

Agenda for Strategic Planning Committee

Monday 21 November 2016, 10.00am



[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 13 September 2016 (pages 3 - 8)
- 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 **Housing monitoring and five year land supply calculations** (pages 9 - 57)
The report sets out the latest monitoring figures on housing completions and projections and sets out the Five Year Land Supply calculation to a base date of 31 March 2016.
- 8 **Draft Exmouth Sports Pitch Strategy** (pages 58 - 62)
The report updates Members on progress with the Exmouth Sports Pitch Strategy.
- 9 **Revised Draft Honiton Sports Pitch Strategy** (pages 63 - 194)
The report updates Members on progress with the Honiton Sports Pitch Strategy with a request to endorse a second public consultation on a revised draft strategy.
- 10 **Planning Obligations Supplementary Planning Document** (pages 195 - 225)
The report seeks agreement from the Committee to commence consultation on the draft Planning Obligations Supplementary Planning Document.
- 11 **Housing and Economic Land Availability Assessment** (pages 226 - 251)
The report outlines the Housing and Economic Land Availability Assessment (HELAA) process and timescale and seeks endorsement of the new HELAA methodology.

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EAST DEVON DISTRICT COUNCIL

Minutes of a meeting of the Strategic Planning Committee held at Knowle, Sidmouth on 13 September 2016

Attendance list at end of document

The meeting started at 1.30pm and ended at 4.21pm.

***8 Public speaking**

The Chairman welcomed everyone present to the meeting.

There were no members of the public that wished to speak.

***9 Declarations of interest**

Cllr Paul Diviani; minute – *12 - A30 Honiton to Devonshire Inn – Highway Improvement Scheme

Interest - Personal

Reason: Lives on the section of the A30 being considered for highway improvement.

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

The Committee considered the Service Lead – Planning Strategy and Development Management's report outlining the consultation results of the Issues and Options stage of the Development Plan Document, and setting out key areas for further work. The proposed further work would inform the preparation of the Preferred Approach Document, which was hoped would be consulted upon in early 2017, with submission of the DPD in late spring/early summer for examination.

Members noted that nearly 160 responses to the consultation had been received, which included a significant proportion from Cranbrook residents. The committee report included a summary of the responses received from key bodies and organisations.

Having considered the representations received it was considered that areas for further work would include:

- Further assessment in respect of airport noise;
- Producing a baseline landscape assessment;
- Undertaking a heritage assessment;
- Addressing outstanding transport issues;
- Developing a Green Infrastructure Strategy to plan ahead for open space and SANGs
- Commissioning further work in respect of the Sustainability Appraisal and Habitat Regulations Assessment

Points raised during discussion included:

- Concern was raised about the economic role being played within Cranbrook. In response, Members were advised that Officers were working with the Cranbrook Consortium to secure employment space within the town and that an application was expected imminently for the provision of an 'employment hub'. Employment land would be allocated to meet the needs of the town through the Cranbrook DPD. Discussions were being held with CABE and the Consortium in respect of the built form of the Town Centre, however it was recognised that there was a need to deliver

short-term solutions until the Centre was completed – a report would be brought to a future committee on possible delivery models.

- There were issues to be resolved in respect of affordable housing delivery and concerns raised about the lack of community facility provision within the town.
- Update sought on the progress of introducing a passing loop at Whimple and second Cranbrook station. In response, Members were advised that there was a large amount of work to do and considerable costs involved, but it would be a key requirement for any expansion of the town to facilitate a modal shift from road to public transport in order to overcome capacity issues at Junction 29. Consideration needed to be given to a joined up transport system – bus and train – to encourage residents to use that mode of transport. It was not envisaged that the second rail station would be on the same scale as the existing station.
- Due to Cranbrook's elongated form a second station would be necessary.
- Suggestion that a tram/metro system be explored. In response, Members were advised that Devon County Council had been undertaking work looking into alternative transport systems, such as a metro system.

RESOLVED:

- 1. that the responses to the Cranbrook DPD – Issues and Options consultation and the main issues raised be noted.**
- 2. that the areas identified for further work, as outlined in the committee report, to allow the Preferred Option document to be prepared be endorsed.**

***11 Evidence base for the Cranbrook Development Plan Document**

The Committee considered the Planning Policy Manager's report which sought endorsement of the following strategies/documents 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

The Cranbrook DPD was intended to guide the future growth and development of the town and it was essential that a robust evidence base supported its policies and proposals.

The Development Manager drew the Committees' attention to a letter received by the East Devon New Community Partners raising concerns about the housing density paper. In response to the points raised, Members were advised that the comments would be taken on board and that housing density would be a key variable in the expansion of the town. Density was recognised as a sensitive issue and there was a need to balance the housing figures set out within the Local Plan with issues such as airport noise and landscape sensitivity. All the supporting evidence strategies/papers would be appended to the Preferred Approach Document and would therefore form part of the consultation on that Document.

Points raised during discussion included:

- There were times when a higher housing density was appropriate, such as when providing sheltered housing or for the town centre. Good design was key.
- With demand for sports pitch provision increasing focus should be placed on the delivery of these facilities. In response, Members were advised that permission had been granted for sports pitches and work on site had commenced. In the meantime

- sports clubs were making use of the facilities at the secondary school.
- Concern was raised that about the lack of community facilities and facilities for young people in the town. In response, it was advised that the town had an operational Community Centre, which included the GP surgery. There was work to be done to ensure that sport/open space provision was kept on track.
 - Getting the density right for the town centre would be crucial to its success – higher density could work when broken up with open space.
 - Disappointment that the sports pitches granted permission did not meet Sports England standards.
 - Minimum standards in respect of living space sizes should be adopted. In response, Members were advised that this would be addressed through the production of the design guide.
 - Queried whether more could be done through the planning process to deliver renewable energy as part of the housing developments. In response, it was advised that work was being undertaken with Exeter University in respect of renewable energy provision and that a report would be brought to a future meeting of the committee. Renewable energy would be addressed in more detail within the Cranbrook DPD.
 - The Economic Development Strategy was currently failing to be delivered. The need for smaller start-up units was highlighted.
 - Concern was raised that lifetime homes and homes for disabled people were not currently being delivered.

RESOLVED: that the Economic Strategy, Cultural Development Strategy, Health and Wellbeing Strategy, Cranbrook – Housing Density paper and the Sports, Leisure and Recreation requirements for the expansion of Cranbrook be endorsed as a sound evidence base for the Cranbrook Plan.

***12 A30 Honiton to Devonshire Inn – Highway Improvement Scheme**

The Committee received a presentation from Dave Black, Devon County Council's Head of Planning, Transformation and Environment and Mike Smith of WSP on proposals for road improvements to the A30 Trunk Road from Honiton to Devonshire Inn. The proposals for improvements to the highway, which would form part of wider improvements to the A30/A303, were currently out for consultation. The A30 trunk road was managed and maintained by Highways England and the Department for Transport would be responsible for the final decision in respect of any improvement scheme, however Devon County Council were promoting options for improvements and were leading the consultation.

Dave Black outlined the background to and reasons for the proposed improvements, which was essentially to improve economic prosperity to the area through enhanced connectivity. Members were advised that a two into one scheme was being proposed; creation of a dual carriageway could not be justified for the level of traffic using the road. Having plotted the environmental constraints and assessed road alignments, two main routes were being promoted and these were outlined Members; both bypassed the village of Monkton.

A report had been prepared by the Service Lead – Strategic Planning and Development Management providing Members with commentary on the consultation from the District Council's perspective.

Comments and questions were invited on the proposals and included:

- Queried whether the existing road could be upgraded. In response, it was advised

that there were typography challenges and that the engineering works required would make the option too expensive. The existing road would be kept as a local route as it was not proposed to have local roads joining or exiting the new highway.

- Concerns were raised about the impact of the proposed routes on the AONB and loss of agricultural land. In response, it was advised that the existing road was already within the AONB and that a lot of work had been done to try to plot routes to limit the impact. Mitigation measures would be imposed.
- Local people do not support a two into one arrangement due to accident concerns;
- Proposed orange route was very steep. In response, it was advised that the road complied with design standards.
- Queried why a dual carriageway could be justified from Honiton to Exeter but not from Honiton to Devonshire Inn. In response, it was advised that the traffic levels from Honiton to Exeter were much higher. Evidence did not support a dual carriageway on this section.
- Needed to be mindful that when the M5 was blocked this was the main route out and into the South West.
- Concern was raised about the impact on properties from the proposed routes. In response, it was advised that the main distinction between the two routes was that the blue route had a greater impact on properties and the orange route had a greater impact on the landscape.
- Improving the route would lead to a greater number of vehicles using the A30/A303.
- Suggestion that the road designs allowed for the possibility for the road to become a dual carriageway at a later stage. In response, it was advised that land purchase could only be made based on the land needed at the time.
- Concern that the two into one arrangement created additional static traffic. In response, it was advised the 'merge' issue only tended to happen at peak times.
- In order to reduce noise levels the road surface should not be concrete.
- Queried whether there would be service station provision. In response, it was advised that there were currently no proposals for provision any that any service station would need to be provided a private company.
- Support expressed for the improvements.
- Queried whether linking the A30 and A35 had been explored. In response, it was advised that the two roads were approximately 2km apart and that there would be a number of challenges involved.

RESOLVED:

- 1. That Devon County Council be advised that:**
 - a) support is given, in principle, to the proposals for improvements to the A30 from Honiton to Devonshire Inn.**
 - b) 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 with that in mind the Council's preference is for the orange route.**
 - c) 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.**
- 2. that the detailed observations and comments highlighted in the committee report be presented to Devon County Council, in particular the need to discuss with EDDC 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.**

(Cllr Mike Allen asked that his vote against the resolutions be recorded)

***13 Draft Gypsy and Traveller Supplementary Planning Document**

The Committee considered the Senior Planning Policy Officer's report, which sought agreement that the draft Gypsy and Traveller Supplementary Planning Document (SPD) be subject to a six week public consultation. The SPD, which accompanied Local Plan Policy H7, set out detailed technical considerations to inform planning applications for new gypsy and traveller pitches. Members noted that the SPD could be taken forwards as an DPD at a later stage.

The Committee discussed the proposed number of pitches per site (15), and suggested that sites should not exceed five pitches in unsustainable locations. In response, the Development Manager advised that the SPD had been drafted based on previous Government guidance, which had been supported by evidence.

RESOLVED: that the draft Gypsy and Traveller Supplementary Planning Document be subject to a six week consultation, in accordance with the Council's adopted Statement of Community Involvement for the Local Plan and other planning documents, subject to any minor typographical amendments and the insertion of diagrams and pictures, and the 'Number of pitches per site' section being amended to read:

- **The needs assessment suggests that small, family sized sites are usually preferred by Gypsies and Travellers and that larger sites in sustainable locations should not exceed 15 pitches.**

***14 East Devon Local List of Non-designated Heritage Assets**

The Committee considered the Development Manager's report, which sought agreement for the draft Local List Supplementary Planning Document to be subject to public consultation. The draft SPD sets out criteria for assessing whether locally important heritage assets should be placed on the East Devon 'Local List'. This process sought to update an existing out dated List.

Members noted that the impact of development proposals on all heritage assets placed on the 'Local List' would be considered when preparing plans, such as neighbourhood plans, and that any implications on the asset must be taken into account when a decision was taken on a planning application. The Development Manager advised that the establishment and maintenance of the List would place extra work on existing resource and that there might be the requirement for additional resources depending on the number of nominations submitted.

In response to a question about the assessment process, the Development Manager referred Members to the consultation document which outlined the process. It was proposed that the decision would be taken by a senior EDDC officer in association with the relevant Portfolio Holder or Chairman of the Strategic Planning Committee. The Planning Authority was required under the NPPF to have regard to non-heritage assets, however at present there was no formal way of identifying them.

Comments made during discussion included:

- Concerns raised about the resource implications for administering the List;
- Correction to appendix 2 - 'Otter Valley Association';
- Appendix 2 should include Fairlynch Museum (Budleigh Salterton);
- Suggestion that the existing List be used as a starting point;
- Nominations were already being received and therefore it was important that criteria were established.

RESOLVED: that consultation on the draft Local List Supplementary Planning Document to guide identification of non-designated heritage assets for inclusion on the East Devon Local List be deferred for further assessment of the resource implications, with a further report to be brought to a future meeting.

Attendance list: Committee Members:

Andrew Moulding – Chairman
Peter Bowden – Vice Chairman
Mike Allen
Susie Bond
Peter Burrows
Jill Elson
Graham Godbeer
Mike Howe
Geoff Jung
David Key
Philip Skinner
Brenda Taylor
Mark Williamson

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

Brian Bailey
Alan Dent
Paul Diviani
John Dyson
Peter Faithfull
Simon Grundy
Tom Wright

Officers present:

Mark Williams, Chief Executive
Richard Cohen, Deputy Chief Executive
Ed Freeman, Service Lead – Strategic Planning and Development Management
Henry Gordon Lennox, Strategic Lead – Legal, Licensing and Democratic Services
Chris Rose, Development Manager
Hannah Whitfield, Democratic Services Officer

Apologies: Committee Members:

Councillor Matt Booth

Non-committee Members

Colin Brown
Ian Hall

Report to: **Strategic Planning Committee**

Date of Meeting: 21 November 2016

Public Document: Yes

Exemption: None

Review date for release None

Agenda item: 7

Subject: **Housing monitoring and Five Year Land Supply Calculations**

Purpose of report: The Council are required to monitor housing completions on at least an annual basis and calculate whether it can demonstrate a “Five Year Land Supply” of sites for housing. This report sets out the latest monitoring figures on housing completions and projections and sets out the Five Year Land Supply calculation to a base date of 31 March 2016. In summary there have been **1,027 net completions** in the monitoring year (1 April 2015 to 31 March 2016) and officers consider that the Council is able to demonstrate a **5.80 years supply of housing**.

Members are asked to note the case made in the report for building an even more robust supply of housing sites in the district. It is considered that Members of Development Management Committee should be advised to consider these comments as a material consideration when considering housing applications particularly where they constitute sustainable development.

