wildlife and cultural heritage of the District.
- 9.69 A significant proportion of visits are day trips from those living in the District or in the villages, towns and city surrounding East Devon. For those holidaying in the District, visitor accommodation takes a number of forms- from seaside hotels and bed and breakfasts, to farmhouse bedrooms and holiday lets, glamping and camping to caravan sites and holiday parks. The tourism sector is largely leisure driven but evidence is presently lacking as to the levels of demand for different types of accommodation.
- 9.70 While the Council supports growth in sustainable tourism, there are associated challenges for the environment and local communities. High numbers of visitors can put pressure on some locations or 'hot-spots', for example, by impacting on tranquillity, increasing traffic and parking congestion, or causing physical erosion. The Council will support proposals for sustainable attractions and recreational activities, which avoid undesirable impacts, and contribute to the conservation and enhancement of the natural environment whilst providing for the needs of users and bringing benefits to the local economy.
- 9.71 Landscape character and built form are central to the attractiveness of East Devon as a destination for visitors and therefore, in the first instance, proposals should retain and utilise existing buildings. If existing buildings are not available, or are causing harm to the special qualities, then proposals for any new buildings should be accompanied by justification and evidence that the proposals are sensitive to the site and its wider context. New buildings for visitor accommodation will not usually be permitted within the designated landscapes. Proposals for temporary, seasonal, accommodation, such as tents, towing caravans and movable glamping pods, may be permitted within the designated landscapes in accordance with policy. Favourable consideration will be given to the removal of existing buildings which produce net gains for landscape.
- 9.72 The Council will resist the loss of permanent visitor accommodation and applicants will be required to demonstrate that it is financially unviable, by providing evidence in accordance with the marketing requirements set out in [Appendix xx](#) . The minimum marketing period required is 12 months but a longer marketing period may be required to cover more than one season or where the existing use is located in close proximity to established tourist attractions or the rights of way network. Redevelopment of visitor accommodation, visitor attraction, recreation facilities or

associated development which is currently resulting in harm to the special qualities of the District (for example the visually prominent static caravans within the Coastal Preservation Area) should, in the first instance, be redeveloped for other more suitable tourist or community uses.

- 9.73 The purpose of this policy is to foster the responsible and sustainable delivery of tourism and visitor recreation development in East Devon in line with the Council Plan aims to increase and support 'green tourism' capitalising on East Devon's natural environment. Proposals for visitor accommodation, attractions, recreational activities, environmental education and interpretation should provide opportunities for visitors to increase their awareness, enjoyment, and understanding of East Devon's natural environment. They should also foster guardianship of the special qualities, for example, by promoting and incorporating the District's natural beauty, wildlife, cultural and built heritage. There are many diverse and creative ways in which development proposals could address this, which should be tailored to the context of the proposals.
- 9.74 There is a fine balance to be reached between encouraging provision of accommodation to enable visitors to enjoy the coast and countryside and damaging the rural character due to a proliferation of new buildings, noise and additional car-based traffic. The high number of planning applications for conversions of existing rural holiday accommodation to other uses (particularly housing) due to a lack of demand/viability indicates that some sectors of the industry are at saturation point and that, rather than permitting new permanent buildings in the open countryside, policy should encourage the conversion of existing buildings to holiday accommodation and temporary, seasonal structures such as yurts and glamping pods
- 9.75 In line with Government guidance development proposals for visitor accommodation, attractions and recreation facilities should be located sustainably. Locating such tourism development within existing tier 1-4 settlements give most opportunity for access to sustainable transport and other facilities, helping to minimise use of the private car.
- 9.76 Given the nature of some tourism-related and recreational activities, a more rural location or proximity to a geographically specific feature, such as the coast or a river, may be required. Policy will seek to ensure that these are planned for appropriately and contribute positively to the natural environment, particularly within designated landscapes.
- 9.77 Every opportunity for sustainable travel should be utilised including access to the site and/or subsequent travel, for example bicycle hire provision, as part of visitor accommodation. This is to ensure that the proposals align with the Council's net-zero targets and do not harm the special qualities of the area.
- 9.78 The towns of Exmouth and Sidmouth are a particular focus for hotel and other serviced accommodation. Principal Holiday Accommodation Areas have been designated around the seafront area where it is considered that visitors would most

expect to find tourist accommodation, and where it is appropriate that the needs of tourists should prevail in considering other developments.

Currently rejected alternative approaches to sustainable tourism

Option B – Do not include a policy to address sustainable tourism

This option was rejected because it is considered to be essential to include such a policy in the plan. Tourism is a key economic sector and the plan needs to make clear the considerations that will apply to any planning application for tourist accommodation or visitor attractions. Added to this, the natural environment is a key visitor draw and policy is needed to ensure that the balance is achieved between encouraging visitors to enjoy and understand it, and protecting it from harm.

DRAFT

58. Policy – Holiday Accommodation Parks in designated landscapes

This proposed policy will relate to existing and proposed caravan, chalet and holiday parks within AONB's, CPA's and Green Wedges. Given the existing number of prominently sited and visually intrusive parks in the District's most sensitive landscapes, the Policy will resist the establishment of new, intensified or extended parks in these areas but will support upgraded accommodation and environmental improvements. Recognising that some ancillary facilities may be required, policy will allow temporary structures where resulting harm can be mitigated.

Justification for Policy

- 9.79 The majority of East Devon lies within one or more designated landscapes. Holiday accommodation parks, comprising static caravans, chalets and/or lodges and associated facilities, are a key feature within the tourism sector and the expansion of existing parks, and potential development of new parks will have a positive effect on the economy of East Devon. This should not, however, be to the detriment of the natural environment or local communities and so a policy is required to establish how applications will be determined. This is particularly important given the large scale, range of facilities, lengthy operational hours and prominent coastal locations of many existing parks and their detrimental impact on both the seascape and the landscape.
- 9.80 Outside designated landscapes, new or expanded parks for holiday accommodation purposes will be acceptable in principle, in accordance with the Sustainable Tourism policy.
- 9.81 Within the designated landscapes no new holiday parks comprising static caravan, chalet, lodge or other similarly (semi) permanent accommodation will be permitted. Existing parks will be encouraged to upgrade and improve their accommodation and other facilities where this will lessen their existing visual, environmental and amenity impact. Extensions to, and intensification of development within, existing sites will not be permitted unless this is to provide related, non-permanent ancillary facilities and any adverse impacts can be satisfactorily mitigated

Currently rejected alternative approaches to holiday parks in designated landscapes

Option B – Do not include a policy to address holiday accommodation parks in designated landscapes

This alternative was rejected because it is considered essential that such a policy be included in the plan. East Devon landscape quality is exceptionally high and there is a longstanding legacy of holiday parks being established in prominent locations where the visual impact is considerable. This policy will control the establishment of new parks and ensure that any works conserve and enhance the protected landscapes, in line with the NPPF. It will add certainty to the planning application process.

Option C- Include a less restrictive criteria-based policy which permits extensions to existing holiday parks and establishment of new parks

This alternative was rejected for similar reasons to Option B. The quality of the landscape is such that the permanent structures associated with new or extended holiday parks are likely to cause considerable harm, given the scale and range of facilities associated with such parks. If new or extended holiday parks are to be permitted in designated landscapes, they could be considered against the Sustainable Tourism policy with additional criteria added if necessary.

DRAFT

Chapter 11 - Designing beautiful and healthy spaces and buildings

- 11.1 Our objective is to promote high quality beautiful development that is designed and constructed to meet 21st century needs. Our aim is that the new local plan will help to deliver this by considering design at all stages. However, there are challenges to achieving this that need be recognised now and, if possible, addressed. In previous local plans we relied heavily on policies to guide development proposals through the development management process, meaning that the design of allocations was often not considered until quite late in the planning process.
- 11.2 National planning policy emphasises the need for high quality design as fundamental to the planning and development process (including through the allocation of sites). It highlights that good design is a key aspect of sustainable development and helps make development acceptable to communities. Ideally, we would like to work with local communities to consider the design of the main allocations throughout the local plan process, but this will require additional resources particularly in relation to design expertise and community engagement. The challenging timetable for plan production also makes this difficult to achieve and so this may need to be done post adoption of the plan.
- 11.3 Given these constraints, it is particularly important that we focus our attention on the most sensitive sites (particularly any allocations within an AONB or affecting a heritage asset) and the formulation of appropriate design policies. Our policies should be able to guide decisions so that new development is integrated into the natural, built and historic environment.
- 11.4 Whilst good design is often associated with the physical appearance or functionality of buildings, it is increasingly concerned with achieving more sustainable and energy efficient buildings and these aspects of design are considered in the tackling climate change chapter. When considering design, every development makes a difference and many small developments can cumulatively change a place dramatically. Every development is an opportunity for good design and many of our policies will have a design element. For example:
- Ensuring climate change resilience;
 - Encouraging healthy and active lifestyles and travel patterns; and
 - Encourage green infrastructure, including green space and landscaping;

59. Development Management Policy – Design and Local Distinctiveness

The policy will require that:

- Planning applications are supported by a design and access statement as appropriate;

- Proposals are compatible with policies for tackling the climate emergency and other relevant plan policies;
- Proposals respect the character of the local area whilst also encouraging innovative design that incorporates new environmentally friendly approaches, materials and technologies;
- Proposals consider the amenity of adjoining residential properties;
- The design of buildings and spaces incorporates safe and convenient access for all;
- Buildings and spaces are designed to reduce the potential for crime;
- Materials used are appropriate to the site context and prioritise the most sustainable options available;
- Building design and orientation make best use of aspect to reduce the need for additional heating and lighting; and
- Landscaping prioritises habitat creation and water permeable surfaces.

Justification for inclusion of policy

- 11.5 In addition to embedding good design throughout the plan policies, we propose a design specific policy. This will be an updated version of Policy D1 – Design and Local Distinctiveness of the adopted local plan, which is one of the policies most often quoted in decision notices and appeals.

Currently rejected alternative approaches to Design and Local Distinctiveness

Option B – Not to have a policy and instead to rely on national guidance

National design guidance has been introduced that provides a strong basis for encouraging and requiring a strong element of design into future proposals and schemes. However, the exceptional quality of the East Devon environment warrants a bespoke policy where we can prioritise the issues that are most locally important.

60. Development Management Policy – Amenity of Future Occupiers

The policy will require that:

- New dwellings meet nationally described space standards;
- All buildings enable a high standard of amenity, living and working conditions, including protection from noise and pollution and adequate light;
- All dwellings have access to appropriate external amenity space;
- Existing surrounding uses are not unreasonably restricted by providing and maintaining appropriate amenity standards for new uses.

- 11.6 The quality of a home is a determining factor in health outcomes and the need for accommodation which is of a suitable size and layout to meet the needs of the occupier/s is key to this. The nationally described space standards are set by

Government and provide a common standard that local planning authorities may choose to adopt through local plan policies, subject to evidence of need and viability. They were introduced to provide a common standard for authorities that choose to impose higher standards than those set under the Building Regulations. Further work is necessary to demonstrate need, viability and to consider transitional arrangements so that higher standards can be factored into land acquisitions.

- 11.7 The policy also seeks to protect surrounding existing uses from pressures to change operational practices in response to development that may be detrimentally affected by them because this needs to be factored into design from the start.

Currently rejected alternative – Amenity of Future Occupiers

Option b – Not have a policy

The incorporation of nationally described space standards into local plan policy is not mandatory so we do not have to include a policy relating to them or any other provisions to protect the amenities of future occupants. This option is rejected at this stage because of the importance of this issue to health. However, further work will be necessary to demonstrate need, viability and whether transitional arrangements should be included.

61. Development Management Policy – Housing Density and Efficient Use of Land

Proposals for residential development will be permitted provided that the development optimises the density of the site in a manner that protects or enhances the character of the area and makes efficient use of land. We will set minimum density standards to achieve this.

- 11.8 Paragraphs 119 – 125 of the NPPF deal with making effective use of land and achieving appropriate densities. In order to meet our sustainability goals we need to ensure that we make efficient use of land and build at the maximum density that is compatible with the character of the surrounding area. Where there is an anticipated shortage of land for meeting identified housing needs, the NPPF (paragraph 125) advocates minimum density standards for town centres and other locations well served by public transport that significantly increase the average residential density of such areas. The NPPF also suggests that a range of densities could be set to reflect the accessibility of different areas. Further work is needed to provide evidence of what the minimum density standards should be.

Currently rejected alternative – Housing Density and Efficient Use of Land

Option b – Not set minimum density standards

The NPPF requirement to use minimum density standards refers specifically to areas where there is an anticipated shortfall of housing land to meet identified needs, a situation that we do not expect to apply to our circumstances, so we could choose not to set minimum standards. It is however important given the environmental constraints of the district that we make efficient use of the available and developable land that is available within the towns and other less sensitive areas.

This approach is rejected because it would be more difficult to ensure that efficient use of land is made without minimum standards.

62. Development Management Policy – Display of Advertisements

The policy will set out that applications for the display of advertisements will be considered in terms of amenity and public safety, taking account of cumulative impacts and requiring advertisements to be:

- Appropriately positioned and scaled in relation to their context;
- Safe in terms of highway safety;
- Sympathetic to the character of the area;
- Designed with colours and materials compatible with the building and area; and
- Where illuminated, the type and level of illumination should reflect the general level of lighting in the area.

11.9 The NPPF highlights that the character of an area can be undermined when advertisements are poorly sited and designed, but should only be controlled in the interests of amenity and public safety, taking account of cumulative impacts (paragraph 136). The proposed policy will help to protect amenities and public safety.

