

Agenda for Strategic Planning Committee

(additional meeting)

Tuesday, 13 September 2016, 1.30pm



[Members of the Strategic Planning Committee](#)

Venue: Council Chamber, Knowle, Sidmouth, EX10 8HL

[View directions](#)

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- 1 [Public speaking](#)
- 2 Minutes of the Strategic Planning Committee meeting held on 21 July 2016 (page 3 - 10)
- 3 Apologies
- 4 [Declarations of interest](#)
- 5 [Matters of urgency](#) – none identified
- 6 To agree any items to be dealt with after the public (including press) have been excluded. There are no items that officers recommend should be dealt with in this way.

Matters for Debate

- 7 **Cranbrook Development Plan Document: Issues and Options Consultation** (pages 11 - 20)
The report provides a summary of the results of the Cranbrook Development Plan – Issues and Options consultation and sets out further work required to enable the preparation of the Preferred Option Document.
- 8 **Evidence base for the Cranbrook Development Plan Document** (pages 21 - 28)
The report seeks endorsement of the Strategies outlined in the committee report to form a sound evidence base for production of the Cranbrook Development Plan Document.
- 9 **A30 Honiton to Devonshire Inn – Highway Improvement Scheme** (pages 29 - 40)
The report provides summary information and commentary on the consultation being undertaken by Devon County Council in respect of improvements to the A30 from Honiton to Devonshire Inn. Dave Black, Devon County Council's Head of Planning, Transportation and Environment, will give a presentation to the Committee.

- 10 **Draft Gypsy and Traveller Supplementary Planning Document** (pages 41 - 64)
The report seeks agreement from the Committee to commence consultation on the draft Gypsy and Traveller Supplementary Planning Document.

- 11 **East Devon Local List of Non-designated Heritage Assets** (pages 65 - 88)
The report seeks agreement from the Committee to commence consultation on the draft Local List Supplementary Planning Document.

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[Decision making and equalities](#)

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EAST DEVON DISTRICT COUNCIL

Minutes of a meeting of the Strategic Planning Committee held at Knowle, Sidmouth on 21 July 2016

Attendance list at end of document

The meeting started at 10am and ended at 12.30pm.

***1 Public speaking**

The Chairman welcomed everyone present to the meeting.

The member of the public wishing to speak did so at item 8 – East Devon Villages Plan.

***2 Declarations of interest**

Cllr Jill Elson; minute 8 – Local Development Scheme

Interest - Personal

Reason: Exmouth Community College Academy Chairman; Member of Devon Education Forum; Member of WEB Consortium Board.

Cllr Philip Skinner; minute 5 – East Devon Villages Plan

Interest - Personal

Reason: Acquaintance of the owners of Greendale Business Park

3 Proposed Greater Exeter Strategic Plan

The Committee considered the Service Lead – Planning Strategy and Development Management's report outlining proposals for a joint Strategic Plan for the Greater Exeter area. The Plan would be prepared in partnership between East Devon District Council, Exeter City Council, Mid Devon District Council and Teignbridge District Council with assistance from Devon County Council. The Plan would cover the geographical area of the four partner authorities (excluding Dartmoor National Park) and would deal with strategic issues and strategic allocations within those areas – local issues would continue to be considered through local plans prepared by each partner authority for their individual area.

The Chief Executive advised of the benefits to a joint plan, such as meeting the Council's duty to co-operate and cost savings through the pooling of resources for commissioning and preparation of evidence. A joint plan would enable the partner authorities to reach agreement on how the needs of the area should be met and would enable discussions on how to deal with competing pressures within the areas.

It was recommended that a joint budget be maintained to cover the costs of production of the Plan (to be held centrally by Devon County Council). Initially each authority was being asked to contribute £70,000 (Devon County Council to contribute £50,000) towards the commissioning of the necessary evidence as detailed in the committee report.

Points raised during discussion included:

- Acceptance of the need to work together on planning policy matters for the wider area, however concern was raised about the implications for East Devon and its communities if partner authorities were expected to meet the housing needs of those authorities that were struggling to accommodate their housing within their own areas or expected to resolve partner authority's infrastructure issues.

- East Devon was in a strong position having a recently adopted Local Plan. A joint plan allowed East Devon to be an equal partner in discussions on the future development of the wider Greater Exeter area.
- Queried why joint evidence was being commissioned for topics such as town centre uses and heritage, as it was considered these should be specific to the individual authority. In response it was advised that there was logic to commissioning joint evidence on cross-over topics/themes, such as Strategic Housing Market Assessment and Habitat Assessments and also where a common strategic policy approach would be appropriate. The Local Plan would continue to deal with the local specifics.
- There was an expectation that Devon County Council would be contributing more to the joint budget due to the infrastructure issues involved.
- Concerns raised about the impact on staffing resource due to increased work involved in creation of the Plan. In response it was advised that initially existing staff resource would be used, however a further report would be brought back to the Committee on staffing and governance arrangements at their next meeting.
- The need for regular progress updates on the Plan production was highlighted.
- A request was made that the terminology used needed to be consistent so as not to confuse the Strategic Plan with the Local Plan.
- Infrastructure needs should be given higher priority within the Plan (above housing). In response, it was advised that the outcomes of the commissioned evidence should be awaited.
- Recognition that the focus was on Exeter as the region's main travel to work area, however, although not a partner authority in the process, the District's boundary with West Dorset should not be forgotten.
- There was a need to ensure that the health and education departments were fully engaged in the process.
- Broadband was essential to achieving productivity.

RECOMMENDED to Council:

- 1. that a Strategic Plan be prepared for the development of the Greater Exeter area intended to cover the period up to 2040 and that it be jointly prepared by East Devon, Mid Devon and Teignbridge District Councils and Exeter City Council with the support of Devon County Council.**
- 2. that a joint budget of £330,000 be established for the current financial year to fund the preparation of the necessary evidence base for the Plan on the basis of an equal split of £70,000 per district level authority with Devon County Council also contributing and holding the joint budget.**
- 3. that a detailed scope, timetable, terms of reference, governance and staffing arrangements be worked up for a joint Strategic Plan and reported to Members at their next available meeting.**

4 East Devon Local Development Scheme

The Committee considered the Planning Policy Manager's report outlining details of the proposed revised Local Development Scheme (LDS) for East Devon, which sets out the work programme for future planning policy production. The revised LDS for 2016/17 and into 2018 was appended to the committee report. The Service Lead – Strategic Planning and Development Management advised that one of the updates was that an Obligations Development Plan Document (DPD) was no longer appropriate and that matters relating to securing developer contributions were better addressed through a Supplementary Planning Document (SPD), which would provide detailed guidance on policy implementation.

The Chief Executive advised that Cabinet had also considered the report the previous week and recommended that the Local Development Scheme be adopted.

In response to a question, the Service Lead – Strategic Planning and Development Management advised that SPDs were guidance documents, which expanded on policies within the adopted Local Plan, they were not an opportunity to review what was within the Local Plan.

Points raised during discussion on the LDS included:

- The guidance on obligations would include greater clarity on the information to be released in respect of the viability disclosure statement.
- Clarification was sought on the timetable for revising the CIL Charging Schedule. In response, it was advised there was a need to undertake a review promptly following the introduction of CIL on the 1 September, however due to the Government currently undertaking a review of the legislation it was considered that there might be benefit in awaiting the outcomes of that review. Training sessions on CIL had been arranged for Members and parish/town councils the following week.
- Suggestion made that an SPD on economy/employment space types and demand be included in the LDS. In response, it was advised that employment allocations for the district were covered within the Local Plan. A report would be commissioned on economic needs as part of the work on the Strategic Plan – the scope of the report could include a breakdown of the sectors of employment needed.
- Further work was required in respect of future projections on employment needs, which the strategic evidence base would provide.
- Consideration needed to be given to how allocated employment sites within the Local Plan would be delivered.
- Industrial employment sites with good transport links should be better utilised.
- Rural economy/micro-businesses should not be forgotten.
- Overview Committee would have a specific meeting on economy as its November meeting.
- Clarification sought regarding the Cranbrook Plan and how the Council would ensure that build-out was 'on track' during Plan production. In response, it was advised that the Cranbrook Plan dealt with the expansion areas. Regular meetings were held with the Cranbrook Consortium regarding the current permissions.

RECOMMENDED to Council:

that the recommended to Council that the East Devon Local Development Scheme, appended to the Committee report, be adopted as from 28 July 2016.

***5 East Devon Villages Plan**

The Committee considered the Senior Planning Policy Officer's report seeking approval for public consultation on the draft East Devon Villages Plan, which was appended to the committee report. The Villages Plan, which was supported by a number of technical documents, translated adopted Local Plan policy to the village level. The Plan included:

- Scope of the Plan;
- Criteria for defining Built-up Area Boundaries (BUABs) for the 14 larger villages and town of Colyton (listed in Strategy 27 of the Local Plan);
- Relationships with Neighbourhood Plans;
- Development boundaries for Greendale and Hill Barton Business Parks.

Consultation on the Villages Plan would take place over an eight week period (3 August – 28 September). The Committee would consider feedback from the consultation before agreeing a 'Publication' plan for further consultation. The Villages Plan would then be submitted for Examination.

The Chairman invited the member of the public who wished to speak on the item to address the Committee.

Alec Carter, Greendale Business Park, spoke of the businesses good relationship with the Council. He advised that the Business Park currently provided over 1200 jobs and that the last of the remaining sites was now allocated. He raised concern that the draft Villages Plan constrained the Business Park, making it unable to meet increasing demand for sites from large and also small/start-up businesses. Hill Barton Business Park was also advised to be experiencing similar demand for sites/units. Greendale Business Park was in the fortunate position in that it owned the surrounding land, however as proposed, the Villages Plan constrained the Business Park's ability to deliver much needed and sought after employment land.

Comments during discussion included:

- Clarification was sought on the Neighbourhood Plan process and how this was being fed into the Villages Plan production process. In response, it was advised that where a Neighbourhood Plan has been 'made' prior to commencement of the Villages Plan, the BUAB would accord to that within the Neighbourhood Plan – such as was the case for Lympstone. For the draft Villages Plan, where there was a proposed BUAB for a Neighbourhood Plan, this was also being consulted upon.
- Neighbourhood Planning Groups were encouraged to send in their evidence to support their proposed BUABs during the consultation.
- In response to a query, it was clarified that Hill Barton and Greendale Business Parks were strategic sites. The boundaries shown indicated the existing authorised area for each of the business parks – they were not Built-up Area Boundaries.
- One-page summaries were being prepared for each of the villages, along with a simplified map. A plain-English guide on the criteria for establishing the BUABs had also been produced.
- A suggestion was made that it would be helpful if the Council could provide maps for the villages concerned.

RESOLVED:

that the draft Villages Plan be publically consulted upon for an eight week period in accordance with the Council's Statement of Community Involvement.

6 Gypsy and Traveller Plan

The Committee considered the Senior Planning Policy Officer's report, which sought to update Members on the current position in respect of meeting the need for gypsy and traveller provision.

Local Authorities were required to assess the need for gypsy and traveller pitches in the area and ensure that sufficient sites were available to meet the likely need for at least five years. Due to timings, it was not possible to include gypsy and traveller site allocations in the Local Plan and therefore a separate Gypsy and Traveller Plan was being produced which would allocate sites. In order to meet the identified gypsy and traveller need the Council had investigated in detail:

- Sites suggested through public consultation;
- Sites submitted by landowners in response to a 'Call for Sites';
- Expansion of existing Gypsy and Traveller sites;
- Provision as part of major developments;
- Land with temporary permission as gypsy and traveller sites;
- Currently unauthorised gypsy or traveller sites;
- Land in public ownership.

The Committee noted that despite extensive efforts and approaches to landowners, owner/occupiers of existing gypsy and traveller sites and public bodies/statutory consultees with landholdings in the District there had been very limited interest in bringing sites forward. Only three landowners had responded to the 'Call for Sites', however issues had been identified with each of those sites. One of the other options being explored was for the Council to acquire a site of its own. However many sites were sold through auction and the Council's current processes did not allow Officers to act quickly enough to make offers; this was sought to be addressed through one of the recommendations to Members.

There was recognition that land allocated as part of any future expansion through the Cranbrook Plan could accommodate up to 30 gypsy and traveller pitches, which would help to need in the long-term, however there was a need to be more proactive in the short-term.

Comments made during discussion included:

- The Council would incur ongoing management and maintenance costs for any site it purchased. In response, it was advised that there would be a revenue cost; however this approach had been successful elsewhere including at South Somerset District Council.
- There was a need to focus on sites along designated routes, such as A30 and A3052;
- It was proposed that land identified at Heathpark should not be explored for some gypsy and traveller pitches, due to it being an employment site and being unsustainable. This was put to the vote and carried.
- The risk of the Council purchasing a site and it not being granted planning permission was highlighted.
- In some other authorities gypsy and traveller provision was delivered as part of Affordable Housing requirement.
- Officers helped and encouraged the gypsy and traveller community to engage in the planning process and would continue to work with the community to break down barriers which existed.
- Enforcement action was being taken on a gypsy and traveller site that was known to be housing non-gypsy and travellers.

RESOLVED:

- 1. that the Committee notes the present position in respect of meeting the need for Gypsy and Traveller need and acknowledges that all currently available options for the provision of Gypsy and Traveller pitches have been fully explored.**
- 2. that work continues on policies and guidance in relation to the design and layout of Gypsy and Traveller pitches.**

3. that Officers continue to consider any suitable sites for the provision of Gypsy and Traveller pitches that become available and that a further report be brought to the next meeting of the Strategic Planning Committee to consider the current position at the time and the unmet need for pitches alongside feedback on the Cranbrook Issues and Options consultation.

RECOMMENDED: that the Chief Executive be authorised to purchase a site or sites up to the previously agreed budget of £500k on terms and conditions to be agreed, in consultation with the Leader, the Chairman of the Strategic Planning Committee, the Strategic Lead (Finance) and Strategic Lead (Legal, Licensing and Democratic Services).

***7 Validation of planning and related applications – adoption of revised information required to be submitted with planning and associated applications (Local List)**

The Committee considered the Development Manager's report, which sought approval to adopt revised requirements and guidance for the validation of planning and related applications.

In 2008, the Development Management Committee had agreed a local validation checklist which ran alongside the national validation requirements for planning and related applications and set out the information that should be submitted to support applications. The checklist had been reviewed every two years since, with a more extensive review of the list undertaken this time around.

In light of this current review, it was decided to produce a comprehensive single document, which would provide applicants and agents with guidance on when certain supporting documents would be required and what those documents should contain. This approach was in line with a number of other local authorities and it was hoped would help to improve the quality of the applications submitted and speed up the planning process, as applicants/agents would have submitted the information/documents required at validation stage avoiding delays later in the process. It was recognised that the change could result in some in-valid applications being submitted in the short-term, however Officers had engaged and consulted agents during the review process. An Agents' Forum was scheduled the following day to take agents through the revised 'Information Required with Planning and Associated Applications' document.

Comments made during discussion included:

- Concern was raised about the level of information that needed to be provided at such an early stage in the planning process and the costs involved, particularly for small scale applications, without any indication as to whether or not an application was likely to be supported. In response it was advised that the information required allowed applications to be considered against legislation. The Government was considering introducing a 'permission in principle', however this had not yet been confirmed. Pre-application advice was available to anyone wanting to discuss the principle of a development – the cost of the advice was dependent on the size of the development.
- The document was designed to cover all types and scale of development. Officers would take a pragmatic/common-sense approach as to the information required.
- Clarification was sought on which assessment/statement energy efficiency fell under as it was not currently clear. In response, it was advised that this would fall under the Sustainability Statement.

- Economic need justification would need to be submitted for any employment land applications outside the Local Plan allocations and Built Up Area Boundaries.
- The revised document gave clear instructions as to what was required.
- Lighting and noise reports should set a standard. Reference to 'significant levels' was considered to be ambiguous.
- The document needed to be more user-friendly.
- The document could be kept under review and amended if necessary.
- The document needed to be designed to make clear that the level of information required was proportionate to the nature and scale of the development proposals.

RESOLVED:

that the revised information and requirements in the document 'Information Required with Planning and Associated Applications' (appended to the committee report) be adopted, subject to delegated authority being given to the Chief Executive, in consultation with the Chairman, to make changes to take into account comments by the Committee and the Agents' Forum.

Attendance list

Committee Members:

Councillors

Andrew Moulding – Chairman

Peter Bowden – Vice Chairman

Mike Allen

Susie Bond

Jill Elson

Mike Howe

Geoff Jung

David Key

Rob Longhurst

Philip Skinner

Also present (present for all or part of the meeting):

Councillors

John Dyson

Simon Grundy

Geoff Pook

Officers present:

Mark Williams, Chief Executive

Richard Cohen, Deputy Chief Executive

Matt Dickins, Planning Policy Manager

Ed Freeman, Service Lead – Strategic Planning and Development Management

Henry Gordon Lennox, Strategic Lead – Legal, Licensing and Democratic Services

Linda Renshaw, Senior Planning Policy Officer

Claire Rodway, Senior Planning Officer

Tim Spurway, Neighbourhood Planning Officer

Hannah Whitfield, Democratic Services Officer

Apologies

Committee Members:

- Councillors
- Graham Godbeer
- Brenda Taylor
- Mark Williamson

Non-committee Members

- Councillors
- Colin Brown
- Paul Diviani
- Ian Thomas

Chairman

Date.....

Report to: **Strategic Planning Committee**

Date of Meeting: 13 September 2016

Public Document: Yes

Exemption: None

Review date for release None



Agenda item: 7

Subject: **Cranbrook Development Plan Document: Issues and Options Consultation**

Purpose of report: This report provides an overview of the results of the consultation on the Issues and Options stage of the Cranbrook Development Plan Document. It details the approach employed for the consultation process, the number of responses received and the main issues that have been raised. Finally it puts forward recommendations for further work.

Recommendation: **It is recommended that Members:**

- 1) Note the responses the consultation exercise and the main issues that have been raised**
- 2) Endorse the areas identified for further work to allow the Preferred Option document to be prepared**

Reason for recommendation: To ensure that the Cranbrook DPD can be progressed as a sound planning document.

Officer: Andy Wood, email adwood@eastdevon.gov.uk, Tel 01395 571743

Financial implications: No financial implications have been identified.