Recommendation:

- 1. Note the Housing Monitoring Update to 31 March 2016 ;**
- 2. Note the approach to the calculation of the 5 Year Land Supply ; and**
- 3. That Members of the committee note the implications of the latest monitoring report and that Members of Development Management Committee also be asked to note the report and use it to inform their decision making.**

Reason for recommendation: To keep Members of the Strategic Planning Committee up to date on latest housing completions and projections and the latest Five Year Land Supply position.

Officer: Ed Freeman, Service Lead Planning Strategy and Development Management, EFreeman@eastdevon.gov.uk, Ext. 2719.

Financial implications: The report is for information and there are no financial implications.

Legal implications: As there is a legal requirement for the Council to monitor housing completions and calculate it can demonstrate a ‘Five Year Land Supply’ of sites for housing it is important the Council complies with this requirement. Other legal implications are covered in the report



Equalities impact: Low Impact

Risk: Medium Risk

There is little to no risk involved in reporting data on completions as this is essentially factual. However, there are risks associated with housing projections and the calculation of the Five Year Land Supply position.

A number of assumptions have to be made about the likely build out rates for sites that have planning permission or acknowledged development potential, allocations and future windfalls. Assumptions are made based on an application of the SHLAA methodology agreed build out rates plus the latest understandings about the intentions of developers and constraints for specific sites. These assumptions have taken a conservative approach unless officers have information to clearly suggest that delivery will come forward more quickly.

The calculation of Five Year Land Supply makes an assumption that the Council should apply the 5% buffer required by paragraph 47 of the NPPF. In recent years, the Council has applied the higher 20% buffer required of authorities that have persistently undersupplied in the past, however, there is now sufficient data showing high completion rates to suggest that East Devon should no longer be considered a persistent under-supplier. It is therefore felt to be appropriate to apply the 5% buffer.

These issues represent medium risks to the Council in that they may be contested by the development industry and third parties at appeal. Officers are confident of the position set out in this report and the attached Housing Monitoring Update and consider it to be defensible at appeal, however, it is a risk that should be highlighted.

Links to background information:

- [Housing Monitoring Update to 31 March 2016](#)
- Appendix 1 [Full list of completions and projections for sites with planning permission](#)
- Appendix 2 [Full list of sites no longer expected to go ahead](#)

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

1. Introduction

- 1.1 Officers monitor housing delivery every six months to base dates of 30th September (half year) and 31st March (full year). Appended to this report is the latest Housing Monitoring Update (HMU) to 31 March 2016. As was highlighted when the previous HMU was considered by Development Management Committee in May 2016, limited staff resources and other workloads have meant monitoring has taken longer than it ideally would. A new Planning Policy Officer and a new Technical Support and Monitoring Officer have been appointed (due to start in November 2016), and these posts should help to ensure speedier monitoring and reporting. Work improving ICT systems has stalled, partly to try and align with work on improving ICT systems for the wider Greater Exeter Strategic Plan, and partly because STRATA have had to focus on delivery of Global Desktop, reducing their capacity to deliver on other priorities. Improved systems remain key to being able to deliver quicker and better monitoring and as such this is not a workstream that should be lost but it does require additional resource from STRATA.

1.2 Housing monitoring is important to ensure that officers and Members are aware of and understand how and where housing is being delivered in the district. In addition to this there is an inherent pressure from central government via the National Planning Policy Framework (NPPF – paragraphs 47-49 in particular) to ensure that the district can demonstrate an up to date five year land supply or else Local Plan policies for the supply of housing may not be considered up to date. It is also an important way of knowing whether Local Plan policies are being successful or require review.

2. **Headline monitoring figures**

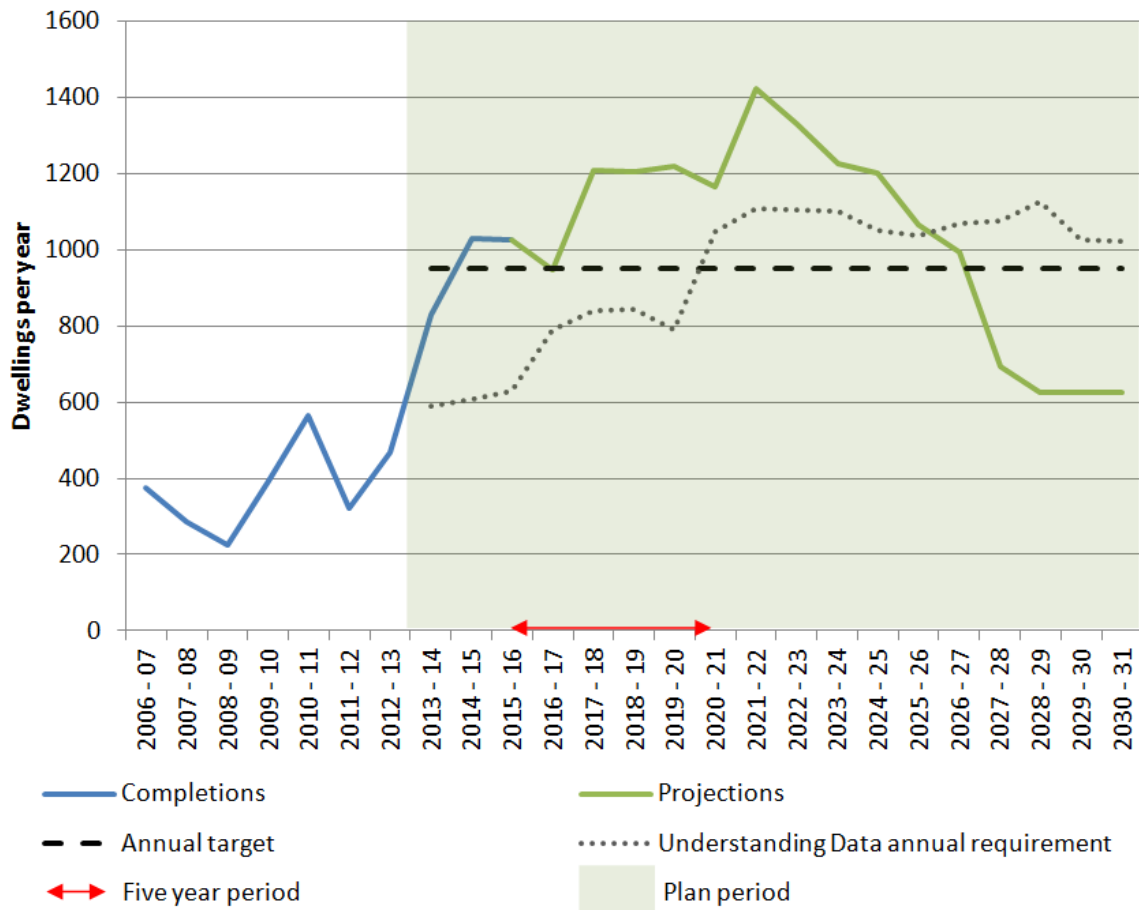
- 2.1 The latest HMU shows that over the six month period from 1 October 2015 – 31 March 2016 there were 515 net new dwellings completed in East Devon and **1,027 net new dwellings completed over the full 2015/16 monitoring year**. This is on a par with the 2014/15 monitoring year which saw 1,029 net completions*.
- 2.2 Drilling down a little further, it is important to note that of the 1,027 net completions over the last year 403 (39%) have been at the West End, with 624 (61%) in the rest of the district. Compared to the 2014/15 monitoring year – 531 (52%) at the West End and 498 (48%) in the rest of the district – there has been drop off in completions at the West End and a rise in completions in the rest of East Devon. The rise for the rest of the district is the result of a number of larger sites elsewhere in East Devon coming “on-stream” and is good evidence that we have been pro-active as a Council in trying to provide for the “step change” in housing delivery required by the Government. The rest of East Devon completions figure for the 2015/16 monitoring year is in line with the highest annual completion figures over the last twenty years for the district (the highest being 629 in 2002/03). The drop off at the West End is considered later in this report.
- 2.3 Over the course of the full monitoring year approximately 81% of net completions were on Greenfield sites (including fields and undeveloped greenspaces, barn conversions and garden sites). Members should keep this in mind and consider the need to increase the number of homes coming forward on Brownfield sites (redevelopments, conversions and change of use). The new Local Plan has a monitoring target to deliver at least 50% of all windfall sites on Brownfield land (i.e. not counting sites allocated in the current or previously adopted or draft Local Plans or Neighbourhood Plans). 404 dwellings were completed on non-allocated sites in the last year, with 211 of these on Greenfield sites and 193 on Brownfield. This means that 47.7% of windfall completions were on Brownfield sites. This position will be monitored but it shows a need to increase brownfield delivery. The Council has started work on a Brownfield Land Register which may potentially help to bring forward more brownfield development with sites identified through this process potentially benefiting from a “permission in principle” in due course. Equally, Members should look to maximise the development potential of Brownfield sites that come before them at Development Management Committee, and feel confident in the Five Year Land Supply position to refuse Greenfield sites where there is reason to do so.
- 2.4 212 of the 1,027 completions were affordable, with 139 (66%) of these coming from the West End (mainly Old Park Farm at Pinhoe as Cranbrook delivered 0 affordable dwellings in the second half of the monitoring year having frontloaded a significant amount of the permitted affordable units). Having said that, there were 73 affordable completions in the rest of East Devon with a good spread of provision in Woodbury, Dalwood, Hawkchurch, Upton Pyne, Budleigh Salterton, Feniton, Ottery St. Mary and Axminster amongst others.

* Note completions figures for a number of previous years have been revised from previously published figures and the subsequent six month and annual totals for the district have also been amended accordingly. In some cases figures have been revised upwards, in others they have been revised downwards. This is as a result of more accurate completion information now being available for specific sites.

- 2.5 The half year monitoring report to Development Management Committee earlier this year projected that over the full monitoring year there would be 1,047 completions which has proven fairly accurate, being just 20 dwellings different to the actual completions figure of 1,027.
- 2.6 It is projected that completions over the next monitoring year (2016/17) will drop slightly to 946 (378 at the West End and 568 in the rest of East Devon). This is mainly due to an assumption of temporarily depressed build out rates at the West End (considered further below). Beyond that, it is assumed that build rates start to pick back up again in future years. However, the specific yearly projection figures are largely academic in isolation. Of key importance is the fact that a total of 5,739 homes are projected to be built out within the five year period (equating to circa 1,148 homes per annum) which is slightly above the build rates achieved over the last two years.
- 2.7 A grand total of 18,425 net new dwellings are now projected to have been completed over the full plan period (2013-2031). This is above the 17,100 minimum figure of housing need outlined by the new Local Plan.
- 2.8 Whilst the below graph shows a flattening out or slight reduction in completions for 2016/17 and projections for 2017/18 it is purely a result of the application of the methodology and calculations. In reality completions will not follow this projection line exactly, some sites projected to be completed next year may be completed in 4 years time, and conversely some projected to be built out in 4 years time may be completed next year. The key point is that over the five year period if completions were annualised (averaged out over the period), the projected completions would be significantly above the 950 per annum target set by the Local Plan as explained in the previous paragraph.
- 2.9 In addition to this, the graph below shows the annual requirement as set out by the Understanding Data report¹ which identifies that annual dwelling requirements over the plan period are not evenly distributed but instead gradually increase over time. Annual projected completions clearly far exceed this secondary annual requirement right up until 2026-27 from which point onwards they drop down significantly. This is evidence of the fact that housing is being brought forward from later in the plan period as required by paragraph 47 of the NPPF.

¹ Demographic advice for East Devon Council (August 2015), Understanding Data, available at: <http://eastdevon.gov.uk/media/1287188/psd2015u-demograpicsunderstandingdataaug2015.pdf>

Projected annual completion trajectory



3. West End delivery

- 3.1 Housing delivery at the West End has dropped over the last year, however this is a temporary situation primarily caused by the reduced flow of available plots with reserved matters at Cranbrook and to a lesser extent uncertainty as a result of the Cranbrook Plan DPD process. It is important to note that in comparison, Old Park Farm (Pinhoe) has continued to deliver at above projected rates and is moving into phase 2 ahead of schedule.
- 3.2 At 31 March 2016, there had been 1,259 completions in total at Cranbrook. Beyond this, at this point there were a further 462 homes with reserved matters approval, however, certain developers (most notably Persimmon) were already running out of plots. On 5th April the Council approved the “Ingrams Land” reserved matters application (14/2137/MRES) for a further 145 dwellings. However, it is important to recognise this finite supply of plots with reserved matters approval has an impact on the delivery rate at Cranbrook.
- 3.3 It is ultimately more cost-effective for the developers to slow build rates down and keep workforces on-site than it is to rush through completions at expected rates and for contractors etc to have to go off-site and be re-engaged when further plots become available. That being the case, until more plots with reserved matters approval are available to build out it is likely that build rates will continue at a reduced level.
- 3.4 The future projected build out rate for Cranbrook has taken this into account by assuming the following depressed and slowly recovering rate over the next few years. This is a conservative assessment.

	2016/17	2017/18	2018/19	2019/20	2020/21
Cranbrook	200	275	350	400	400

3.5 The Major Projects team are in receipt of a reserved matters application for 134 dwellings to the East of Cranbrook town centre and in pre-application discussions in anticipation of reserved matters applications for other parcels of land within the outline permitted area. This identifies the flow of plots for the next few years. For this reason, it is not considered to be an ongoing/extended issue. The Cranbrook Plan DPD will drive future development.