Currently rejected alternative – Display of Advertisements

Option b – Not have a policy

We could choose not to have a policy and to rely on the NPPF statement that poorly designed and sited advertisements can undermine the quality of areas and should be controlled in the interests of public safety and amenity. This approach is rejected because clarifying what is likely to be acceptable aids the decision making process for designing advertisements and dealing with applications.

Chapter 12 - Prioritising Sustainable travel and providing the transport and communications facilities we need

- 11.1 East Devon is a largely rural district and travel patterns reflect this, with relatively low levels of walking, cycling and public transport; and higher levels of car ownership than the national average. Nevertheless, many settlements offer a range of jobs, facilities, and services, suitable for day-to-day life, which can be accessed using sustainable travel modes. Exmouth, Honiton, Seaton and Ottery St Mary all have bespoke bus services that travel around these towns, and there are several high frequency bus routes linking East Devon settlements to Exeter. East Devon has a large number of train stations for its size (nine in total), across two lines, and usage has increased significantly over the last 20 years. There are also high quality active travel corridors, notably the Exe Estuary Trail and proposed Clyst Valley Trail.
- 11.2 Sustainable transport is defined as “any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra-low emission vehicles, car sharing and public transport”.²¹ Promoting sustainable transport in new development has multiple benefits – these include less traffic congestion, lower carbon dioxide emissions, better air quality, and improved physical and mental health. In addition, where sustainable travel is not prioritised, those without access to a car (including young people, older people, those with disabilities, low income households) can suffer from social exclusion and difficulty in accessing jobs, shops, leisure, education and other activities. Sustainable travel opportunities should therefore be prioritised in new development to realise all of these benefits. It is important to note that, whilst electric cars help tackle climate change by lowering carbon dioxide emissions they are far from zero carbon and they do not reduce congestion or address issues relating to social exclusion discussed above.

Figure 9: Features of 20-minute neighbourhood²²

63. Policy – Walking, cycling and public transport

The preferred approach is to include policy that requires new development to be within a “20-minute neighbourhood” either within the site (at larger scale development) or through links outside the site. The first priority is walking and cycling in new development; followed by public transport, low and ultra-low emission vehicles, and car sharing.

1st priority:

- Ensure new development is accessible to a range of facilities
- Provide walking and cycling networks that are coherent, direct, safe, comfortable and attractive

²¹ NPPF Annex 2: [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/551022/nppf-annex-2-national-planning-policy-framework.pdf)

²² 20-Minute Neighbourhoods, The Town and Country Planning Association, 2021: [The 20-minute neighbourhood | Town and Country Planning Association \(tcpa.org.uk\)](https://www.tcpa.org.uk/20-minute-neighbourhood/)

- Segregate cycle paths from pedestrians to reduce potential for conflict
- Provide secure cycle parking at dwellings and in public areas

2nd priority:

- Ensure that new homes and employment uses can reach public transport by convenient walking and cycling routes.
- Require bus priority measures.
- Improve the integration of sustainable modes in new development so that walking, cycling, and public transport all work together.
- Contribute to the provision additional public transport services or facilities (e.g. bus stops).

Justification for inclusion of policy

- 11.3 The Local Plan preferred spatial strategy ensures that development is focussed on those places which are or can be made sustainable, through limiting the need to travel to jobs, facilities, shops, schools and leisure; and offering a genuine choice of transport modes. National policy makes clear that the Local Plan should identify and pursue opportunities to promote walking, cycling and public transport. Much Government guidance has been published in recent years on designing places to promote sustainable travel, including the National Design Guide,²³ National Model Design Code,²⁴ Cycle Infrastructure Design,²⁵ Gear Change,²⁶ and Active Design,²⁷ and Building for a Healthy Life.²⁸ More locally, Devon County Council's Cycling and Multi-Use Trail Network Strategy²⁹ proposes strategic cycle network schemes from Cranbrook to Exeter, Seaton to Colyton, and Feniton to Sidmouth.
- 11.4 Studies have shown that most people will choose to walk only if their destination is less than a mile away, with 800m being a typical distance.³⁰ Nevertheless, distance is just one of several factors to consider – others include topography, surveillance, directness, attractiveness of the environment, and the intended destination. Given the rural nature of much of East Devon, it is not realistic to require all new development to be within 800m of a range of uses, but this should be the aim at the larger settlements and within larger scale developments.

²³ National Design Guide: [National design guide.pdf \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/4465/national-design-guide.pdf)

²⁴ National Model Design Code: [National Model Design Code - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/4465/national-model-design-code.pdf)

²⁵ Cycle Infrastructure Design – Local Transport Note 1/20, Dept for Transport: [Cycle Infrastructure Design \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/4465/cycle-infrastructure-design.pdf)

²⁶ Gear Change – a bold vision for cycling, Dept for Transport: [Gear change: a bold vision for cycling and walking \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/4465/gear-change-a-bold-vision-for-cycling-and-walking.pdf)

²⁷ Active Design, Sport England: [Active Design | Sport England](https://www.sportengland.org/active-design/)

²⁸ Building for a Healthy Life, 2020: [BFL-2020-Brochure.pdf \(designforhomes.org\)](https://www.designforhomes.org/wp-content/uploads/2020/03/BFL-2020-Brochure.pdf)

²⁹ Cycling and Multi-use Trail Network Strategy, Devon County Council: [150316_Cycle & Multi Use Strategy FINAL.docx \(sharepoint.com\)](https://www.devon.gov.uk/sites/default/files/2020-03/150316_Cycle%20%26%20Multi%20Use%20Strategy_FINAL.docx)

³⁰ Planning for Walking, CIHT, 2015: https://www.ciht.org.uk/media/4465/planning_for_walking_-_long_-_april_2015.pdf ; National Design Guide: [National design guide.pdf \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/4465/national-design-guide.pdf)

11.5 The idea of “20-minute neighbourhoods”³¹ has been gaining momentum for several years. Interest in this idea has grown as the COVID-19 pandemic meant people spent more time locally working at home, using public open space, and walking and cycling.

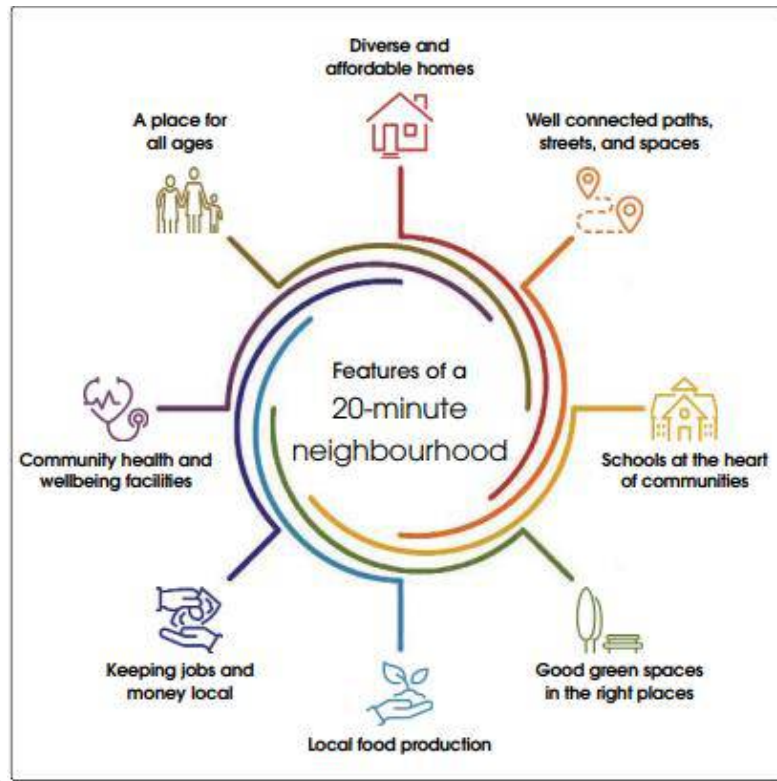


Figure 10: Features of 20-minute neighbourhood³²

11.6 The National Model Design Code makes clear that walking and cycling should be the first choice for short local journeys, particularly those of five miles or less. Indeed, figures show that 43% of journeys in the south west are under two miles – these shorter journeys offer the greatest potential for people to get out of their car and walk or cycle instead.³³ Securing access to high quality public transport from new development is another important way of promoting sustainable travel.

Currently rejected alternative approaches to walking, cycling and public transport

Option b – Specify walking distances to local facilities from new housing

This would entail identifying a specific walking distance to local facilities that new housing must be within, to be considered acceptable in terms of access to local

³¹ Decarbonising Transport, Department for Transport, 2021: [Transport decarbonisation plan - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/transport-decarbonisation-plan) ; 20-Minute Neighbourhoods, The Town and Country Planning Association, 2021: [The 20-minute neighbourhood | Town and Country Planning Association \(tcpa.org.uk\)](https://www.tcpa.org.uk/20-minute-neighbourhood)

³² 20-Minute Neighbourhoods, The Town and Country Planning Association, 2021: [The 20-minute neighbourhood | Town and Country Planning Association \(tcpa.org.uk\)](https://www.tcpa.org.uk/20-minute-neighbourhood)

³³ See: <https://www.gov.uk/government/statistical-data-sets/nts99-travel-by-region-and-area-type-of-residence#trip-length>

facilities. However, this is considered to be too prescriptive, recognising that there are factors other than distance that make walking attractive or otherwise.

Option c – Set mode share targets

This would mean setting targets for different travel modes (e.g. 50% car, 30% walking/cycling, 20% bus/train), and proposals for new development should demonstrate how they would be met. 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. In addition, it is challenging to enforce mode share targets once a development is occupied.

64. Strategic policy – Protecting transport sites and routes

The preferred approach is to include policy that protects sites and routes from development, and show these on the policies map. We are seeking comments on which sites/routes through public consultation, but at this stage we intend to protect the following sites and routes:

- Strategic cycle network schemes:
 - Cranbrook to Exeter
 - Seaton to Colyton
 - Feniton to Sidmouth
 - Clyst Valley Trail
 - Sidford to Sidbury
- Railway passing loops as necessary at:
 - Axminster
 - Honiton
 - Whimble to Cranbrook

Justification for inclusion of policy

11.7 Where there is robust evidence, we should identify and protect sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development.³⁴ Such sites and routes could include park and ride/change sites, train stations and/or routes, bus priority measures, and walking/cycling routes. The focus will be on protecting sites and routes that promote sustainable travel, consistent with national policy, but there may also be a need to protect land for road schemes that realise opportunities for large scale development. Evidence³⁵ indicates protecting the sites/routes listed in the

³⁴ NPPF paragraph 106c: [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

³⁵ Cycling and Multi-use Trail Network Strategy, Devon County Council: [150316 Cycle & Multi Use Strategy FINAL.docx \(sharepoint.com\)](#) ; West of England Study 2020 – Continuous Modular Strategic Planning, Network Rail: [West of England Study - Continuous Strategic Planning](#)

preferred approach policy above, but we are seeking comments on this through public consultation.

Currently rejected alternative approaches to protecting transport sites and routes

Option B – The identified alternative option is to not have a policy to protect these routes.

This option has been rejected at this stage as it would be less helpful in delivering transport sites and routes to widen transport choice and deliver large scale new development.

DRAFT

65. Policy – Travel Plans, Transport Statements, Transport Assessments

The preferred approach is to include a policy that:

- Requires a Travel Plan at specified thresholds of residential and non-residential development.
- Requires a Transport Statement or Transport Assessment at specified thresholds of residential and non-residential development.
- Enables a Travel Plan, Transport Statement or Transport Assessment to be required below these thresholds taking into account: the scale of the proposed development; availability of public transport; proximity to environmental designations; impact on promoting walking and cycling; cumulative impacts of multiple developments in the area; and whether there are particular types of impacts.

Justification for inclusion of policy

- 11.8 The spatial strategy and preferred policies that prioritise sustainable transport should limit the need to travel and offer a genuine choice of transport modes. Nevertheless, new development will still generate car travel, particularly given the rural nature of much of East Devon. Therefore, it is important to include policies to ensure that new development addresses the impacts of development on transport networks. For example, junctions 29 and 30 of the M5 and sections of the A30 are already constrained at peak times, as is the A3052 corridor in the north west quadrant of East Devon, resulting in queuing and delay. Although outside of East Devon, the main road links in the eastern parts of Exeter suffer from congestion which affects those living and working in East Devon, particularly at peak times.
- 11.9 National policy states that all developments that will generate significant amounts of movement should provide a travel plan, and be supported by a transport statement or transport assessment so that the likely impacts of proposals can be assessed.³⁶ Travel plans are long-term management strategies for integrating proposals for sustainable travel into the planning process. Transport assessments are thorough assessments of the transport implications of development, whilst transport statements are a lighter-touch approach where there are limited transport impacts. "Significant" is not defined in national policy, so we are seeking consultation responses on an appropriate threshold to require a transport statement or assessment and travel plan.

³⁶ NPPF paragraph 113: [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Currently rejected alternative approaches to protecting Travel Plans, Transport Statements, Transport Assessments

Option B – An alternative option would be to not have a policy in the plan

This option is not preferred as it would cause uncertainty for applicants on when travel plans, transport statements and/or transport assessments would be required.

DRAFT

66. Policy – Residential car parking standards

Residential car parking standards

The preferred approach is to include a policy setting out residential and non-residential car parking and cycle parking standards.