Legal implications: The preparation of a DPD follows a formal process which is set out in legislation and government guidance. The report identifies the next stages of the formal process. Having consulted it is important that regard is given to the outcome of those consultation responses. The areas of further work would seem appropriate given the issues identified and are necessary in order to progress to the next stage of the DPD preparation. Otherwise there are no legal issues arising.

Equalities impact: High Impact

The Cranbrook DPD needs to ensure that the needs of all groups and sections of society are considered and catered for including Gypsies and Travellers.

Risk: Medium Risk

The Cranbrook DPD will guide the expansion of the town to circa 8,000 homes and will be used as the basis for determining planning applications. It is essential that it meets all necessary procedural requirements to ensure that it can be progressed as a sound planning document through to final adoption.

Links to background information:

- Cranbrook Issues and Options Report - <http://eastdevon.gov.uk/planning/planning-policy/cranbrook-plan/issues-and-options-consultation/#article-content>
- [Appendix 1 – Summary: Cranbrook DPD](#)
- [Appendix 2 - Comments received on the Cranbrook Issues and Options Consultation](#)

Link to Council Plan: The Cranbrook DPD is relevant to all of the priorities of the Council Plan.

Background

In November 2014 the Council committed to a masterplanning exercise, known as the Cranbrook Plan, to review progress with the new town, refresh the vision and guide the expansion to 8,000 homes. It was anticipated that the main outputs from the Cranbrook Plan and associated studies and strategies would lead to the production of a Development Plan Document (DPD) that would identify and allocate sites and land to take Cranbrook up to around 8,000 new homes alongside all the other facilities and infrastructure needed to support the new town. Specifically this would address the 1,550 homes that are not currently allocated through Strategy 12 of the Local Plan.

Development Management Committee approved the first major stage in this process, the Issues and Options document, on the 31st May. A consultation period subsequently ran between 18th June and the 25th July. This report outlines the responses received to this consultation exercise and identifies areas for further work necessary to move forward with the Preferred Option document, the next stage in the preparation of the DPD.

Consultation Process and Responses

The consultation on the Issues and Options document was a major opportunity to engage residents of the town and surrounding parishes, landowners/developers and other consultees in determining how Cranbrook should best develop over the period to 2031. Leaflets were delivered to each household in Cranbrook and a series of events were planned to engage local communities. Appendix A sets out the process that was undertaken and the events that were held.

The Issues and Options document contained the following main sections;

- Background and evidence
- Vision
- Objectives
- Issues
- Scenarios
- Next Steps

It was accompanied by a Sustainability Appraisal and a Habitat Regulations Assessment.

A questionnaire set out a total of 46 questions and overall 123 responses were received. A further 32 responses in addition to this in the form of separate representations with 23 of these from organisations and 9 from individuals.

Key issues

The consultation responses received have been assessed both in terms of the statistical analysis of responses to the questionnaire and the issues raised in written responses. This section summarises the main issues that have been raised including by different groups of organisations.

Questionnaire results

The report at Appendix B that sets out the detailed analysis of the questionnaire results and the free text responses to the questions therein. Broadly speaking the majority agreed with the main objectives highlighted in the document. There was strong support for the incorporation of measures such as Sustainable Urban Drainage whereas for other issues, such as whether a second railway station was required to serve Cranbrook, this was much more finely balanced. Three quarters of respondents did not favour increasing densities above current levels.

Parish, Town and County Councils

Cranbrook Town Council highlighted the need to be sensitive to the expectations of the pioneering residents of the town and the need to focus on delivery. The local community was most likely to benefit from good design and quality build, a good mix of market and affordable homes, local opportunities for employment, regular integrated and affordable transport, opportunities for relaxation, sport and access to open space and to the countryside. The Council did not support any of the four scenarios set out in the document and emphasised the need to build the appropriate number of homes rather than necessarily a fixed figure.

Rockbeare Parish Council warned that the document was disregarding some of the established policies in the Local Plan and emphasised the need to protect the green wedge between Rockbeare and Cranbrook and for development to be outside of neighbourhood plan areas. It was concluded that the DPD starts from the wrong place by seeking to accommodate housing numbers rather than accepting the physical limits of Cranbrook.

Clyst Honiton Parish Council believes that there should be no development in areas with noise levels over those recommended by World Health Organisation and that other areas should be utilised for any additional development. The importance of business space is emphasised which is vital for the well being of the town to enable people to work close to where they live. Any extra buses should link with surrounding parishes so the residents there also benefit. The integrity of Rockbeare and Whimble should be maintained with development to remain within the natural boundaries created by the railway line and London Road with ridgelines protected. Cranbrook is not an island but has great potential to affect neighbouring communities and landscapes in either a positive or negative way.

Broadclyst Parish Council highlight that the vision does not include mention of cohesion between Cranbrook and its neighbours or the need to develop good links into the town. Such links are an integral part of its long term sustainability. It is vital to protect the operation of the airport and its growth and expansion cannot be restricted by poorly-placed development. A second Cranbrook station is not supported as this could jeopardise the future of Whimble Station, and with a good public transport system the one station should be sufficient. Development should only be brought forwards under a Neighbourhood Plan or Neighbourhood Development Order in the relevant areas.

The County Council emphasised a number of areas including health and wellbeing, transport, education and infrastructure provision. The importance of taking a precautionary approach in terms of safeguarding the future operation of the Airport was emphasised and recommended that a buffer is incorporated to ensure that airport operation and expansion are not affected by future changes to noise standards. A comprehensive network of high quality pedestrian and cycle routes was seen as crucial for the town along with maximising the use of the rail network through enhanced frequency and provision of a second station. The function of the Main Local Route and the London Road were seen as needing to change as the town grows, with the latter becoming an urban road with active frontages.

Landowners/Developers

The East Devon New Community Partners (EDNCP) provided an extensive response to the Issues and Options report and accompanying sustainability appraisal. Particular topics covered included Airport expansion and airport noise, landscape and visual impact, density and scale of development and the choice of scenarios. In terms of the vision the EDNCP put forward that the expansion of Cranbrook should be based around clearly focused neighbourhoods with every opportunity for walking and cycling being encouraged. A second rail station was not seen as necessary and it was anticipated that there would be no or very little need to make provision for Gypsy and Travellers pitches at Cranbrook. A number of shortcomings are identified with regard to the Sustainability Appraisal which is seen as lacking in balance. Further detailed evidence is submitted in relation to noise and landscape impact.

The agent acting on behalf of the owners of Tresbeare Farm considered that the sustainability appraisal underplayed the benefits of the southern expansion area. It was not believed that development to date or in the future would prove in any way incompatible with the use of the Airport. Capitalising on the opportunity for a comprehensive sustainable neighbourhood in this location was seen as needing to be a very high priority for the emerging DPD.

Persimmon Homes set out the view that a DPD for Cranbrook adds unnecessary complexity to the plan making and development process and need not be a stage that was or is undertaken. There is concern that the judgments and decisions made in or through the DPD are therefore more likely to be formed on the basis of high level information or the inflexible application of particular standards or conclusions. This particularly relates to noise thresholds, green infrastructure and the approach to employment and density. It is stated that no technical assessment of the landscape issues raised in the report has been undertaken, or a baseline study prepared to inform the preparation of the document. The issues raised therefore need to be understood as high level issues and are not supported by more detailed technical assessment. In this light a number of conclusions or issues raised must be regarded as subjective and preliminary. There is a concern that the wider benefits of accommodating development in the south western expansion area are largely ignored. It is stated that the DPD and future master planning of Cranbrook should be focused around Scenario 1 being most closely related to the vision, providing most opportunity to deliver wider benefits, and being entirely deliverable.

A number of other land areas were promoted for development. Waddeton Park Ltd put forward land to the south of the London Road and to the north of Rockbeare. This was seen as an alternative to the south westerly expansion of Cranbrook and was unconstrained by Airport noise. The area was seen as having the potential to deliver housing and commercial uses as well as social and cultural activity without impacting negatively on the landscape setting of Rockbeare. Further land to the south of London Road was promoted by the Trustees of the Rockbeare estate.

Land at Little Cobden and Higher Cobden Farm was seen as being capable of being beneficially developed and could help meet the overall housing requirement without any harm. It was identified that an area of land could be set aside to meet the requirement for the inclusion of self/custom build. The assessment of the land through the sustainability appraisal process was sought and the importance of maintaining access arrangements emphasised.

The agents promoting the development of land at Farlands (which forms part of the allocated eastern expansion area which is not controlled by the EDNCP) support the vision for Cranbrook but question the cost of the second railway station and the impact on overall viability. Sports hubs being dispersed around Cranbrook is supported as this would provide greater accessibility to local residents.

Two areas of land within the area of the Lodge Trading Estate were also put forward for redevelopment. This brownfield site was seen as forming part of the Cranbrook area which should accommodate residential development including affordable housing. The development would potentially allow a pedestrian route to Cranbrook station.

The agents acting on behalf of Skypark Development Partnerships emphasise that whilst the principle of providing start up business space at Cranbrook is supported, larger grow on space should only be provided on Skypark. There are concerns with over provision of employment land at Cranbrook and they wished to ensure that links between Cranbrook and its neighbouring development is encouraged. The agents acting on behalf of the Church Commissioners for England will shortly be submitting an application for phase 2 of the distribution site to the north of Skypark. They request that further regard is given to the allocation of this site and proposed use which will assist in the avoidance of future conflicts. This includes the potential of the site as a major employer.

The National Trust highlight that the Cranbrook DPD will need to set out precise details of SANGs design including the overall quantum and how this will provide the necessary mitigation. The Trust has produced a SANGs assessment for Killerton and they stress the need for Cranbrook to look beyond its boundaries and be developed in the context of landscape scale green infrastructure projects. A green infrastructure masterplan is seen as a pre-requisite to the Trust's involvement as this would guide and inform individual proposals. The need to test the spatial options in relation to the historic environment is highlighted and the Killerton Setting Study is referenced.

Other consultees

Highways England is supportive of the DPD and the objective to create a sustainable community reducing the need for external travel, particularly by private car. The aspiration for up to 7,850 homes at Cranbrook is supported but there should be recognition that this will lead to an over-capacity situation in several locations at M5 junction 29 by 2030. Measures to encourage modal shift are strongly supported, notably rail enhancements to the Exeter/Honiton line. Improvements to public transport provision are not seen as a substitute to critical enhancements to the local road network.

Network Rail seek reassurance that the Crannaford Level Crossing will keep its existing character and not become a 'rat run' or even an official access to an improved northern route towards the M5. Also they would not want to see a large increase in pedestrian use especially unsupervised children. Limits on new development or trigger points at which the level crossing would be closed and a bridge over the railway put in place are sought.

Railfutures highlight that a passing loop around Whimple would double capacity to three trains per hour each way. There is concern that two stations at Cranbrook would slow the Waterloo service too much. A metro service running from Exeter to Feniton and then over a short stretch of reopened line to Ottery St Mary is recommended.

Exeter and Devon Airport Limited emphasise that the Airport is a significant economic driver and employer whilst supporting the expansion of Cranbrook in principle, they could not accept any proposal that would reduce the ability of the Airport to expand and grow in the future. A review of the Airport masterplan will take place in due course which will help in determining likely future passenger numbers. The 57dB contour is recognised as an aviation standard utilised in the assessment of the need for any airport noise action plan. The need to establish common ground for noise contouring is emphasised. Ensuring that there is no negative impact on the airport's operation or growth prospects is of paramount importance.

Historic England stress the need for the DPD to be underpinned by an adequate, up-to-date and relevant historic environment evidence base. It is not considered that the plan fully contains or demonstrates a positive or clear strategy for conservation and enjoyment of the areas' historic environment. This needs to be incorporated through the vision and objectives for the plan. A heritage assessment is needed that identifies the assets and understands what contribution the site might make to the heritage asset; what impact the allocation might have on that significance; or consider how to maximise enhancements and avoid harm; and determine whether the allocation is appropriate in the light of the NPPF's tests of soundness. The Devon Gardens Trust seek inclusion of a reference to Rockbeare Manor being included by Historic England on the Register of Parks of Special Historic Interest at Grade II in the Landscape and Biodiversity section of the report.

The Environment Agency welcome the objectives set out in relation to energy and climate change. A reference to increased storm intensity and flood risk is also sought. It is recommended that the landscape and biodiversity objective is re-worded to highlight the role of features such as ponds and ditches in collecting storm water. The lack of reference to the Green Infrastructure Strategy is highlighted and further reference is sought to the role of water courses and protecting and enhancing their ecological status. The RSPB also emphasise that biodiversity should be protected and enhanced. The need for ecological mitigation is stressed by the EA and that this should be integral to the design and development process. It is identified that the Sustainability Appraisal lacks a Water Framework Directive assessment.

Natural England welcome the prominence given to landscape and biodiversity within the overall objectives of the plan but are disappointed that the opportunity was not taken to examine policy, delivery or monitoring options. The development of a Green Infrastructure strategy is recommended to help plan ahead for open space including SANGs, spaces for biodiversity, walking routes, SUDs etc. in an interconnected manner. It is also recommended that options for the delivery of SANGs are specifically set out and analysed as well as any alternative mitigation options. Natural England would also like to see the issue of the best and most versatile agricultural land incorporated in to the report.

The Devon Countryside Access Forum state that the recreational experience offered by any SANGs needs to be good in order to ensure that people stay in the vicinity and are not tempted to make the Pebblebed Heaths and the Exe Estuary their destination of choice. Dog owners need safe access where they can exercise their dogs. The Council is advised to consider the recommendations of the 'Planning for Dog Ownership in New Developments' publication.

The CPRE consider that none of the scenarios are ideal. The importance of avoiding building close to the airport is emphasised. Protecting the green wedges between Rockbeare and Whimble and Cranbrook is seen as equally important. There should be thought given to the needs of a population which will grow older over time including lifetime homes and extra care provision. The landscape impact is seen as unacceptable at present with serious consideration needing to be given to expanding Cranbrook north of the railway line. There is a compromise between higher density and land usage with higher densities seen as preferable to impacting upon neighbouring settlements.

The Low Carbon Task Force considers that the section on energy and climate change lacks ambition and commitments. A zero carbon aspiration should be the basis of the design philosophy of the town in terms of the disposition of uses, the construction of buildings and the methods of heating those buildings and generating power. This approach would guarantee the delivery of a community which can cope with the massive challenge of climate change, build Cranbrook's reputation as a leading sustainable community and help people with the affordability of housing by dramatically reducing their energy costs.

Devon and Cornwall Police would welcome the opportunity to apply for further funding to support the delivery of a dual Police and Fire station to serve Cranbrook and the surrounding area. The Fire and Rescue Service support a safer community to ensure people who live in, work in and visit Cranbrook are safer from fire, road collisions, crime and other emergency incidents. The need for a bluelight facility housing fire, police and ambulance to service the community of Cranbrook is identified. Devon and Cornwall Police would welcome the opportunity to apply for further funding to support the delivery of a combined service facility.

Sport England emphasise that the Cranbrook DPD should include sport, recreation and physical activity opportunities for the future residents to ensure that this is well designed, healthy and safe community. New development should be designed in line with Active Design principles to secure sustainable design including co-location and sports hubs.

England Hockey state that it is essential that the sports facility provision is fit for purpose and suitable for participation for local community sport. Strong consultation with the National Governing Bodies of Sport will ensure that the correct design and technical specifications are met to ensure that all sports are catered for.

EDVSA state that Cranbrook should be a strong and resilient community where communities and individuals are empowered to take action, where self-determination enables a strong sense of citizenship and community ownership within the Town. Implementation should not be phased based on population growth but on community need.

The Diocese of Exeter and Churches Together in Devon seek an additional objective about Cranbrook being a town where voluntary and community sector providers are supported to build the social capacity, variety and resilience of the local community. It is emphasised that there are a range of determinants of health and well-being with this including a spiritual component. People with decision-making responsibilities need to be proactive in creating opportunities and providing capacity to develop agencies among residents, doing so repeatedly with existing residents and afresh with each successive wave of new residents. Given the existing demographic profile of the town, there's also an important piece of work to be done to invest in intergenerational relationships.

The Cornerstone Church would like to see the town develop in a way that leaves space for future development. Cranbrook should have inbuilt flexibility to meet changing and growing needs over time. The need for a worship/church space near the town centre is identified. Provision should be made for all ages as Cranbrook matures.

Devon Senior Voice consider that the ageing of the population of Cranbrook should be taken in to account. This can make a positive contribution to maintaining a vibrant community. The inclusion of enabling policies within the Plan would provide for this opportunity and further create a more caring society. DSV is in general agreement with scenario 4 but this is subject to the preparation of a Strategic Design Guide on Residential and Landscape impact.

The Theatres Trust is pleased the scoping document recognises the importance of providing cultural and community facilities as they are vital for their contribution to life satisfaction and this should be promoted in this plan. The importance of planning for culture and community facilities is emphasised in the National Planning Policy Framework. The most successful examples of the new town had cultural facilities provided from the outset. Unfortunately cultural facilities are now seen by developers as un-viable in a commercial sense because of their community rather than commercial role, and are rarely provided in developments, unless required to do so by a local plan. The Theatres Trust recommend that in addition to a policy to encourage cultural led development, community infrastructure levies and s106 agreements are used to provide the range of cultural and community infrastructure needed, such as multi-purpose community halls, to support a sustainable new community.