4. Five Year Land Supply

- 4.1 The final page of the HMU sets out the five year land supply calculation based on the 31 March 2016 monitor. It shows that East Devon can demonstrate **5.80 years supply** of land for housing taking account of a 5% buffer as required by paragraph 47 of the NPPF. If a 20% buffer is applied then a 5.07 years supply can be demonstrated.
- 4.2 Paragraph 47 of the NPPF sets out that in calculating the five year land supply authorities should apply a 5% buffer, or a 20% buffer where there has been a record of persistent under delivery. There is no Government guidance on how or when to apply which percentage buffer or what constitutes “persistent under delivery”, which is left to local authorities to determine. The Council has in recent years applied the 20% buffer as a conservative approach, recognising that there was under delivery in the years prior to the current plan period. However, it is now reasonable for the Council to say that it is clearly delivering at around or above requirements and that the trajectory projects it to continue doing so for the next ten years and so the 5% buffer should apply.
- 4.3 It is important to note the conservative nature of assumptions made in the supply side of the equation. In general, SHLAA methodology compliant build-out rates have been used to project future completions unless there is evidence that alternative build out rates are likely. The approach taken is set out on a site by site basis within the HMU.
- 4.4 In addition to this, a robust but conservative assessment of future windfalls has been used which complies with NPPF requirements. The approach used is intended to be incorporated into the forthcoming new HELAA (Housing and Employment Land Availability Assessment) methodology for consistent use across the Exeter Housing Market Area. In all reality, it is likely that the projected numbers of windfalls will be exceeded.
- 4.5 Where it is understood that there are specific constraints or sites are otherwise stalled, this has been taken into account and projected delivery has been either pushed back within the five year period or identified as likely to be delivered outside the five year period. A number of these sites could conceivably deliver within the five year period but it has been assumed that they will not in the interests of calculating a robust and conservative assessment.
- 4.6 The build out rates, approach to calculating windfalls and detailed site assessments mean that generally the projected housing supply calculations err on the conservative side.
- 4.7 The calculation shows that over the five year period a surplus of 789 net new dwellings are projected to be built over the district as a whole. This is a healthy surplus that means that should certain sites not deliver or under-deliver there is an added buffer of supply, however this is not anticipated to be an issue.

5. Future Actions

- 5.1 The fact that the Council can demonstrate a healthy five year land supply means that Local Plan policies can be given full weight in assessing planning applications. Members should not, however, become complacent over the existence of a five year land supply and the projected surplus as such a buffer can quickly be reduced if appropriate future windfall sites or allocated sites are not developed. It is important that the Council retain a focus on housing delivery and continue to strive to increase the delivery of housing sites to bolster the 5 year housing land supply position and provide greater security that the supply can be maintained in the long term. There are a number of good reasons for doing this:
- PAS (Planning Advisory Service) advise states that “The five year supply is best thought of as a 7-8 year supply as only having 5 years' worth of sites will render you vulnerable within a very short period.”
 - The projections for housing delivery for the Local Plan show delivery increasing beyond current levels over the next couple of years up to 1,464 in 2018-19. In order to achieve this supply will need to increase over the coming years. While existing allocations and sites that are expected to come forward should enable this to happen market conditions are uncertain and having a choice of different sites across the district will provide a more robust supply of housing and give greater certainty that this continued increase in supply can be achieved.
 - Delivery at the west end has started to drop and is likely to be lower in the next reporting period this is a vulnerability to our housing land supply in the medium to long term although it is expected to pick up in subsequent years. Actions are being taken to encourage developers to progress applications for detailed consents on those sites that are currently only consented in outline and to remove obstacles to delivery.
 - The government wants to see a significant uplift in housing delivery and the more we can do to support this through supporting delivery of the Local Plan the better.
 - Expected changes to make starter homes an affordable housing product will reduce the number of traditional affordable homes that will be provided. In order to maintain the supply the traditional affordable homes it will be necessary to increase supply of housing overall.
 - For each new home built the Council receives new homes bonus and this in itself is a material consideration albeit one that has to be apportioned appropriate weight when balancing the various other planning considerations.
- 5.2 All of the above issues are good reasons why we should not be complacent and apply policies associated with development boundaries in an overly rigid way. It is good to have the luxury of being able to give these policies full weight and defend against unsustainable developments in inappropriate locations. The legislation does however allow us to depart from policy where other material considerations indicate that we should. Where developments in sustainable locations are proposed beyond but adjacent to built up area boundaries it is important that due consideration is given to the benefits of the development to the delivery of housing and maintaining a housing land supply. It is recommended that Members of DMC be reminded of the need to balance these issues against policy in their decision making.



East Devon District Council

Housing monitoring update to 31 March 2016

October 2016

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1. Introduction

- 1.1 This document provides a housing monitoring update for East Devon District Council to a base date of **31 March 2016**. The report considers the following:
- Housing completions over the last six months (1 October 2015 – 31 March 2016) including:
 - Total completions district wide, on a parish by parish and settlement by settlement basis;
 - Breakdown of completions on brownfield and greenfield sites; and
 - Breakdown of completions of affordable housing.
 - Analysis of windfall completions.
 - Housing projections and housing trajectory for the plan period;
 - Five year land supply calculations for the period 1 April 2016 to 31 March 2021.
- 1.2 Section 113 of the Localism Act (2011) removed the requirement of Councils to submit an Annual Monitoring Report (AMR) to the Secretary of State, but allowed monitoring reports to be produced covering individual indicators which must be published at least once a year. This housing monitoring update complies with that requirement.
- 1.3 The National Planning Policy Framework (NPPF) requires Councils to be able to demonstrate a five year supply of land for housing plus a 5% or 20% buffer requirement depending on past performance. Paragraph 47 of the NPPF states that local planning authorities should:
- “identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land”.*
- In addition to this, paragraph 49 of the NPPF states:
- “Housing applications should be considered in the context of the presumption in favour of sustainable development. Relevant policies for the supply of housing should not be considered up-to-date if the local planning authority cannot demonstrate a five-year supply of deliverable housing sites”.*
- 1.4 This report considers the extent to which extant permissions, sites with a resolution to grant permission or acknowledged development potential, proposed allocations and future windfalls contribute towards meeting the five year requirement.

2. Completions

How do we know if a house has been completed?

2.1 Housing completions are monitored every six months through interrogation of Building Control and Council Tax records against a list of sites with planning permission.

Dwellings are considered to be complete if they fall into one of the following brackets:

- East Devon Building Control have recorded a dwelling as having completed; OR
- East Devon Council Tax have recorded a dwelling as being banded or awaiting banding (sent to the Valuation Office); OR
- A Building Control approved inspector has notified the Council that a dwelling has been completed; OR
- The developer of a site has provided the Council with a build return showing completions; OR
- Planning permission is retrospectively granted to legalise an existing use.

How is a “dwelling” defined?

2.2 For the purposes of housing monitoring, generally, a dwelling is defined as being a separately Council Tax banded property. As an example, this would mean that if a house that had previously been a single Council Tax banded dwelling were split into four flats, each being separately Council Tax banded, then there would be an assumed three net new dwellings on the site upon completion.

2.3 The above definition means that annexes are not counted as a dwelling unless they become separately Council Tax banded. By becoming Council Tax banded, the annexe is recognised as a self contained dwelling. Despite the fact that it may still be tied conditionally to be used ancillary to the main dwelling, it is serving the purpose of a self contained dwelling and therefore should still be counted as such for the purposes of monitoring.

2.4 In addition to this the Strategic Housing Land Availability Assessment (SHLAA) methodology for the Exeter Housing Market Area (HMA) was updated in 2014 and now states that care and extra-care homes should contribute towards dwelling numbers despite units not being separately Council Tax banded. The reasoning for this is that as elderly people move into care / extra-care homes they “free up” open market dwellings for others to move into. The methodology conservatively assumes that one dwelling is freed up by every two nursing or care home beds created. This is based on primary research conducted within the HMA whereby existing care homes were contacted to find out numbers of residents, the proportion that were permanent and the proportion that had previously lived alone. This research suggested that on average 50% of residents were permanent and had previously lived alone which suggests that when they permanently moved to the care home they were leaving an empty house. This equates to the rate of two beds equalling one dwelling. Two bed spaces equalling one dwelling is the final confirmed ratio in the updated SHLAA methodology, however previous drafts of the updated methodology have included 1.4 bed spaces equalling one dwelling and 1.67 bed spaces equalling one dwelling. Completions of care/nursing homes in the October 2013-March 2014 monitoring period assumed 1.4:1 as a ratio, completions from April 2014 to September 2014 assumed 1.67:1 as a ratio, and completions/projections from 1 October 2014 onwards now assume 2:1 as the correct ratio. Extra-care homes/sheltered housing is assumed to be a new dwelling in its own right. Generally this type of housing is separately Council Tax banded anyway.

Total completions

2.5 A full schedule of completions and projections with planning permission by site from the start of the plan period (April 2013) can be found at Appendix 1. As shown in the table below, over the last six months (1 October 2015 to 31 March 2016) a total of 515 dwellings have been completed in East Devon. This includes 180 at the district's "West End" and 335 in the Rest of East Devon. Over the course of the year as a whole a total of 1,027 dwellings have been completed with 403 of them at the West End and 624 of them in the Rest of East Devon.

	April 2013 - Sept 2013	Oct 2013 - Mar 2014	Apr 2014 - Sept 2014	Oct 2014 - Mar 2015	Apr 2015 - Sept 2015	Oct 2015 - Mar 2016
West End	184	302	225	306	223	180
RoED	202*	142	235*	263*	289*	335
East Devon TOTAL	386*	444	460*	569*	512*	515
Annual TOTAL	830*		1,029*		1,027	

* Note the RoED completions figures for a number of years have been revised from previously published figures and the subsequent six month and annual totals for the district have also been amended accordingly. In some cases figures have been revised upwards, in others they have been revised downwards. This is as a result of more accurate completion information now being available for specific sites.

2.6 Looking at the East Devon total for the past six month period, it has remained largely on a par with the previous six month period, however there has been a significant drop-off in completions at the West End and a simultaneous significant increase in completions in the Rest of East Devon. This has continued the trend seen in the previous six month period whereby West End completions have reduced and completions for the rest of the district have increased. This trend is largely due to a temporary slow down of development at Cranbrook and a number of larger sites in the Rest of East Devon coming on stream.

2.7 1,027 completions over the year as a whole means that there have been two years in a row of completions exceeding 1,000 dwellings per annum, a trend which is generally expected to continue for some time (see projections in chapter 3). The Rest of East Devon completions figure for the monitoring year (624) is by far the highest of the plan period so far, and is roughly in line with the highest historical completions data for the district (excluding the West End) over the last twenty years (629 in 2002/03).

2.8 It is clear from both the six monthly and annual figures in the table above and completions prior to the current plan period that housing delivery has significantly increased across the district. This has been a result of completions both at the West End and in the Rest of East Devon. The fact that district-wide figures have remained high despite a temporary reduction in completions at the West End is evidence that the upturn in housing delivery is not solely because of Cranbrook and other West End sites. Though clearly, they are a significant factor and once delivery at Cranbrook and other West End sites yet to come on stream increases again then potentially district-wide figures will increase further. This shows that the "step change" in housing delivery that the Government is promoting is being implemented in East Devon and in a more general sense reflects a market desire to build that was less pronounced in previous years.

Completions by parish

2.9 The table below shows the last year (divided into the two six month periods) of completions by parish. Town councils are highlighted in yellow.

Parish	1 Apr 15 – 30 Sept 15	1 Oct 15 – 31 Mar 16	2015 – 2016 TOTAL
All Saints	1	0	1
Awliscombe	0	2	2
Axminster	58*	106	164
Axmouth	0	0	0
Aylesbeare	0	1	1
Beer	1	0	1
Bicton	0	0	0
Brampford Speke	0	0	0
Branscombe	2	2	4
Broadclyst	49	54	103
Broadhembury	0	0	0
Buckerell	0	1	1
Budleigh Salterton	15	0	15
Chardstock	0	5	5
Clyst Honiton	0	2	2
Clyst Hydon	0	0	0
Clyst St George	1	0	1
Clyst St Lawrence	0	0	0
Clyst St Mary	1	0	1
Colaton Raleigh	0	2	2
Colyton	4	6	10
Combe Raleigh	0	1	1
Compyne Rousdon	0	0	0
Cotleigh	0	0	0
Cranbrook	176	126	302
Dalwood	7	0	7
Dunkeswell	1	5	6
East Budleigh	0	0	0
Exmouth	29	45	74
Farringdon	0	0	0
Farway	0	0	0
Feniton	26	1	27
Gittisham	0	0	0
Hawkchurch	0	6	6
Honiton	11	8	19
Huxham	7	0	7
Kilmington	0	0	0
Luppitt	1	0	1
Lypstone	1	12	13
Membury	0	0	0
Monkton	1	0	1
Musbury	1	0	1
Newton Poppleford	0	3	3
Northleigh	0	0	0
Offwell	1	0	1
Otterton	0	0	0
Ottery St Mary	35	53	88
Payhembury	2	0	2
Plymtree	2	0	2

Parish	1 Apr 15 – 30 Sept 15	1 Oct 15 – 31 Mar 16	2015 – 2016 TOTAL
Poltimore	0	0	0
Rewe	0	0	0
Rockbeare	0	2	2
Seaton	10	34	44
Sheldon	0	0	0
Shute	0	0	0
Sidmouth	25	16	41
Southleigh	1	0	1
Sowton	0	1	1
Stockland	1	0	1
Stoke Canon	0	0	0
Talaton	2	0	2
Uplyme	0	1	1
Uppottery	1	1	2
Upton Pyne	1	10	11
Whimble	7	1	8
Widworthy	2	1	3
Woodbury	28	6	34
Yarcombe	1	1	2
Totals	512*	515	1,027

*More accurate completions data has revealed an additional 12 completions occurred in Axminster during the April 2015 to September 2015 period than were previously reported.

Completions by Built-up Area Boundary and Strategic Allocation

2.10 The table below shows completions over the last six months by Built-up Area Boundaries (BuABs) and Strategic Allocation. The BuABs for the towns of Axminster, Budleigh Salterton, Exmouth, Honiton, Ottery St Mary, Seaton and Sidmouth are defined by the New Local Plan. The New Local Plan identifies 15 settlements at which BuABs will be defined by the Villages Plan DPD (which is currently in production). Until the Draft Villages Plan has progressed further towards Examination the previous BuABs (as defined by the old Local Plan) are being used for this exercise. Lypstone BuAB is defined in the Lypstone Neighbourhood Plan. In addition to these, development within the Strategic Allocations at the West End are recorded. Development outside of the defined BuABs or Strategic Allocations is considered to be in open countryside by the Local Plan.