In town centres where there is access to public car parks and/or on-street parking lower levels of parking and in exceptional cases where there are also very good public transport links, car parking spaces may not be deemed necessary

Electric Vehicle Charging points

Development needs to provide Electric Vehicle Charging points in accordance with the latest Government guidance.

Rapid charging points will be particularly important in the public domain.

Provide spaces for public electric car charging points and for car clubs.

11.10 The NPPF sets out five issues to take into account if setting local parking standards:

- The accessibility of the development
- The type, mix and use of development
- The availability of and opportunities for public transport
- Local car ownership levels
- The need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.

11.11 We are preparing evidence to cover these issues, which will inform parking standards. As previously highlighted, whilst there are many settlements which offer good access to jobs, facilities and services, overall East Devon is largely rural and car ownership levels are higher than the national average.

11.12 In order to promote cycling, new residential development should provide bicycle parking spaces.

11.13 In the UK, total emissions from surface transport in 2019 were more than one-fifth of the total UK Greenhouse Gas emissions. Cars and vans account for 77.9% of surface transport emissions.³⁷ In East Devon, total CO2 emissions from road transport in 2019 were more than one-third of East Devon total CO2 emissions.

11.14 The government announced its intention to end the sale of new petrol and diesel cars and vans in the UK from 2030, and with all vehicles being 100% zero emissions from 2035. Thus, the numbers of Ultra Low Emission Vehicles and electric vehicles are

³⁷ The Sixth Carbon Budget Surface Transport :[Sector-summary-Surface-transport.pdf \(theccc.org.uk\)](https://www.theccc.org.uk/publications/sector-summary-surface-transport/)

expecting a significant increase in the next decade. EDDC will contribute to the reduction of emissions and support a low carbon future through smarter choices, including electric vehicle infrastructure.

Currently rejected alternative approaches to car parking standards

Option b – Do not set residential car parking standards

This would cause too much uncertainty for developers and the council in determining applications.

Option c – Supplementary Planning Document (SPD) to provide guidance on the provision of parking, including residential & non-residential car parking and cycle parking requirement, Electric Vehicle Charging point requirement and design standard.

This would be overly complex to justify given the wide range of uses and scales of development across the district.

Other transport issues

11.15 The NPPF also states that planning policies should provide for any large-scale transport facilities that need to be located in the area; and recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages. At the current time, there is a lack of evidence of these being particular issues in East Devon that should be addressed in the Local Plan, but we keep this under review as further evidence comes forward and invite comments through public consultation to consider these points.

67. Strategic policy – Digital Connectivity

The preferred approach is to include a policy to require all new development to have access to superfast broadband from day one recognising it as the fifth utility and to continue to support the expansion of full fibre broadband connections in the district.

Other requirements would include requiring ducting to be installed with capacity for more than one provider and other provisions to enable the delivery of multi-operator fibre to the premises and sufficient mobile connectivity.

Developers are encouraged to have early discussions with strategic providers or CDS for major development.

Justification for inclusion of policy

Communications

11.16 The NPPF supports high-quality communication, as it is an essential element for economic growth and social well-being and society is more reliant on the internet since the COVID-19 pandemic, as it changed people's living and working style.

Digital Connectivity

11.17 East Devon faces challenges in delivering communications infrastructure in a rural area. East Devon is part of the Connecting Devon and Somerset (CDS) programme. CDS comes under the Government's Superfast Broadband Programme to deliver next-generation broadband infrastructure to areas where the commercial market has failed to invest.

11.18 According to Ofcom, in 2021 89.5%³⁸ of the addresses in East Devon have super-fast broadband coverage and 35.7%³⁹ have ultra-fast broadband coverage, in comparison the mean for all English district local authorities are 94.55% and 48.02%.

11.19 East Devon District Council would support further digital connectivity improvements in the district by liaising with delivery partners and operators in the area and supporting the community engagement of their programmes.

³⁸ [Percentage of addresses with Superfast broadband availability in East Devon | LG Inform \(local.gov.uk\)](#)

³⁹ [Percentage of addresses with Ultrafast broadband availability in East Devon | LG Inform \(local.gov.uk\)](#)

Currently rejected alternative approaches to Digital Connectivity

Option b – No Policy

We could leave digital connectivity to market forces on the basis that connectivity is a big selling point for new developments and provision will be made by developers on that basis. This however runs the risk of inadequate provision being made that is not future proofed and installations not providing consumer choice because of the lack of conducting for other providers which is then cost prohibitive to install after the event. This option has therefore been rejected.

Option c – Include policy on the roll-out of 5G Mobile Networks

An important part of connectivity is clearly mobile phone coverage particularly as we move from 3G and 4G to 5G networks. These installations are however often permitted development under the legislation and do not require planning permission and so any policy is likely to be largely redundant and thus hard to justify and may cause frustration when its requirements cannot be enforced.

DRAFT

Chapter 13 - Caring for our outstanding landscape

- 12.1 East Devon has a beautiful natural environment, which makes the District an attractive place to live and work. This environment also attracts visitors who contribute to the local economy.

68. Policy – Landscape Features

This overarching policy aims to protect important features in the landscape, whether designated or not.

Landscape, countryside and rural areas will be protected against harmful development. Development will only be permitted where it protects and, where possible enhances, features that contribute to the nature and quality of East Devon's landscapes, in particular:

- i) trees (including individual trees, groups of trees and woodlands), hedgerows and field boundaries;
- ii) irreplaceable habitats such as ancient woodland and aged or veteran trees found outside ancient woodland;
- iii) rivers, tributaries and flood plains;
- iv) other watercourse and water bodies;
- v) seascapes and coastline;
- vi) the landscape setting of settlements;
- vii) topographical features;
- viii) areas or features of cultural and historic value;
- ix) important views and visually sensitive skylines; and
- x) aesthetic and perceptual factors such as tranquility, wildness, intactness, rarity and enclosure.

The Council will seek the retention of important hedgerows. Where retention is not possible and a proposal seeks the removal of a hedgerow, the Council will require compensatory planting with a mixture of native hedgerow species.

Justification for inclusion of policy

- 12.2 The landscape of the District includes deep valleys, wooded hills, ancient woodlands, historic parkland, low-lying farmland, riverside meadows and a variety of urban forms. The whole of East Devon is rich in biodiversity, including international, national and locally protected sites and habitats and forms a part of a wider ecological network across the County. Maintaining sustainable agricultural land and practices is important in preserving the district's rural character and landscape.

Currently rejected alternative approaches to landscape features

Option b – Do not include a policy to protect landscape features

There is no requirement to include an overarching policy affording protection to landscape features. These could be protected through separate policies focussing on specific feature types or through a design policy. This is not the

favoured approach as it lacks certainty and does not provide the comprehensive protection that landscape features are considered to warrant.

69. Policy - Areas of Outstanding Natural Beauty

It is proposed that a policy be included to ensure that the highest level of protection will be given to the landscape and scenic beauty of the Areas of Outstanding Natural Beauty (AONBs) in East Devon:

- Development in an AONB or affecting the setting of an AONB will only be permitted where it conserves, and where possible, enhances the character and natural beauty of the AONB;
- Development in an AONB will only be permitted where it is appropriate to the economic and environmental wellbeing of the area or promotes understanding or enjoyment of the AONB;
- Major development in an AONB will only be permitted in exceptional circumstances and where it can be demonstrated to be in the public interest; and
- Development proposals that could affect the special qualities of an AONB (including the setting of an AONB) either individually or in combination with other developments, should be accompanied by a proportionate Landscape and Visual Impact Assessment.

AONB Management Plans will be a material consideration in decision making.

Justification for inclusion of policy

- 12.3 Areas of Outstanding Natural Beauty account for around two thirds of the District and cover a number of villages as well as the small town of Budleigh Salterton. There are two AONBs in East Devon, the East Devon AONB occupies much of the south of the District, and the Blackdown Hills AONB (which although mostly in East Devon also extends into neighbouring mid Devon and Somerset) covering much of the north of the District. It should be noted that a very tiny part of the Dorset AONB extends into the extreme east of the District. These areas have the highest level of landscape protection in England, equal to that of National Parks and are designated by the Secretary of State, so the boundaries and statutory protection cannot be amended through the local plan process.



- 12.4 Having said that, provided it accords with the NPPF, the Local Plan is able to be flexible in the way that policies relating to the AONB are worded and can choose to accommodate a limited amount of new development within them if desired.
- 12.5 Policy is required to ensure that the District's AONBs are protected and conserved in accordance with an area of outstanding natural beauty (AONB) is land protected by the Countryside and Rights of Way Act 2000 (CROW Act). It protects the land to conserve and enhance its natural beauty.

Currently rejected alternative approaches to AONBs

Option b – Do not include a policy to protect Areas of Outstanding Natural Beauty

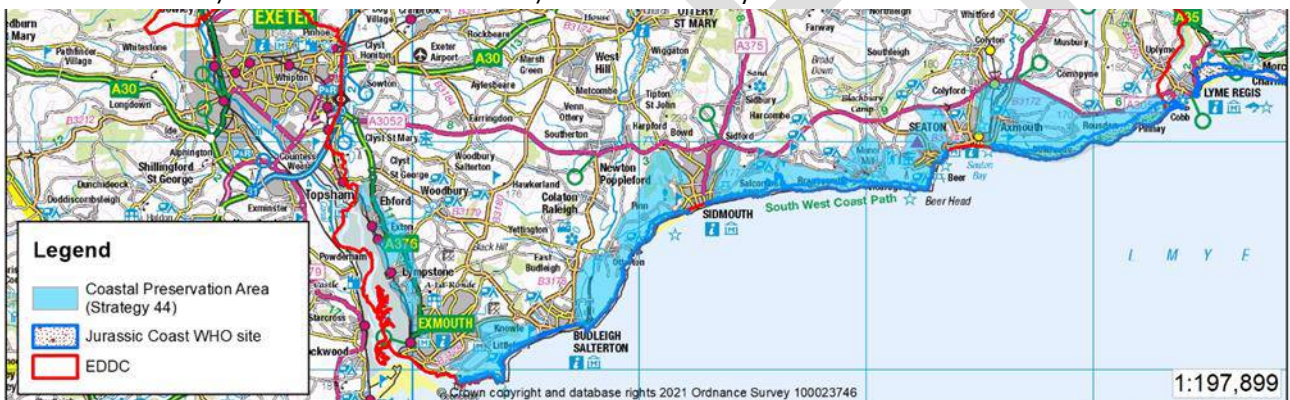
There is no requirement to include a policy to protect Areas of Outstanding Natural Beauty as they are afforded protection through legislation and national planning guidance. Given that two thirds of East Devon is designated AONB, and this is comparable to National Park status, it is considered that a local policy is justified.

70. Policy - Coastal Preservation Areas

It is proposed that a policy be included to ensure that coastal preservation areas and the undeveloped coast is protected from development which would harm its character. Appropriate proposals which increase public access to the coast will be supported.

Justification for inclusion of policy

12.6 The majority of the coastline of East Devon is inscribed by UNESCO as being of international importance, recognised by its status as part of the Jurassic Coast World Heritage Site. Whilst the WHS was chosen for the outstanding value of its rocks, fossils and landforms the wider setting of the cliffs contribute significantly to the landscape (which is, itself, part of the landform). The NPPF (para. 174 c) requires local authorities to “maintain the character of the undeveloped coast, while improving public access to it where appropriate”. Policy in the plan protects the character of the undeveloped coast (including the WHS) and designates a Coastal Preservation Area. This local designation is based on a detailed character assessment of undeveloped coast in terms of openness and views to and from the sea. (Note- the boundary of the CPA is currently under review)



Currently rejected alternative approaches to coastal preservation areas

Option b – To not have a policy to protect the undeveloped coastline was rejected as a reasonable alternative for several reasons-

- The NPPF requires the character of the coast to be maintained
 - The coastline is of exceptional quality and requires bespoke protection
 - The quality of the coastline, and it's undeveloped character, are a major natural tourist attraction and contribute substantially to the District's economy
- Without a policy there is a high likelihood that development could erode the undeveloped character of this area

Option c – to afford greater levels of protection which could include a greater area of protection. This was rejected on the basis that the CPA boundary has been drawn to include the area that has a direct visual relationship with the

undeveloped coast and to allow only those types of development which are essential and where harm can be minimised/mitigated. It is not appropriate to allow or restrict additional types or scales of development, or cover a greater area as this would not accord with the policy intent.

Option d – to afford lower levels of protection which could include a smaller area of protection. This was rejected on the basis that the CPA boundary has been drawn to include the area that has a direct visual relationship with the undeveloped coast and to allow only those types of development which are essential and where harm can be minimised/mitigated. It is not appropriate to allow or restrict additional types or scales of development, or cover a lesser greater area as this would not accord with the policy intent.

DRAFT

71. Policy – Green wedges

It is proposed that a Policy be included to protect the separate character and identity of settlements in close proximity and prevent their coalescence, protecting their openness, role and function. In accordance with criteria to be established, development will not be permitted where it would conflict with the purposes of the green wedges, which are to:

- prevent the coalescence of settlements and maintain a sense of place and identity for neighbourhoods
- maintain the open character of a green lung contributing to health and wellbeing for residents
- provide accessible formal and informal recreation, sport and play
- provide valuable wildlife corridors and habitat
- protect areas of landscape importance and visual amenity

Policy will specify the location of the green wedges and they will be identified on the proposals map.