Other individual responses

A total of 9 responses were received from individuals outside of completing the online questionnaire the responses to which are summarised and attached as an appendix to this report. These raised a wide variety of issues including:

- Development on ridgelines would be visible
- Flooding
- Noise pollution
- Impact of development on privacy
- Loss of high quality agricultural land
- Preference for the easternmost site for the second rail station
- Dualling of the rail track is required to increase capacity
- Gaps in the current public transport timetable between 21:30 and 23:10
- Speed of traffic along the London Road
- Need for a travel card
- Self build should be encouraged
- Smaller retail units rather than large retail companies
- Encourage businesses which sell produce
- Support a site available for Gypsies
- Cranbrook should only take a small proportion of Gypsy and Traveller sites
- Gypsy and Traveller provision should be spread throughout the District
- House a proportion of refugees
- Need to encourage retail development on the eastern side of the M5
- A leisure centre is needed
- The masterplan process is protracted and will delay determination of planning applications/investment
- Action is needed on designing and presenting ideas for the town centre
- Best message for the town is a continuation of dynamic growth
- Concerned about piecemeal development along the Rockbeare Straight
- Specialist transport input is required in to the DPD
- Overemphasis on the useful but limited gains that improvement to the rail network can provide to the detriment of a more meaningful discussion of how a substantial modal shift from car use might be delivered
- Severe congestion is inevitable without proactive initiatives to reduce level of car usage
- Like to see commuter cycle lanes
- Cranbrook should be marketed as a cycle friendly town
- Outdoor gyms and fitness infrastructure are needed
- Town centre should be traffic free
- London Road is dangerous for pedestrians
- Access and traffic in front of St Martin's and school is too close to the road
- Need better screening for future schools
- Terms of the consultation are constrained
- Consultation exercise is a waste of time and money

Evidence base and areas for further work

An accompanying report sets out key evidence base documents that will support the development of the next stage of the DPD process. This includes the Economic Development, Cultural Development and Health and Wellbeing Strategies as well as further work on energy and the density of development. Having considered the representations to the Issues and Options stage for the DPD it is considered that the following are areas for further work and undertaking these form a specific recommendation of this report:

Airport Noise – a two stage noise report has already been completed but further evidence has been submitted through the consultation process, notably from the East Devon New Community Partners, that will require further assessment.

Landscape assessment – it has been highlighted that there is no baseline assessment in terms of the visual impact of development on the landscape and this needs to be addressed.

Heritage assessment – this will address the concerns raised by Historic England in terms of ensuring that the DPD has a positive strategy for conservation.

Transport – further work to be lead by the County Council is required to ensure that outstanding issues, such as the design of London Road, are addressed.

Green Infrastructure and SANGs – Natural England recommend that a GI strategy is developed to help plan ahead for open space including SANGs and that options for the delivery of these are specifically set out and analysed.

Sustainability Appraisal and Habitat Regulations Assessment – further iterations of both of these documents will be commissioned to inform the preparation of the next stage of the DPD.

Conclusion

The Issues and Options Report was an important stage in the preparation of the Cranbrook DPD. Considerable time and effort was invested in to the consultation process and it is heartening that there has been nearly 160 responses submitted including a significant proportion from Cranbrook residents. This paper highlights the main issues raised in these representations and sets out key areas for further work. These will inform the preparation of the Preferred Option which will again be the subject of consultation.

Report to: **Strategic Planning Committee**

Date of Meeting: 13 September 2016

Public Document: Yes

Exemption: None

Review date for release None



Agenda item: 8

Subject: **Evidence base for the Cranbrook Development Plan Document**

Purpose of report: This report seeks endorsement of the following documents so that they can form a key part of the evidence base to underpin the ongoing preparation of the Cranbrook Development Plan Document:

- Economic Development Strategy
- Cultural Development Strategy
- Health and Wellbeing Strategy
- Cranbrook – Housing Density
- Sports, Leisure and Recreation requirements for the expansion of Cranbrook

Recommendation: **That the committee endorses the Economic Development Strategy, Cultural Development Strategy, Health and Wellbeing Strategy, Cranbrook – Housing Density Paper and the Sports, Leisure and Recreation requirements for the expansion of Cranbrook as a sound evidence base for production of the Cranbrook Plan.**

Reason for recommendation: To ensure that the Cranbrook DPD is supported by a robust evidence base

Officer: Officer: Kenji Shermer (Urban Designer for Cranbrook)

Direct dial: 01395 571 593

Email: kshermer@eastdevon.gov.uk

Financial implications: No financial implications have been identified.

Legal implications: The preparation of a DPD follows a formal process which is set out in legislation and government guidance. The report identifies the next stages of the formal process and identifies and details the strategies / documentation that will help underpin the evidence base for preparation of the DPD (as distinct from the specific areas of work identified in the previous item on the agenda). It is important that the preparation of a DPD is backed by a sound evidence base and accordingly the recommendation to endorse this documentation appears sound. Otherwise there are no legal issues arising.

Equalities impact: High Impact

It is essential that action is taken to ensure a strong, resilient community can develop in Cranbrook. This is dependent on there being strong economic and cultural activity and that action is taken to ensure people in Cranbrook and surrounding communities are able to live happy, healthy lives within a sustainable and attractive town.

Risk: Medium Risk

Links to background information:

- [Appendix 1 – Cranbrook Expansion Zone West](#)
- [Appendix 2 – Cranbrook Expansion Zone South](#)
- [Appendix 3 – Cranbrook Expansion Zone East](#)
- [Appendix 4 – Landscape Strategy](#)
- [Economic Development Strategy](#)
- [Cultural Development Strategy](#)
- [Health and Wellbeing Strategy](#)
- [Cranbrook – Housing Density](#)
- [Sports, Leisure and Recreation requirements for the expansion of Cranbrook](#)

Link to Council Plan: Encouraging communities to be outstanding
Developing an outstanding local economy
Delivering and promoting our outstanding environment
Continuously improving to be an outstanding council

Report in full

1. Background

Cranbrook continues to grow rapidly and much has been achieved to date. Over 1,300 homes are now built and occupied. 7 neighbourhood shops have been completed and 6 occupied. The GP surgery, pharmacy, train station, St. Martin's primary school and the Education Campus are all complete and providing valuable services to the community in Cranbrook and beyond. However, there is much more to be done to realise the vision for Cranbrook as a sustainable, attractive town of East Devon with a vibrant day and night-time economy.

As a new town Cranbrook represents a unique opportunity for East Devon and for its present and future community to get things right and provide an excellent living environment. This can help to contribute to enhanced health and wellbeing outcomes where people can lead happy and healthy lives. The inclusion of Cranbrook as one of ten national 'Healthy New Towns' pilots gives further opportunity and assistance to better understand and act on the ways to achieve the vision for Cranbrook.

Cranbrook has always been conceived as a fully functioning town, not a dormitory to Exeter or housing serviced by the minimum of infrastructure. To become a fully functioning town, as stated in the Local Plan, Cranbrook needs to develop its own resilient economy and culture to give purpose and identity to the town and community.

The district heating system that is already operational at Cranbrook is symptomatic of some of the key strategic decisions that have been taken to support the development of a sustainable and resilient town. Moving forward there are unique opportunities to secure large scale and cost effective carbon savings and to rise to the challenges posed by climate change.

The Cranbrook Development Plan Document will play a seminal role in guiding the future growth and development of the town. It is essential that this rises to all of the challenges detailed above and that its policies and proposals are supported by a robust evidence base.

2. Evidence Base for the Cranbrook DPD

The first stage in the progression of the Cranbrook DPD was the publication of the Issues and Options Report. Members are receiving a separate report that details the results of the accompanying consultation exercise that closed during July and the main issues that have been raised. A number of areas are identified as requiring further work. But considerable time and effort has already been invested in to developing specific strategies to guide specific themes within Cranbrook. It is important that these form part of the evidence base for progressing the next stage of preparation of the DPD, the Preferred Option.

Three strategies are appended to this report and it is a specific recommendation that these are endorsed so that they can form part of the foundation for the development of the Preferred Option document. These are considered in turn below;

Economic Development Strategy

The Cranbrook EDS has been developed to best serve the community of Cranbrook and the wider community of East Devon. Its development has been in close partnership with the community in Cranbrook to understand and reflect the community's wants and needs to help ensure its success. The EDS suggests an economic branding for Cranbrook as a Small Enterprise Town. This best captures how Cranbrook can capitalise on available opportunities and build itself as a resilient, vibrant town and community. There is evidence that there is strong unmet demand for small employment spaces, particularly in the west end of East Devon.

The EDS suggests an economic vision for Cranbrook as “a lively, enterprising town with a strong entrepreneurial identity, building its own business base and business links with surrounding employment developments”. Three themes are put forward to achieve the vision:

- *Support enterprise with the business ladder*

To support businesses of different scales and at all stages of development the EDS proposes a 'Business Ladder'. This provides space at different scales in the form of space for a market; space for office based start-up businesses in enterprise and start-up hubs; low cost modular and movable spaces (termed 'CranBox') for enterprise and retail start-ups that need to have a visible presence; permanent, full market rate premises for established businesses and other organisations. The Business Ladder is designed as a complete package. Individual elements are seen as being at risk of failure without the rest being in place. It can be delivered in phases as part of a co-ordinated plan with infrastructure that can grow and move as and when needed.

- *Create employment and services in Cranbrook*
The Business Ladder will not suit all business. Established businesses including large office based organisations, retailers and leisure providers should be encouraged into Cranbrook. This will help create diverse, vibrant and attractive town and neighbourhood centres and reduce the reliance on commuting out of Cranbrook; particularly important with the constraints on the road network.
- *Build strong links with the Growth Point*
Cranbrook should develop to compliment and not compete with the Growth Point. The town can provide complimentary business spaces

Developers, the Councils and other public sector organisations, the community, business groups and organisations are all anticipated as playing important roles in delivering the strategy.

Cranbrook Health and Wellbeing Strategy (HWB)

The Cranbrook HWB has been prepared by the Public Health team at DCC in partnership with the Clinical Commissioning Group and EDDC.

The HWB Strategy aims to make Cranbrook a ‘cutting edge pioneer’ among new town developments. It seeks to reduce the health burden on society by taking every available means to maintain the community’s health and happiness.

The Strategy highlights how much younger the population at Cranbrook is from the norm. A younger population presents an opportunity to make significant gains in preventative medicine and ensuring people do not develop avoidable long-term health disorders.

It is recognised that the HWB Strategy cannot be delivered by health services alone, but by having a shared ambition and understanding will be delivered through the built environment, arts, leisure and culture, community and third sector organisations. Planning and design are highlighted as critical elements. The built environment is a critical area for action if the HWB is to be successful as it can either help or hinder good health and quality of life. The report sets out what this means for Cranbrook.

- *Street layout, connectivity **and active transport***
Physical inactivity directly contributes to one in six deaths in the UK. Mixed land use, higher population densities and well-connected street layouts are associated with 25-100% increases in active transport. Urban design, attractive public transport infrastructure, street design and routes must prioritise cycling and walking over the car and make it the norm.
- *Built environment for health and healthcare*
Buildings for health need to be modular and flexible to cope with a growing and changing population. Health and wellbeing facilities should be alongside leisure and social facilities such as cafes.
- *Facilitating balanced communities*
Age balance within the community is important for community cohesion. Mixed housing stock, tenure and good design provides a diverse range of homes and help create a sense of place. Housing and space needs to be provided for communities that are not well represented, such as the elderly, gypsies and travelling communities, other ethnic minorities and single people.

- *Neighbourhood and community spaces*
The HWB points out that socially isolated people are 2-5 times more likely to die prematurely than those with strong social connections. It states that a wide range of flexible indoor and outdoor spaces are needed as early as possible to help support local identity.
- *Co-location of facilities*
Health and wellbeing facilities should be in town and neighbourhood centres alongside other uses to create easier access. This also creates multiple reasons to visit areas and increases social interaction.
- *Active buildings and infrastructure*
Sports and active recreation promote active lives and social interaction. Sports and active leisure facilities suitable for all ages, abilities and interests should feature prominently in Cranbrook. Buildings and public realm need to be well designed to encourage people to linger and socialise; walking and cycling routes should be well designed and integrated.
- *Food production*
Ready access to food grown locally has been shown to increase social interaction and healthy diets. Allotments and community gardens should be in small localised groups throughout the town to be accessed easily on foot. Outdoor spaces should be designed to maximise the ability to produce food including roof terraces, balconies and private gardens to provide this opportunity in as universal a way as possible.
- *Open and Green Space*
Open and green space has been linked to improvements in active lifestyles and mental health. Cranbrook needs a network of linked, multi-functional green and open spaces including those of sufficient scale and quality to host social events year round.
Buildings should form part of the green environment wherever possible using green roofs and other planted areas to bring additional green space into urban areas.
- *Affordable, flexible and energy efficient homes across the social gradient*
The standard of housing is a major factor in attaining and maintaining good health and wellbeing. Being a new town Cranbrook should benefit from the best standards of energy efficiency and good design to benefit from these long term benefits.
- *Access to education, training and skills*
Cranbrook should create employment and training opportunities, making the best of its young age profile. This will involve support for start-ups, technical and cultural innovation and flexible business units to enable people who are disadvantaged in the labour market to have access to and maintain employment.
- *Air quality*
Particulate pollution from traffic is responsible for 29,000 annual early deaths. Maintain diversion of transport routes and restricted access to residential areas, especially by lorries.

- *Noise*
Noise can have significant impact on quality of life and physical and mental health. Development should reduce noise exposure through good layout, design, orientation of buildings and maintaining effective distance from noise sources.

Cranbrook Cultural Development Strategy (CDS)

The Cultural Development Strategy (CDS) for Cranbrook was commissioned on the recognition that culture is integral to a good quality of life, towards maintaining good health and wellbeing and to ensure Cranbrook is a place where people want to be. The strategy does not cover sport, play, transport, health and wellbeing or economy as these are covered in other documents.

The development of the CDS involved significant engagement with the community with the consultants facilitating workshop events for 86 people, interviewing 77 people from a wide range of organisations, gathering views from 80 people from the Cultural Strategy stall at Cranbrook day.

Consultation on the CDS in its final form has not been carried out at this, but will be carried out as part of the Preferred Option stage of the Cranbrook Development Plan Document.

Themes. The CDS looks at the culture and history that already exists at Cranbrook and makes recommendations for actions that based around the person. The strategy is based on four key themes:

- *People*
Supporting the creative interests of residents to build ‘communities of interest’ at local, regional and national scale.
- *Learning and Skills*
Develop skills for personal enjoyment, leading to informal learning and further formal training
- *Activity*
Building on self-initiated projects, to guided activity with other agencies, to a specific and structured cultural programme for Cranbrook
- *Infrastructure*
Develop a network of facilities and spaces along with supporting IT to form a resource that both drives and meets local demand. A focus on co-located and flexible ‘meanwhile’ use in the early development phases leading to permanent provision as the community matures.

The CDS makes floor space recommendations for the town when complete that are the bare-minimum of what would be considered acceptable in national guidance from TCPA, Arts Council and Fields in Trust. It also suggests that the community take part in co-design of public spaces and buildings.

Developing from the idea of a strategy based around people the CDS does not call for large-scale infrastructure, such as standalone theatres or cinemas, in the initial phases of development. However, it makes clear that action to stimulate and support cultural activity and development must be taken early on and be maintained and that infrastructure needs must be met at all stages of development. For early stages of development this should take the form of temporary buildings, ‘meanwhile’ use of space and buildings, and co-location of infrastructure.

Recommendations. The CDS makes point by point recommendations for action based around its four themes. Maintaining its focus around people it recommends top-down support from the Council, developers and other agencies for initiatives and projects developed from within the community. Recommendations include new posts to support cultural development as well as phased cultural infrastructure with temporary facilities giving way to permanent buildings as the town matures and needs become established.

Cultural Development Model. The Cultural Development Model provides a framework within which to deliver the recommendations and actions. This works through the short and medium terms enabling actions to build on each other. The model also shows the recommendations from each theme running in parallel so that the way in which they reinforce each other is clear.

Exemplars. A series of examples are given for each of the different themes. The projects show how projects have addressed these themes in different communities. Some are build projects, others are initiatives to train, support or create with communities.

Density

A brief paper outlining the case for increasing the average density in Cranbrook was provided by the consultants working on the masterplan for Cranbrook. The consultants have an average density of around 45 dwellings per hectare (dph) that could be achieved across Cranbrook. This would mean a range of densities from 20-60 dph in housing parcels. Around and within the town centre densities could rise to around 100dph. It is important to note that the majority of respondents to the recent Issues and Options consultation were not supportive of higher densities, however it is important that the evidence on densities is endorsed and carries weight so that it can be considered alongside the comments that have been received.

Building at higher average densities has been achieved successfully in other new developments. The paper provides a number of examples of which Trumpington Meadows, near Cambridge, is the most well know example. This development is built at an average of 50+dph and is the best selling development for Barratt's in the East Region, averaging values in excess of £380 per sq.ft. Densities in Trumpington Meadows range from around 40 to 110dph.

In new developments higher densities are typically achieved with apartments. These would be most suited in and around the town centres and would typically not go beyond around 4 storeys.

The paper points out that higher densities may be necessary if we are to build the number of houses required at Cranbrook. Evidence on noise levels at the airport and other constraints, such as the neighbourhood plan areas, make this the case. All of these issues will need be weighed in the balance alongside the benefits of higher densities detailed in the paper and the concerns expressed by respondents to the recent consultation.

Sport and Recreation

A major piece of work was undertaken in response to the Consortiums applications for the expansion of Cranbrook to assess the proposals against the Council's policies and standards for the provision of sport and recreation facilities to identify the relevant requirements and how they could be accommodated at Cranbrook. This paper provides a detailed assessment of the needs of the town moving forward.

Although written specifically with the Consortium's applications in mind the document provides a sound evidence base for the facilities that would be needed for Cranbrooks expansion and should be considered when producing the Cranbrook Plan. The report addresses needs associated with the following:

- Grass sports pitches;
- Artificial sports pitches;
- Swimming pools;
- Indoor sports halls;
- Gyms;
- Exercise studios;
- Tennis courts;
- Bowling greens;
- Outdoor hard courts;
- Athletics tracks;
- Skate / BMX parks;
- MUGAs (Multi-Use Games Areas);
- Parks and recreation grounds;
- Children's and youth play areas;
- Allotments;
- Amenity green space; and
- Natural and semi-natural green space.

Clearly it is vital to the success of the town and the health and well being of its occupants that the requirements are met for each of these areas and so this work will provide an important evidence base to preparation of the Cranbrook Plan.

Report to: **Strategic Planning Committee**

Date of Meeting: 12 September 2016

Public Document: Yes

Exemption: None

Review date for release None



Agenda item: 9

Subject: **A30 Honiton to Devonshire Inn – Highway Improvement Scheme**

Purpose of report: This report provides summary information and commentary on the consultation being undertaken by Devon County Council in respect of improvements to the A30 from Honiton to Devonshire Inn. Proposals for road improvement are welcomed as is the manner in which they have been developed taking into account the very specific environmental constraints and challenges that highway provision in an Area of Outstanding Beauty and through an area of great biodiversity impose.