2.11 Sub-totals for each section (West End Strategic Allocations, towns and Strategy 27 villages) are highlighted in yellow.

BUAB/Allocation	1 Apr 15 – 30 Sept 15	1 Oct 15 – 31 Mar 16	2015 – 2016 TOTAL
West End Strategic Allocations - Totals	220	180	400
Cranbrook	173	126	299
Pinhoe	47	54	101
North of Blackhorse	0	0	0
Towns - Totals	141*	220	361

BUAB/Allocation	1 Apr 15 – 30 Sept 15	1 Oct 15 – 31 Mar 16	2015 – 2016 TOTAL
Axminster	55*	104	159
Budleigh Salterton	15	0	15
Exmouth	29	44	73
Honiton	11	8	19
Ottery St Mary	0	15	15
Seaton	9	34	43
Sidmouth	22	15	37
Strategy 27 Villages - Totals	9	21	30
Beer	1	0	1
Broadclyst	1	0	1
Clyst St Mary	1	1	2
Colyton	0	1	1
East Budleigh	0	0	0
Feniton	0	0	0
Kilminster	0	0	0
Lypstone	1	12	13
Musbury	0	0	0
Newton Poppleford	0	3	3
Sidbury	1	0	1
Uplyme	0	1	1
West Hill	3	2	5
Whimble	1	1	2
Woodbury	0	0	0
			0
Open Countryside	142	94	236
Grand TOTAL	512*	515	1,027

*More accurate completions data has revealed an additional 12 completions occurred in Axminster during the April 2015 to September 2015 period than were previously reported.

2.12 The above table shows that of the 1,027 net completions in the last year, 236 (23%) have been outside of BuABs and strategic allocations. This is likely to be mainly the result of planning permissions either granted by the Council or allowed on appeal in recent years in response to a lack of five year land supply due to the absence of an adopted Local Plan housing target. The table appears to show fairly limited development at the Strategy 27 villages and at key towns such as Ottery St Mary, however this is because permissions granted and currently being built out are simply beyond the BuAB.

Completions by settlement

2.13 The following table shows completions by the settlement which the site is *effectively* at. This is irrespective of policy boundaries (BuABs and allocations) and provides a more accurate picture of housing delivery by settlement without applying policy boundaries. Towns are highlighted in yellow, Strategy 27 villages are highlighted in green and West End settlements are highlighted in blue.

Settlement (at which the development occurs whether within BuAB or not)	1 Apr 15 – 30 Sept 15	1 Oct 15 – 31 Mar 16	2015 – 2016 TOTAL
Alfington	0	0	0
Awliscombe	0	0	0
Axminster	55*	104	159
Axmouth	0	0	0
Aylesbeare	0	1	1
Beer	1	0	1
Blackhorse	0	0	0
Brampford Speke	0	0	0
Branscombe	0	0	0
Broadclyst	1	0	1
Budleigh Salterton	15	0	15
Chardstock	0	5	5
Church Green	0	0	0
Clyst Honiton	0	2	2
Clyst Hydon	0	0	0
Clyst St George	0	0	0
Clyst St Lawrence	0	0	0
Clyst St Mary	1	1	2
Colaton Raleigh	0	2	2
Colestocks	0	0	0
Colyford	4	5	9
Colyton	0	1	1
Combe Raleigh	0	1	1
Combpyne	0	0	0
Cotleigh	0	0	0
Cowley	0	0	0
Cranbrook	176	126	302
Dalwood	6	0	6
Dulford	0	0	0
Dunkeswell	0	1	1
Dunkeswell (Highfield)	1	3	4
East Budleigh	0	0	0
Ebford	0	0	0
Exmouth	29	45	74
Exton	0	1	1
Farringdon	0	0	0
Farway	0	0	0
Feniton	26	1	27
Gittisham	0	0	0
Harpford	0	0	0
Hawkchurch	0	6	6
Honiton	11	8	19

Settlement (at which the development occurs whether within BuAB or not)	1 Apr 15 – 30 Sept 15	1 Oct 15 – 31 Mar 16	2015 – 2016 TOTAL
Huxham	0	0	0
Jack in the Green	0	2	2
Kerswell	0	0	0
Kilmington	0	0	0
Luppitt	0	0	0
Lympstone	1	12	13
Marsh	0	0	0
Membury	0	0	0
Monkton	1	0	1
Musbury	0	0	0
Newton Poppleford	0	3	3
Newtown	1	0	1
Northleigh	0	0	0
North of Blackhorse	0	0	0
Offwell	0	0	0
Old Feniton	0	0	0
Otterton	0	0	0
Ottery St Mary	29	49	78
Payhembury	2	0	2
Pinhoe	48	54	102
Plymtree	1	0	1
Poltimore	0	0	0
Rawridge	0	0	0
Raymond's Hill	2	1	3
Rewe	0	0	0
Rockbeare	0	0	0
Rousdon	0	0	0
Rousdon Estate	0	0	0
Salcombe Regis	1	0	1
Seaton	9	34	43
Seaton Junction	0	0	0
Sheldon	0	0	0
Shute	0	0	0
Sidbury	1	0	1
Sidmouth	22	15	37
Smallridge	1	0	1
Smeatharpe	0	0	0
Southleigh	1	0	1
Stockland	0	0	0
Stoke Canon	0	0	0
Street	0	0	0
Talaton	1	0	1

Settlement (at which the development occurs whether within BuAB or not)	1 Apr 15 – 30 Sept 15	1 Oct 15 – 31 Mar 16	2015 – 2016 TOTAL
Tipton St John	0	0	0
Tytherleigh	0	0	0
Uplyme	0	1	1
Upottery	0	0	0
Upton Pyne	1	10	11
West Hill	3	3	6
Weston, Honiton	0	1	1
Weston, Sidmouth	1	0	1
Whimble	5	1	6
Whitford	0	0	0
Wilmington	1	0	1
Woodbury	28	5	33
Woodbury Salterton	0	0	0
Yarcombe	0	0	0
Yawl	0	0	0
Yettington	0	0	0
Other rural areas	26	11	37
Grand TOTAL	512	515	1027

*More accurate completions data has revealed an additional 12 completions occurred in Axminster during the April 2015 to September 2015 period than were previously reported.

2.14 The table above shows that whilst a significant portion of completions have been outside of policy boundaries, the majority of completions have been “at” the towns, West End and more sustainable villages.

Greenfield/brownfield split

2.15 The table below shows the breakdown of completions between greenfield and brownfield sites over the past year. Greenfield describes any site on land which has not previously been developed. Brownfield therefore describes sites of previously developed land, the definition of which can be found within the glossary of the NPPF but is reproduced below for ease of reference:

“Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.”

		April 2015 to Sept 2015		Oct 2015 to March 2016		2015 – 2016 TOTAL	
		Dwgs	%	Dwgs	%	Dwgs	%
Greenfield	Greenfield	402	79%	374	73%	776	76%
	Barn Conversions	7	1%	2	0%	9	1%
	Garden Sites	18	4%	31	6%	49	5%
	TOTAL	427	83%	407	79%	834	81%
Brownfield	Redevelopment	54	11%	67	13%	121	12%
	Conversions/COU	31	6%	41	8%	72	7%
	TOTAL	85	17%	108	21%	193	19%
TOTAL		512	100%	515	100%	1,027	100%

2.16 The table above shows that around $\frac{4}{5}$ of completions in the district over the last year were on greenfield sites. This figure has crept up consistently over the last few years presumably as a consequence of the lack of a five year land supply and NPPF requirement to permit greenfield developments that might otherwise have been resisted where this is the case.

2.17 The new Local Plan has a monitoring target to deliver at least 50% of all windfall sites on brownfield land (ie not allocated in the current or previously adopted or draft Local Plans or the Lympstone Neighbourhood Plan). 404 dwellings were completed on non-allocated sites in the last year, with 211 of these on Greenfield sites and 193 on brownfield. This means that 47.7% of windfall completions were on brownfield sites. This position will be monitored but it shows a need to increase brownfield delivery. The Council has started work on a Brownfield Land Register which may help to bring forward more brownfield development.

Affordable completions

2.18 The table below shows the number of affordable homes completed across East Devon over the last year. Affordable homes are those completed as “affordable rented”, “social rented”, “shared ownership”, “intermediate” or “affordable by design”.

	April 2015 to Sept 2015	Oct 2015 to Mar 2016	2015 – 2016 TOTAL
RoED	67*	72	139
West End	52	21	73
East Devon TOTAL	119*	93	212

*More accurate completions data has revealed an additional 4 affordable completions occurred in Axminster during the April 2015 to September 2015 period than were previously reported.

2.19 A reasonable proportion (34.4%) of affordable completions have come from the West End developments at Cranbrook and Old Park Farm, however this dropped off significantly in the second half of the year as the majority of affordable plots on active parcels at Cranbrook have been built out. Clearly there have been a significant number of affordable completions in the rest of East Devon. This has been driven by completions on a number of sites providing purely or mainly affordable housing including Land North of Webbers Caravan Park in Woodbury, Land North of Carter’s Farm in Dalwood, Land adjacent Hawkchurch Primary School in Hawkchurch and Land South of Glebe Close in Upton Pyne, as well as large sites such as Land adjacent to and North of Greenway Lane in Budleigh Salterton, Land adjacent to

Louvigny Close in Feniton, Land East of Butts Road in Ottery St Mary and Cloakham Lawns in Axminster amongst others.

Windfall completions

2.20 Windfalls refer to sites built out which are the result of speculative planning applications. They have not been allocated by the current, previously adopted or any emerging Draft Local Plans.

2.21 The table below shows that over the past year 405 of the 1,027 net completions have been windfalls. This equates to 39.4% of all completions in the last year. However, of these 405 net windfall completions 3 were on the Wainhomes site at the West End and the remaining 402 were in the Rest of East Devon. This means that of the 624 net completions in the Rest of East Devon, 64.4% were windfalls.

Gross site capacity	1-2 dwellings	3-5 dwellings	6-9 dwellings	10-20 dwellings	21+	TOTAL
RoED	101	58	50	50	143	402
West End	0	0	0	0	3	3
TOTAL	101	58	50	50	146	405
Percentage	24.9%	14.3%	12.3%	12.3%	35.3%	100%

2.22 In addition to the headline totals, the above table shows how many windfalls have been delivered on sites of different sizes. The gross site capacity refers to the gross number of dwellings due to be delivered on a site as a whole. As an example, if 2 windfall dwellings were completed in the last six months on a site due to take a total of 5 gross new dwellings they would be listed in the 3-5 dwellings column.

2.23 In terms of calculating five year land supply, paragraph 48 of the NPPF allows for future windfalls to be counted towards supply, however the figure should not include residential gardens. This being the case, the assessment below shows the number of net windfall completions in the last year on sites other than back gardens. Further analysis of windfalls for the purposes of projections can be found in paragraphs 3.20-3.23 below.

Gross site capacity	1-2 dwellings	3-5 dwellings	6-9 dwellings	10-20 dwellings	21+	TOTAL
RoED	70	53	37	50	143	353
West End	0	0	0	0	3	3
TOTAL	70	53	37	50	146	356
Percentage	19.7%	14.9%	10.4%	14.0%	41.0%	100%

3. Projections

- 3.1 This section is an assessment of projected completions for the remainder of the plan period. The adopted New Local Plan runs from 2013 to 2031.
- 3.2 Projections are broken down into:
- Extant permissions;
 - These are sites that already have planning permission (either in full or outline and including sites that are already under construction) and are expected to be built out.
 - Acknowledged development potential;
 - These are sites which either have gained a resolution to grant planning permission subject to a S106 being signed, or sites which are known to be available and which are policy compliant but which do not yet have planning permission.
 - Allocations;
 - These are sites allocated by the adopted East Devon Local Plan or the adopted Lympstone Neighbourhood Plan which do not yet have planning permission.
 - Future windfalls.
 - These are an allowance for completions on windfall sites that do not yet have permission. Windfalls are calculated based on historic past windfall completions in line with the NPPF.
- 3.3 Projections are based on the status of sites and extant planning permissions at 31 March 2016 unless pertinent additional information has arisen since that date to aid understanding of delivery (e.g. commencement information).
- 3.4 Projected build out rates for sites generally follow the approach advocated by the Exeter Housing Market Area (HMA) Strategic Housing Land Availability Assessment (SHLAA) methodology market conditions model unless we are aware of an alternative build out rate. The market conditions model assumes currently reduced build out rates for the next five years indicating a lack of market confidence from the SHLAA panel which includes representatives of the development industry. This approach is set out over the page for ease of reference. This is a conservative assumption as seen by the clearly increased delivery over the past six months and year in comparison to previous months and years. However, they are used to project the delivery of the majority of sites in the interest of consistency. Where an alternative build out rate is used this is because there is clear evidence that the site has and will continue to build at above or below methodology rates and the commentary column explains the reasoning behind this.
- 3.5 A full schedule of completions and projections with planning permission on a site by site basis can be found at Appendix 1.

Excerpt from the Exeter HMA SHLAA Methodology: Market conditions model for calculating housing delivery rates

Size of site (no of dwellings)	Commencement of sites			Build out rate	
	Sites where dwellings are under construction	Sites where dwellings have planning permission	Suitable sites without planning permission	Years 1-5	Years 6+
1-15 dwellings (assumes one developer)	Commence in Year 1	Commence in Year 1	Commence in Year 3	1 st year – 12 dwellings maximum 2 nd year onward – 25 dwellings per year maximum	1 st year 25 dwellings maximum 2 nd year onward – 50 dwellings per year maximum
16-500 dwellings (assumes one developer)	Commence in Year 1	Commence in Year 2	Commence in Year 3	1 st year – 12 dwellings maximum 2 nd year onward – 25 dwellings per year maximum	1 st year 25 dwellings maximum 2 nd year onward – 50 dwellings per year maximum
501-1000 dwellings (assumes two developers)	Commence in Year 1	Commence in Year 3	Commence in Year 4	1 st year – 12 dwellings maximum 2 nd year onward – 50 dwellings per year maximum	1 st year 25 dwellings maximum 2 nd year onward – 100 dwellings per year maximum
1001+ dwellings (assumes three developers)	Commence in Year 1	Commence in Year 3	Commence in Year 4	1 st year – 12 dwellings maximum 2 nd year onward – 75 dwellings per year maximum	1 st year 25 dwellings maximum 2 nd year onward – 150 dwellings per year maximum

N.B. These figures provide a general guideline. Different commencement dates or build out rates may be chosen for selected sites by the SHLAA panel if warranted due to site specific issues, or if landowners have identified sites as being available at a later date.