Justification for inclusion of policy

- 12.7 Green wedges are a long-standing local landscape designation that recognises the importance of maintaining open green networks between settlements in close proximity, for wildlife, flood storage capacity, leisure and recreation and preventing settlement coalescence in order to maintain a sense of place and identity for local communities. New buildings within the Green Wedge will be restricted to ensure that the openness, role and function of these landscapes are not adversely affected. There are a number of functions, supported by the NPPF, which they can fulfil:
- Preventing the coalescence or merging of settlements and preserving the separate identity and character of settlements;
 - Providing a green lung into urban areas;
 - A recreational resource;
 - Protecting and enhancing ecological value and linkages;
 - Flood storage capacity.
- 12.8 Green wedges are identified on the proposals map (note- this map shows current green wedges, they are under review).
- 12.9 Proposals for new buildings will be assessed to ensure that they are proportionate in size and scale in relation to their intended use; in most circumstances, including proposals for new agricultural buildings, evidence may be required to demonstrate the requirement for a building of the size proposed.
- 12.10 Essential infrastructure, such as sewage or water connections, power sources, waste water recycling/treatment sites, electricity substations, emergency services or telecommunications will be permitted within the green wedge provided it must be situated in the location proposed for connection purposes and the benefits will override the impact on the designation. Local transport infrastructure is defined as

being infrastructure that must be situated in the location proposed such as a Park and Ride facility, new roads and bridges.

- 12.11 Buildings for outdoor sport and recreation will include stabling for horses. Cemeteries, with ancillary buildings, and allotments are also acceptable in principle. The size and scale of these types of development will be judged on a site-by-site basis in relation to their intended use. The Council also recognises that there can sometimes be a need for outbuildings within residential properties because the size or location of the building falls outside of the remit of permitted development. These types of buildings may be used for purposes incidental to the enjoyment of the dwelling house; it is not intended for the policy to provide new planning units or non-domestic uses within a residential site in the Green Wedge.
- 12.12 The Council supports, in principle, the provision of new buildings for community use including educational facilities that can demonstrate a requirement for a Green Wedge location. This is likely to be due to the location of the community or facility in which it serves.
- 12.13 Economic growth in the Green Wedge, and the re-use of existing buildings for employment purposes is encouraged but new buildings will only be permitted in circumstances where the proposal supports the sustainable growth and expansion of an existing, authorised and viable rural business. The need for the building and its Green Wedge location should be justified. New buildings for start-up businesses will not be permitted in the Green Wedge in order to avoid the proliferation of new buildings which are unconnected to existing sites and uses and may result in harm to the openness and landscape character.
- 12.14 Redevelopment of previously developed land, or replacement of lawful existing buildings, will be permitted where the development would not have a greater impact on the characteristics and attractiveness of the landscape and the purpose of including land within the Green Wedge than the existing development and also represents sustainable development. To avoid the replacement of shacks, caravans, sheds or other structures which, through the passage of time have blended into the landscape buildings must be of permanent and substantial construction.



Currently rejected alternative approaches to green wedges

Option b – To not have green wedge areas in the plan. This option was rejected because it is considered that settlement coalescence should be resisted and that green wedges are the most straightforward means of achieving this. They add certainty to the planning process and can contribute to wider policy aims such as flood management, recreation and biodiversity.

Option c – to have more extensive areas of Green Wedges. Green wedges are designated following a landscape review to ensure that sufficient land is designated to restrict development and therefore prevent settlement coalescence and protect the separate identities and characters of settlements in close proximity to each other. Extensive areas of green wedge that go beyond the area needed to achieve this aim would unnecessarily restrict development that would otherwise be acceptable.

Option d – to have very tightly defined and small green wedge designations. As proposed, green wedges ensure that settlement coalescence is prevented and the separate identities and characters of settlements in close proximity to each other are maintained. Their extent is based on a landscape assessment and so designating smaller areas would create visual, if not physical, coalescence especially when viewed in the context of the wider landscape.

72. Policy – Land of Local Amenity Importance

It is proposed that a Policy be included to protect and enhance the 14 areas designated as Land of Local Amenity Importance on the proposals map. Policy will only permit development on LLAI in very special circumstances and proposals that protect, enhance, and sustain them in a way which is consistent with their significance to the community will be supported.

Justification for inclusion of policy

- 12.15 Land of Local Amenity Importance is highly valued by local communities. The Local Plan recognises the particular visual, and other, importance of 14 sites within 5 of the District's towns and restricts development that is not for a community purpose or that would undermine the open character of the area. The sites are deemed to be locally significant, with opportunities of enhancement to provide multiple benefits, including improved water quality, access, biodiversity, recreational, health and educational benefits.
- 12.16 The Land of Local Amenity Importance designation will convey protection separate to (and in some cases in addition to) the Local Green Space designation which some East Devon communities have identified through Neighbourhood Plans.
- 12.17 The existing protection afforded to the natural environment within East Devon is likely to help preserve the character and integrity of important green areas within and around the District. However, there is also likely to be potential for the erosion of valued character qualities due to development pressure. This policy seeks to give added protection against development to locally valued green areas or open spaces within and around the towns.

Currently rejected alternative approaches to land of local amenity importance policy

Option b – Include a wider-reaching policy to protect Local Green Space but do not identify all LGS in the Plan

This option was rejected because it is considered more appropriate to give the 14 important amenity spaces referred to in policy their own local plan designation. This will differentiate it from the nationally recognised Local Green Space. Local Green Space is afforded protection by the NPPF but this is generic and, as LGS is considered to be the equivalent of green belt land, a wider range of alternative uses is permitted than would be allowed by the bespoke LLAI policy. If option b is endorsed, then LGS may be identified through Neighbourhood Plans, listed in this Policy (and identified on the Proposals Map) or identified in a future Supplementary Planning Document.

Option c – Identify and protect all Local Green Space in the District

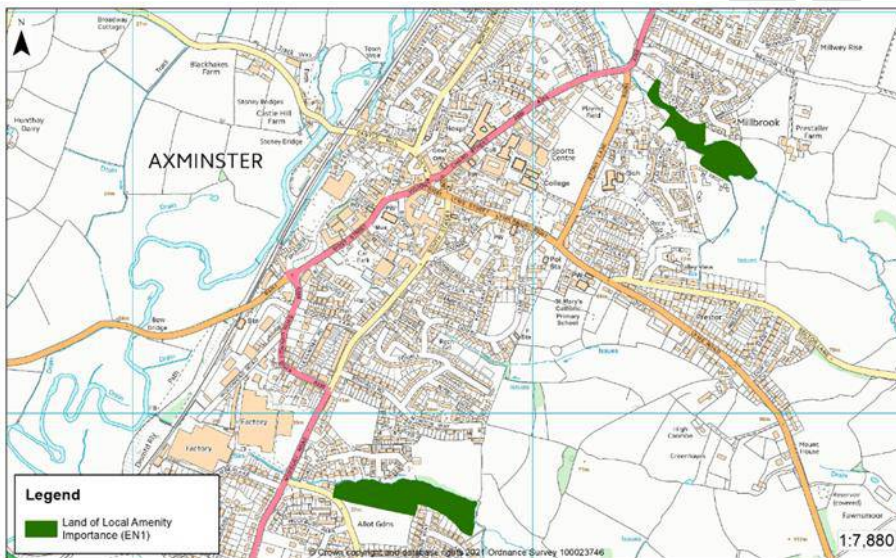
This option was rejected because, as well as concerns as to the range of uses allowed on LGS by the NPPF, it would require a high degree of resources to assess

every area of green space. Instead, it is recommended that Local Green Space continues to be designated through Neighbourhood Plans.

Option d – Do not include a policy

This option was rejected because it is considered that the 14 green areas warrant protection from development and, being located within the settlement boundaries, there will otherwise be pressure for their development. Designation provides certainty.

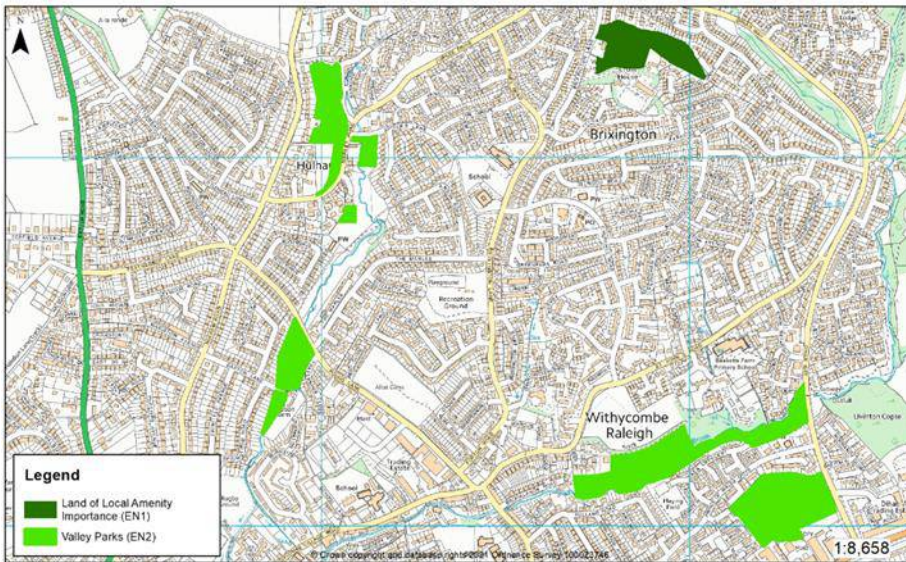
12.18 Maps for information only- the Policy will list these by name and they will appear on the Proposals Map.



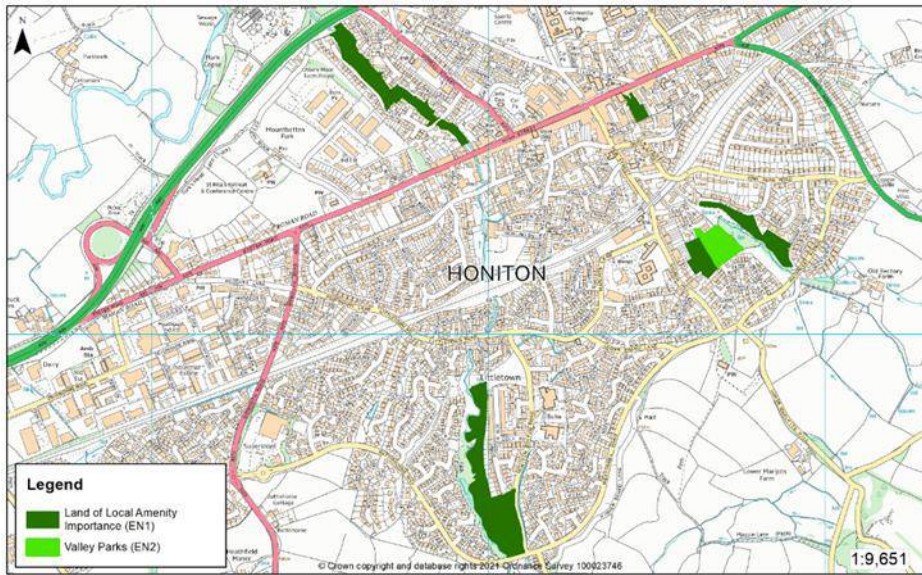
Land of Local Amenity Importance within Axminster



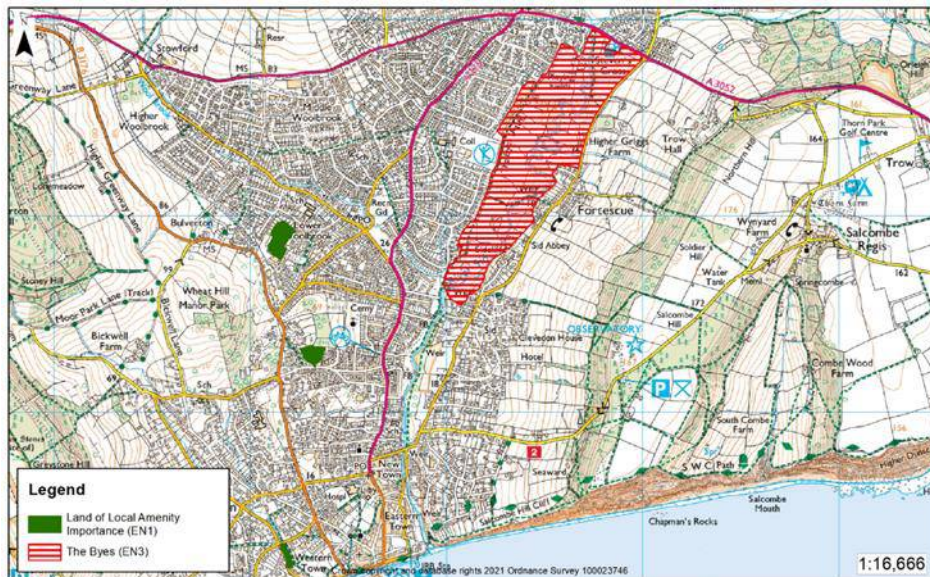
Land of Local Amenity Importance within Budleigh Salterton



Land of Local Amenity Importance within Exmouth



Land of Local Amenity Importance within Honiton



Land of Local Amenity Importance within Sidmouth

Chapter 14 - Protecting and enhancing our outstanding biodiversity

- 13.1 East Devon benefits from an exceptional abundance of biodiversity and wildlife interest and through local plan policy we will need to protect and enhance the assets we have. We will, however, need to do so within the context of a changing climate and that will impact on species and habitats and also recognising the development and population increase can have an adverse impact on wildlife and biodiversity interests.
- 13.2 East Devon has extensive tracts of land and water that are recognised at a national and international level for their biodiversity importance. However, beyond the statutory designated sites there are endless additional areas of land, sites, habitats and features that are of wildlife and biodiversity importance and of great significance for people's enjoyment on the natural world and human wellbeing. In this context the value and importance of wildlife and the natural world is increasingly recognised by Government with this being shown through the 2020 Environment Bill which itself followed on from the Government paper 'A Green Future: Our 25 Year Plan to Improve the Environment' – see https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf

73. Strategic Policy – Protection and enhancement of biodiversity and geological features

This overarching strategic policy will address and afford general protection to biodiversity and geological features in East Devon, to include:

- Protection of existing features, habitats, sites and species;
- Promoting opportunities for restoration, enhancement and connection of natural habitats;
- Incorporating beneficial biodiversity conservation and enhancement features.