It is recognised that road improvements should improve journey safety and time and offer scope for enhancement of amenity for residents and businesses along the existing A30. Improvements to the highway are seen as a key means to help secure wider economic benefits. It is acknowledged that the proposed Orange route directs traffic furthest from the current route and therefore existing businesses. It does however minimise the impact on the AONB which is in itself an economic as well as environmentally important feature of the area. It is therefore considered that the orange route should be the Council's preferred route.

Recommendation:

- 1. Support is given, in principle, for proposals for improvements to the A30 from Honiton to Devonshire Inn.**
- 2. The approach adopted by Devon County Council, developing a scheme within the context of the environmental constraints at and along the length of the route, is welcomed and that with this in mind a preference for the proposed Orange route be expressed.**
- 3. That the final road scheme should be developed in a manner that ensures the highest levels of environmental mitigation and should avoid adverse impacts on residences and businesses.**
- 4. That the detailed observations and comments highlighted in this report are presented to Devon County Council in particular the need to discuss with Officers the potential to accommodate new playing pitch provision on the former showground site and provision of gypsy and traveller stopping places along the proposed route.**

Reason for recommendation:	To ensure that East Devon District Council provides comment to Devon County Council in respect of A30 road improvements.
Officer:	Ed Freeman, Service Lead – Planning Strategy and Development Management efreeman@eastdevon.gov.uk , 01395 517519
Financial implications:	No financial implications have been identified for EDDC.
Legal implications:	The report is response to a consultation being carried out by Devon County Council. While it identifies the issues that need to be highlighted to Devon County Council for them to consider as the project moves forward, there are no direct legal implications arising which require comment.
Equalities impact:	Low Impact There are no specific equalities issues associated with this proposed consultation feedback.
Risk:	Low Risk Whilst there is low risk in respect of choosing to provide or not provide feedback it is notable that there are risk considerations associated with provision (or not) of improvements to the road and the various options highlighted in the consultation material,
Links to background information:	Links to background documents are provided in the body of the report.
Link to Council Plan:	The reports referred to in this report relate to all priorities set out in the Council Plan.

1 Background Information on the A30 Improvement Proposals

- 1.1 Devon County Council is undertaking consultation on proposals for improvements to the A30 Trunk Road from Honiton to Devonshire Inn. Being a Trunk Road this is a road that is managed and maintained by Highways England. The Department of Transport will be responsible for finally deciding on any improvement scheme, however Devon County Council are promoting options for improvement and are leading on this stage of consultation.
- 1.2 The County Council have produced a consultation document which forms Appendix 1 to this report. They have also provided a considerable amount of background information on their web site, see:
<https://new.devon.gov.uk/a30-blackdownhills/>

1.3 On their web pages (at 5 August 2016) the County Council advise:

“The Government’s 2014 Road Investment Strategy (RIS), which includes the period up to 2020, identifies a commitment to turn the A30/A303 into a strategic corridor for the South West. It includes 3 major schemes and the inclusion of smaller scale improvements between Honiton and Southfields.

Following this there will be a further programme of improvements and a potential RIS2 for the next 5 year period up to 2025. The minister is keen that Highways England works with the LEP, Local Councils and MPs to shape the programme for the next tranche of RIS, which is the aim of our study.

Devon County Council is promoting and developing the A30 Honiton to Devonshire Inn section to a preferred route stage with the aim that funding would be secured through RIS2.

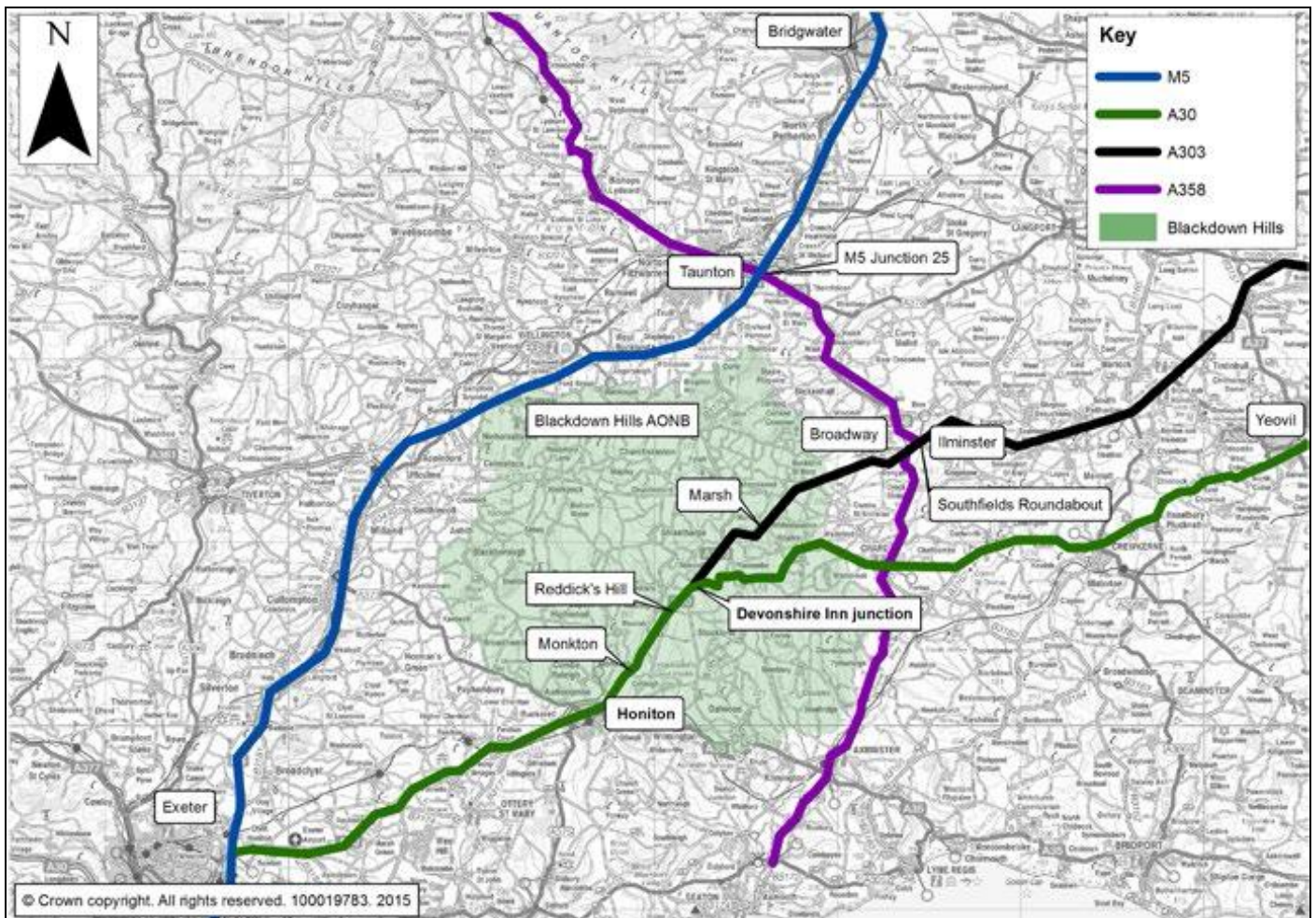
The objectives of this project are as follows:

- Encourage economic growth in the South West peninsula and particularly the large scale planned development of Exeter*
- Improve journey speed and reliability*
- Increase the resilience of the strategic road network*
- Improve safety for road users and road operators*
- Minimise adverse environmental impacts through exemplary approaches to design and mitigation and adoption of sustainable and innovative solutions*
- Ensure that unavoidable impacts on the character and special qualities of the Blackdown Hills AONB are offset through a significant programme of compensatory measures and the inclusion of opportunities for environmental enhancement in line with AONB Management Plan objectives.”*

1.4 It is important to recognise, therefore, that improvements from Honiton to Devonshire Inn should be seen within the context of potential for other improvements to the A30/A303 and A358 all the way from Honiton in Devon to the east of Stonehenge in Wiltshire and up to the M5 at Taunton.

1.5 There are clearly many challenges associated with improvements to any length of road, not least the cost and complexity of designing and implementing a scheme. It is, however, critical to recognise that a key challenge for this scheme is that the Honiton-Devonshire Inn section runs through the Blackdown Hills Area of Outstanding Natural Beauty (AONB). AONBs are in the highest tier of protected landscapes and there are significant biodiversity designations and resources that lie within and close to the corridor within which any improvements could be located.

1.6 By way of context setting, the map below, taken from the County Council consultation document, shows the A30 and area proposed for improvement in wider context.



1.7 The County Council advise that following on from consultation they propose to present an Outline Business Case for road improvements to the Department for Transport in December 2016.

2 Reasons Set Out for Improving the Road

2.1 In their consultation report the Council highlight the following key concerns associated with the road at present:

- Sharp bends;
- Steep hills;
- Narrow carriageways;
- Poor visibility;
- Poor verges;
- High levels of seasonal traffic; and
- Higher risk of collisions compared with modern standard roads.

2.2 Associated with these issues are problems of congestion and safety that the County Council advise will get worse over time. Improvements are seen as essential to address these problems whilst also generating positive wider benefits, including economic growth.

3 Options identified in the Devon County Council Consultation Document

3.1 Following on from extensive background work the County Council have identified two potential proposed routes:

- Blue route – though there is a Blue North option and a Blue South Option; and
- Orange route.

The County Council consultation document explains why a 'do nothing option', in the opinion of the County Council, is not acceptable.

The Blue Route Options

3.3 The Blue route options utilise more of the existing highway than the Orange option. The Blue north and south options relate only to the south-westerly length of the proposal, in total a road length of around 1 kilometre. Blue north would widen the existing road through road widening on the northern side of the existing highway. Blue south would widen the road through road widening on the southern side of the existing highway. The two Blue options are the same for the rest, the vast majority, of their alignment.

3.4 The Blue route, running south west (Honiton end) to the north east (Devonshire Inn end) runs close to the existing highway, initially utilising it with improvements, and then diverts to run to the south east of Monkton village with a new highway of around 4.5 kilometres in length that runs roughly parallel to the existing road. The part around Monkton, and for its next 2.5 Kilometres, is approximately 240 metres from the existing highway. The blue route climbs up through the southern flank of the River Otter Valley in a similar way/gradient as the existing road.

The Orange Route

3.6 The Orange route option is more significant in scale, it lies to the south east of the existing route and at its furthest is around 750 metres away from the existing highway. The fundamental difference between the Blue route and the Orange route is that the Orange route rises more sharply up the southern side of the River Otter valley to reach the plateau of land above the valley and to the south of Monkton. The Orange route then proceeds for most of its length along the plateau before merging with the alignment of the Blue route at around 2.5 kilometres west of Monkton village.

Plan and Commentary on the Route Options

3.7 The plan below/over the page, taken from the County Council document, shows the Blue and Orange options in the context of key environmental constraints and considerations. An integral part of both routes is a bypass of Monkton village and Reddick's Hill which are amongst the most unsuitable and dangerous parts of the existing A30 in this section.



Summary of Significant Environmental Constraints Used in the Selection of Route Options

Not to Scale
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KEY

- Flood Zone 2: Annual probability of flooding of between 1 in 100 and 1 in 1,000 years
- Flood Zone 3: Annual probability of flooding of up to 1 in 100 years
- Ground Water Protection: Zone 1 (high risk of contamination) to Zone 3 (low risk of contamination)
- Lowland meadow & heathland (Priority Habitat)
- Purple moor grass & rush pasture (Priority Habitat)
- Ancient Woodland Site shown on Ancient Woodland Inventory
- Woodland and tree covered ground shown on National Woodland Inventory
- Approximate extent of area illustrated by aerial photograph

- Mature trees
- Veteran trees (trees of special value due to their age, size or condition)
- Blackdown Hills AONB
- County Wildlife Sites
- Ponds with potential amphibian interest
- Noise Important Areas
- Listed Buildings
- Scheduled Ancient Monuments

This plan illustrates a number of the significant and localised (i.e. site-specific) environmental constraints which have influenced the selection of route options. A wider range of constraints data has been collated and used in developing the scheme proposals, but it is impractical to illustrate all of these together on a single plan. Further constraints are illustrated and referred to through the Environmental Assessment Report (available on the scheme website).

Consultation boards produced by Devon County Council show route alignments options in far more detail but they will not produce at this A4 report scale. The consultation boards are best viewed in print format but can also be seen on the County Council website at: <https://new.devon.gov.uk/haveyoursay/consultations/a30-improvement/> - see Exhibition boards 6 to 8 and 9 to 11 (web address/details correct at 5 August 2016).

3.8 The County Council, in their consultation document provide a summary comparative assessment of the two Blue options and the Orange option. All three options have a similar road length, cost similar sums of money (around £170 million) and have a similar land take. The key statistical difference highlighted is that the Orange option provides more road length for overtaking – specifically for westbound traffic.

4 Overarching Environmental Assessment work accompanying the Proposals

4.1 To inform the proposed schemes Devon County Council has undertaken a considerable amount of environmental assessment work. This work has culminated in the production of a draft Environmental Assessment Report, which can be viewed on the County Council web page at:

<https://new.devon.gov.uk/a30-blackdownhills/public-consultation>

4.2 The Environmental Assessment Report covers a broad range of environmental topics and is cross-referenced to in commentary set out below.

5 Potential Landscape Impacts Associated with the Two Options

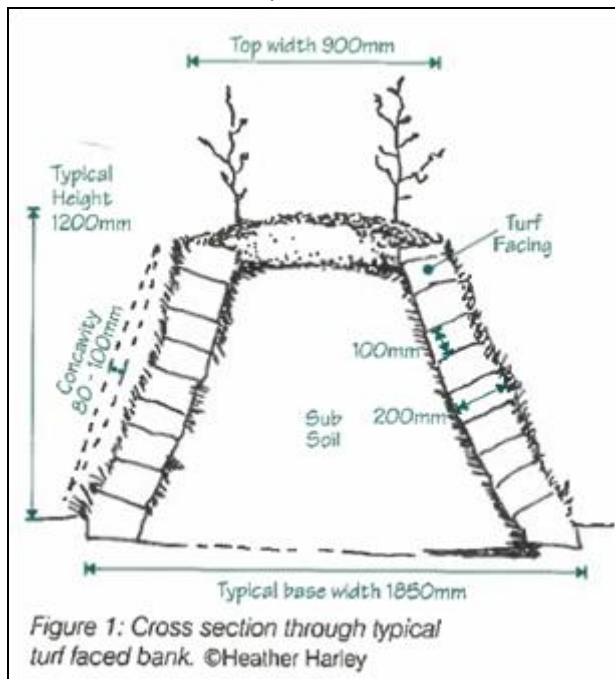
4.1 A considerable amount of time has gone into developing the two road options within the context of landscape impact considerations. The road improvement proposals, both options, fall almost entirely within the Blackdown Hills AONB. It is, therefore, seen as essential that landscape concerns are at the forefront of any evaluation of the possible impact of the schemes. To inform the overall schemes the County Council has undertaken a Landscape and Visual Impact Assessment (LVIA). LVIA is a process for evaluating the effect of a proposal upon the landscape. The LVIA has been undertaken in a thorough manner that has helped inform the alignment of the options and in general terms establish appropriate mitigation.

4.2 Any road schemes of the scale proposed could be expected to potentially have some adverse landscape impacts but through careful design work the generic landscape design principles that have informed the work, and option specific landscape design principles that have then been applied have resulted in schemes that are, in general, in keeping with the local landscape and visual context. Should either scheme go ahead then the construction mitigation measures should be followed through in the detailed design of the road.

4.3 There are a series of more technical considerations that have been highlighted by this Council's Landscape Architect, these include:

- Any woodland/copse planting should incorporate a percentage of standard trees to add age variety and to reduce the visual effects from the outset.
- Some of the enhancement measures should be considered as a mitigation measures:
 - The Re-instatement of woodland and habitat to compensate for the effects of the construction of an offline route should by its compensatory nature be considered mitigation and not enhancement

- The streetscape enhancement within Monkton Village should be considered a mitigation measure as implementation will affect the outcome of the cumulative landscape and visual impact assessment in a positive manner
 - Existing street light enhancement should be considered mitigation as it would positively alter the cumulative effects of the scheme.
 - Appropriate street furniture design is raised as a generic landscape design principle and can assist in significantly reducing the impact of the road and therefore it should be considered a mitigation measure.
- A hedgebank strategy is provided but it is not fully in keeping with the local landscape context and does not include the typical Devon hedgebank approach (see detail below):



Hedge type 3 as defined on the submitted design proposal includes a bank but no hedge planting on top as is commonly the case across East Devon, instead it proposes planting on either side of the bank. The landscape area as defined in DCC's Landscape character assessment typifies the area as having '*low narrow earthbanks with hedges on plateaux; with wider historic banks in the upper farmed valleys; and more species-diverse Devon hedges (e.g. beech, sycamore, ash, hazel and gorse) with flower, fern and moss-rich banks on lower slopes*'. The hedge strategy should reflect these characteristics

- The next stage design of the side roads will have to ensure they integrate properly into the existing network of rural lanes as stated within the draft Environmental Assessment Report accompanying the proposals generic landscape design principles. The current design proposals for the different options show minor side roads with large curved turn-offs, which is alien to this landscape defined by a rectilinear field pattern. Further a less engineered approach to the side roads will reduce opportunities for speeding and will reduce their appeal as potential rat runs.

- The conclusions reached within the Draft EAR are correct in relation to which option causes the least landscape character and visual impact. However the currently proposed mitigation measures require amending and expanding in regards to the comments raised above.
- A more detailed cumulative assessment should be carried out to investigate how old and new A30 route would work together especially in relation to the orange route where Streetscene improvements to the old A30 could reduce some of the potential cumulative effects.

6 Potential Built Heritage Impacts Associated with the Two Options

- 6.1 The proposed routes would each impact on the setting of a number of heritage assets and Devon County Council's attention is drawn to the need to have special regard to the setting of heritage assets and where there is harm to the setting of such assets to only grant permission where the public benefits that outweigh that harm.
- 6.2 The submitted Heritage Assessment concludes that many of the identified impacts can be minimised by "...careful, sensitive design". It is not clear what is meant by this and we look forward to understanding the proposed mitigation measures in due course. It is also acknowledged that some heritage assets along the existing route will benefit from reduced traffic impacts and this must also be weighed into the balance.
- 6.3 It has not been possible in the time available to assess the impact on each heritage asset ourselves to see if we agree with the County's assessment. Clearly this will need to be done and any comments fed into the process at a later stage.