Extant permissions

3.6 The tables below consider large sites (sites of 10 or more gross units) already with planning permission at 31 March 2016 which are expected to be built out. It discounts any sites which are acknowledged as unlikely to go ahead – these are set out at Appendix 2. Sites which have gained permission since 31 March 2016 and sites whose planning permission is deemed to have lapsed are not included.

Large development sites with planning permission in the Rest of East Devon

Site	Permission	Parish	Settlement (at which the development occurs whether within BuAB or not)	Commentary on Site	2016 - 17	2017 - 18	2018 - 19	2019 - 20	2020 - 21	2021 - 22	2022 - 23	2023 - 24	2024 - 25	2025 - 26	2026 - 27	2027 - 28	2028 - 29	2029 - 30	2030 - 31	Five Year Supply – April 16 – March 21	Overall Projections
Land At Rear Of West Close , West Street, Axminster, Devon	03/P2728 AND 07/1128/MRES AND 08/2300/RES AND 12/2257/FUL AND 13/2612/MFUL	Axminster	Axminster	Site containing multiple permissions and different parts of the site are at different stages. Building control records and Council Tax show 7 terraced cottages complete with 2 more approaching completion. 8 apartments and 6 townhouses have commenced so assume completion of these in 2016/17. 5 apartments do not yet have approved building control applications so assume completion of these in 2017/18. Total of 9 completions to date.	16	5														21	21
Land At, Dukes Way, Axminster, Devon Phase 2	09/2350/MFUL	Axminster	Axminster	Second phase of Betterment Homes development. Variation to S106 agreed October 2014 to now only require 6 further affordables on this site. Site recommenced soon after this and now back on track. 12 homes Council Tax banded by 31 March 2016. Assume remaining homes to be completed in line with SHLAA methodology.	25	25	8													58	58
Land at Cloakham Lawns	10/0816/MOUT AND 13/1489/MRES AND 14/0774/MRES	Axminster	Axminster	Site well underway. Wider site (400 units total) now has reserved matters approval. Completions are ahead of SHLAA rate and could argue for 30-40 per annum but a conservative approach of applying SHLAA rates has been used. 68 completed (27 of which affordable).	25	25	25	25	25	50	50	50	50	7						125	332
Land At Milbrook Valley Stoney Lane Axminster	92/P0998 AND 11/0509/VAR	Axminster	Axminster	Jessopp site adjacent to Wainhomes (Chard Road) site, part of the oldest permission for Chard Road developments, permission therefore remains extant. 2011 variation of condition to enable development without improvements to Stoney Lane. Site still	0	0	0	0	0	12	6									0	18

Site	Permission	Parish	Settlement (at which the development occurs whether within BuAB or not)	Commentary on Site	2016 - 17	2017 - 18	2018 - 19	2019 - 20	2020 - 21	2021 - 22	2022 - 23	2023 - 24	2024 - 25	2025 - 26	2026 - 27	2027 - 28	2028 - 29	2029 - 30	2030 - 31	Five Year Supply - April 16 - March 21	Overall Projections
				expected to be built out but conservatively beyond the five year period.																	
Chard Road - Phase 3 -south of brook (eastern portion)	10/0132/MFUL	Axminster	Axminster	Phase 3 of Wainhomes site off Chard Road. Previous years completions amended retrospectively. Total of 78 dwellings completed to date including 10 dwellings completed pre-plan period. 25 affordables completed to date. Assume remaining dwellings will be completed in 2016/17.	20															20	20
Axminster Football Club	11/1660/MFUL AND 15/0309/FUL	Axminster	Axminster	Development well advanced with just 14 units remaining. Assume all 14 (11 of which will be affordable) will be completed in 2016/17.	14															14	14
Stoneleigh Holiday And Leisure Village Weston Sidmouth EX10 0PJ	08/2558/MFUL	Branscombe	Weston, Sidmouth	17 additional holiday lets on holiday park site. 1 of the new dwellings already completed and Council Tax banded. Assume others will not be so no projections shown, but will continue to be monitored and any that do become banded will be counted as completions.																0	0
Kerswell Barton Farm Broadclyst Exeter EX5 3AF	12/1285/MFUL	Broadclyst	Rural areas	Not yet implemented. Assume completion will be in 2017/18	0	12														12	12
Land South Of B3178 Budleigh Salterton	11/2629/MFUL	Budleigh Salterton	Budleigh Salterton	Site on North side of Budleigh Salterton allocated in the new Local Plan. Site commenced June 2016. Assume first completions will be in 2016/17 and built out at rate consistent with SHLAA methodology.	12	25	22													59	59
Land West Of Woodbury Road Clyst St George	14/0167/MFUL	Clyst St George	Clyst St George	Large site adjacent to Clyst St George allowed at appeal. Not yet implemented. Assume completion will be in 2017/18 and 2018/19 in line with SHLAA methodology.	0	12	13													25	25
Land North Of Yaffles Coly Road Colyton	13/1401/MOUT	Colyton	Colyton	No reserved matters approval as yet. Current application to vary S106 requirement relating to affordable units. Assume completion will be in 2018/19	0	0	12	4												16	16
Land At, Marcus Road, Exmouth	10/1392/MFUL	Exmouth	Exmouth	All plots underway but as yet none complete. Assume completion in 2016/17.	14															14	14
11 Camperdown Terrace, Exmouth, EX8 1EJ	10/1686/MFUL	Exmouth	Exmouth	Building control plans submitted Feb 2014 for 3 of the apartments (plots 9,10 and 11). Excavations on plot 9 began March 2014. Letter on planning file states that this was considered to be a material operation and so planning consent remains extant. Previously assumed that this meant the site would build out now,however, no further information so now conservatively assumed to not deliver	0	0	0	0	0	12										0	12

Site	Permission	Parish	Settlement (at which the development occurs whether within BuAB or not)	Commentary on Site	2016 - 17	2017 - 18	2018 - 19	2019 - 20	2020 - 21	2021 - 22	2022 - 23	2023 - 24	2024 - 25	2025 - 26	2026 - 27	2027 - 28	2028 - 29	2029 - 30	2030 - 31	Five Year Supply - April 16 - March 21	Overall Projections
				within the five year period.																	
Hillcrest School St Johns Road Exmouth EX8 4EB	09/2331/MFUL AND 11/2814/MFUL	Exmouth	Exmouth	C G Fry & Son Ltd site on former Hillcrest School, Exmouth. 66 units completed with final one to be completed in 2016/17.	1															1	1
Dunsinane Maer Road Exmouth EX8 2DA	11/0721/MFUL	Exmouth	Exmouth	Former Rolle College halls of residence site on Maer Road. Commenced on site Summer 2013. Flatted development of two blocks so expected to deliver all flats in each block around the same time. 13 complete with remaining 1 expected to be completed in 2016/17.	1															1	1
Pier Head Mamhead View Exmouth	12/2163/MFUL	Exmouth	Exmouth	Site adjacent to Exmouth Docks commenced March 2015. Assume completion in line with SHLAA methodology in 2016/17 and 2017/18.	12	1														13	13
34 Cranford Avenue Exmouth EX8 2QA	13/2647/MFUL	Exmouth	Exmouth	Not yet implemented. Assume completion will be in 2017/18	0	11														11	11
6 Portland Avenue, Exmouth, Devon, EX8 2BS	11/0733/FUL AND 12/2171/FUL	Exmouth	Exmouth	Site commenced. Assume completion will be in 2016/17	6															6	6
34 Douglas Avenue Exmouth EX8 2HB	14/1542/MFUL	Exmouth	Exmouth	Redevelopment of former hotel site to provide 11 dwellings. Commenced 2015. Assume completion will be in 2016/17.	11															11	11
Pankhurst Close Trading Estate Pankhurst Close Exmouth	13/1230/MFUL	Exmouth	Exmouth	Large redevelopment site in Exmouth. Not yet implemented. Assume completion will be from 2017/18 onwards in line with SHLAA methodology.	0	12	25	13												50	50
Land North Of Acland Park Feniton	11/1021/MFUL	Feniton	Feniton	Site allowed at appeal. Commenced demolition works. Assume completion will be from 2017/18 onwards in accordance with SHLAA methodology.	0	12	20													32	32
Land West Of Hayne Lane Honiton	13/2744/MOUT	Gittisham	Honiton	Site approved February 2015. No reserved matters application as yet so assume completions from 2018/19.	0	0	12	25	13	50	50	50	50	25						50	275
Heathfield House, Rosemount Lane, Honiton, EX14 1RN	15/0612/MFUL	Honiton	Honiton	Redevelopment site with permission for 14 (13 net new) dwellings. Site at advanced stage, assume completion will be in 2016/17.	13															13	13
Land Off Of Clapper Lane (Previously Allotments) Honiton	13/2508/MOUT	Honiton	Honiton	No reserved matters approval as yet. Assume completion will be in 2018/19	0	0	10													10	10
The Cedars	14/0405/VAR	Honiton	Honiton	No new completions to report. Assume	0	5														5	5

Site	Permission	Parish	Settlement (at which the development occurs whether within BuAB or not)	Commentary on Site	2016 - 17	2017 - 18	2018 - 19	2019 - 20	2020 - 21	2021 - 22	2022 - 23	2023 - 24	2024 - 25	2025 - 26	2026 - 27	2027 - 28	2028 - 29	2029 - 30	2030 - 31	Five Year Supply – April 16 – March 21	Overall Projections
Otter Valley Park Honiton EX14 4PA				completion will be within the five year period.																	
Lilac Haven Jerrard Close Honiton EX14 1DX	15/0895/MFUL	Honiton	Honiton	Site redeveloping existing plot for 10 dwellings. Site commenced so assume completion will be in 2016/17.	10															10	10
Land South Of The A35 (off George Lane) Gammons Hill Kilmington	14/1905/MFUL	Kilmington	Kilmington	Mainly affordable housing site. Commenced July 2015. Site at advanced stage so assume completion will be in 2016/17.	13															13	13
Land To The West Of Strawberry Hill Lympstone	12/0506/MFUL	Lympstone	Lympstone	Mixed market and affordable site immediately adjacent to Lympstone. Appeal for alternative scheme on this site (13/0820/MFUL) recently dismissed and new application seeking alternative access currently pending consideration. Assume completion will be in 2017/18 and 2018/19 in accordance with SHLAA methodology.	0	12	3													15	15
Land South Of Jackson Meadow Lympstone Exmouth	12/2625/MFUL	Lympstone	Lympstone	Plots 1-12 completed January to March 2016. Assume remaining plot 13 will be completed in 2016/17.	1															1	1
Land South Of King Alfred Way Newton Poppleford Sidmouth	13/0316/MOUT	Newton Poppleford	Newton Poppleford	Reserved matters recently refused and is now at appeal. Assume completion from 2018/19 onwards in line with SHLAA methodology.	0	0	12	25	3											40	40
Land Adjacent To North Star Ottery Street Otterton	11/1597/MFUL	Otterton	Otterton	Mixed market/affordable site on the edge of Otterton. S106 finally signed November 2015 after years of negotiation. Assume will now be built out. Not yet implemented so assume completion will be from 2017/18 onwards in line with SHLAA methodology.	0	12	3													15	15
Marist Convent 8 Broad Street Ottery St Mary Devon EX11 1BZ	12/1622/MFUL	Ottery St Mary	Ottery St Mary	Large site in the centre of Ottery St Mary. 2 completed to date. Remainder will be completed in 2016/17.	10															10	10
Land East of Butts Road, Higher Ridgeway, Ottery St Mary	13/0577/MRES	Ottery St Mary	Ottery St Mary	93 completions by end of March 2016, building out ahead of projected SHLAA rate and could argue 40+ per annum but conservatively projected SHLAA compliant rate for future years.	25	12														37	37
Land At Barton Orchard Tipton St John	11/2172/MFUL AND 14/1745/VAR	Ottery St Mary	Tipton St John	Mixed market and affordable site immediately adjacent to Tipton St John. Variation to permission (14/1745/VAR) approved December 2014 to increase size of open market units. Further variation (15/2753/VAR) approved August 2016 (after	0	12	3													15	15