Policy will also highlight the essential importance of habitat assessments and surveys accompanying planning applications, particular so in respect of cases where there is or could be the presence of protected species.

Justification for inclusion of policy

- 13.3 Statutory designated wildlife sites already enjoy substantial protection under national legislation, as do protected species, and local plan policy will not seek to replicate existing rules and regulations. However, the local plan will seek to add to the existing protection and set out more detail on enhancement of biodiversity interests, including in respect of protecting and enhancing habitats and environments of more local interests. Policy coverage in the plan will also extend to geological interest and value as well.

Currently rejected alternative approaches to protection and enhancement of biodiversity and geological features

Option b – to not have a policy to provide for high level protection and enhancement of biodiversity and geological features

This approach would place a reliance on national legislation and policy. Whilst the national agenda will often be critical, and in many cases legislation is explicit on what can and cannot be done, just relying on national legislation would reduce scope to set out a more local agenda highlighting matters and concerns of specific local importance.

Option c – to place a lower emphasis on the importance of wildlife assets

This option could actually seek to run counter to national legislation and policy though if acceptable it would down play matters of biodiversity importance, as such it would run counter to the Council Plan objective of promoting a greener East Devon.

DRAFT

74. Strategic Policy – Habitat Regulations and mitigation of adverse impacts

Policy will establish the need for mitigation measures in respect of adverse impacts that would otherwise arise from development or from occupiers or users of development at SACs, SPAs and Ramsar sites. Policy will address:

- Need for Appropriate Assessment (under the Habitat Regulations) to be undertaken in respect of cases where development could adversely impact on sites.
- Need to contribute, where adverse impacts may arise, to packages of mitigation measures and/or to provide direct relevant mitigation works.

Policy will also need to consider exclusion zones at or around sites where development is either totally ruled out or very heavily restricted. Issues associated with predation by domestic cats is one reason why, for some sites, significant restrictions on development are appropriate.

Justification for inclusion of policy

- 13.4 A series of wildlife sites in East Devon (and surrounding areas) benefit from internationally recognised protection and are designated as Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and there is a Ramsar site. SPAs and Ramsar sites are specifically designated on account of bird populations that they support. SACs cover more general biodiversity interest.
- 13.5 The designated sites are referred to as European Sites and are given the highest level of protection in legislation through the Habitats Directive, as translated in to UK law by the Conservation of Habitats and Species Regulations 2010. The conservation of these sites and the specific reasons for designation is afforded particular importance if development may lead to adverse negative impacts that will not be mitigated it would not be allowed unless it can be shown to be of overriding national importance.
- 13.6 The East Devon Heaths SPA is a network of heathland sites which are designated on account of the internationally important breeding populations of nightjar and Dartford warbler. This site also overlaps the Devon Pebblebed Heaths SAC which is designated in recognition of its wet and dry heathland vegetation and for the Southern Damselfly. The Exe Estuary SPA is designated for its internationally important populations of birds (it is also a Ramsar site). The River Axe Special Area of Conservation (SAC) is designated for its habitat provision, particularly for vegetation and fish species. Sidmouth to West Bay SAC is a coastal strip designation, focusing on sea cliff, scree and drift line vegetation. Beer Quarry and Caves SAC is designated for the existence of 3 bat species.
- 13.7 Under the Habitat Regulations the local plan will need to be accompanied and informed by an assessment under the Habitat Regulations. This assessment will specifically consider the potential adverse impacts that development, and the users and occupiers of development, could have on the international tier of wildlife sites.

Outputs of the assessment will establish whether the plan can go ahead as drafted or proposed, they will highlight proposed amendments to the plan to make it acceptable and the work will outline mitigation measures that are needed for the plan to be acceptable.

- 13.8 Assessment work under the Habitat Regulations will be started in 2022, most likely through appointment of external consultants to provide advice and produce reports and recommendations to meet legal tests and ensure the local plan is setting high policy standards. It should be noted that the local plan and its proposals will need to be considered in respect of the designated sites in East Devon as well as sites outside of the District but where development in East Devon could adversely impact on such out-of-District designated sites. Overall assessment work will look at individual and collective or cumulative impacts of development within East Devon as well as across neighbouring local authority boundaries.
- 13.9 In respect of cross-boundary considerations the Exe estuary, Pebblebed Heaths and Dawlish Warren (in neighbouring Teignbridge District) have formed a cluster of very important sites where East Devon District Council, Exeter City Council and Teignbridge District Council have a collective approach to delivering mitigation schemes. For these sites mitigation is required now and will be in the future specially (but not only) on account of people undertaking recreational activities, specifically including dog walking on, at and around the protected sites and also for watersports. Financial contributions are required from new housing and tourism accommodation within 10 kilometres of these sites. Monies are currently secured to pay for mitigation measures and the three local authorities will be commissioning a new mitigation strategy (it will be supersede an existing strategy) that sets out the scale and nature of challenges and future approaches for mitigation required to accommodate development into the future. The new mitigation strategy is scheduled to be produced in 2022. Assuming the same types of approaches to mitigation are recommended in the future strategy they will include management and information measures on the or close to the designated sites as well as creation or enhancement of new spaces for recreation that will divert pressure and use away from the designated sites. These new or enhanced recreation spaces are called Suitable Alternative Natural Greenspaces (SANGs).
- 13.10 At the River Axe SAC the chief negative concern is excessive phosphate levels in the designated river. Resultant elevated nutrient levels in the river result in excessive algae growth and this adversely impacts on the biodiversity interest that lie behind the designation. Whilst most of the phosphates entering the river come from agriculture sources an important component part comes from human sewage waste sources and this explicitly includes waste discharges from sewage treatment plants (typically such plants remove some but not all phosphates). Any development that has toilets or emits other waste to the watercourse may be adding to the phosphate levels and causing extra harm. Options for improving the water quality of the River Axe are currently being investigated and addressed by a multi-agency partnership and the hope is that this work will extend to identifying and securing mitigation, with financial contributions from developers, to allow for development to go ahead.

Though there may also be relevant mitigation that can be secured through other means, potentially including on development sites themselves. The concerns at the River Axe are cross-boundary with the river rising in Dorset and there being tributaries in Somerset and pollutants coming from neighbouring authority areas as well as from East Devon.

- 13.11 For the Beer Quarry Caves SAC there is ongoing work to establish guidance in respect of allowing development to go ahead that does not adversely impact on the bat populations and the surrounding zones that support the bats.
- 13.12 The Habitat Regulations assessment and associated mitigation work that will be undertaken will explore these issues further and potential wider considerations in respect of the impacts of development on protected sites. Recommendations coming from this work will help shape the local plan as it evolves and develops.

Currently rejected alternative approaches to Habitat Regulations and mitigation of potential adverse impacts of development

Option b – to not have a policy in respect of Habitat Regulations and mitigation of potential adverse impacts of development

Under this option we would not have a policy and instead would need to apply and be reliant on legislation and national guidance. One consequence could be that it may be challenging to ensure that mitigation schemes are effectively planned for and can be implemented. It would also most likely place more reliance on assessing individual planning applications against regulations in order to determine, potentially on a case by case basis, the mitigation that is appropriate.

Option c – to vary the approach to mitigation

It may be possible and reasonable to identify a range of approaches to secure mitigation, and alternative options for mitigation, but at this stage of plan making explicit favoured approaches and alternatives have not been identified. Future further work may be needed to look into options in more detail.

The option of not providing mitigations has been rejected as not acceptable as it is not regarded that the plan is proposing anything of over-arching national importance.

75. Policy – Biodiversity net gain

This policy will establish a requirement for all development proposals to demonstrate at least 20% net gain in biodiversity compared with the pre-development situation by including or funding biodiversity enhancements, as appropriate.

Biodiversity losses, compensation and enhancements will be calculated using the most recent nationally endorsed biodiversity metric, taking into account any adopted local authority guidance. Compensation and enhancements will be delivered in accordance with the Local Nature Recovery Strategy and Network [emerging] and secured by planning conditions and/or planning obligations.

Justification for inclusion of policy

- 13.13 East Devon is blessed with an outstanding natural environment which supports a wide range of species and habitats of international importance. Some of these habitats are offered European protection due to their uniqueness in supporting rare and threatened species of flora and fauna, including the Pebblebed Heaths and Exe Estuary.
- 13.14 Despite this, it is widely accepted that the UK's biodiversity has been massively depleted by centuries of habitat loss, management changes and development. The UK state of nature report undertaken in 2019⁴⁰ identified that since 1970, 41 per cent of species studied have fallen and 133 species have already been lost.
- 13.15 These trends have been reflected in Devon with the majority of habitats now small and fragmented with their value being threatened due to a range of issues including invasive species, disease, lack of appropriate management, pollution, climate change, changes to funding sources such as agri-environment grants and continued fragmentation due to development pressure⁴¹. Clearly, action needs to be taken and in an attempt to buck these trends.
- 13.16 The NPPF is supportive of Local Plans providing for net gains in biodiversity and the Government will be introducing a mandatory requirement for all development to deliver at least 10% biodiversity net gain through the Environment Act.
- 13.17 Given the ecological richness and sensitivity of the District, we are seeking an uplift on the minimum proposed statutory requirement to 20%, which will provide greater certainty that net gain will be achieved through development.
- 13.18 To prevent local depletion of nature, net gains should be delivered on or as near to the losses as practical. In addition, the Devon Local Nature Recovery Strategy and Network Map should be used to focus delivery of biodiversity net gain into particular

⁴⁰ UK State of Nature Report, National Biodiversity Network, 2019, [State of Nature 2019 - National Biodiversity Network \(nbn.org.uk\)](https://www.nbn.org.uk/state-of-nature-2019)

⁴¹ Devon State of Nature Report, Devon Local Nature Partnership, 2013, [Wildlife - Devon Local Nature Partnership \(devonlnp.org.uk\)](https://www.devonlnp.org.uk/wildlife)

areas within the District where maximum benefits for nature can be achieved. These are currently under production by the Local Nature Partnership and Devon Wildlife Trust.

Currently rejected alternative approaches to biodiversity net gain

Option b – to seek a lower percentage gain – for example to align with the Government's 10% figure

This is clearly an option given it is the Government's proposed minimum threshold. It may allow for a greater proportion of funds to be spent on other Council priorities e.g. affordable housing. However, evidence from some academic literature suggests that a level of net gain at, or ideally above, 10% is the minimum necessary to give reasonable confidence in halting development's role in biodiversity loss (i.e. no net loss). This is due to sources of uncertainty such as recording habitats incorrectly, the narrow scope of measurements (due to the metric being simplified) the risk of habitat degradation before application submission (i.e. baseline alteration) and the risk of undervaluation of habitats. As such, to give greater confidence that net gain will be achieved an uplift to 20% is the preferred approach.

Option c – to seek a higher percentage figure – i.e. greater than 20%

This option was considered, however, it was concluded that a higher requirement would be inappropriate given that it could put other Council priorities for development at potential risk and that 20% would provide a high degree of certainty that net-gain would be achieved through development.

Option d – To not have a policy and rely on legislation and government requirements

This approach was considered inappropriate as there are no guarantees that Government legislation will ever come into force, and it would miss the opportunity to set out local priorities for the delivery of net gain.

76. Policy – Protection of nationally important wildlife sites

Policy will afford protection to and resist loss of:

- National Nature Reserves; and
- Sites of Special Scientific Interest.
- Policy will address exceptional cases where development may be allowed and cover the need for full mitigation and/or compensation which leads to a net gain in biodiversity value.

Justification for inclusion of policy

13.19 There are a series of nationally important sites in East Devon in the form of National Nature Reserves and Sites of Special Scientific Interest. Policy will seek to resist loss or damage to these sites and development resulting in loss or damage will only be allowed where it is shown that the benefits clearly outweigh both the impacts on the special features of the site and broader impacts on the national network of sites.

Alternative options to policy on nationally important wildlife sites and features

Option b – to not have a policy to protect national wildlife sites and features

This approach would place a reliance on national legislation and policy. Whilst the national agenda will often be critical, and in many cases legislation is explicit on what can and cannot be done, just relying on national legislation would reduce scope to set out a more local agenda highlighting matters and concerns of specific local importance.

Option c – to place a lower emphasis on the importance of wildlife assets

This option could actually seek to run counter to national legislation and policy though if acceptable it would downplay matters of biodiversity importance, as such it would run counter to the Council Plan objective of promoting a greener East Devon.

77. Policy – Protection of local wildlife sites and features

Policy will afford protection to and resist loss of:

- Local Nature Reserves.
- County Wildlife Sites.
- County Geological Sites.
- Other areas or sites identified to have wildlife importance

Policy will address exceptional cases where development, to include certain uses (including if compatible with the reasons of objectives for designation), may be allowed and cover the need for mitigation in associated with development that might under exceptional circumstances be permitted.