7 Potential Environmental Health Issues Associated with the Two Options

- 7.1 At present the A30 runs through Monkton village and close to a number of properties. The Blue and Orange options would see a new highway that is further away from some existing properties, but closer to a smaller number of others. Both proposed routes would reduce noise for properties in Monkton though the Orange route would result in more new properties affected by increases in noise than the blue routes.
- 7.2 All routes would improve air quality in and around Monkton village. Though some net adverse impacts could arise for more properties close/closer to the new route alignments. The Orange route results in slightly greater overall benefits than the blue routes.
- 7.3 In terms of tranquility all routes would lead to some adverse effect on localised parts of the AONB, but with scope for reduction over time. The tranquility (or current lack of) in Monkton village would improve with all routes but the Blue routes have greater impact on sensitive parts of valley slopes and on the views from Dumpdon Hill. Blue South would minimise the effect on views from Dumpdon Hill. The Orange route would have greater impact on the tranquility of the Plateau area.

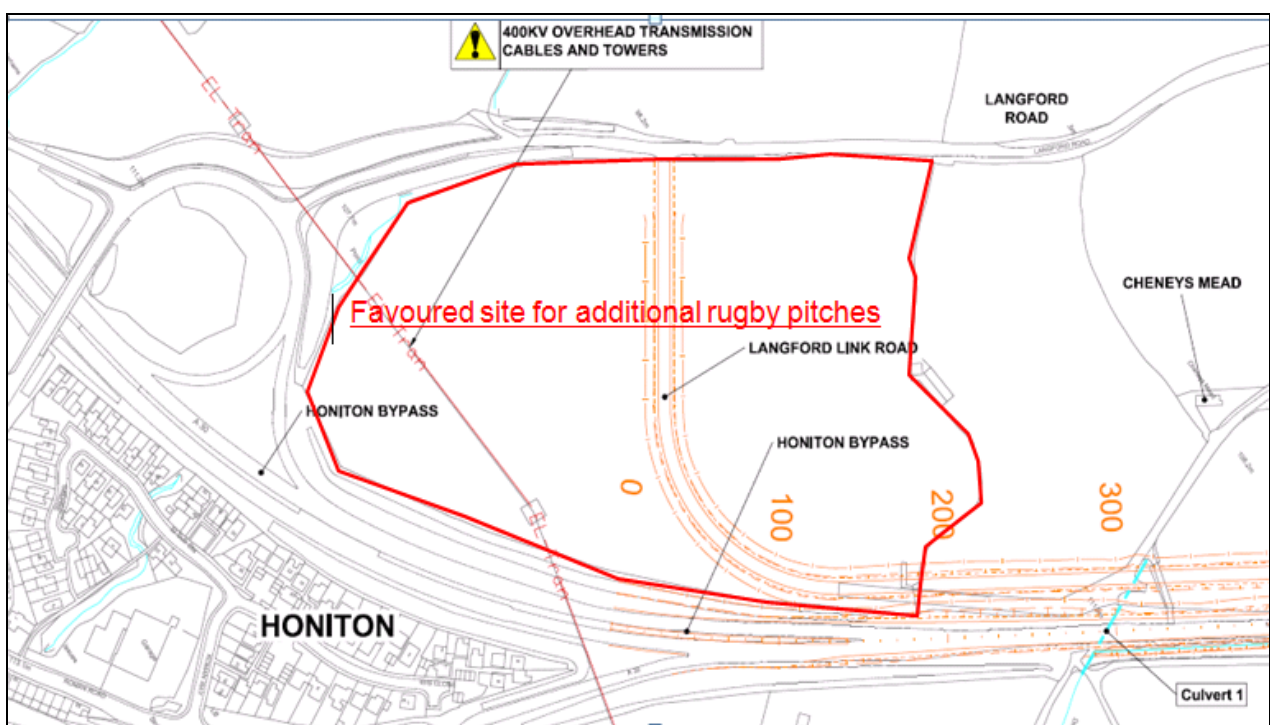
8 Potential Economic Impacts Associated with the Two Options

- 8.1 From an economic perspective, either proposed scheme to reduce congestion, logistics costs and improve the flow of traffic along this major commuting and tourism route would be very welcome indeed. The diverse benefits would be wider than the objectives listed – encouraging broader economic growth, improving the inward investment appeal of our major employment land allocations (as well as the proposed Enterprise Zone) and improving people’s experience of the district. This improvement to a crucial part of our strategic road network would likely extend the draw of jobs provision in the West of our district and Exeter to our economically active residents further east and will grow our travel to work area (TTWA).
- 8.2 The Federation of Small Businesses (FSB) have highlighted the significance of Honiton as a major cross roads of communication linking the A30, A35, A303 and A373 - strengthening its strategic importance and providing a major stimulus to businesses looking to locate and invest in the town. They view it as vital that this major artery of communication is improved to help businesses function and grow, to keep up with our competitors in neighbouring counties where they benefit from better road infrastructure.
- 8.3 The blue route, with its closer proximity to the existing A30 may offer a greater opportunity to mitigate any adverse loss of passing trade to established businesses in through appropriate signage. The Monkton Court Hotel is one such business who have already expressed concern at turnover being lost when the existing road is closed through accidents or flooding. This is to be balanced against the ability for improved overtaking that the orange route seems to offer and the cumulative economic benefits of any reduced journey time.
- 8.4 In this instance, given the far wider economic benefit of having this Strategic Corridor for the South West coming forward - the economic argument would be to promote the most deliverable route such that this improvement is realised.

9 Potential social impacts associated with the two options

- 9.1 In both route options there will be some positive social impacts through the provision of improved carriageways as by definition they will improve connectivity and ability for Devon residents to access facilities and opportunities in Somerset and beyond. Beyond this, residents of Monkton village should see significant beneficial social impacts. The current A30 splits the village in half and the speed, volume and nature of the traffic accommodated means that it is inherently dangerous to walk along or cross the road through the village. Provision of a bypass to the village could enable better social integration and improve resident’s lives significantly.
- 9.2 At the same time, however, either of the proposed routes would in turn potentially have detrimental social impacts on individual homes and farms along their routes.
- 9.3 It is important to consider whether the improvements could bring any opportunities (or stymie potential opportunities) for social development.

- 9.4 An ongoing aspiration expressed by some in Honiton is for an Eastern bypass to the town linking the A30 and A35, this is seen as a means to reduce congestion at the Eastern end of the High Street and along Kings Road/Monkton Road whilst making for much quicker and easier access for one trunk road to the other. The Orange route runs closer to the A35 at the top of Tower Hill than the Blue route with the gap being just 1.3 kilometres as it reaches the top of the hills at/near Holmsleigh Farm. The detailed proposals presented by Devon County Council do not have any junctions on the Orange Route and existing C class and smaller roads in this vicinity are not shown to have junctions directly on to the new road proposals. It might be that it is not technically possible or feasible to secure a link from the Orange route to the A35 but this could be an option that is worthy of further investigation as part of the wider future work associated with refinement of a scheme.
- 9.5 Officers of the District Council have recently conducted a public consultation on a Draft Honiton Sports Pitch Strategy. This strategy is designed to respond to the action plans identified in the adopted district-wide Playing Pitch Strategy (PPS). A report detailing responses to the consultation and recommendations for next steps etc will be considered by Strategic Planning Committee in October 2016. In the meantime, it is important to note that a potential positive option for additional rugby pitches to serve Honiton is the Former Showground at the eastern end of Honiton, on the northern side of the A30 between it and Langford Road. The Orange route shows a link road between the existing A30 (which would be downgraded at this point) to Langford Road cutting directly across this site (see plan below). Delivery of this route in this location would appear to compromise in part or full the potential to deliver sports pitches on this land. The Draft Honiton Sports Pitch Strategy explains why this site is the only suitable option for additional rugby pitches to meet the needs of Honiton. However it is understood that the route of this link road is only indicative. If the Orange route were to go ahead, it could be appropriate, in order to support and encourage sports pitch provision to work with Devon County Council to secure an alignment that does not comprise, and if possible helps facilitate, provision of pitches. The plan below shows the road alignment as currently proposed.



9.6 The A30 is a main South West England through route used by Gypsies and Travellers. There are, however, limited stopping points on the road and any new highway provision could offer positive scope for provision of space to provide overnight/short term stopping places to contribute to the need for 4-5 emergency stopping places identified in the 2015 Devon-wide Accommodation Assessment. Such provision may be able to utilise any surplus road space freed-up by what could become the redundant length of 'old A30' or perhaps greater scope could exist to purposefully plan in one or more stopping spaces on or adjacent to the new road or any works associated with the new route. It is noted that the construction of the road could require compounds for the storage of equipment and materials which after road completion may not have a specific and productive defined end use. Spaces such as these, especially if planned for at the outset in a careful and sensitive manner, may offer scope for well managed and located overnight spaces to accommodate Gypsies and Travellers.

Report to: **Strategic Planning Committee**

Date of Meeting: 13 September 2016

Public Document: Yes

Exemption: None

Review date for release None



Agenda item: 10

Subject: **Draft Gypsy and Traveller Supplementary Planning Document**

Purpose of report: To update Members on the present position with regard to meeting the need for Gypsy and Traveller provision

Recommendation: **That Members agree that, subject to any minor typographical amendments and the insertion of diagrams and pictures, the draft SPD should be subject to 6 weeks consultation in accordance with the Councils adopted Statement of Community Involvement for the Local Plan and other planning documents.**

Reason for recommendation: To obtain the agreement of Members to commence consultation on the proposed supplementary planning document.

Officer: Claire Rodway
Email: crodway@eastdevon.gov.uk
Tel: 01395 571543

Financial implications: No financial implications have been identified.

Legal implications: The basis for this SPD is set out in the report and is sound. For a document to become an SPD it needs to go through a formal consultation exercise as identified in our Statement of Community Involvement. Accordingly as the report only seeks authority for consultation at this stage, there are no other direct legal implications requiring comment.

Equalities impact: High Impact
A delay in delivering sites for gypsies and travellers could lead to them being disadvantaged through a lack of suitable housing and a failure to meet the Public Sector Equality Duty. This document provides further certainty as to how any planning applications should be determined.

Risk: High Risk
The Local Plan Inspector requires a Gypsy and Traveller DPD to be completed by the end of 2016. Failure to make local authority provision if private sector sites do not come forward could lead to gypsies and travellers being disadvantaged. This document provides further certainty as to how any planning applications should be determined.

Links to background information:

- Devon Partnership Gypsy and Traveller Accommodation Assessment 2015 - <http://eastdevon.gov.uk/media/1072089/PSD2015o-DevonPartnership2015GTAA-Final-Report.pdf>
This assessment forms the primary evidence establishing accommodation needs.

Link to Council Plan: Living in this Outstanding Place.

1. Purpose of Report

- 1.1 Members will recall that, at the last meeting, they considered a report setting out the up-to-date position regarding the provision of accommodation for Gypsies and Travellers in East Devon. A lack of sites suitable for allocation meant that the immediate need for new pitches was being met through planning applications on an ad-hoc basis. During the discussion the matter of the criteria used to determine planning applications for Gypsy and/or Traveller sites was raised and Officers subsequently felt it would be an appropriate time to produce detailed guidance to accompany Local Plan Policy H7.
- 1.2 Previously we were able to rely on the Government advice in ‘Designing Gypsy and Traveller Sites- a Good Practice Guide (2008)’ to provide very detailed technical guidance in applying Policy H7, but, subsequent to the Local Plan Examination, this was replaced by the Government’s ‘Planning policy for traveller sites (2015)’ a far less detailed and more generic policy document which does not fulfil the same practical role.
- 1.3 The text of a draft Supplementary Planning Document (SPD) has now been produced and sets out the detailed, technical considerations which will inform decision making on any planning applications for new Gypsy and/or Traveller pitches. It requires the addition of photographs (best practice examples have been requested from neighbouring authorities) and diagrams for consultation. It adds detail to Policy H7 and must be read alongside it as per the advice in the National Planning Practice Guidance, in para 153, which says that
“(SPD) should build upon and provide more detailed advice or guidance on the policies in the Local Plan. They should not add unnecessarily to the financial burdens on development.”
- 1.4 It is intended that this document be subject to 6 weeks public consultation. It will be advertised on the Council’s website and through press releases. Statutory consultees, Parish Councils, District Councillors and potentially interested parties (including Gypsies and Travellers) on the Council’s database will be informed. Copies of the SPD will be available online, through Parish Councils, at EDDC Offices and in local libraries.
- 1.5 Depending on the responses to the consultation, the document may need to be amended and a further consultation undertaken. All comments received will be considered and recorded. A final document will then be published and adopted (in line with Regulation 14 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

2. Conclusion

- 2.1 Until suitable sites are allocated for Gypsy and/or Traveller development it is likely that planning applications will be received and will need to be determined using Local Plan policy H7. To add technical detail, and in the absence of the previous Government Good Practice Guide, it would be useful for Officers and applicants to have additional guidance to inform the decision making process. Members are asked to agree that, subject to any minor typographical amendments (such as paragraph numbering and the inclusion of photo's and diagrams) the attached draft SPD be subject to 6 weeks public consultation.

Draft Gypsy and Traveller Site Supplementary Planning Guidance- September 2016

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Introduction

East Devon District Council has produced this Gypsy and Traveller Site Supplementary Planning Document (SPD) to provide guidance to help inform and determine planning applications for Gypsy and/or Traveller sites. It will set out guidance on pitch size, site layout and design, and provides further guidance to the Local Plan Policy H7. The SPD will apply to the whole of East Devon District.

This SPD should be read alongside the Government's National Planning Policy Framework (NPPF) and Guidance (NPPG), and 'Planning policy for traveller sites (Aug 2015)', the adopted East Devon Local Plan 2013-2031, and relevant policies in adopted Neighbourhood Plans or Orders. It has also been informed by other planning documents and technical evidence, including the Devon Partnership 'Gypsy and Traveller Accommodation Assessment (2015)' and best practice on sites in East Devon and surrounding Authorities.

The SPD draws significantly upon the Government's 'Designing Gypsy and Traveller Sites Good Practice (2008)' which has been superseded by 'Planning policy for traveller sites (Aug 2015)'. The good practice guidance was based upon extensive research with the Gypsy and Traveller communities and contained considerable detail relating to site specific considerations and has proved useful in reaching planning decisions in East Devon.

This draft SPD will be subject to a minimum 6 week public consultation. It will be advertised on the Council's website and through press releases. Statutory consultees, Parish Councils, District Councillors and potentially interested parties (Including Gypsies and Travellers) on the Council's database will be informed. Copies of the SPD will be available online, through Parish Councils, at EDDC Offices and in local libraries.

Depending on the responses to the consultation, the document may need to be amended and a further consultation undertaken. All comments received will be considered and recorded. A final document will then be published and adopted (in line with Regulation 14 of the Town and Country Planning (Local Planning) (England) Regulations 2012).

District Wide Pitch Numbers and Distribution

A site is the area of land on which pitches are located, and In East Devon most existing sites are small in terms of numbers of pitches (less than 5 pitches), with the largest being 17 pitches (12 permanent and 5 transit). A shared site is a site occupied by more than one Gypsy or Traveller family.

A **pitch** is the space required to accommodate one household and will vary depending on the size of the household in the same way that house sizes vary depending on the needs of the settled population. The number of caravans on a pitch could be considered comparable to the bedrooms in a house. Best practice in the District, supported by the needs assessment, suggests that typical permanent pitches should be capable of accommodating an amenity building, a large trailer and touring caravan (or two trailers), drying space for clothes, a lockable shed, parking space for two vehicles and a small garden.

The needs assessment identifies how many pitches are required across the District between 2014 and 2034 and is the main source of evidence used in this report. In order to align with the East Devon Local Plan end-date, the projected need has been adjusted to run from 2014- 2031 and reflects the 6 permanent pitches granted permission since the assessment was carried out (previously the need was for 34 pitches, 22 of which were needed in the first 5 years). The key requirements for new sites:

- 28 new Gypsy and/or Traveller pitches are needed between 2014- 2031
- Of these 28 pitches, 16 are needed in the first 5 years (up to 2019)
- 3 new Travelling Showpeople pitches are needed between 2014- 2031 (no change from the 3 required between 2014-2034)
- Of these 3, only 1 is needed in the first 5 years (up to 2019). The family owned and occupied site from which this need arises is only partially developed and could potentially accommodate this need, so further Travelling Showpeople sites are not specifically addressed in this SPD.
- 5 emergency stopping places/transit sites, each comprising 5 pitches, are required across the Devon study area. No specific East Devon need has been identified, however provision will be made should suitable sites come forward.
- 20 Bricks and Mortar houses are required between 2014-2031 (or 23 from 2014-2034), these will be met from the general housing stock and are not addressed in this SPD.

According to the Needs Assessment, and evidence from the Gypsy and Traveller Liaison Service provided by Devon County Council, most of the need arising in the first five years will come from newly formed families on existing sites in the District. Most of this need is immediate' from families already living in overcrowded accommodation or wishing to start their own families but lacking space to do so. As most existing sites are located to the west of the District, around Exeter, this is the area where most new pitches will be required.

The East Devon Local Plan makes provision for up to 30 pitches as part of a future expansion of

Cranbrook, but it does not allocate specific areas of land (at Cranbrook or elsewhere in the District) for new pitches. Instead it contains Policy H7 which will be used, along with other relevant policies, to assess planning applications for new pitches as and when they arise:

Local Plan Policy H7 - Sites for Gypsies and Travellers:

In the period up to 2034, 37 Gypsy and Traveller pitches and 3 plots for travelling showpeople should be provided. During the first 5 years, from 2014-2019, at least 22 of the Gypsy and Traveller pitches should be provided and 1 of the travelling showpeople's plots (with this to be accommodated on an existing permitted site with spare capacity at Clyst St Mary).

Planning permission for a permanent or transit sites for Gypsies and Travellers will be granted if the proposal satisfies all of the following requirements:

1. It has a satisfactory relationship with other neighbouring land uses.
2. It has acceptable vehicular access and provision for on-site turning, parking and servicing.