Site	Permission	Parish	Settlement (at which the development occurs whether within BuAB or not)	Commentary on Site	2016 - 17	2017 - 18	2018 - 19	2019 - 20	2020 - 21	2021 - 22	2022 - 23	2023 - 24	2024 - 25	2025 - 26	2026 - 27	2027 - 28	2028 - 29	2029 - 30	2030 - 31	Five Year Supply – April 16 – March 21	Overall Projections
				monitor) and applications to discharge conditions currently being considered. Not yet implemented. Assume completion will be in 2017/18 and 2018/19 in accordance with SHLAA methodology.																	
West Hayes West Hill Road West Hill Ottery St Mary EX11 1UZ	15/1258/MFUL	Ottery St Mary	West Hill	New permission (15/1258/MFUL) for 10 dwellings at 40% affordable approved November 2015. Site understood to have implemented in summer 2016. Assume completion will be in 2017/18.	0	10														10	10
Land North Of Eastfield West Hill	14/2861/MRES	Ottery St Mary	West Hill	Site for 25 dwellings commenced. Assume completion from 2016/17 onwards in line with SHLAA methodology.	12	13														25	25
Land Adjoining The Tumbling Weir Hotel Ottery St Mary	12/2770/MFUL	Ottery St Mary	Ottery St Mary	Part of former emerging allocation in the Draft Local Plan (removed from final adopted version as already had permission). This site forms Area 1 of the regeneration area and comprises of 29 retirement apartments. Understood that this part of the site will likely come forward later in the overall development and potentially beyond the five year period so assumed from 2021/22 onwards in line with SHLAA methodology.	0	0	0	0	0	12	17									0	29
Former Town Mills Mill Street Ottery St Mary	12/2771/MFUL	Ottery St Mary	Ottery St Mary	Part of former emerging allocation in the Draft Local Plan (removed from final adopted version as already had permission). This site forms Area 2 of the regeneration area and comprises of 30 apartments. Site has commenced but mainly still only on demolitions so assume completion will be from 2017/18 onwards in line with SHLAA methodology.	0	12	18													30	30
Site Of Former Engineering Factory (Mill Buildings) Mill Street Ottery St Mary	12/2772/MOUT	Ottery St Mary	Ottery St Mary	Part of former emerging allocation in the Draft Local Plan (removed from final adopted version as already had permission). This site forms Area 3 of the regeneration area and comprises of 33 dwellings. Site has commenced but mainly still only on demolitions so assume completion will be from 2017/18 onwards in line with SHLAA methodology.	0	12	21													33	33
Former Gerway Nurseries Ottery St Mary EX11 1PN	16/0103/MRES	Ottery St Mary	Ottery St Mary	Large site on the edge of Ottery St Mary. Developer intends to commence on site in summer 2016. Assume completion will be from 2017/18 onwards in line with SHLAA methodology.	0	12	25	8												45	45
Land North Of Higher Ridgeway Ottery St Mary	14/2419/MFUL	Ottery St Mary	Ottery St Mary	Site redeveloping existing allotments and replacing them on adjacent land. Essentially phase 2 to Redrow development off Butts Road (13/0577/MRES) and already on site so assume will carry on where that	0	13	18													31	31

Site	Permission	Parish	Settlement (at which the development occurs whether within BuAB or not)	Commentary on Site	2016 - 17	2017 - 18	2018 - 19	2019 - 20	2020 - 21	2021 - 22	2022 - 23	2023 - 24	2024 - 25	2025 - 26	2026 - 27	2027 - 28	2028 - 29	2029 - 30	2030 - 31	Five Year Supply – April 16 – March 21	Overall Projections
				development completes. In reality may well come forward much quicker than projected as completions so far have been well above SHLAA methodology rates.																	
Land South Of Exeter Road Ottery St Mary	14/2553/MRES AND 15/2059/MRES	Ottery St Mary	Ottery St Mary	Site previously allocated in the Draft Local Plan for up to 200 dwellings. Permission is for 165 dwellings plus a 66 bed care home (which equates to 33 dwellings in SHLAA methodology) so total of 198 dwelling equivalents. Reserved matters permission granted for 165 dwellings in March 2015. Care home reserved matters approval in March 2016. Commenced May 2015 with first completions in December 2015. Assume completions in line with SHLAA methodology.	25	25	25	25	25	50	14									125	189
Salston Manor Hotel Ottery St Mary EX11 1RQ	13/0496/MFUL	Ottery St Mary	Rural areas	Site for conversion of former hotel into apartments. Initial notice received November 2015 for 16 of the apartments so assume looking to commence relatively soon. Assume completion will be in 2017/18 and 2018/19 in line with SHLAA methodology.	0	12	15													27	27
Seaton Quay, (Former Racial Site), Riverside Way, Seaton, Devon, EX12 2UE	13/0304/MOUT	Seaton	Seaton	Seaton Quay development that has been stalled for recent years but has now been permitted with less obligations. New permission granted in 2013 with 0% affordable housing and recently granted variation (15/1107/VAR) to allow a more viable site layout to be considered through a subsequent reserved matters application which is now being considered (16/0503/MRES). This being the case expect the site to move forward now. No reserved matters permission as yet. Assume completion from 2018/19 in line with SHLAA methodology once approved.	0	0	12	25	13	15										50	65
Land Adjacent Harbour Road Seaton	13/2392/MRES	Seaton	Seaton	Site within Seaton Regeneration Area adjacent to Tesco. NHBC return shows total of 30 completions by 31 March 2016 in line with stated intentions of Bovis as per their latest viability appraisal so just above SHLAA methodology rate.	30	30	30	30	30	30	12									150	192
Land Off Barnards Hill Lane Seaton	15/1195/MOUT	Seaton	Seaton	Site previously allocated in the Draft Local Plan. New permission reducing overall numbers and percentage of affordable homes. No reserved matters approval as yet. Assume completion will be in 2018/19 and 2019/20 in line with SHLAA methodology.	0	0	12	8												20	20
Land To Rear Of, 39 Fore Street, Seaton, Devon, EX12 2AD	14/1960/MRES	Seaton	Seaton	Reserved matters (14/1960/MRES) approved November 2014. Building control plans approved June 2015. Site not yet commenced. Assume completion will be in 2018/19 and 2019/20 in line with SHLAA methodology.	0	0	12	1												13	13

Site	Permission	Parish	Settlement (at which the development occurs whether within BuAB or not)	Commentary on Site	2016 - 17	2017 - 18	2018 - 19	2019 - 20	2020 - 21	2021 - 22	2022 - 23	2023 - 24	2024 - 25	2025 - 26	2026 - 27	2027 - 28	2028 - 29	2029 - 30	2030 - 31	Five Year Supply – April 16 – March 21	Overall Projections
Fosse Way Court Seaton EX12 2LP	14/0187/MFUL	Seaton	Seaton	Refurbishment of existing apartments plus construction of new block linking existing buildings comprising total 30 additional open market apartments. Not yet implemented and understood to be stalled due to a freeholder/leaseholder issue so assume completion will be beyond the 5 year period.	0	0	0	0	0	0	0	0	12	18						0	30
Land North Of Rowan Drive Seaton	13/1091/MOUT	Seaton	Seaton	Part of site allocated for 30 dwellings by the newly adopted Local Plan. Permission is for 36. Note, site next door (which forms the remainder of the allocation site recently approved (August 2016) for addition 4 dwellings however these are not counted here. No reserved matters approval as yet. Assume completion will be in 2018/19 and 2019/20 in line with SHLAA methodology.	0	0	12	24												36	36
Victoria Hotel, The Esplanade, Sidmouth, Devon, EX10 8RY	06/2382/MRES	Sidmouth	Sidmouth	Site commenced 2008 (08/1873/CPE certificate of lawfulness for foundations implementing this development). No further information and assume requires new building control application approval to recommence but expected to happen within the five year period.	0	12	2													14	14
Land At Frys Lane Sidford	12/2222/MOUT	Sidmouth	Sidmouth	No reserved matters approval as yet. Assume completion will be in 2018/19	0	0	12													12	12
Land To The East Of The Village Hall Sidmouth Road Clyst St Mary	15/1269/MRES	Sowton	Clyst St Mary	Large site on the edge of Clyst St Mary. Commenced in mid 2016. Assume completions will be from 2016/17 onwards in line with SHLAA methodology.	12	25	25	18												80	80
Land Adjacent To Trederwen Town Lane Woodbury	14/1380/MOUT	Woodbury	Woodbury	Large site immediately adjacent to Woodbury. Site also has permission for 15 dwellings (11/2490/MFUL) - not expected to be built out. Also new application 16/1249/OUT for only 5 dwellings pending consideration. No reserved matters permission as yet so assume completion will be in 2018/19.	0	0	11													11	11
Land To South Broadway Woodbury	15/1370/MRES	Woodbury	Woodbury	Site immediately adjacent to the BUAB. Reserved matters (15/1370/MRES) approved December 2015. Current application to vary affordable percentage pending consideration. Assume completion in line with SHLAA methodology from 2018/19 onwards.	0	0	12	8												20	20
REST OF EAST DEVON TOTAL					308	369	430	239	109	231	149	100	112	50	0	0	0	0	0	1,455	2,097
					1,455						642			0							

Large development sites with planning permission at East Devon's West End

Site	Permission	Parish	Settlement (at which the development occurs whether within BuAB or not)	Commentary on Site	2016 - 17	2017 - 18	2018 - 19	2019 - 20	2020 - 21	2021 - 22	2022 - 23	2023 - 24	2024 - 25	2025 - 26	2026 - 27	2027 - 28	2028 - 29	2029 - 30	2030 - 31	Five Year Supply - April 16 - March 21	Overall Projections
Land At Old Park Farm Pinn Hill Exeter EX1 3TH	12/0130/MRES	Broadclyst	Pinhoe	Developers have advised that expect to complete Old Park Farm 1 by Autumn 2017 depending on sales. 293 units CT banded or awaiting banding by end of March 2016. Remaining units awaiting completion. Site building out well ahead of SHLAA rate and even above projections so far. Projections for future years may be conservative.	100	48														148	148
Tithebarn Green, Land At Monkerton, Exeter And Redhayes/North Of Blackhorse, East Devon	12/1291/MOUT AND 15/1565/V106	Broadclyst	North of Blackhorse	Large site straddling the M5 between East Devon and Exeter. 580 of the proposed dwellings would be within the EDDC area. Site has outline permission and signed S106. Variation to S106 agreement reducing affordable housing on site from 28% to 25%. Reserved matters for northern end of the link road approved and implemented. Reserved matters for first residential parcel of 248 dwellings submitted but not yet validated and pre-application discussions started for socond parcel. Phasing plan discharging condition 22 of outline permission shows development of residential parcels 1 and 2 between 2016 and 2018. Linked application for Mosshayne development (14/2761/MOUT) has resolution to grant permission subject to S106 which is currently being negotiated. Both developments to be built out simultaneously to a total of 140 per annum as per email from developer.	35	140	105	70	70	70	70	20								420	580
Land South Of Moonhill Copse West Clyst Exeter	15/1240/MRES	Broadclyst	Pinhoe	Site immediately to North of Pinn Court Farm allocation site now with reserved matters permission. Commenced June 2016. Assume completion from 2016/17 in line with SHLAA methodology.	12	23														35	35
Pinn Court Farm Pinncourt Lane Exeter EX1 3TG	12/0795/MOUT	Broadclyst	Pinhoe	Appeal allowed June 2015. Reserved matters for phase 1 currently being considered. Phasing schedule received June 2015 suggests phase 1 (150 dwellings) to start March 2016 and built out over three years with phase 2 (150 dwellings) starting in June 2019 and phase 3 (130 dwellings) starting in June 2022 but application still not determined so conservatively push all dates back by 1 year. Assume SHLAA compliant 12 dwellings for year 1 then remaining 138 to be delivered over the following 27 months to June 2020 = 5.11 per month = 61.33 per annum so assume 61 maximum build out per year. Future years (beyond June 2020) build	0	12	61	61	66	50	50	50	50	50	40					200	490

Site	Permission	Parish	Settlement (at which the development occurs whether within BuAB or not)	Commentary on Site	2016 - 17	2017 - 18	2018 - 19	2019 - 20	2020 - 21	2021 - 22	2022 - 23	2023 - 24	2024 - 25	2025 - 26	2026 - 27	2027 - 28	2028 - 29	2029 - 30	2030 - 31	Five Year Supply – April 16 – March 21	Overall Projections
				out reduced to 50 per annum in line with submitted phasing schedule. 2x 60 bed care homes (equivalent to 60 dwellings total) in addition to the 430 dwellings = total of 490 dwellings.																	
Old Park Farm Two West Clyst Exeter	13/0001/MOUT	Broadclyst	Pinhoe	Phase 2 of Old Park Farm for 350 dwellings. Reserved matters (15/2902/MRES) approved May 2016 (after monitor). Site due to be developed out by Redrow rather than David Wilson Homes. Agreement in place for them to be able to access their site ahead of completion of phase 1. Submitted phasing plan shows start on site summer 2016 with first 3 phases (165 dwellings) completed by December 2019 and all dwellings completed by December 2021. This assumes a slightly slower build out than phase 1. Commenced June 2016.	12	50	75	75	75	63										287	350
Site Of New Town Honiton Road Rockbeare Exeter Devon	03/P1900 AND 11/0053/MRES AND 13/1752/MFUL	Cranbrook	Cranbrook	New Community being developed by East Devon New Community Partners (EDNCPs) consortium of developers. Latest build returns shows 1,261 completions by the end of March 2016 so 126 completions since last monitored position. Updating further, there have been 1,325 completions to the end of June 2016. Local Plan Inspector suggested 400 projections per annum a reasonable figure to use for EDNCP sites, however currently experiencing lower build rate due to Persimmon running out of plots on sites with reserved matters approval. It is expected for this issue to be resolved, however, projected a slowly recovering build rate to 400 per annum in 2019/20. Beyond the five year period delivery rate assumed to increase to 475 per annum on EDNCP sites in order to deliver the full Local Plan allocation within the plan period.	200	275	350	400	400	475	156									1625	2256
Land Rear Of The Jack In The Green London Road Rockbeare	14/0300/MFUL	Cranbrook	Cranbrook	Windfall site immediately adjacent to main Cranbrook development. Commenced March 2015. Developer expects site to be completed by January 2017.	19															19	19
				WEST END TOTAL	378	548	591	606	611	658	276	70	50	50	40	0	0	0	0	2,734	3,878
							2,734				1,104				40						

3.7 The tables above show that for the next five years, 1,454 dwellings are projected to be built on large sites with extant planning permissions in the rest of East Devon and 2,734 dwellings on large sites with extant planning permissions at the West End.

3.8 Small sites are shown as a combined total in the table below which shows they are projected to complete a total of 629 net new dwellings over the five year period. There are 479 small sites with extant planning permission (all within the rest of East Devon) expected to deliver between 0 and 9 gross units. 373 of these sites are expected to deliver the 629 net new dwellings in the next five years. 101 of the remaining 106 sites are considered to be currently stalled or otherwise not expected to deliver within the five year period and so these sites have been projected to deliver beyond the five year period (hence the 41 completions projected in 2021-22). The remaining 5 sites are understood to no longer be going ahead and so are not projected to be delivered – these are contained in Appendix 2 for information. All other small sites with planning permission can be found within the table of all completions and projections at Appendix 1. It is important to note that whilst these smaller sites are projected to deliver in specific years based on their status (under construction, not yet implemented or awaiting reserved matters etc), it is in fact perhaps more appropriate to consider them as being deliverable within the five year period as a whole. For instance, a site that is under construction is generally projected to be completed within the next twelve months, however, in reality some sites take longer and may be delivered in the following year or even the one after that but critically they can reasonably be expected to deliver in the five year period. An implication is that future projected year on year predictions can show variation compared against actual delivery that will be recorded with a bias to higher first year development. But over the longer term, 5 years, peaks and troughs even out and so it is the five year total projection that is the relevant and critical consideration.