Justification for inclusion of policy

13.20 In addition to the national and internationally recognised wildlife sites there are many 'local sites' that are of importance. Three categories sites exist - Local Nature Reserves, County Wildlife Sites and County Geological Sites. Policy provides for the protection of these sites. These are designated or identified at the local scale.

Alternative options to policy on local wildlife sites and features

Option b – to not have a policy to protect local wildlife sites and features

This approach would place a reliance on national legislation and policy, though this is less clear cut and explicit to that which exists for internationally and nationally designated sites. Relying on national legislation (with its limitations) would reduce scope to set out a more local agenda highlighting matters and concerns of specific local importance.

Option c – to place a lower emphasis on the importance of wildlife assets

This option would down play matters of biodiversity importance, as such it would run counter to the Council Plan objective of promoting a greener East Devon.

Protected species

78. Policy – Protected species

Policy will seek to afford appropriate protection to protected species adding to and providing local detail to national policy and legislation on protection. Policy will seek to promote additional habitat protection in association with any development that does occur.

13.21 Many species of plants and animals in England and often their supporting features and habitats are protected with legislation specifying what can and cannot be done to them. The presence of protected species can have significant impacts on

the nature of acceptable development. Natural England has issued standing advice on protected species. [Protected species and development: advice for local planning authorities - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/protected-species-and-development-advice-for-local-planning-authorities)

Option b – to not have a policy for protected species

This approach would place a reliance on national legislation and policy. Relying on national legislation would reduce scope to set out a more local agenda highlighting matters and concerns of specific local importance. Having our own policy also ensures that these important issues are given sufficient prominence in local level decision making.

DRAFT

79. Policy – Trees and development

Policy will seek to afford protection to existing trees in East Devon and planting of new trees. Matters for policy to address will include:

- Encouragement of new tree planting;
- Retention of trees, hedgerows and similar features on development sites;
- Planting of native species;
- On street planting in new developments;
- Specific protection of ancient and veteran trees and ancient woodlands; and
- Initiatives and planting schemes that seek to connect existing but separate woodlands or groups of tree planting

Justification for inclusion of policy

13.22 Trees, both individually and collectively, make an important contribution to the amenity, character and environmental value of the area. Increasingly the Government are encouraging the planting of more trees in respect of climate change considerations, wildlife value and general amenity value. On street planting of trees, in new developments, is given particular increasing importance.

13.23 Ancient and veterans trees can be particularly important and many trees are afforded particular importance through the designation of Tree Preservation Orders. Ancient woodland (areas wooded since at least 1600) are an especially important asset of particular biodiversity value found in a number of parts of East Devon.

Currently rejected alternative approaches to trees within development

Option b – to place a lower importance on the importance of trees in respect of development

This option would seek to place a lower importance on the protection and planting of trees in and through new development. As such it would run counter to objectives of a greener East Devon though in some cases it may simplify development processes and bringing land forward for development (there may also be some cases where tree planting alongside built development may not be reasonable or possible and potentially might even be detrimental).

As policy is developed there will need to be more precision built into precise policy requirements and if policy develops in this direction alternative options may need more detailed specific testing at a future date.

80. Policy – Jurassic Coast World Heritage site and geodiversity

Policy will seek to afford protection to the World Heritage site and at a more local level to geodiversity interests. In respect if the Jurassic Coast policy will seek to protect and not compromise the Outstanding Universal Value that justifies its designation.

In respect of geological sites more generally policy will seek to afford protection and retention of sites resisting development that may bring about adverse changes.

Justification for inclusion of policy

- 13.24 The Jurassic Coast is a hugely diverse and beautiful landscape underpinned by incredible geology of global importance. In 2001 it was inscribed as a World Heritage Site by UNESCO for the outstanding universal value of its rocks, fossils and landforms. It remains England's only natural World Heritage Site. The Jurassic Coast begins at Orcombe Point in Exmouth Devon, and continues for 95 miles eastward to Old Harry Rocks near Swanage in Dorset.
- 13.25 The Jurassic Coast Partnership Plan 2020-2025 identifies the 'Outstanding Universal Value' (OUV) of the World Heritage coastline and identifies the following OUV attributes:
- Stratigraphy (the rock record) and structure;
 - Palaeontological record;
 - Geomorphological features and processes;
 - Ongoing scientific investigation and educational use, and role in the history of science; and
 - Underlying geomorphological processes in the setting of the Site
- 13.26 The Partnership Plan highlights the geological value of the WHS, and identifies a significant opportunity to promote the role of geodiversity within the area's landscapes; with an emphasis on the presentation of the site and people's ability to use and enjoy it.
- 13.27 A key characteristic of the WHS is its high rate of erosion, creating a dynamic coastline which maintains rock exposures. Development requiring increased coastal defences would therefore be harmful to the OUV of the site.
- 13.28 At the local level, Regionally Important Geological and Geomorphological Sites (RIGS) are protected for their scientific and educational value. There is sometimes potential for designation of alternative sites and the creation of new exposures. The policy therefore allows some flexibility in protecting these sites, except where the features concerned are not capable of being re-created elsewhere.

Currently rejected alternative approaches to Jurassic Coast World Heritage site and geodiversity

Option b – to not have policy in respect of the Jurassic Coast World Heritage site and geodiversity

We could choose not to have a policy on the Jurassic Coast World Heritage site and geodiversity but this may increase vulnerability of loss and damage to these assets. The World Heritage site, despite its international importance and status, does not benefit from the same levels and form of protection that applies to national and international designated biodiversity sites. Not having a policy could, therefore, lead to a vulnerability to adverse impacts and at its extreme adverse impacts could be of such significance to threaten the entire site status (in 2021 the Liverpool Waterfront was stripped of its World Heritage Site status on account of adverse impacts of development).

Should a policy for the World Heritage Site and geodiversity be carried forward into the draft local plan consideration, not undertaken in detail to date, will need to be given to precise matters that policy will address. It may also be appropriate to consider separate policies for 1) The World Heritage site and 2) geodiversity interests more generally. Further work will, however, need to be undertaken.

DRAFT

81. Policy – Incorporation of wildlife friendly features into new developments

Policy will seek to promote, encourage and where possible require development schemes to be wildlife friendly through such measures as:

- Expecting, as the norm, planting of native species;
- Incorporation of wild and non-manicured spaces in development.
- Avoidance of hard surfacing.
- Incorporation of wildlife friendly features such as – bird and bee houses built into the fabric of buildings and hedgehog tunnels. In particular, an average of at least one integral bird box per residential unit should be incorporated in the fabric of all new housing developments, with flats, hotels, care/nursing homes, commercial and public buildings considered on a case-by-case basis.

Justification for inclusion of policy

- 13.29 Many wildlife species can happily co-exist with built development and environments and with the presence of humans. Developers will be expected to explore the opportunities for incorporation of wildlife friendly and supportive development schemes by such measures as use of native species, avoidance of manicured spaces and hard surfacing and ensuring incorporation of positive spaces and areas for wildlife to live in development schemes.
- 13.30 There have been a number of examples across the Country who have applied a 1:1 nest box per dwelling ratio including Exeter, Cornwall and Oxford. Experience from those authorities suggests that the most suitable box type for cavity nesting birds is the swift brick, which are also mentioned in National Planning Practice Guidance (Paragraph 023, Reference ID: 8-023-20190721). Boxes designed for swifts replicate the cavities found in older buildings and mature trees and are used/preferred by many birds including swifts, house sparrows, house martins, blue tits, great tits, starlings and nuthatches⁴². This is therefore considered to be the preferred box to be utilised.
- 13.31 In line with RSPB guidance, using integral swift boxes located under the eaves or adjacent to the verges of gable ends, proximity to doors and windows should be avoided. Where more than one is being sited, loose clusters approx. one metre+ apart evenly spread across the development will be acceptable.

⁴² Swifts Local Network (SLN), 2020, [Swift Bricks - the universal nest brick Issue 02.pdf - Google Drive](#)

Currently rejected alternative approaches to incorporation of wildlife friendly features into new developments

Option b – to not include a policy

This approach was not preferred as delivering biodiversity improvements through development is considered to be a key strategic objective of the Local Plan. Not including a policy would make it less certain that improvements would come forward as the NPPF is not as prescriptive.

DRAFT

Chapter 15 - Ensuring access to open space and sporting and recreation facilities

The importance of open space and sport and recreation facilities

- 14.1 Having ready and easy access to open spaces for all people at all stages of life is extremely important for mental and physical wellbeing. In East Devon we are blessed with an exceptionally attractive environment with many open spaces areas. However this does not translate to all residents and visitors to the District having readily accessible open space available to use and enjoy.
- 14.2 Open spaces and their use and availability can be divided between those that are used for informal recreational activities, for example as simple as 'just' going for a walk in a nice green environment, and those used for formal sport or recreation activities, such as playing a match of football.
- 14.3 For informal activities the expansive open spaces area of East Devon formed by the countryside, the sea and beaches and also parks and gardens and other open areas in the District form spaces that are widely enjoyed. In some areas, especially the more urban, and for people with limited mobility access such spaces can, however, be challenging and concerns are compounded for those without access to a car or private vehicle. When it comes to formal recreation facilities, specifically playing pitches for sport and recreation accessibility can be far more challenging with the availability and quality of pitches and facilities being variable across the District but with a general picture of high demand levels stretching many of the facilities available close to or sometimes beyond capacity.

82. Strategic Policy – Access to open space and recreation facilities

Insert policy that establishes a strategic approach to ensuring that new development is only provided or allowed where it can provide appropriate access to existing open space and/or will provide appropriate provision as part of the overall scheme being proposed. Policy is to provide a framework to support others in this chapter and throughout the plan and will:

- Highlight relevance of accessibility to open space;
- Require new provision where shortfalls exist; and
- Generally set a high standard for all developments in order for them to be acceptable.

Justification for inclusion of policy

- 14.4 A key consideration in accommodating new development will be to ensure that residents, visitors to or users should be able to access open spaces and enjoy the benefits that they offer. Such an outcome will require that availability of space and

facilities will need to be taken into account at the outset of designing any scheme or proposal for development whether at the smallest of scales, perhaps as simple as taking into account footpaths and local greenspaces through to any major schemes where open space and facility provision needs to be built into any proposals and links to surrounding open spaces and facilities may be integral to and essential for future success.

Currently rejected alternative approaches to access to open space and recreation facilities

Option b – to not have a policy that promotes access to open space and recreation facilities

This approach would place a reliance on national legislation and policy and more importantly more detailed local plan policies. However national policy and guidance is less clear cut on sports and recreation provision than for some other policy areas (for example biodiversity). Furthermore absence of a policy would prejudice attempts to establish a local agenda that highlights matters and concerns of specific local importance.

Option c – to place a low or lower emphasis on access to open space and recreation facilities

This option would downplay the importance of sport and recreation facilities such an approach may assist in promoting the delivery of development but potentially at a real cost to the quality of development and the social and wellbeing benefits that could or should be associated with it.

83. Policy – Retention of land and buildings for sport and recreation use

Proposed policy will establish that the loss of land and buildings that are currently or were previously used for sport and recreation will not be acceptable unless: Alternative provision of equal or greater community quality and benefit is delivered (to include additional provision the need for which is generated by any net additional building);

A development involving some site loss will result in overall net gains through existing facility enhancement;

In the local area (local to be defined) there is a net surplus of the general type of facility or space that is being lost (this will **not** be taken to be a specific sports pitch/space surplus but a generic space type reference – e.g. grass area suitable for team sport).

Justification for inclusion of policy

- 14.5 Whilst there are a wide range of existing sports and recreation facilities in East Devon, for both indoor and outdoor use, we are aware that coverage and availability is variable. Consultants (as at the Autumn of 2021) are producing a Leisure Strategy for the Council that will set out a strategic vision for the future of leisure provision in East Devon. The same consultants, in parallel with the leisure strategy work, will also be producing a Built Facilities Strategy will assess suitability of and access to indoor sport facilities.
- 14.6 There is an existing though dated Playing Pitch Strategy that covers East Devon and the Council are now producing a new Playing Pitch Strategy for the District. The new Playing Pitch strategy will assess availability, access and use of pitches used for football, cricket, hockey, rugby and tennis
- 14.7 These leisure and sport strategy documents should be completed in 2022 though and as such should be available to inform local plan policy choices and refinement to go into the Publication draft of the local plan. Amongst other matters they will identify where improvements to existing facilities may be desirable and where extra facilities may be needed, or perhaps (and exceptionally) if there may be an existing over provision. The strategy documents, specifically from a planning and planning policy perspective, will help inform policy that seeks to protect existing facilities from loss and provide for additional facility in association with new development. More widely, and typically beyond the remit or role of planning, the strategy documents may be used by the Council and other bodies to inform decisions on maintenance and enhancement of existing facilities and bidding for monies for new or enhanced facilities.
- 14.8 Facilities used for sport and recreation can come under pressure for reuse or redevelopment for non-sporting and recreational uses or changes from one type of

sporting use to another. Policy of the local plan will seek to resist such losses unless, under plan policy, there is clear justification.

Currently rejected alternative approaches to retention of land and buildings for sport and recreation use

Option b – to be more open to accepting the loss of land and buildings for sport and recreation use

This option would downplay the importance of existing sport and recreation facilities and such an approach may allow for alternative forms of development and land uses, for example housing development, to come forward. However such an approach could be to the detriment of existing communities and their local environments and opportunities to play sport with the social and wellbeing benefits this bring. There is also very real potential for conflict with Sport England policy and guidance and power that Sport England operate under.