(There is no criterion 3- this was deleted during the Local Plan process)

4. It contains satisfactory proposals for screening and landscaping.
5. It has no significant adverse impact on the appearance or character of the landscape or amenity of occupiers of neighbouring properties and any impacts will be mitigated to an acceptable level.
6. In respect of proposals outside Built-up Area Boundaries, the local East Devon need has been proven and cannot be met elsewhere In the District.
7. Where sites already exist within the locality, new pitches should be accommodated through expansion/ increased use of these existing sites though as smaller sites can be more acceptable, site size restrictions could be applicable to ensure sites do not become too large. Where it is not possible to expand/intensify existing sites, the cumulative impacts of additional sites, particularly on the character of the local area and existing community, will be taken into account in addition to other considerations.

Permanent sites should be conveniently located for access to existing community services and facilities and within 30 minutes travel time by public transport, walking or cycling of a primary school.

As well as these overarching locational considerations, there are also a number of issues specific to the design of Gypsy and Traveller sites which are not covered in detail in the Local Plan. A design policy is needed to establish what the Council expect to see in terms of the design and layout of new sites. The policy will include criteria relating to the quality of a site and facilities

that it must include in order to meet the needs of the Gypsy and Traveller communities. The policy would apply to all sites seeking to gain planning permission, whether through an allocation or a windfall site.

Permanent Site Requirements

Number of pitches per site

The needs assessment suggests that small, family sized sites are usually preferred by Gypsies and Travellers and that larger sites should not exceed 15 pitches. This is supported by Government research (Designing Gypsy and Traveller Sites (2008)) which found that residents and site managers alike considered 15 pitches to be the maximum conducive to providing a comfortable environment which is easy to manage. Larger sites are also more likely to impact upon the settled community, and integrate with existing residents to a lesser degree.

Residents of Cranbrook (where up to 30 pitches are allocated in the Local Plan) were asked how many sites should be located in a future expansion of the town, and how many pitches should be accommodated on each. The responses were close, with most respondents (38%) favouring three or four sites, each consisting of five or six pitches. However one or two sites, accommodating up to fifteen pitches, was supported by 36% and a large number of smaller sites was supported by 26%.

Pitch size and space requirements

There is no minimum pitch size specified in Government guidance, however for practical reasons, caravan sites require a greater degree of land usage per family than bricks and mortar housing. Most permanent pitches in East Devon are at least 500m², or 20 dwellings to the hectare, and this is considered an appropriate minimum size (as recommended in the needs assessment) given the uses to be accommodated within each pitch and the need for large vehicle turning space and landscaping, it is also the figure used in our neighbouring authority of Teignbridge. This size pitch does not include specific 'work space', for example for the storage of scrap metal/materials, machinery and equipment, or for the keeping of animals (both discussed later in the document). Where additional pitches are proposed as an extension to existing family pitches (e.g. to accommodate growing families) and existing facilities are to be shared, space needs will be assessed on an individual basis.

Site Boundaries

The perimeter boundary must clearly demarcate the site and should act to prevent unauthorised access, screen unpleasant characteristics (for example if the site is adjacent to an industrial area) and help to ensure the safety of residents, particularly children.

A range of boundary treatments may be used depending upon the character of the local area, including planting, fencing, low walls and natural features, but they should be of a material and height sympathetic to, and in keeping with, the local area. In residential areas, more open or low, boundaries may be preferred to increase integration with neighbouring residents and promote community cohesion.

Based on the model standards for park homes, a gap of 3 metres should be provided within the perimeter of all sites to reduce fire risk.

Orientation of pitches

Site layout and design should ensure a degree of privacy for individual households on shared sites, but still encourage the important sense of community. To improve security, it is useful if individual households are able to have reasonable vision of the site in general and this is an advantage of a circular or horseshoe layout with communal space at its heart. Where there is a desire from residents for a higher degree of privacy, the height of fencing or planting provided between individual pitches can be varied.

In designing the layout of a site enough space must be provided to permit the easy manoeuvrability of resident's own living accommodation both to the site and subsequently onto a pitch. In order to overcome this, the site design should strike a balance between enabling a variety of accommodation to be catered for, and making best use of available space. Access roads and the site design itself should be capable of providing sufficient space for the manoeuvrability of average size trailers of up to 15 metres in length, with capacity for larger mobile homes on a limited number of pitches on larger sites. Gates and fences should be capable of being movable if they are located on the roadside and may block access or manoeuvrability.

Layout of pitches

The layout of individual pitches will be dependent on the layout of the overall site and the needs of immediate, and future, residents. Wherever possible, measures should be taken to ensure that pitches are suitable for all members of the community, including those with disabilities, the elderly and those with young children.

Boundaries

Each pitch should be clearly demarcated to make it entirely clear what each individual household may occupy in return for the fee paid and their responsibilities for the pitch they occupy. A range of different boundaries may be used including fences, low walls, hedges and natural features, although consistency in height and materials across the site will ensure a cohesive design. Between and to the rear of pitches, boundaries of up to 2m will be acceptable and reduce overlooking, but front boundaries should usually be much lower to offer surveillance of any public areas.

Car parking

Adequate parking space for resident's use will be essential on any site and spaces must be a minimum of 2.4 x 4.8 metres and allow space for disabled residents to manoeuvre wheelchairs and for child car seats to be easily accessed. Resident parking should largely be provided for on individual pitches but a site could also contain additional parking facilities for visitors, as parking on the roadside could otherwise impede access of fire and other emergency services. 10

Separation Distance

To ensure safety in the event of a fire, it is essential that every caravan or mobile home is separated from any other caravan or mobile home that is occupied separately, by a distance of at least 6 metres. Other structures are allowed in the separation zone if they are made of non-combustible materials (such as a brick built amenity building), as long as they do not impede means of escape. For further guidance refer to the Model Standards for Park Homes.

Hardstanding

Each pitch should include a hard standing area constructed of a hard wearing material which extends over the whole area to be occupied by a mobile home, touring caravan or other vehicle (not the whole pitch). These standings should project a sufficient distance outwards to enable occupants to enter and leave safely. The base must be sufficient to bear the load placed on it by the home or vehicle and its contents, and the anticipated level of vehicle movement.

Hardstanding should be part of the landscape design and allow for surface water run-off to be managed e.g. through permeable blocks, gravel or grass. Some New Travellers have expressed a preference for 'natural' sites, without hard landscaping, however it will still be necessary for the living accommodation to be located on a hard, supporting, surface.

Space for waste and water storage

An area which is accessible for waste collection should be provided for the storage of a large wheelie bin and recycling boxes within each pitch. A water butt should also be provided for the collection of rainwater for gardening, car washing etc.

Amenity buildings

An amenity building must be provided for each pitch, although this can be provided across two pitches as semi-detached units provided they are entirely self contained. The amenity building should be designed and constructed to be sympathetic to the local vernacular, and should not dominate the pitch or mobile home in terms of height or scale. It should incorporate cost effective energy efficiency measures such as passive solar gain, insulation of plumbing systems, the use of low energy light fittings and appropriate heating and ventilation systems. Any opportunities for using energy from renewable sources should be considered.

The amenity building must be constructed so that residents with reduced mobility are able to reach and use all rooms (e.g. wheelchair accessible doorways, mobility aids in the bathroom). Buildings must include, as a minimum: cold and hot (thermostatically controlled) water supply; electricity supply with sockets in each room; a separate toilet and hand wash basin; a (suitably tiled) bath/shower room; a fire/smoke alarm; a kitchen (with several metres of worksurface and cupboards) and dining area. The access to the toilet should be through a lobbied area or by

separate access direct from the pitch.

The amenity building should also include: secure storage space for harmful substances/ medicines; enclosed storage for food, brooms, washing, cleaning items etc; and space for connection of cooker, fridge/freezer and washing machine (plus a microwave, if possible). Means of heating should be installed in each room which is economical and capable of individual control for each room.

Where possible, a day/living room for family meals should be included in the amenity building. This space could be combined with the kitchen area to make best use of space. It is desirable that the day/living room should not be part of essential circulation space, nor contain essential storage. A plan of a typical modern amenity building is featured below:

Site Layout

Safety

All sites are required to have a 'responsible person' identified who will be responsible for safety matters, particularly with regard to fire. In the case of a caravan site, this could be an employer or any other person who may have control of any part of the site, e.g. occupier or owner, manager etc. The 'responsible' person must carry out a fire risk assessment, which must focus on the safety in case of fire of all 'relevant persons'. It should pay particular attention to those at special risk, such as children, and must include consideration of any dangerous substance liable to be on the site. Fire risk assessment will help identify the risks that can be removed or reduced, and to decide the nature and extent of the general fire precautions that need to be taken. The significant findings of the assessment should be recorded if the site is licensed or the site operator (e.g. the local authority) employs five or more staff, however, it is good practice to record the significant findings in any case.

The 'responsible person' is required to take such "general fire precautions" as will ensure, so far as is reasonably practicable, the safety of any of his employees and other relevant persons. General fire precautions include measures to reduce the risk of fire on the premises and the risk of the spread of fire on the premises (e.g. on the caravan site). Further guidance can be found in the Model Standards, for Park Homes. A series of guides and checklist have been developed which may assist the 'responsible person' to comply with the fire safety law and provide help to carry out a fire risk assessment. These guides and checklist are available from the Communities and Local Government website.

When designing the layout of a site, careful consideration must be given to reducing the potential for accidents between vehicles and pedestrians (particularly children). This will be a more significant issue on larger and shared sites, and can be addressed through measures such as traffic calming, separate pedestrian pavements and clear signage.

Where sites are located close to hazards (for example, main roads, level crossings, railways, rivers) boundaries should be appropriately fenced and planted to ensure that residents (particularly children) are protected.

Flammable or hazardous material should be kept in purposely constructed storage away from residential caravans to reduce the risk of fire and explosion. This is particularly relevant where bottled gas or wood are used for cooking and heating.

Site layout should include sufficient space for the turning and reversing requirements of emergency vehicles and suitably surfaced roads must be provided, with no mobile home more than 50 metres from a road. Roads must have no overhead cable less than 4.5 metres above the ground and vehicular access and gateways must be at least 3.1 metres wide and have a minimum clearance of 3.7 metres. Fire hydrants must be clearly marked.

Site Manager Facilities

Some, particularly larger, sites may require a site manager to be present regularly. This is a matter for the site owner, possibly in consultation with residents to decide, and the manager may live on-site (and could be a resident) or travel to the site to work.

Where a site manager is present, they would usually require an office, storage, a car parking space, and toilet and kitchen facilities. This could be provided as a standalone building or in the communal building, if there is one but the location should be visible to users and have a good overview of the site. The site manager should provide a visible presence to residents and visitors, ensure that safety and other requirements are met and manage the collection of site fees and resolution of disputes. On transit sites, a site manager would need to attend the site particularly regularly given the frequent turnover of residents.

Many Gypsies and Travellers are in favour of controlled access to sites, for example using a lockable gate. Their experience has been that such controls can prevent unauthorised parking and unauthorised caravans being pitched on the site. However, the presence of such gates can sometimes act as a psychological barrier to effective social inclusion and a site manager may perform a similar role in controlling access.

Play areas and communal facilities

On larger sites, and smaller sites where other provision is not available within reasonable walking distance, a communal recreation space should be provided. This space will provide a focus for outdoor social activity and should be laid out in consultation with residents and with ongoing maintenance in mind. Where individual pitches lack space for children's play equipment within their private gardens, a range of equipment suited to all age groups will be particularly important. The space should be located where it is easily accessible, allowing for

natural supervision and with children's safety as a priority.

Generally, sites should be located where they are accessible to a range of shops and facilities. Where a site is isolated from local facilities however and/or is large enough to contain a diverse community of residents rather than one extended family, provision of a communal building is recommended. This facility can be an important resource in sustaining a more remote site, offering an opportunity for visits by health visitors, youth workers and education services, as well as for use by site management and residents alike.

Any such building should include:

- Community room
- Toilets (male and female, with disabled and baby changing facilities)
- Kitchenette.

Ideally it should be situated in a location towards the front of the site, to be accessible to all the community, not just site residents, and if promoted and managed well can help encourage good relations between the Gypsy and Traveller and neighbouring communities.

Security

Site layouts should minimise crime and social exclusion through openness of design, and making travel through the site- on foot or driving- safe and easy. By maximising natural surveillance e.g. through maintaining front boundaries at low levels, facing onto public spaces and providing lighting at night, residents should be able to watch over all areas of the site as well as increasing their feeling of safety.

Landscaping

The need to provide significant areas of hard surfacing to accommodate the vehicles associated with a travelling lifestyle can lead to sites looking stark and obtrusive in the landscape. Attractive soft landscaping (for example grassed areas, shrubs and trees) should be used to soften the appearance of sites from outside, form natural boundary screens, and can improve the quality of life of residents and increase the biodiversity value to wildlife. Native species and traditional forms, such as Devon banks, will be favoured. The travelling lifestyle of residents may not allow for the regular cutting that grass, annual plants and fast growing shrubs may require during the summer months, and planting schemes should be planned with this in mind.

Some New Travellers in East Devon have expressed a preference for minimal, if any, hard landscaping in order to reduce their environmental impact. It is likely that their living accommodation and car parking will need to be situated on/supported by some form of

hardstanding (this could be compacted earth if the soil type is appropriate) to ensure that the site is habitable in winter however, provided emergency services can safely access each pitch, it may not be necessary to provide further hardsurfacing and individual circumstances will be assessed on their merits.

Soft landscaping can be useful to ensure spatial separation which prevents movement of trailers to positions which would breach fire safety distances from the adjoining pitch. When designing a site to include soft landscaping, consideration needs to be given to preventing grassed areas from being used for unauthorised parking or unauthorised pitching of caravans.

Inclusion of space for work

Gypsy and Traveller sites are essentially residential and those living there are entitled to a peaceful and enjoyable environment. At the same time, self-employment is very high amongst the Gypsy and Traveller communities and travelling for work and 'working from home' are fundamental to both cultures.

On shared sites, commercial or other work activity should be sited so that it does not cause noise or other nuisance to nearby residents (whether occupiers of the site or members of the settled community). Planning conditions may be imposed to control the hours of operation, the area where activity can take place and the types of activity which are acceptable. Specific space for the storage of scrap and/or other waste material should be provided within the commercial area and tightly controlled.

Inclusion of space for animals

Keeping animals, particularly dogs and horses, is a cultural tradition amongst many Gypsies and Travellers and residents may wish to accommodate this on their pitches. Site owners may choose to allow dogs and other domestic pets, but care should be taken to ensure that pitches are suitably fenced, that numbers are controlled and that other residents are not disturbed e.g. by barking.

Where Gypsies or Travellers have a specific cultural need for grazing space (where they use horse drawn wagons, for example, as part of their travelling lifestyle) an individual case will need to be made for larger pitches to the site owner (and, in planning terms, to the District Council) who should endeavour to incorporate stabling within pitches. Horses usually need a minimum acre of grazing land per animal however, and it is unlikely to be possible to accommodate this on Council owned (or other shared) sites, so residents will need to seek local grazing land privately.

Infrastructure

Each pitch should be provided with the same basic services that are available to the settled

population. Ideally, separate meters (for domestic usage) should be installed on each pitch (usually located in the amenity building) by the relevant local authority to ensure that each household pays for their own usage rather than being sold from a central point on site. All provision must accord with current legislation, regulations and British Standards.

Consideration may be given to providing more than one electricity, water and sewerage access point on each pitch to allow for homes to be realigned either through resident's choice, family expansion or to cater for visitors.

Water supply

Each pitch must have an adequate, safe drinking water supply. Water pressure must be sufficient to enable the use of fire hydrants by the emergency services which should be at a convenient place near to the front of the site. Provision of an outside tap on each pitch is also recommended.

Drainage

Surface water drainage and storm water drainage must be installed as caravans and mobile homes are particularly vulnerable in the event of flooding.

Gypsy and Traveller sites may offer opportunities for implementing a Sustainable Drainage Systems (SUDS) approach for dealing with surface water drainage management whereby surface water runs off to either natural water courses or municipal systems.

It is recommended that consideration be given to the inclusion of interceptors within the drainage system to ensure protection against petrol, oil and other substances.

Sewerage

Wherever possible, each pitch should be connected to a public sewer. Where this is not possible provision must be made for discharge to a properly constructed sealed septic tank or appropriate treatment process e.g. reed bed system.

Electricity

The provision of mains electricity to each pitch is essential, sufficient to meet the reasonable requirements of the residents. Underground cabling must be adequately earthed. Electrical Installations must be inspected annually. All electrical work must be carried out by competent and appropriately qualified personnel.

Renewable energy

Some New Travellers are reliant on renewable forms of energy and have expressed a preference for new pitches to be carbon-neutral. Solar panels and solar water heating are likely to be the most practical and viable providers of renewable energy and will usually be supported and encouraged. Other forms of renewable energy will also be encouraged but factors such as installation cost and operational noise may make them unsuitable for mobile homes.

Other forms of fuel

Other forms of fuel, such as gas (mains or bottled), oil and wood may be used by residents. It is essential that the installation of equipment using such fuel is carried out by a qualified professional, and inspected annually, as fire and toxic poisoning (e.g. from carbon monoxide) are particularly dangerous in confined spaces.

The guidance on storage of fuel is complex and advice should be sought from the Environmental Health Section of the District Council and from the Fire Service. All fuel must be stored in a non-combustible structure and where any leaks can be contained.

Lighting

It is necessary to provide an appropriate level of lighting on the site to enable safe movement of vehicles and pedestrians, however this should be proportionate to the scale of the site and its location. Use of timers and three quarter length light pillars should be considered to reduce the likelihood of light pollution.

The street lighting arrangements should be planned to minimise the risk of damage through vandalism and avoid problems of light pollution to the homes on the site through light shining

directly into caravans, amenity buildings or mobile homes. It is recommended that external lighting is provided on each amenity building to ensure safe access.

Waste disposal, scrap and storage

The District Council collects domestic waste (including recycling) from Gypsy and Traveller sites in the same way that it does for the settled community. A key element in designing the layout of the site is to ensure that sufficient space exists for local authority refuse collection vehicles to reach an appropriate point from which waste can be collected from individual pitches, as well as any communal refuse areas.

Each pitch should include space for a large wheelie bin and recycling bin/s to be stored in a position which is accessible for collection.

Scrap and storage associated with commercial activity should be stored in a separate location from the residential area (ideally each business storing their own waste within their premises) and should be collected regularly to ensure that no nuisance is created by it.