	2016 - 17	2017 - 18	2018 - 19	2019 - 20	2020 - 21	2021 - 22	2022 - 23	2023 - 24	2024 - 25	2025 - 26	2026 - 27	2027 - 28	2028 - 29	2029 - 30	2030 - 31	Five Year Supply – April 16 – March 21	Total outstanding
All small sites with planning permission (all RoED)	259	281	89	0	0	41	0	0	0	0	0	0	0	0	0	629	670

3.9 The combined totals of large and small sites with planning permission are shown in the table below.

	2016 - 17	2017 - 18	2018 - 19	2019 - 20	2020 - 21	2021 - 22	2022 - 23	2023 - 24	2024 - 25	2025 - 26	2026 - 27	2027 - 28	2028 - 29	2029 - 30	2030 - 31	Five Year Supply – April 16 – March 21	Total outstanding
Total Rest of East Devon	567	650	519	239	109	272	149	100	112	50	0	0	0	0	0	2,084	2,767
Total West End	378	548	591	606	611	658	276	70	50	50	40	0	0	0	0	2,734	3,878
Combined Total	945	1,198	1,110	845	720	930	425	170	162	100	40	0	0	0	0	4,818	6,645

3.10 The table above shows that 2,084 dwellings with permission in the rest of East Devon and 2,734 dwellings with permission at the West End are projected to be built out within the next five years.

Sites with acknowledged development potential

3.11 Sites with acknowledged development potential are sites that did not have planning permission at 31 March 2016, however, they are expected to gain permission in the future. These are mainly sites that at 31 March had been to Development Management Committee and gained a resolution to grant permission subject to signing a Section 106 Agreement, however there are also sites that are known to be available for development and which are considered to be in principle policy compliant.

3.12 The table below lists the sites with acknowledged development potential in the rest of East Devon and their projected build out rates.

Site	Planning application number (if applicable)	Parish	Settlement (at which the development occurs whether within BuAB or not)	Commentary on Site	2016 - 17	2017 - 18	2018 - 19	2019 - 20	2020 - 21	2021 - 22	2022 - 23	2023 - 24	2024 - 25	2025 - 26	2026 - 27	2027 - 28	2028 - 29	2029 - 30	2030 - 31	Five Year Supply – April 16 – March 21	Overall Projections
Webster Garage Site, Axminster	No applications	Axminster	Axminster	This site is identified as having development potential, was allocated in the old Local Plan and is fully policy compliant. The 25 dwelling figure is a lower end estimate and whilst development may happen in the five year period the site is conservatively projected to come forward outside of this time period.	0	0	0	0	0	12	13									0	25
Land adjacent The Fountain Head, Branscombe	10/0921/MFUL	Branscombe	Street	Application (10/0921/MFUL) Delegated recommendation to approve made in May 2011 and awaiting S106 agreement. Unlikely to get S106 signed on this scheme as finances no longer available for affordables. New application (15/1291/MOUT) currently pending consideration for lower number of affordables. Assume development will happen but outside five year period.	0	0	0	0	0	10										0	10
Land Adjoining Withycombe Brook St Johns Road Exmouth	12/1016/MFUL	Exmouth	Exmouth	This scheme was previously approved by DM Committee awaiting S106 agreement. Amendments to application means it is currently being reconsidered. Assume completion from 2018/19 in line with SHLAA methodology.	0	0	12	25	15											52	52
Land Adjoining 2 Byron Way Exmouth EX8 5SA	15/2463/FUL	Exmouth	Exmouth	Site approved subject to S106 by DM Committee in Feb 2016. S106 signed and approval granted in June 2016. Site commenced in June 2016. Assume completion will be in 2016/17.	1															0	150
Land South Of Ashcroft Bassetts Gardens	15/1490/OUT	Exmouth	Exmouth	Site approved subject to S106 by DM Committee in March 2016. S106 signed and approval granted	0	0	1													7	7

Site	Planning application number (if applicable)	Parish	Settlement (at which the development occurs whether within BuAB or not)	Commentary on Site	2016 - 17	2017 - 18	2018 - 19	2019 - 20	2020 - 21	2021 - 22	2022 - 23	2023 - 24	2024 - 25	2025 - 26	2026 - 27	2027 - 28	2028 - 29	2029 - 30	2030 - 31	Five Year Supply – April 16 – March 21	Overall Projections
Exmouth				in April 2016. No reserved matters application as yet. Assume completion will be in 2018/19.																	
Land Adjacent To Buckingham Close (Plumb Park) Buckingham Close Exmouth	16/1022/MOUT	Exmouth	Exmouth	Previous allocation for 350 homes at Plumb Park, Exmouth. Previously had permission (13/0297/MOU) but this expired 1 April 2016 (after monitor). New hybrid application (16/1022/MOUT) pending consideration for 350 dwellings (264 for full permission, 86 for outline). Site was only removed from the Local Plan as an allocation because it had permission. Assume completions will be from 2018/19 in line with SHLAA methodology	0	0	12	25	25	25	50	50	50	50	50	13				6	6
Exebank And Danby House Mudbank Lane Exmouth EX8 3EG	16/1978/MFUL	Exmouth	Exmouth	Application site within the Built-up Area Boundary with acknowledged development potential and currently pending consideration for 36 new dwellings (50% affordable) replacing derelict care homes that had not been in use for a number of years.	0	0	12	24												1	1
Land Adjacent Woodside Farringdon Devon	15/2756/FUL	Farringdon	Rural areas	Site approved subject to S106 by DM Committee in March 2016. S106 signed and approval granted in April 2016. Assume completion will be in 2017/18.	0	1														1	1
Land At Ottery Moor Lane Honiton	14/0557/MOUT	Honiton	Honiton	Site allocated in the New Local Plan. Planning application (14/0557/MOUT) resolved to grant permission subject to S106 Agreement June 2015. Subject to gaining outline and subsequent reserved matters approval development might be expected to commence in 2018/19, however, possible issues with restrictive covenant means conservatively projected to deliver outside the 5 year supply at SHLAA methodology compliant rates.	0	0	0	0	0	12	50	50	38							1	1
Land At Pit Orchard Bim Bom Lane Kilmington	15/1746/OUT	Kilmington	Kilmington	Site approved subject to S106 by DM Committee in November 2015. S106 signed and approval granted in April 2016. Reserved matters (16/1586/RES) pending consideration. Assume completion will be in 2018/19	0	0	6													4	4
Land Adjacent Regis House (formerly	14/2801/FUL	Uplyme	Uplyme	Site approved subject to S106 by DM Committee in April 2015.	0	7														62	350

Site	Planning application number (if applicable)	Parish	Settlement (at which the development occurs whether within BuAB or not)	Commentary on Site	2016 - 17	2017 - 18	2018 - 19	2019 - 20	2020 - 21	2021 - 22	2022 - 23	2023 - 24	2024 - 25	2025 - 26	2026 - 27	2027 - 28	2028 - 29	2029 - 30	2030 - 31	Five Year Supply – April 16 – March 21	Overall Projections
Lydwel House) Lyme Road Uplyme				Assumed completion will be in 2017/18.																	
Land West Of Herons Brook (Wadley Hill) Venlake Uplyme Lyme Regis Devon DT7 3SG	15/1994/OUT	Uplyme	Uplyme	Site approved subject to S106 by DM Committee in December 2015. S106 signed and approval granted in May 2016. No reserved matters application as yet. Assume completion will be in 2018/19.	0	0	4													36	36
REST OF EAST DEVON TOTAL					1	8	47	74	40	59	113	100	88	50	50	13	0	0	0	170	643
					170			410			63										

3.13 The table below lists the sites with acknowledged development potential at the West End and their projected build out rates.

Site	Planning application number (if applicable)	Parish	Settlement (at which the development occurs whether within BuAB or not)	Commentary on Site	2016 - 17	2017 - 18	2018 - 19	2019 - 20	2020 - 21	2021 - 22	2022 - 23	2023 - 24	2024 - 25	2025 - 26	2026 - 27	2027 - 28	2028 - 29	2029 - 30	2030 - 31	Five Year Supply – April 16 – March 21	Overall Projections	
Mosshayne Land North Of Tithebarn Lane Clyst Honiton	14/2761/MOUT	Broadclyst	North of Blackhorse	Allocation site on further land North of Blackhorse and to the East of Tithebarn Green. Planning application (14/2761/MOUT) resolved to approve subject to S106 Agreement. Developer intention is to build out simultaneous to Tithebarn Green to a total of 140 per annum. Once Tithebarn Green complete (2023/24) assumed Mosshayne build out rate increases in response.	0	0	35	70	70	70	70	120	140	140	140	45					175	900
Site Of Cranbrook New Community Road Past Till House Farm London Road Broadclyst	No applications	Cranbrook	Cranbrook	Care/extra care home in Cranbrook town centre identified by S106. 50 beds @ 2 bed = 1 dwelling equivalent = 25 dwelling equivalent. Assume completion in 2020/21 and 2021/22 in line with SHLAA methodology.	0	0	0	0	12	13										12	25	
WEST END TOTAL					0	0	35	70	82	83	70	120	140	140	140	45	0	0	0	187	925	
					187			553			185											

3.14 The combined totals of sites with acknowledged development potential at the West End and in the rest of East Devon are shown below.

	2016 - 17	2017 - 18	2018 - 19	2019 - 20	2020 - 21	2021 - 22	2022 - 23	2023 - 24	2024 - 25	2025 - 26	2026 - 27	2027 - 28	2028 - 29	2029 - 30	2030 - 31	Five Year Supply – April 16 – March 21	Total outstanding
Total Rest of East Devon	1	8	47	74	40	59	113	100	88	50	50	13	0	0	0	170	643
Total West End	0	0	35	70	82	83	70	120	140	140	140	45	0	0	0	187	925
Combined Total	1	8	82	144	122	142	183	220	228	190	190	58	0	0	0	357	1,568

3.15 Of the above sites it can be seen that 170 dwellings in the rest of East Devon and 187 dwellings at the West End are projected to be built out within the next five years.

Allocations

3.16 The table below shows the allocations in the rest of East Devon which have not yet gained planning permission or a resolution to grant permission.

Site	Planning application number (if applicable)	Parish	Settlement (at which the development occurs whether within BuAB or not)	Commentary on Site	2016 - 17	2017 - 18	2018 - 19	2019 - 20	2020 - 21	2021 - 22	2022 - 23	2023 - 24	2024 - 25	2025 - 26	2026 - 27	2027 - 28	2028 - 29	2029 - 30	2030 - 31	Five Year Supply – April 16 – March 21	Overall Projections
Land North and East Of Axminster	No applications	Axminster	Axminster	Planning applications (15/0435/MOUT, 15/0436/MOUT and 15/0442/MOUT) pending refused January 2016. Now working in pre-application discussions with all relevant interests on a comprehensive masterplan. Assumed completions from 2019/20 onwards in line with SHLAA methodology.	0	0	0	12	25	100	100	100	100	100	100	13				37	650
Winslade Park	No applications	Clyst St Mary	Clyst St Mary	Brownfield site allocated in the Local Plan. Applications refused May 2016 and understood that new application expected soon. Assume completion will be from 2019/20 onwards in line with the SHLAA methodology.	0	0	0	12	25	50	50	13								37	150
Goodmores Farm, Exmouth	14/0330/MOUT	Exmouth & Lypstone	Exmouth	Site allocated in Local Plan. An application is currently being considered having been submitted in February 2014. Subject to gaining outline and subsequent reserved matters approval development might be expected to commence in 2018/19 in line with SHLAA methodology.	0	0	12	25	25	50	50	50	50	50	38					62	350
Lypstone Nurseries	No applications	Lypstone	Lypstone	Allocated by the Lypstone Neighbourhood Plan. Assume completion will be in the latter part of the five year period.	0	0	0	0	6											6	6
The Knowle, Station Road, Sidmouth, EX10 8HL	16/0872/MFUL	Sidmouth	Sidmouth	Local Plan allocates 50 dwellings at The Knowle. Pegasus Life have agreed to buy the site and latest plans suggest a total of 118 retirement apartments rather than houses for the site. Conservatively assume that just 50 dwellings will be delivered. The Council has publicly stated its intention to relocate from The Knowle with relocation to be finalised in early 2018. Assumed first completions on this site to be in 2019/20.	0	0	0	12	25	13										37	50
Manstone Depot, Sidmouth	No applications	Sidmouth	Sidmouth	Site allocated in Local Plan and no applications as yet. Assume	0	0	0	0	0	12	8									0	20

Site	Planning application number (if applicable)	Parish	Settlement (at which the development occurs whether within BuAB or not)	Commentary on Site	2016 - 17	2017 - 18	2018 - 19	2019 - 20	2020 - 21	2021 - 22	2022 - 23	2023 - 24	2024 - 25	2025 - 26	2026 - 27	2027 - 28	2028 - 29	2029 - 30	2030 - 31	Five Year Supply – April 16 – March 21	Overall Projections
				completion beyond the five year period.																	
Port Royal, Sidmouth	No applications	Sidmouth	Sidmouth	Site allocated in Local Plan and no applications as yet. Assume completion will occur from the latter part of the five year period in line with SHLAA methodology.	0	0	0	12	18											30	30
				REST OF EAST DEVON TOTAL	0	0	12	73	124	225	208	163	150	150	138	13	0	0	0	209	1,256
							209				896					151					

3.17 The table below shows the allocations at the West End that have not yet gained planning permission or a resolution to grant permission and their projected build out rate.