DRAFT

84. Policy – land and buildings for sport, recreation and open space areas in association with development

Insert policy that establishes that new sporting and recreational facilities and open space will be required in association with and to match need generated by new development. Policy to major on new housing growth and from the Playing Pitch Strategy outputs and open space evidence/sports facility evidence we will quantify standards/levels of facility provision to be provided on-site (typically on larger development schemes) or contribution equivalents off-site. Policy to include:

Requirements for space to accommodate - with actual space standard requirements to be defined:

- Allotments
- Outdoor sports pitches
- Parks and recreation grounds
- Play space for children and youth
- Accessible semi-natural green space
- Fixed sport facilities

The space standards may be varied (further work required) across urban and rural areas of East Devon or other sub-divisions.

Need to determine contributions for paying for facilities not just land provision.

Where flexibility may be appropriate – specifically to include where existing levels of provision are greater than need requirements.

Look at ability to secure provision on non-residential developments.

On sites allocated for development in the plan the provision should be accommodated within the actual allocated land.

Justification for inclusion of policy

14.9 New development, specifically including where this gives rise to an increased population, can generate a need for additional facilities, unless under exceptional circumstances there is a demonstrable surplus of provision in the locality. Policy of the plan will require new facilities to match changes occurring in the local population. This policy will be most typically relevant where new housing is proposed. It may, however, have relevance where other forms of development could lead to changes in population or people in a locality. For example it could have applicability where a new commercial development results in a new concentration of workers in a given locality.

14.10 Facilities under this policy will include those for sport and recreation as well as more general open space areas.

Currently rejected alternative approaches to land and buildings for sport, recreation and open space areas in association with development

Option b – To not seek new facilities in association with development or downplay importance or level of provision

Under this approach demands for facility provision may be lower or nil compared to an option of seeking what could be higher standards or levels of provision under plan policy. Such an approach may allow for more development to come forward, and potentially more quickly, but this could potentially be expected to be at the cost of the overall development scheme and the life, in the case of housing for example, of future residents and their recreational opportunities and wider social and wellbeing outcomes.

DRAFT

85. Policy – Location of facilities for sport and recreation, open spaces and allotments

Insert policy that establishes location and site considerations applicable to new facilities for sport and recreation use and open space. Policy to include:

- Need for public accessibility, specifically including for non-car users.
- Making footpath/cycle links to and from other accessible open spaces.
- Avoiding adverse amenity or natural or built environment adverse impacts.
- Providing any buildings within or next to/close to the built form of settlements or development boundaries.
- Access to facilities by all

Justification for inclusion of policy

14.11 New facilities and open space can typically be expected to be accommodated on and within development sites, especially so for larger developments. In such cases they should be located in accordance with detailed design proposals for any specific development scheme taking into account design policies in this plan as well as specific characteristics of the development site.

14.12 Where otherwise come forward for development they should be accessible to close by residential populations and centres and avoid adverse impacts.

Currently rejected alternative approaches to Location of facilities for sport and recreation, open spaces and allotments

Option b – To not set out location criteria and offer more flexibility - we could choose to be less specific in respect of locations where facilities maybe provided. This could allow for more facilities to come forward but they could potentially be in locations that are not accessible for those without a car and they could lead to possibly greater adverse impacts.

86. Policy – Avoiding the loss of allotments to other use.

Insert policy that establishes that planning permission for loss of allotments will not be allowed unless:

- A development proposal will create a new provision that is equal to or better than that being lost; or
- There is a demonstrable over-supply in a locality (need to define what we mean by locality).

Justification for inclusion of policy

14.13 Allotments form a valued community asset and are increasingly important to many local communities and people. Demand for allotments has risen over recent years with waiting lists frequently becoming longer.

Currently rejected alternative approaches to avoiding the loss of allotments to other use.

Option b – To not seek to avoiding the loss of allotments to other uses

This approach would not seek to avoid the loss of allotment to other uses or perhaps would not be as demanding as policy might otherwise be. Under this policy it could make development for other uses, such as housing, easier and quicker though allotment loss could be expected to result in adverse impacts in respect of amenity and well-being as well as promoting a green agenda.

87. Policy – leisure and recreation developments

Insert policy that establishes planning considerations in respect of leisure and recreation developments in the countryside. To include:

- Expectations of low key and low impact uses;
- Expectation of most/all of the development not being buildings;
- Any buildings being small scale and sub-servient to the dominant open space uses of the site
- Uses being compatible with countryside activities and settings;
- High environmental standards and expectations;

Suggestion is, therefore, for a quite restrictive policy approach.

Justification for inclusion of policy

14.14 Many leisure activities, especially of a low key or informal nature, take place in countryside locations and away from settlements. Often such activities don't take place in paces or use facilities that have been developed (that is not developed in the planning sense and in terms of where planning permission may be or have been required). However proposals for commercial or other leisure facilities often associated with tourism attractions or accommodation sites may come forward for development.

Currently rejected alternative approaches to leisure and recreation developments in the countryside

Option b – being less restrictive in respect of leisure and recreation developments in the countryside

As proposed the policy is relatively restrictive of leisure and recreation development in the countryside. Amongst other matters it seeks to ensure that any provision is for uses that by their nature and character can be looked upon as countryside compatible, needing a countryside location and low impact in nature (as opposed to being uses that more reasonably or easily sit with an urban location). Under the proposed policy approach it could place clear limits on new developments both locational terms, i.e. some use may have to go into urban areas to be acceptable, or may limit some development types being built at all in East Devon. The limit being that some uses may need large land areas and such they simply may not exist or be available in urban areas or perhaps they are noisy or otherwise intrusive/bad neighbour activities and need to be away from developed and especially residential areas. An option of being less restrictive could open up new opportunities for leisure and recreation provision, though it could result in adverse land scape or wider environmental impacts and be located in locations where access is car dependent.

Chapter 16 - Our outstanding historic environment

A heritage asset is defined by central government in the NPPF as:

“A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).”

- 15.1 East Devon is fortunate in having a rich heritage and distinctive vernacular architecture which makes it a unique place to live in and visit. Local materials such as chert, cob, thatch and clay tiles are used extensively as well as local limestone and Beer stone. East Devon's historic environment isn't just limited to man-made buildings, monuments, standing stones and archaeological sites, but landscapes and wildlife habitats resulting from millennia of human interaction with nature.
- 15.2 National policy emphasises the importance of heritage assets for their contribution to quality of life, and as an irreplaceable resource which should be conserved in a manner appropriate to their significance. Local planning authorities are required to set out in their plans, “a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats” and to make information on the historic environment, gathered as a part of policy-making or development management, publically accessible. Policy implementation will be informed by the East Devon Heritage Strategy, which presents a summary of the District's heritage, its significance and its benefits whilst developing objectives for the future, with an action plan for the delivery of recommendations. The strategy runs for 12 years from 2019 – 2031 and will be updated during the life of the local plan. The strategy focuses on the heritage assets of the district where the Council has a direct role and responsibility, or influence, in the decision making or management process. However broader designations that inform the strategy are also considered, such as the Areas of Outstanding Natural Beauty, which have a positive influence on the enhancement and management of the district's heritage.
- 15.3 Non-designated heritage assets may be identified by a local planning authority as having a local heritage value that should be taken into account when considering any planning application that affects either the asset or its setting. National policy further advises that heritage assets should be conserved in a manner appropriate to their significance. In weighing an application that may affect a non-designated asset, a balanced judgement is required regarding the scale of any harm or loss and the significance of the asset.
- 15.4 All of the policies in this chapter are considered essential to ensure that the Council meets its statutory duty to protect the Districts heritage assets and ensure that they are appropriately considered in the context of any planning application which may affect them.

88. Policy – Historic Environment

This policy will apply to proposals for new development that may affect designated and non-designated heritage assets and will take account of the desirability of sustaining and enhancing the significance of those assets and putting them to viable uses consistent with their conservation. The greater the significance of the asset the higher the requirement for conservation and enhancement.

Criteria will require new development to be sensitively designed and cause no harm to the historic environment. Development will be required to provide a viable future use for a heritage asset and/or protect an asset that is at risk.

Particular encouragement will be given to schemes that will help secure the long term conservation of vacant and under-used buildings and bring them back into appropriate use.

Applicants will be required to describe, in line with best practice and relevant national guidance, the significance of any heritage assets affected including their setting. In some circumstances a planning condition will require further survey, analysis and/or recording.

Policy will be clear that alterations to historic buildings, for example to improve energy efficiency or reduce carbon emissions, should respect the integrity of the historic environment and the character and significance of the building.

Justification for inclusion of policy

- 15.5 Heritage assets may be classified as either 'designated' or 'non-designated' and the importance of both can be taken into account through the planning process. Heritage assets can include Listed Buildings, Scheduled Monuments, Conservation Areas, Registered Parks and Gardens, archaeological sites and other assets. The majority of heritage assets in East Devon, whether buildings, archaeological sites or areas of historic landscape character, do not have a statutory designation and so their conservation relies on the planning system and positive management by land and property owners.
- 15.6 In preparing development proposals, applicants should refer at an early stage should refer to sources of information on the historic environment such as the The Devon Historic Environment Record, The National Heritage List for England, any local Heritage Impact Assessments, and, where relevant, Conservation Area Character Appraisals to ensure that proposals are based on an understanding of the significance of any heritage assets that may be affected. Development proposals should also accord with the Heritage Strategy, take into account the principles set out in any Supplementary Planning Documents and other relevant guidance.
- 15.7 In some circumstances, further surveys and analysis may be required prior to any application being determined. Heritage Statements, Statements of Significance, and Impact Assessments should be produced in line with current best practice and relevant national guidance.

- 15.8 The Council will monitor buildings or other heritage assets at risk through neglect, decay or other threats, proactively seeking solutions for assets at risk through discussions with owners and willingness to consider positively development schemes that would ensure the repair and maintenance of the asset, and, as a last resort, using its statutory powers. The Council will work with relevant stakeholders to encourage better understanding of the heritage assets on the Historic England “Heritage at Risk” Register. Where appropriate the Council will encourage Heritage Partnership Agreements, particularly for Listed Buildings on any ‘at risk’ register.
- 15.9 The Council will support Neighbourhood Development Plans where they seek to assess their heritage assets and add to the evidence base.

89. Policy – Listed Buildings

This policy will require proposals for development to conserve or enhance listed buildings and be sympathetic to their character and setting. Any harm arising from development must be minimised/avoided and a record of losses of historic fabric must be kept. Development proposals that will lead to substantial harm will not be permitted.

Policy will support new uses for listed buildings where these can be accommodated without any adverse effect on the significance of the building and its setting and will ensure the future of the building is secured.

Justification for inclusion of policy

- 15.10 Within East Devon around 4600 buildings and structures are “listed” (included on a register known as the List of Buildings of Special Architectural or Historic Interest) due to their special architectural or historic interest at a national level. When a building or structure is listed, it is listed in its entirety, which means that both the exterior and the interior are protected which includes interior features and fabric such as staircases, panelling, roof structures, floors, walls, fireplaces, doors etc. In addition, any object or structure fixed to the building, and any object or structure within the curtilage of the building, which although not fixed to the building, forms part of the land and has done so since before 1 July 1948, are treated as being part of the listed building. Occasionally land will form part of the setting of a heritage asset despite lying some distance away, for example where there is a historical or functional association.
- 15.11 Many listed buildings, due to their age and construction, have features which could support roosting bats. To ensure compliance with relevant legislation, species survey information will be required, and ecological conditions applied to consents granted, in instances where proposed works to listed buildings would be reasonably likely to impact roosting bats

90. Policy - Conservation Areas

Proposals for development within or affecting the setting of a Conservation Area will be required to conserve or enhance its special interest, character, setting and appearance. Criteria will be set out in the policy which require development to contribute to the Conservation Area's special interest and its relationship within its setting.

It will explain that, where a proposed development will lead to substantial harm to or total loss of significance of a Conservation Area, consent will only be granted where it can be demonstrated that the substantial harm is necessary to achieve substantial public benefits that outweigh that harm or loss.

Policy will also establish that, where a development proposal will lead to less than substantial harm to the significance of a Conservation Area, this harm will be weighed against the public benefits of the proposal.

Justification for inclusion of policy

- 15.12 There are 33 Conservation Areas in East Devon, covering parts of all the main towns (except Cranbrook) and the historic cores of many smaller settlements. Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 describes Conservation Areas as "areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance". Inevitably, these areas will vary greatly. Attractive groups of buildings, open spaces, trees and hedgerows, an historic settlement pattern, or features of archaeological interest, may all contribute to the special character of an area, and it is that character, rather than individual buildings, which Conservation Area legislation seeks to preserve and enhance. This does not mean that they cannot develop; change is often necessary to accommodate the demands of modern living as our historic towns and village centres are always likely to attract new development. Any development would, however need to preserve or enhance the character of the area and may require planning permission and/or planning permission for demolition in a conservation area.
- 15.13 A feature in some town centres are 'burgage plots'. Surviving patterns of burgage plots have considerable historic and archaeological significance and contribute much to the character of the market towns, Honiton in particular.
- 15.14 When undertaking Conservation Area Appraisals the opportunity will be taken to produce and update lists of locally important non-designated heritage assets and identification of any heritage assets 'at risk' in order to encourage better understanding.

91. Policy – Archaeology and Scheduled Monuments

This policy will state that development must protect the site and setting of Scheduled Monuments or nationally important designated or undesignated archaeological remains, including ancient routeways and milestones. It will set out the process that applicants will be expected to follow to undertake an assessment to determine whether the development site is likely to contain archaeological remains and what will happen if archaeological evidence is found.