Experience on some sites has shown that communal refuse areas can actually encourage fly-tipping and the accumulation of non-domestic waste. If a communal refuse area is deemed necessary (in addition to individual refuse collection for each pitch), this should be designed and located so as to be convenient, accessible, robust and inconspicuous.

Any communal refuse areas, or commercial waste storage, should be located away from close proximity of individual pitches and from access points to the site, to ensure that fire service vehicles can enter the site and deal with any fire which might break out there.

Post

The site should be designed so that post can be delivered separately for each pitch. Experience has shown that postal deliveries to pitches can be disrupted by complaints about harassment by dangerous dogs so the provision of an individual box at the entry to a pitch would be advisable.

Consultation has shown that a simple but key element in helping to avoid discrimination against the residents of a Gypsy and Traveller site is to allocate site and pitch addresses which are of a similar nature to those for the settled community- and which do not highlight that the accommodation is site based.

Transit Sites

Transit sites are not intended to be occupied permanently, instead they provide a short-term stopping place for Gypsies and Travellers moving through East Devon.

Transit pitches may be provided on a stand-alone basis, or as part of a larger, permanent site, but they will require the site owner to complete a check-in process where they can collect the fee and advise on safety procedures etc. as well as ensuring that they do not exceed the permitted temporary length of their stay.

Site layout, access and orientation

With regard to site layout, much of the same guidance will apply as to permanent pitches.

The total number of permanent and transit pitches should not exceed 15, and smaller sites of 4-5 transit pitches are advocated in the needs assessment.

Site boundaries - The guidance for permanent sites applies.

Orientation of pitches - The guidance for permanent sites applies.

Health and safety- The guidance for permanent sites applies.

Size of pitch – It is important to ensure that wherever possible each pitch is of a size sufficient to accommodate two touring caravans, two parking spaces and private amenities. It has been found (through research underpinning best practice guidance and in the Needs Assessment) that the majority of Gypsies and Travellers prefer private amenities on each pitch including a toilet, wash basin and shower with hot and cold water supply. Where transit sites are empty for lengthy periods there is a risk of vandalism to facilities and it may be preferable for private amenities to be removed until the site is reoccupied. In adopting this approach it is sensible to ensure that permanent waste and water pipework is in place for facilities to be easily reinstalled.

Access for emergency vehicles- The guidance for permanent sites applies.

Security- The guidance for permanent sites applies.

Landscaping -The guidance for permanent sites applies, although the high turnover of residents means that regular maintenance is unlikely to be undertaken by residents and so will fall to the site owner/manager. Sites will be considered individually to ascertain the degree to which soft landscaping within the site is required.

Parking - Parking space for at least two vehicles should be provided on each individual pitch at a minimum size of 2.4m x 4.8 metres each. Additional space for a towing caravan may also be required.

Density and spacing between vehicles -The guidance for permanent sites applies,

Inclusion of work space -Work vehicles may be accommodated on pitches, however there would not normally be a requirement for the storage/disposal of commercial waste or scrap.

Inclusion of animal space- Animals will often accompany their owners when travelling, and horses may be used to travel in a traditional manner. It is unlikely that grazing space will be provided on transit pitches, however secure tying-up places and troughs should be made available.

Site services and facilities

Accommodation for a Resident Manager- Transit sites may present particular management challenges and depending on local circumstances and sufficient usage, it is recommended that provision is generally made for a resident manager. As the resident manager will be living on the transit site on a semi-permanent basis, facilities for the manager should comply with the guidance for permanent sites, including the provision of an amenity building.

Water supply- The guidance for permanent sites applies.

Electricity supply- Where possible, the guidance for permanent sites applies, although in practice a central electricity supply administered by the site management may be provided, which would entail residents paying by meter or being charged cash retrospectively.

Gas supply - Mains gas supplies are not applicable to transit sites.

Drainage -The guidance for permanent sites applies.

Sewerage- The guidance for permanent sites applies.

Lighting -The guidance for permanent sites applies.

Waste disposal-Waste disposal for individual pitches on transit sites is recommended. Communal refuse disposal should be provided which is convenient (but away from pitches and associated dwellings on site), fenced off, robust and Inconspicuous.

Gypsy and Traveller Supplementary Planning Guidance Policy 1

DESIGN OF GYPSY AND TRAVELLER SITES

Proposals for sites for Gypsies and Travellers will be granted planning permission where they comply with the policies of the East Devon Local Plan and achieve a high quality design and layout, reflecting Government good practice guidance, and where:

- a) The proposal clearly demarcates the site and pitch boundaries using appropriate boundary treatments and landscaping which is sympathetic to, and in keeping with, the surrounding area. There should be clear separation between public areas and private spaces, and between residential areas and any non-residential areas;
- b) Site design and layout takes account of the needs of residents, with special regard to the differing cultural or heritage requirements of different groups;
- c) Safe access for pedestrians, cyclists and vehicles, is provided including for turning and parking, vehicles towing caravans, emergency vehicles and servicing requirements, including waste collection;
- d) All necessary utilities can be provided on the site including mains water, electricity supply, drainage, sanitation and provision for the screened storage and collection of refuse, including recyclable materials;
- e) The proposal would avoid any unacceptable adverse or detrimental impact on the health and living conditions of the residents of the site or on neighbouring uses, including as a result of contamination, excessive noise, dust, fumes, lighting, traffic generation or activity;
- f) A communal recreation area is provided for children for all larger sites, and on smaller sites where suitable provision is not available within walking distance on a safe route or using easily accessible public transport;

Each pitch shall measure at least 500 square metres (unless extended families are sharing facilities, in which case their needs will be assessed individually) and provide, as a minimum, a utility building, an amenity area, appropriate hard standing for a trailer, touring caravan and other vehicle and be laid out to ensure the security and safety of residents and allow ease of movement, whether walking, cycling or driving;

All buildings and structures must be designed to reflect and respect the wider character of the area in which they are located and be screened and landscaped to minimise visual intrusion; Stables and/or other outbuildings will be considered on their merits depending upon the nature of the site and the use and design proposed;

Employment uses should be restricted to purposely designed live/work pitches or areas specifically designated and properly designed for such use, recognising that large equipment is essential to the lifestyle of many Gypsies and Travellers. Outside storage, parking of unused or scrap vehicles or machinery or other materials associated with business activity will not be permitted.

Report to: **Strategic Planning Committee**

Date of Meeting: 13 September 2016

Public Document: Yes

Exemption: None

Review date for release None



Agenda item: 11

Subject: **East Devon Local List of Non-designated Heritage Assets**

Purpose of report: To agree a draft Supplementary Planning Document (SPD) for public consultation. The draft SPD sets out criteria for assessing whether locally important heritage assets should be placed on the East Devon 'Local List'.

Recommendation: **That public consultation is undertaken on the appended draft Local List Supplementary Planning Document to guide the identification of non-designated heritage assets for inclusion on the East Devon Local List.**

Reason for recommendation: To ensure that the approach to local listing of heritage assets is undertaken in an open, transparent and consistent basis having regard to Government advice and best practice.
Officer: Linda Renshaw, Senior Planning Officer (Policy), lrenshaw@eastdevon.gov.uk (01395 – 571683)

Financial implications: There are no additional financial implications; staff resources are already included in the budgets.

Legal implications: The basis for this SPD is set out in the report and is sound. For a document to become an SPD it needs to go through a formal consultation exercise. Accordingly as the report only seeks authority for consultation at this stage, there are no other direct legal implications requiring comment.

Equalities impact: Low Impact
No specific equalities impacts are identified.

Risk: Low Risk
The publication of a formal list will help identify locally important heritage assets.

Links to background information:

- General Government policy set out in the National Planning Practice Guidance on conserving and enhancing the historic environment is available at [12. Conserving and enhancing the historic environment | Planning Practice Guidance](#)

- Government advice on non-designated heritage assets is included in National Planning Practice Guidance at [Non-designated heritage assets | Planning Practice Guidance](#)
- A good practice guide for local heritage listing was published by English Heritage in May 2012 <https://historicengland.org.uk/images-books/publications/good-practice-local-heritage-listing/favicon.ico>
- The Historic England Good Practice Advice in Planning:1 'The Historic Environment in Local Plans' March 2015 [Historic Environment Good Practice Advice in Planning Note 1 | Historic England](#)

Link to Council Plan:

Living in this Outstanding Place.

Report in full

1. What is a Local List?

- 1.1 Heritage assets are divided into nationally designated assets, such as Listed Buildings and Registered Parks and Gardens and more locally important 'non-designated' heritage assets. The 'non-designated' heritage assets are identified by the local planning authority and recorded on a 'local list'.
- 1.2 The purpose of a local list is to identify high quality, locally significant built or landscape feature that are not subject to any other heritage designations, such as Scheduled Ancient Monuments or Listed Buildings. The high levels of neighbourhood planning in East Devon are helping to focus communities on what features of their environment are highly valued and add to local distinctiveness. Whilst the responsibility for including heritage assets on the local list lies with the local planning authority, it is often at the neighbourhood level that locally valued heritage features are identified and it is important to adopt an approach that makes best use of this resource.
- 1.3 The impact of development proposals on all heritage assets must be considered when preparing plans, including neighbourhood plans, and when assessing planning applications. When planning applications are submitted, any implications for heritage features included on the local list must be taken into account when a decision is made. Policy EN8 of the adopted East Devon Local Plan requires applicants to provide an 'Assessment of Significance' to understand the potential impact of proposals on any heritage asset, including those identified on the local list. There are no additional restrictions or planning controls over alterations or demolition on locally listed heritage assets.

2. Why do we need a Supplementary Planning Document on the East Devon Local List?

- 2.1 Local Planning Authorities are required to set out a positive strategy for the conservation and enjoyment of the historic environment in their Local Plan (paragraph 126 of the NPPF). The Historic England Good Practice in Planning: 1, 'The Historic Environment in Local Plans' includes local lists as a way to help identify and manage the conservation of non-designated heritage assets (paragraph 13). Paragraph 12 of the National Planning Policy Framework (NPPF) requires local planning authorities to make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible.
- 2.2 The current East Devon local list is out of date and has not been updated to take account of heritage assets identified through conservation appraisal work or the development management process. In practice, at the moment, non-designated heritage assets tend to be identified through the development management process when it is more difficult for the significance of the asset and its setting to be taken into account when development proposals are planned.
- 2.3 Supplementary Planning Documents (SPD's) are produced where they can help applicants make successful applications and should not add financial burdens (paragraph 153 of the NPPF). Policy EN8 of the adopted Local Plan requires locally listed assets to be taken into account when developing a proposal, but it is difficult for applicants to identify non-designated heritage assets in East Devon at the current time. It is also difficult for neighbourhood planning groups to know what is locally listed in their area and we have no formal mechanisms in place for considering community requests for additions to the local list.
- 2.4 Work being undertaken on neighbourhood planning together with initiatives by amenity groups such as Sid Vale Association and the Otter Valley Association is likely to result in significant numbers of assets being put forward for consideration for local listing. It is important when choosing assets for the local list they are judged against firm selection criteria so that the process is consistent and the significance of each feature properly considered.
- 2.5 It would be possible to just adopt selection criteria without consultation, but this would be a flawed approach as it would not take into account the contributions that could be made from outside groups that are likely to result in a better approach. In addition to proposing selection criteria, the proposed SPD sets out a procedure by which nominations for inclusion will be considered. It is important for the transparency and integrity of the process that this is clearly established and that interested parties have the opportunity to comment on it before it is adopted by the Council.

3. What does the draft Local List Supplementary Planning Document say?

- 3.1 The proposed consultation SPD is included in **Appendix 1** of this report. It explains what designated and non-designated heritage assets are and sets out the reasons for producing a local list. In accordance with English Heritage guidance the SPD includes a statement of significance for East Devon that sets out key elements of historic distinctiveness for East Devon that helps to develop the local selection criteria that are included. The local selection criteria are based on those set out in the English Heritage guide but are adapted to suit the particular characteristics of East Devon.
- 3.2 The draft SPD sets out a procedure for how nominations for historic assets to be included on the list will be assessed. All nominations would need to follow a prescribed form (set out in Appendix 2 of the SPD) that would include a location plan, photograph and any evidence to support the asset meeting the selection criteria. The assessment procedure starts with an initial assessment by EDDC officers to see if the nominated asset meets the selection criteria sufficiently to warrant further investigation. If it does, research (which may include consulting expert bodies) would be undertaken and a draft report prepared for consultation with the owner of the asset. At the same time the report would be published on our web site and the relevant parish council and any local amenity body informed. There would be 4 weeks to make comments on the report before a decision is made on whether to add to the local list. A feature would only be added to the list if it met at least one of the specified criteria.

4. Resource Implications

- 4.1 The intention is that production of the SPD; including consultation, undertaking amendments, future committee report production and final adoption and publication will be undertaken by staff in the Planning Policy section, though this will be done in consultation with the Building Conservation staff and staff in other sections and departments. This will, however, only deal with the initial part of the overall workload.
- 4.2 The SPD will establish the criteria that will need to be considered to allow something to get on to the list (the process side); for an asset to actually get onto the list, over the months and years ahead, details will need to be submitted and assessment take place. The bulk of the assessment work will fall to the Building Conservation staff. The assessment process could have significant implications for staff time and in the event that a large number of nominations come forward in a short space of time the Conservation Officers will not be able to handle the incoming demand. Should this occur the expectations of those making nominations will have to be carefully managed as it may be some time before they can be considered or additional temporary staff resource may need to be put in place. Overall while the establishment and maintenance of the list will place extra work on Council staff with the potential for this to require

additional resources depending on the number of nominations coming forward it should:

- provide a very valuable local resource (of relevance to planning and wider interest – e.g. local history interests) ;
- help local communities in their work, especially Neighbourhood Plan making;
- assist those preparing applications;
- assist with determination of planning applications and applications for Listed Building consent; and
- help conserve and enhance our assets.

4.3 There would also be a need to plot entries onto the GIS system and ensure that the system was regularly updated, which would require technical input.

East Devon District Council Local List Supplementary Planning Document

Draft for Consultation from 01/10/2016 until
11/11/2016



*Images above are indicative of common features that are typically included in Local Lists elsewhere.

How to comment on this document

We are seeking views on this draft supplementary planning document (SPD), which proposes criteria for identifying locally important 'heritage assets' and sets out a procedure for including them on a 'local list'.

Anyone can comment on what we are planning to do and your comments will be considered before our approach is finalised.

To comment you just need to email us at localplan@eastdevon.gov.uk.

Alternatively you could write to us at:

Planning Policy

The Knowle

Sidmouth

EX10 8HL

To enable us to process comments received it would be helpful if you could answer the following questions when making comments.

1. Are there features missing from the proposed statement of significance and how could this be improved?
2. Are any factors missing from the criteria for inclusion on the list and how could these be improved?
3. Is the proposed selection procedure fair and reasonable and how could it be improved?
4. Should any other amenity groups be added to the table shown in Appendix 2?
5. Overall is the proposed supplementary planning document clear and coherent and how could it be improved?

East Devon District Council Draft Local List Supplementary Planning Document

Summary

- East Devon District has nearly 4,500 buildings and structures that are of significant architectural and historic importance that are included on the National Listed Building Register. Many other buildings and structures contribute to the special character of East Devon but do not meet the strict criteria for statutory listing. East Devon District Council recognises the valuable contribution that these local heritage assets make to their locality and is reviewing how they are identified and publicised.
- Currently, features of local importance are noted on our conservation area appraisals (which may be viewed on our web site) but this does not include areas outside of the designated conservation areas. We want to encourage local communities to identify buildings and structures that are important to them, so that those that meet certain criteria can be placed on a 'local list' and taken into consideration in the preparation and determination of development proposals.
- We have set out the criteria that we think applications for inclusion on the local list ought to be considered against. These reflect the guidance set out in the English Heritage publication 'Good Practice Guide For Local Heritage Listing'.
- Local lists only deal with things that are locally important rather than the nationally listed and statutorily protected listed buildings, scheduled ancient monuments and registered parks and gardens.
- The purpose of the Local List is to identify high quality, locally significant, built or landscape features which are not subject to any other heritage designation such as statutory listing or registered parks and gardens status.
- As this is a local list, we are looking for the features of East Devon that help make up its distinctive identity, the particular character that makes it different from elsewhere. It is often the things that are not significant on a national scale that make the biggest contribution to the 'distinctiveness' of a local area and that is what we hope to capture by encouraging local listing.

1. Introduction

- 1.1 Nationally important heritage assets¹ are protected through various listing systems, but not all of the heritage assets that are important to the distinctive character of East Devon register on the national scale. Heritage assets can include buildings, places and landscapes that should be considered in planning decisions because of their heritage interest. So that locally important heritage assets are identified and can be taken into account in planning decisions, East Devon District Council is compiling a 'local list' of heritage assets that will be kept on the Devon Historic Environment Record². This will list those heritage assets that East Devon District Council identifies as being of local importance. It will be a resource that will be useful to those preparing plans (particularly neighbourhood plans), anyone submitting a planning application and to planning decision makers.
- 1.2 Once adopted, this 'supplementary planning document' will provide guidance on how locally important heritage assets can be identified, the selection criteria that will be used to determine whether the asset should be included in the local list and the effects of its inclusion. It is based on the guidance from the English Heritage Good Practice Guide for Local Heritage Listing.³

2. National Policy

- 2.1 Local planning authorities are required to set out a positive strategy for the conservation and enjoyment of the historic environment and to make information about the significance of the historic environment publically accessible.
- 2.2 Non designated heritage assets may be identified by a local planning authority as having local heritage value that should be taken into account when considering any planning application that affects either the asset or its setting. Local planning authorities are encouraged to publish the criteria they will use to identify locally important heritage assets and to keep an up-to-date list of such assets.

¹ The National Planning Policy Framework defines as heritage asset 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. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing)*'.

² The Devon Historic Environment record is a record of the known archaeology and historic environment for the county of Devon.