Justification for inclusion of policy

- 15.15 East Devon has a significant archaeological heritage which is a finite and non-renewable resource with great social, economic, cultural and educational value. Around 200 archaeological sites and monuments are designated as Scheduled Monuments and are legally protected under the terms of the Ancient Monuments and Archaeological Areas Act. These will be shown on the Proposals Map.
- 15.16 The Devon Historic Environment Record, maintained by the County Council, also includes numerous other sites of local interest but, due to their size, form and the large numbers added to the record annually, it is not practical for the Proposals Map to identify them.
- 15.17 A network of historic routes also exist as archaeological features in the district, ranging from pre-historic tracks, Roman roads, sunken lanes to later turnpike roads. These routes are integrated into the district's landscape and serve an important function in linking settlements and forming a unique setting for the district's distinctive landscape features and will therefore be protected.

92. Policy – Historic Landscapes, parks and gardens

This policy will require applications to conserve or enhance the special historic interest, character or setting of a park or garden on the Historic England Register of Historic Parks and Gardens of Special Historic Interest in England. Where harm to or loss of significance of any heritage asset is proposed, exceptional circumstances must be proven and justified as being in the public benefit. Applications will require a statement explaining the significance of the asset. In some circumstances planning conditions will require further survey, analysis and recording.

Justification for inclusion of policy

- 15.18 Historic landscapes, parks and gardens are an important part of East Devon's heritage and environment. They comprise a variety of features including the open space itself, views in and out, archaeological remains and, in the case of parks or gardens, a conscious design incorporating planting and water features, and frequently buildings. Historic landscapes are also important for their green infrastructure and biodiversity value. There is a need to protect such sites and their settings and to encourage sympathetic management wherever possible.
- 15.19 The most important sites have been included on the "Historic England Register of Historic Parks and Gardens of Special Historic Interest in England" and/or on the National Heritage List for England. In addition to the nationally important registered sites the district has several other sites of regional or local importance that should also be protected from harm, and enhanced where possible.

Currently rejected alternative approaches to all policies related to the historic environment

Option b – No policy

A reasonable option could be to leave the protection and conservation of built heritage to national policy and the protection conferred through national legislation and the NPPF. Given the importance of built heritage to the Districts character and the non-designated status of the majority of heritage assets this is not the preferred option.

Chapter 17 - Ensuring we have community buildings and facilities

- 17.1 Thriving communities are reliant on having spaces and buildings to meet and for community based activities to take place. Without such spaces many communities would not survive and would not provide the support mechanisms that are needed for the health and wellbeing of their residents.

93. Policy – new or extended community facilities

Insert policy that provides for expansion of or new provision of community spaces and buildings. To include:

- Provision to be within or adjoining the built up areas or edges of a settlement and where a settlement has a Settlement Boundary to be within, adjacent to or close d well related to this boundary.
- Development to serve a local community and proportionate to the needs of that community.
- Encouragements (or requirement?) for sharing of facilities?

Justification for inclusion of policy

- 17.2 Facilities such as schools, libraries, halls, health and sports centres and Places of Worship fulfil an important role as a focus for social activities taking place in the local community. Community centres and village halls are already established in many settlements in East Devon, and where appropriately sited or proposed the Council will encourage the expansion of or new provision of these types of uses.

Currently rejected alternative approaches to new or extended community facilities

Option b – to be more restrictive of locations where community facilities are located

As drafted policy allows some flexibility over where facilities are located, including being outside of development boundaries but well related to settlements. Under this policy development could potential go ahead in locations that are of environmental importance or sensitivity and as such there is some potential for adverse impacts (other policies in the plan, of course, dependent). A more restrictive policy approach could place greater limits on acceptable locations and in so doing lessen the potential for adverse impacts, but at the same time it could lessen potential for such facilities to be built.

Option c – to be less restrictive of locations where community facilities are located

In contrast to option b, above, a less restrictive approach could see scope to provide facilities in locations that are more remote from settlements and centres of

population. Such locations could increase potential for adverse landscape and other environmental impacts and may be in locations where users are car dependent to gain access. However by being more flexible in locational terms it may provide greater opportunity and potential for new facilities to come forward.

Option d – Be less restrictive of facilities serving and being proportionate to meeting a local need

As drafted the policy seeks to ensure and provide for facilities that are really geared around there being a local need for the development and the scale of provision being proportionate to it (in this respect policy might for example be most readily applicable to allow for say a new village hall). This proposed policy approach would, however, not provide for facilities that are designed to serve a wider than local need perhaps for a distinct group of uses. We could look to make the policy more flexible in terms of local need consideration, though this may lead to more development, especially if greater location flexibility were introduced, in countryside locations with potential for adverse environmental impacts.

In respect of option d, above, some consideration may need to be given in future plan drafting to consideration of locational considerations in respect of facilities to serve specific groups of people and or specific interest activities.

DRAFT

94. Policy – Loss of community facilities

Insert policy that seeks to resist loss of communal facilities unless they are clearly not needed, not used or surplus to requirements.

Justification for inclusion of policy

- 17.3 Policy of the local plan will resist the loss of community facilities unless they are clearly not needed, not used or surplus to requirements.

Currently rejected alternative approaches to the loss of community facilities

Option b – To not seek to avoid, or be less concerned about, the loss of community facilities to other uses

This approach would not seek to avoid the loss of community use to other uses or perhaps would not be as demanding as policy might otherwise be. Under this policy it could make development for other uses, such as housing, easier and quicker. However, community facility loss could be expected to result in adverse impacts in respect of levels of and access to community activities and therefore people's well-being.

Chapter 18 - Implementation and monitoring of the local plan

Infrastructure provision

- 17.1 The delivery of infrastructure alongside housing and economic development is vital in creating sustainable communities. Transport, flood risk measures, utilities connections, and habitat mitigation are often critical to allow new development to take place; whilst people should be able to access facilities such as education, health, open space and play areas on a day-to-day basis.
- 17.2 Infrastructure can be funded and delivered in a variety of ways. New development is required to address its direct impacts by directly providing infrastructure or paying for it, through planning obligations, also known as section 106 agreements and where relevant under legal agreements for highway works. Under legislation there are specific tests that need to be met. The council also charges Community Infrastructure Levy, which is collected when new homes are built and put into a 'pot' for future infrastructure projects. Sometimes grants or loans to fund infrastructure from national or local government may become available. Infrastructure may also be funded by organisations that have statutory powers and funding drawn from charges to customers (e.g. utilities companies), or central Government (e.g. works to protect existing development from flooding).
- 17.3 As local plan making progresses we will need to undertake detailed assessment of infrastructure needs and how we plan for provision.

Monitoring

- 17.4 It is essential that the Local Plan is capable of being delivered and isn't just a wish list of proposals that have little chance of being implemented. Every policy in this Local Plan recognises that there is an issue or consideration to which the council needs to respond. Accordingly, for each policy the council needs to set out the intended outcomes for its implementation, and how the policy's success can be measured.
- 17.5 Monitoring is a key means to assessing the success of any given policy. To ensure this is the case, each year the council will produce a series of report which, in total, will comprise its statutory Annual Monitoring Report.
- 17.6 These will include, but not be limited to, the following documents:

Housing Monitoring Update (HMU)

- 17.7 The NPPF states that "to maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission"; this report will include housing completions figures for the previous 12 months, including:
- Total net completions district wide (including by parish, settlement and Built-up Area Boundary);

- Breakdown of completions on brownfield and greenfield sites;
- Affordable housing.

17.8 The NPPF also stipulates that “local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies”. Therefore the HMU will also include:

- Housing projections and a trajectory for the Local Plan period;
- Five Year Housing Land Supply calculations (for the western side of East Devon, the rest of East Devon and the district as a whole);
- Housing Delivery Test results.

Employment Land Review (ELR)

17.9 This report will provide an assessment of employment land availability at a given point each year in East Devon. It will identify the major employment sites and business parks in the district and within these employment areas record and highlight:

- Plots of land and building floorspace that has been developed;
- Vacant or undeveloped plots of land that could be suitable for future business development.

17.10 The ELR will also include:

- A district wide analysis of Non Domestic Rated (NDR) and Vacant NDR units at employment sites, commenting on identified uses of units, numbers and distribution across the district;
- Information on wage levels;
- Unemployment rates;
- Employee/job numbers.

Self and Custom-Build Demand and Supply monitoring report

17.11 This report will set out both the demand for self-build in East Devon, as shown by the numbers on the council's self-build register, and the supply of self-build plots in the district, assessed by the number granted planning permission throughout the year.

Brownfield Land Register

17.12 The NPPF requires the council to encourage the effective use of land within settlements by reusing land that has been previously developed (brownfield land).

17.13 Since December 2017, the council has been legally required to prepare, maintain and publish a brownfield land register of sites. Registers help builders to identify potentially suitable brownfield sites for housing development, whilst data on sites is ‘harvested’ nationally.

17.14 To be included on the register, sites must be:

- Suitable for residential development, in accordance with policies in the adopted Local Plan and the NPPF;
- Free from adverse impacts on the natural environment, habitats or built heritage that cannot be mitigated;
- Viable and capable of being delivered within 5 years;
- At least 0.25 hectares in size or capable of supporting five or more dwellings;
- Available for residential development (meaning that there is no impediment to development in terms of either ownership issues or legal constraints on the land).

Additional monitoring

17.15 Other areas that will require monitoring include:

- Section 106 / CIL Developer Contributions;
- Heritage Strategy;
- Gypsy and Traveller Sites;
- Neighbourhood Plans;
- Planning Appeals.

DRAFT

Chapter 19 - What happens next

- 18.1 This working draft local plan is just that, it's a starting point in terms of presenting to and seeking instructions through Committee on a suggested draft plan that members of this Committee, are keen to put out for public consultation.
- 18.2 The working draft of the local plan does not contain all the answers, far from it, but it does highlight suggested ways forward that will need to be refined over the coming weeks. In so doing it sets out strategic themes and suggested approach, not least in respect of the scale of growth to be planned for (explicitly including the number of new homes) and the distribution of that growth. Officer recommendations in this plan advocate a continuation of past patterns of development with a focus for future development on the western side of the District close to Exeter and with more modest development elsewhere, primality geared around meeting local area needs. To accommodate the development on the western side of East Devon the working draft local plan recommends the development of a second new town.
- 18.3 Members of the Committee need to be satisfied that they agree with the strategic approach advocated, but also members need to be aware of and provide a clear steer on a range of additional and more detailed policy matters. It is stressed that in this working draft plan to committee there is a shortfall in proposed development site allocations to meet the objective need for housing; and there would be an even greater shortfall if we do not plan to exceed what are suggested as being reasonable minimal housing numbers that we should be planning for, or if suggested land allocations are taken out.
- 18.4 One of the tasks identified for committee, whether the broad approach to development is agreed with (and matters of more detail are agreed with) or not, is to give a steer or instruction about how and where the development should occur.
- 18.5 Looking forward the timetable for future work will see a revised version of this working draft plan coming back to Strategic Planning Committee in March 2022 with, to accord with the published plan making timetable, a recommendation for public consultation. It is recognised that arriving at a credible document for public consultation will place a lot of pressure on officers to produce further work. It will, however, also demand of members a requirement to take what could be some challenging decisions. The clear suggestion is that the document that is endorsed for consultation is one that members are happy is broadly along the right lines (though of course with scope for refinement) and that is fit for purpose to guide thinking on the future development of East Devon for the next twenty years or more.
- 18.6 In endorsing a document for consultation any decisions taken in respect to policy will need to be justified by evidence and members of the Council will need to be satisfied that the options they pursue and routes they go down are robust and logical. Eventually, come public examination, the Planning Inspector considering the plan will demand that evidence is in place and that it is robust. The Inspector will test the evidence and also seek to ensure that the plan is justified under national

policy and guidance and that it, and the process for making it, meet legislative requirements. Local plans do fail at examination and members need to be aware that the bar to achieving success is high.

- 18.7 In terms of evidence the working draft plan is underpinned by research and studies that we have available to date. But it needs to be recognised that there are holes and gaps that need filling and in part getting a member steer on the way forward will help crystallise thinking on the further evidence and assessment needed. Some evidence work may be complete prior to or at March 2022. Beyond March 2022, however, there will still be further evidence gathering needed and it is this further work, augmented and informed by feedback from consultation, that will lead on to the Publication draft of the plan later in 2022.
- 18.8 The Publication draft of the plan is the version of the plan that the Council is satisfied is correct, sound and robust. It is made available for the public and anyone else, including developers, agents, Government agencies, to comment on. But from the council's perspective the opportunity for people to make comment, at plan Publication, should not be seen as an exercise in 'we want to hear your views so we can amend or refine plan content'; rather responses received are challenges to the plan to be considered by the planning inspector. The Council will need to defend its plan to an Inspector in response to these challenges (and more generally in respect of matters an Inspector may raise) and those commenting on the plan (objecting to it) will explain to the Inspector why the plan is wrong and how it should be changed or why it should be 'thrown out'.
- 18.9 Members will need to consider how they wish to get to the final Publication draft plan but before getting to that point they will need to consider work and demands upon them to ensure that a March 2022 version of the plan is fit for endorsement for public consultation. In this December 2021 working draft officers have undertaken a higher level preliminary assessment of sites that are seen as potentially appropriate for allocation for development and in January 2022 the intent is that Strategic Planning Committee will receive presentations from land owners, prospective developers and agents promoting land and sites for development. Members might also wish to highlight further work and research they consider appropriate, matters they wish to debate in early 2022 or highlight potential for public engagement activities prior to March 2022.