³ Good Practice Guide for Local Heritage Listing, English Heritage, May 2012 <http://www.english-heritage.org.uk/publications/good-practice-local-heritage-listing/local-listing-guide.pdf>

3. Local Plan Policy

3.1 The adopted East Devon Local Plan has several policies relating to heritage issues (as highlighted in Appendix 1).

4. Proposed Statement of Significance to inform process of identifying heritage assets in East Devon

- 4.1 The English Heritage guide suggests that preparing an overarching statement setting out local historic distinctiveness can be a useful aid to developing local selection criteria. We have identified and set out below the main elements that contribute to the special character of East Devon, recognising its inherent diversities.
- 4.2 East Devon is a predominantly rural area with attractive market towns, a world heritage coastline and picturesque villages. Much of the landscape of East Devon is of outstanding scenic beauty and this is reflected by the designation of two areas of outstanding natural beauty which cover around two thirds of the District. The diversity of the landscape and its underlying geology has helped to create a distinctive local environment, which is valued by both local people and the many visitors who are attracted to visit and relocate to the area.
- 4.3 East Devon stretches from the city of Exeter and the natural boundary of the Exe Estuary in the West to the Dorset and Somerset borders in the East. There is a perceptible change in character across the district from the main centre of population in Exmouth and the neighbouring city of Exeter towards the remoter settlements of the Blackdown Hills to the north and east. Further details of the elements that contribute to the special character of the Blackdown Hills Area of Outstanding Natural Beauty (AONB) are available on the web site [The Blackdown Hills](#) and for the East Devon AONB at [East Devon Area of Outstanding Natural Beauty - Welcome - East Devon Area of Outstanding Natural Beauty](#).
- 4.4 The main historic construction material in East Devon is cob, which is earth compacted with natural material such as straw or animal dung. This concentration of earth buildings is significant on a national scale given the scarcity of this construction method in other parts of the United Kingdom. The main traditional roofing material is Devon reed, although many thatched roofs were replaced with tiles when transport improvements allowed and since the second world war alternative reeds from Norfolk or abroad have been introduced (although this would be inappropriate on a listed building).
- 4.5 The geology of East Devon is complex and the southern coastline is internationally recognised for its geology as part of the 'Jurassic Coast' World Heritage Site. Local stone has provided material for local buildings, including Triassic sandstone, Blue Lias limestone, chert,

flint and limestone. Beer Stone is a particularly fine limestone quarried near the East Devon village of Beer, which has been used locally, but also in many English parish churches and cathedrals. Local materials have often been used in combination to create a distinctive style with cheaper materials supplemented with more expensive stone. For example, in the Blackdown Hills AONB, chert is often laid randomly with more expensive Beer stone being used for defined features like door jambs. Throughout East Devon cob is often supported on low chert or flint walls to improve weather resistance with the use of dressed stone reserved for quoins, window and door details. Pebble bed stones or 'Budleigh Buns' are large distinctive 'pebbles' that are used throughout the western fringes of the District. Whilst slate is a prominent roofing material in the west as a result of the railway, there is a tendency for more clay tiles, usually from Bridgewater, towards the east (possibly brought in by canal). Many of the older brick buildings are constructed from local brickworks (now closed) including from Exmouth and Ottery and all of the 'Mark Rolle' buildings were constructed from bricks from the Rolle Estate brickworks.

- 4.6 East Devon is bounded to the south by Lyme Bay and to the west by the Exe Estuary and the coastal area is an attractive tourist and retirement destination. The main 'seaside' destinations are Exmouth, Budleigh Salterton, Sidmouth, Beer and Seaton, while Lyme Regis lies just over the county border in Dorset. The towns of Exmouth, Budleigh Salterton and Sidmouth first developed as 'watering holes' for the wealthy during the Napoleonic wars, when the convention of continental travel for the aristocracy was interrupted. There are fine examples of Georgian architecture in all of the towns of East Devon and particularly in Exmouth and Sidmouth, which is renowned as a 'Regency' town. Exmouth is essentially Victorian in character as the most rapid growth happened after 1860. The opening of the railways increased the opportunities for attracting visitors and Exmouth in particular, with its sandy beach and scenic location on a promontory between the open sea and Exe Estuary, became a popular tourist destination. The Cottage Orne (rustic buildings of picturesque design) was a popular movement in the late 18th and early 19th century with fine examples in Budleigh Salterton and Sidmouth. There was also high quality development in Budleigh Salterton and Beer during the early 20th Century including good examples of the Arts and Crafts style, which extended along the lower Otter Valley. The towns of Honiton, Axminster and Ottery St Mary were centres of the textile industry from medieval times. Axminster is synonymous with carpet production and Honiton was the focus for the historic East Devon cottage industry of lace making.
- 4.7 In an East Devon context farmstead groupings are an important local feature, particularly those of medieval origins or planned as part of land estates. Several of the most beautiful East Devon Villages have their origins as planned estate villages, including Broadclyst, Gittisham and Broadhembury.

5. Criteria for inclusion on local list

- 5.1 It is important when choosing or nominating assets to be included on a local list that they should be judged against firm selection criteria so that the process is consistent and the significance of each feature is properly considered. English Heritage has set out commonly applied selection criteria, which we have adapted to take account of the statement of significance for East Devon. We intend to use this both as a guide for people wishing to put forward assets for consideration and to assess applications for inclusion on the East Devon local list. It is essential that the local list is not de-valued by the inclusion of heritage assets that do not meet the criteria. In some cases only one of the criteria listed will need to be met to make the building or structure suitable for inclusion on the local list, however age will not of itself be sufficient grounds for inclusion with at least one of the other criteria also needing to be met.

Table 1: Proposed selection criteria for assessing suitability of assets for local heritage listing.

Criteria for local listing in East Devon - A feature of local interest is one that retains its historic form and external detail and makes a positive contribution to the architectural and historic character of the locality for one or more of the following reasons.
Age: The age of an asset may be an important criterion but buildings and structures will not be included simply because they are old. The more recent an asset is, the more unaltered it will need to be to be included. Buildings dated after 1939 will only be considered if they are outstanding (for example they have been documented in recognised publications or received a planning or architectural award) or they represent an important architectural style.
Rarity: Generally, the less common an asset is in an East Devon context, the more likely it is to be considered for inclusion on the local list. The main exception is likely to be cob buildings, where walls are constructed of compacted earth and natural material (such as straw). This was a common historic building method in East Devon, but was far less common in the rest of the United Kingdom. Examples of cob building are therefore likely to be important components of the East Devon list, even though they are not particularly rare in an East Devon context.
Aesthetic value: Good examples of identifiable building traditions, techniques, materials or characteristics that are part of the local styles. This could include the work of recognised local architects, builders and engineers and is likely to include some of

<p>Criteria for local listing in East Devon - A feature of local interest is one that retains its historic form and external detail and makes a positive contribution to the architectural and historic character of the locality for one or more of the following reasons.</p>
<p>the best examples of the work of David Carr in Beer, RW Sampson in Sidmouth, Mark Rolle in Exmouth and Hatchard Smith in the Otter Vale.</p>
<p>Important Groups: Groupings of assets with a clear visual, design or historic relationship. In an East Devon context farmstead groupings are an important local feature, particularly those of medieval origins or planned as part of land estates.</p>
<p>Evidential Value: The significance of a local heritage asset of any kind may be enhanced by a significant contemporary or historic written record.</p>
<p>Historic Association: The significance of a local heritage asset of any kind may be enhanced by a significant historical association of local or national note, including links to important local figures.</p>
<p>Archaeology: Archaeological interest may justify registration of a locally significant asset, if the evidence base is sufficiently compelling and a distinct area can be identified.</p>
<p>Designed landscapes: Designed landscapes including parks and gardens. There are some particularly fine examples of large estates with designed landscapes in East Devon that are not nationally registered, but are included on the Devon Gazetteer of Parks and Gardens of Local Historic Interest. Devon Gazetteer Devon Gardens Trust</p>
<p>Landmark: Features that have a landmark or group value that contributes to the image of the local area.</p>
<p>Community Significance: Features with special local or national historical associations. This may relate to places that aid a perception of local identity or social interaction and could include intangible aspects of heritage that contribute to the “collective memory” of a place. Examples may be features that are important in events like the Ottery St Mary tar barrel races or the Honiton hot pennies.</p>

6. Assessment Procedure

- 6.1 Anyone can nominate an asset for inclusion using the nomination form, which can be downloaded from the Council’s website (Appendix 2). It will be necessary to provide a site location plan, photograph and a brief statement on how the nomination meets the selection

criteria. Comprehensive surveys by local amenity groups or parish councils will be welcomed, particularly if local people have been encouraged to take part in the process.

6.2 The assessment process will be as follows:

1. Nominations will be assessed initially by East Devon staff to see if the nominated asset meets the criteria sufficiently to warrant further investigation. If it does not, the nominating individual/organisation will be advised in writing of the reasons and no further action will be taken.
2. If further investigation is warranted, research will be carried out; this may involve consultation with expert bodies.
3. A draft report will be prepared for consultation with the owner (if known) who will have four weeks to respond if they wish. At the same time the report will be published on our web site and the relevant parish council and local amenity society (if applicable) will be informed (See Appendix 3 for a list of local amenity societies that will be notified where relevant). Any request for an asset not to be included on the list will need to be based on evidence that it fails to meet the requirements of the selection criteria.
4. Final reports, together with any written responses received, will be considered by a senior EDDC officer in association with the relevant Portfolio holder or Chair of the Strategic Planning Committee, who will determine if a feature should be added to the local list: to qualify for inclusion on the list one or more of the criteria set out in Table 1 above must be met. The Council will only be able to consider comments relating to the criteria and cannot consider personal circumstances or development proposals. If one or more criteria are met there will be no valid reason for omitting the feature unless the background information is incorrect. The reasons for either inclusion or exclusion from the list will be recorded and made publically available if requested.
5. Following a decision to include a feature on the local list our web site will be updated and the details made available to the Devon Historic Environment Record.
6. The list will be reviewed periodically and this may result in removal of assets where they no longer meet the selection criteria, have been demolished or have undergone changes that undermine their significance.

(N.B. – Anyone making nominations for buildings or structures to be included in the list should note that the above assessment process make take several months to complete due to our limited resources and so your patience would be appreciated, however we will try and keep you advised of our progress.)

7. Effect of inclusion on the local list

- 7.1 When a planning application is considered the implications for the locally listed asset and its setting will be taken into account when a decision is made. It will be necessary to submit a 'statement of significance' with an application for either planning permission or listed building consent. This will need to include
- A statement of significance of the heritage asset;
 - Details of the proposal; and
 - Analysis of the impact of the proposal on the significance (including a statement of need & statement of impact)
- 7.2 Heritage assets included on the local list are not subject to any additional planning controls over alteration or demolition.
- 7.3 Any locally listed asset and its setting should be considered when development is being proposed as part of a development plan document or neighbourhood plan.
- 7.4 A locally listed building would also become a building where special considerations apply in relation to Approved Documents L1B and L2B of the Building Regulation. This effectively means that its heritage significance can be taken into account when considering the requirement under the building regulations in relation to the conservation of fuel and power in existing homes and other buildings.

APPENDIX 1

Adopted East Devon Local Plan

EN7 - Proposals Affecting Sites which may potentially be of Archaeological Importance:

When considering development proposals which affect sites that are considered to potentially have remains of archaeological importance, the District Council will not grant planning permission until an appropriate desk based assessment and, where necessary, a field assessment has been undertaken.

EN8 - Significance of Heritage Assets and their Setting

When considering development proposals the significance of any heritage assets and their settings, should first be established by the applicant through a proportionate but systematic assessment following East Devon District Council guidance notes for 'Assessment of Significance' (and the English Heritage guidance "The Setting Of Heritage Assets"), or any replacement guidance, sufficient to understand the potential impact of the proposal on the significance of the asset. This policy applies to both designated and non-designated heritage assets, including any identified on the East Devon local list.

EN9 - Development Affecting a Designated Heritage Asset

The Council will not grant permission for developments involving substantial harm or total loss of significance of a designated heritage asset unless it can be demonstrated that it is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site.
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation.
- c) conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible.
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.

Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance should be wholly exceptional.

Where total or partial loss of a heritage asset is to be permitted the Council may require that:

- e) A scheme for the phased demolition and redevelopment of the site providing for its management and treatment in the interim is submitted to and approved by the Council. A copy of a signed contract for the construction work must be deposited with the local planning authority before demolition commences.
- f) Where practicable the heritage asset is dismantled and rebuilt or removed to a site previously approved.
- g) Important features of the heritage asset are salvaged and re-used.
- h) There is an opportunity for the appearance, plan and particular features of the heritage asset to be measured and recorded.
- i) Provision is made for archaeological investigation by qualified persons and excavation of the site where appropriate.

Where a development proposal would lead to less than substantial harm to the significance of a designated heritage asset, the harm will be weighed against the public benefits of the proposal, including securing its optimum viable use. Favourable consideration will be given for new development within the setting of heritage assets that enhance or better reveal the significance of the asset, subject to compliance with other development plan policies and material considerations.

EN10 - Conservation Areas:

Proposals for development, including alterations, extensions and changes of use, or the display of advertisements within a Conservation Area, or outside the area, but which would affect its setting or views in or out of the area, will only be permitted where it would preserve or enhance the appearance and character of the area. Favourable consideration will be given to proposals for new development within conservation areas that enhance or better reveal the significance of the asset, subject to compliance with other development plan policies and material considerations. Loss of a building or other structure that makes a positive contribution to the significance of a Conservation Area will be considered against the criteria set out in Policy EN9.

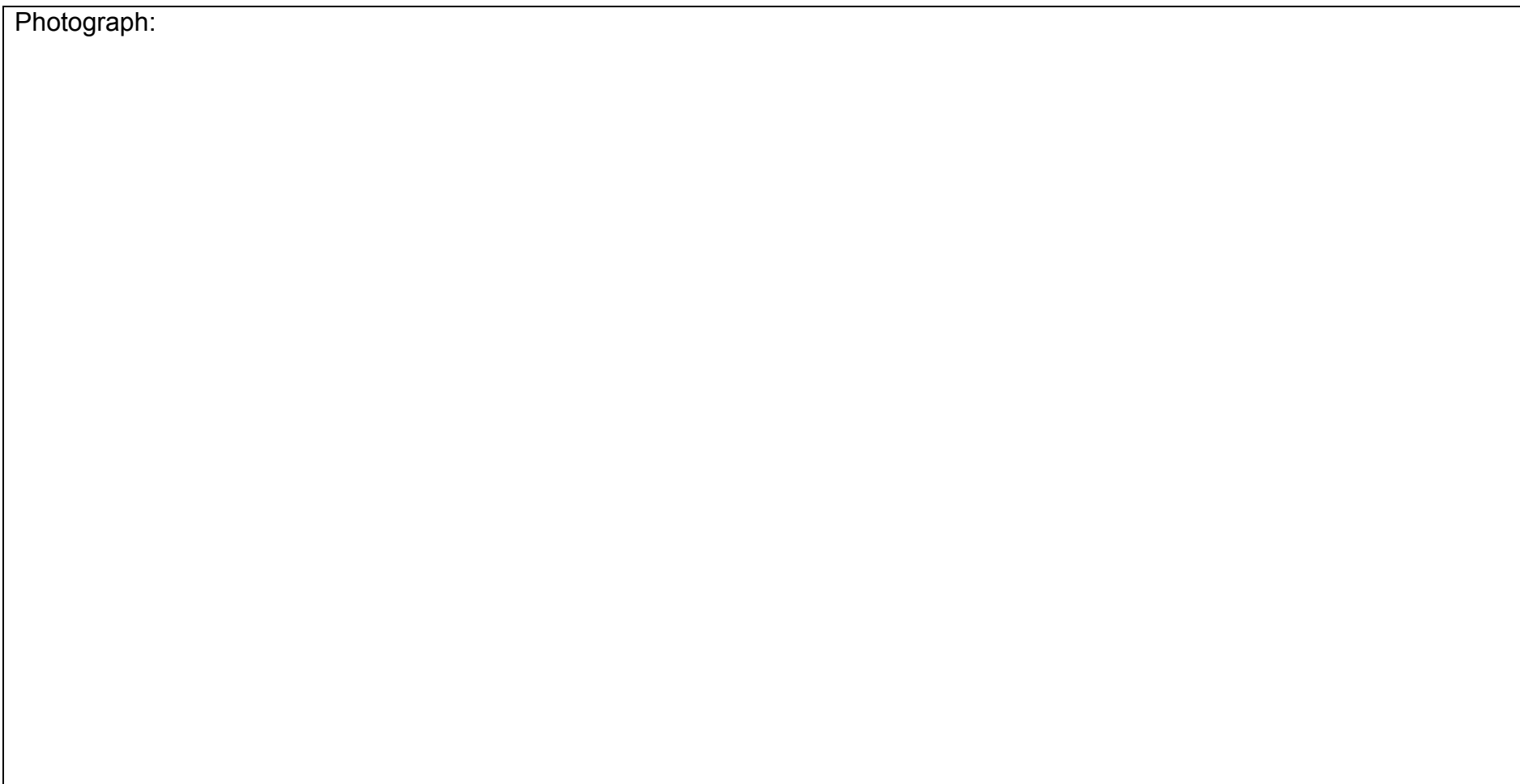
Appendix 2 Draft Nomination Form

Contact details
Name:
Email:
Telephone:
Address:

Nomination details
Site Address:
Ownership details (if known)

Location Plan:

Photograph:



Selection Criteria (please tick as many as apply):

A feature of local interest is one that retains its historic form and external detail and makes a positive contribution to the architectural and historic character of the locality for one or more of the following reasons (please tick as many that you consider apply):

Criteria	Tick Box	Comments/evidence to support
Age		
Rarity		
Architectural Significance		
Important Group		
Written record		
Association with notable people		
Archaeology		
Designed landscape		
Landmark		
Community significance		

Comments

Please provide any further details about your nomination and how it meets the criteria.

Please click here to submit completed form

If not completing on line, please email to

or post to: Building Conservation, Planning Department, The Knowle, Sidmouth, EX10 8HL

Appendix 2 List of local amenity organisations to be notified of draft report following nomination for local listing

- Axminster Historical Society
- Branscombe Project
- Broadclyst Local History Society
- Chardstock Historical Record Group
- Colyton Parish History Society
- Exmouth Historical and Archaeological Society
- Feniton History Group
- Hawkchurch History Society
- Honiton History Society
- Lympstone History Society
- Membury History Society
- Newton Poppleford Local History Group
- Otter Vale Association
- Ottery St. Mary Heritage Society
- Sidmouth Local History Group
- Sid Vale Association Whimble History Society
- Whimble History Society
- Woodbury Local History Society

(List mainly taken from Devon History Society at [Devon History Society: Local History Societies](#))