Site	Planning application number (if applicable)	Parish	Settlement (at which the development occurs whether within BuAB or not)	Commentary on Site	2016 - 17	2017 - 18	2018 - 19	2019 - 20	2020 - 21	2021 - 22	2022 - 23	2023 - 24	2024 - 25	2025 - 26	2026 - 27	2027 - 28	2028 - 29	2029 - 30	2030 - 31	Five Year Supply – April 16 – March 21	Overall Projections
Cranbrook Expansion Areas (East, West and additional areas to be defined through the Cranbrook Plan DPD)	14/2945/MOUT AND 15/0045/MOUT 15/0046/MOUT 15/0047/MOUT	Cranbrook	Cranbrook	This provision will form part of the longer term development at Cranbrook comprising of allocated East and West expansion areas (totalling 2,820 including 250 on Farlands site by separate developer) plus 1550 on additional land to be defined through the Cranbrook Plan DPD. Farlands site is a separate developer and anticipated to come forward earlier than other parts of expansion areas with first completions in 2019/20. Remainder of expansion areas assumed to be delivered by the EDNCPs following completion of extant permissions in 2022/23 at a rate of 475 per annum (beyond the five year period). Delivery in years 2022/23-2024/25 includes both EDNCP and Farlands sites. Inspector suggested 400 projections per annum a reasonable figure to use for	0	0	0	12	50	50	369	525	513	475	475	475	475	475	476	62	4,370

Site	Planning application number (if applicable)	Parish	Settlement (at which the development occurs whether within BuAB or not)	Commentary on Site	2016 - 17	2017 - 18	2018 - 19	2019 - 20	2020 - 21	2021 - 22	2022 - 23	2023 - 24	2024 - 25	2025 - 26	2026 - 27	2027 - 28	2028 - 29	2029 - 30	2030 - 31	Five Year Supply – April 16 – March 21	Overall Projections
				EDNCP sites, however, beyond the five year period it is assumed that this will increase in order to deliver Local Plan allocations within the plan period.																	
				WEST END TOTAL	0	0	0	12	50	50	369	525	513	475	475	475	475	475	476	62	4,370
					62					1,932					2,376						

3.18 The combined projected build out rates for the remaining allocations are shown in the table below.

	2016 - 17	2017 - 18	2018 - 19	2019 - 20	2020 - 21	2021 - 22	2022 - 23	2023 - 24	2024 - 25	2025 - 26	2026 - 27	2027 - 28	2028 - 29	2029 - 30	2030 - 31	Five Year Supply – April 16 – March 21	Total outstanding
Total Rest of East Devon	0	0	12	73	124	225	208	163	150	150	138	13	0	0	0	209	1,256
Total West End	0	0	0	12	50	50	369	525	513	475	475	475	475	475	476	62	4,370
Combined Total	0	0	12	85	174	275	577	688	663	625	613	488	475	475	476	271	5,626

3.19 The above assessment shows that of the allocations sites 209 dwellings in the rest of East Devon and 62 dwellings at the West End are projected to be built out in the next five years.

Windfalls

3.20 Paragraph 48 of the NPPF allows for future windfall completions to be taken into account so long as historic windfall delivery is considered and sites on gardens are not counted. This being the case, the assessment below shows net windfall completions (excluding gardens) over the last five years (1 April 2011 to 31 March 2016) – which is the period which the Council have the most accurate information on. Net completed windfall dwellings are split into the gross capacity of the site on which they came forward in order to be able to analyse the types of windfalls that might come through in the future.

Gross site capacity	Net windfall dwellings completed district-wide (excluding garden sites)					
	2011 to 2012	2012 to 2013	2013 to 2014	2014 to 2015	2015 to 2016	Average per year
1 - 2 dwellings	32	41	45	37	70	45
3 - 5 dwellings	14	27	23	21	53	28
6 - 9 dwellings	22	12	11	16	37	20
10 - 20 dwellings	54	47	74	58	50	57
21 + dwellings	52	68	92	286	146	129
TOTAL	174	195	245	418	356	278
Total on gross sites of 20 or less dwellings	122	127	153	132	210	149

3.21 Taking the combined total windfalls and dividing by the number of years they were delivered in (5 years) gives an average number of dwellings completed on each size of site per annum.

3.22 If past trends were reproduced in the future with regards to windfall completions then it would be prudent to assume that 278 windfalls could be built each year in the future. However, the new Local Plan was adopted in January 2016 and as such the larger greenfield windfall sites which have significantly pushed up the average totals in recent years are likely to now be treated as a departure from the plan and are less likely to be granted planning permission. Taking a very conservative/cautious approach it is assumed that the only windfalls will be infill, redevelopment and conversion sites. This being the case it is assumed that average total windfall completions of the last four years on sites of 20 dwellings and under might be delivered in the future. This equates to an average of 149 dwellings per year.

3.23 In recent years and in support of the new Local Plan at Examination, a figure of 130 dwellings per year was used for projected future windfalls. The Local Plan Inspector was satisfied that this was a suitable projection for future windfalls. However, the above assessment is considered to be robust local evidence that that figure may well be exceeded and as such 149 windfall completions per annum is used as the base windfall assumption for the projections below. Of course this is still a conservative estimate and in reality larger windfall sites will on occasion come forward for development as will garden sites.

3.24 Whilst previously the Council has made a fairly arbitrary assumption that there would be no additional projected windfall completions in years one and two and then year three projections would be moderated to account for windfalls that are already in the system, a more considered approach is taken here. The table below shows the annual projections for sites with planning permission and sites with acknowledged development potential which are on windfall sites (i.e. not allocated in the current or

previously adopted or draft Local Plans or the Lympstone Neighbourhood Plan). Where the combined annual projection exceeds the base windfall projection of 149, it is therefore assumed that there will be no additional windfall projections for that year and the windfall projection is 0. Where the combined annual projection is below 149 then the base windfall projection is moderated accordingly so that a total of 149 windfall completions are projected. The table below shows that 293 windfall completions are projected to occur within the next five years.

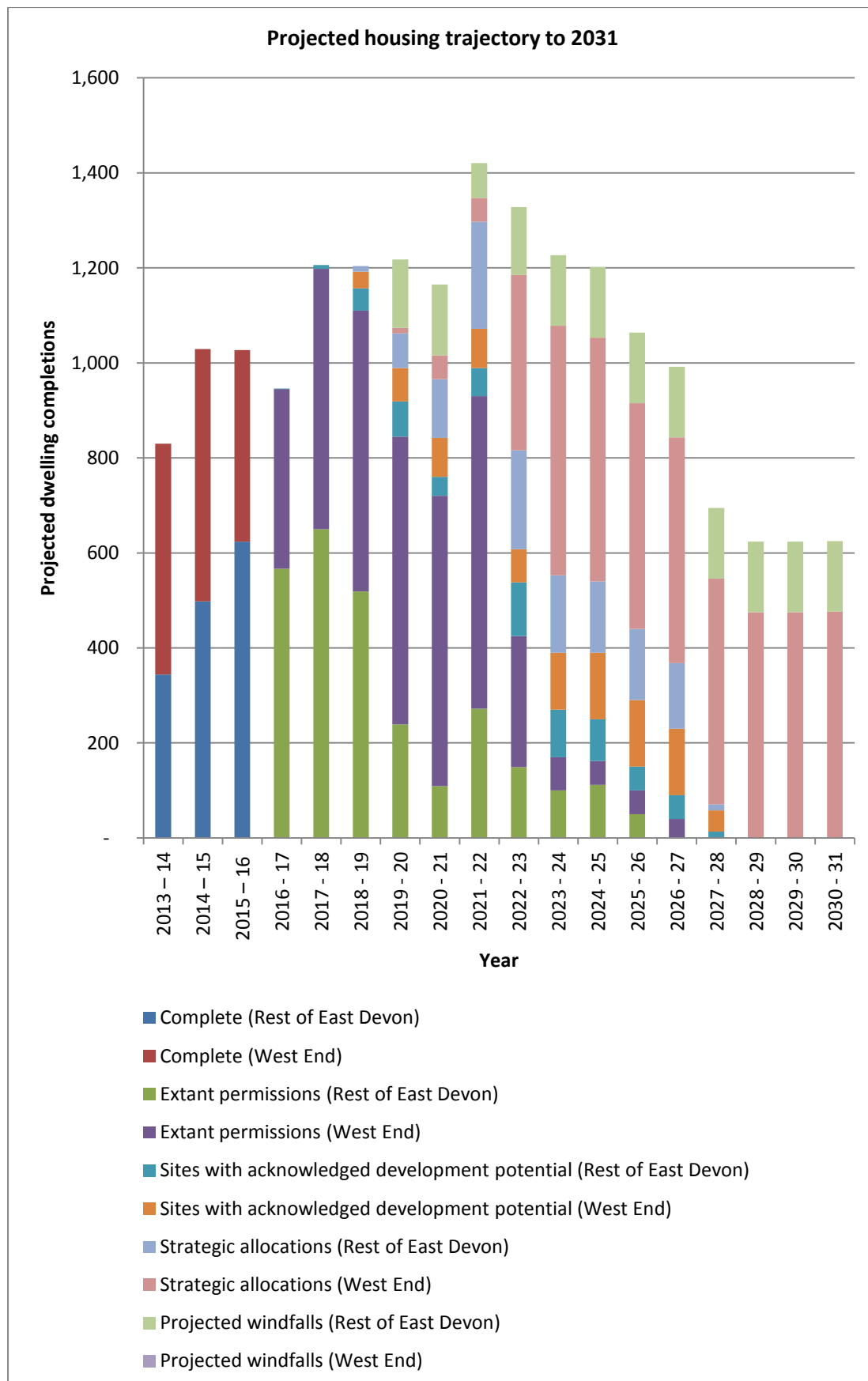
All Windfalls	2016 - 17	2017 - 18	2018 - 19	2019 - 20	2020 - 21	2021 - 22	2022 - 23	2023 - 24	2024 - 25	2025 - 26	2026 - 27	2027 - 28	2028 - 29	2029 - 30	2030 - 31	Total supply 2013-2031	Five Year Supply - Oct 15 to Sept 20
Projected completions on windfall sites with permission (excluding sites of 21 or more dwellings and garden sites)	367	373	138	4	0	57	6	0	0	0	0	0	0	0	0		
Projected completions on windfall sites with acknowledged development potential (excluding sites of 21 or more dwellings and garden sites)	1	8	11	0	0	10	0	0	0	0	0	0	0	0	0		
Combined annual projection (excluding sites of 21 or more dwellings and garden sites)	368	381	149	4	0	67	6	0	0	0	0	0	0	0	0		
Base windfall projection	149	149	149	149	149	149	149	149	149	149	149	149	149	149	149	2,232	744
WINDFALL PROJECTIONS	0	0	0	145	149	82	143	149	149	149	149	149	149	149	149	1,709	293

Overall projections and trajectory

3.25 Having gone through the various elements of supply above, the below table and graph set out the projected development for the plan period to 31 March 2031.

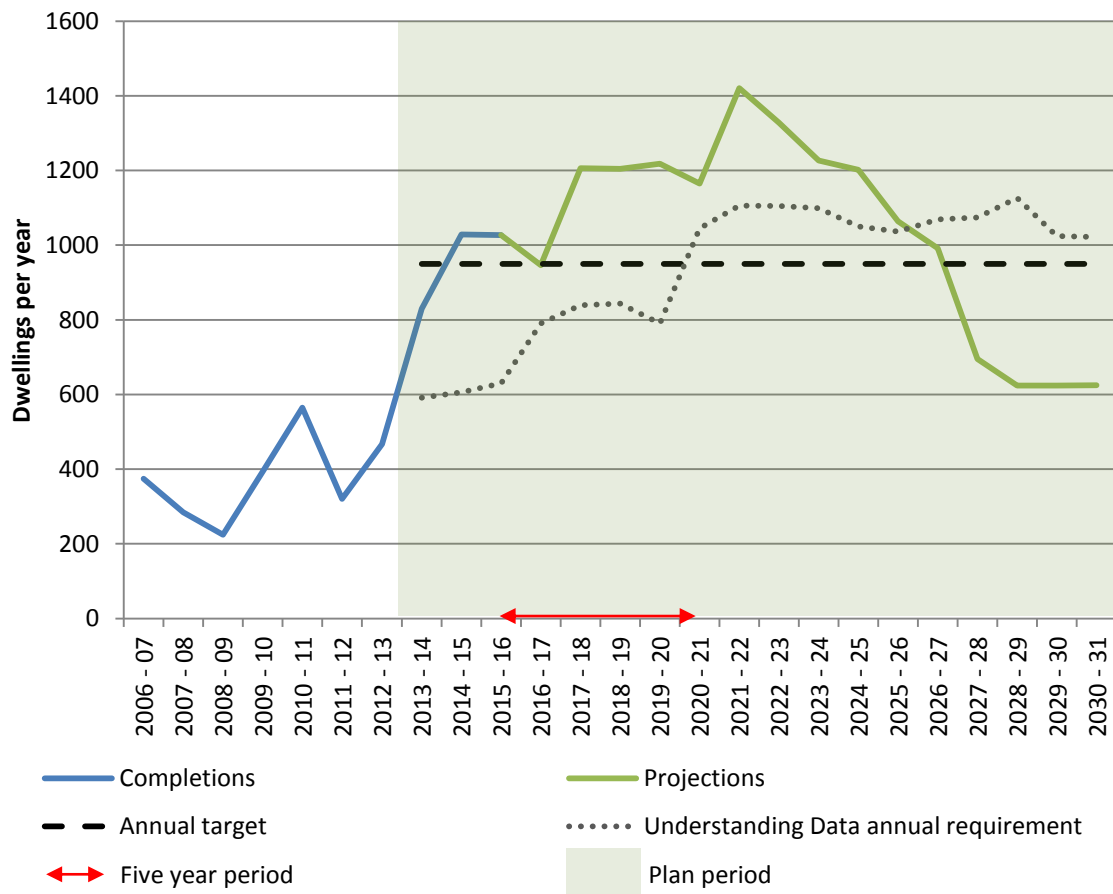
	2013 – 14	2014 – 15	2015 – 16	2016 - 17	2017 - 18	2018 - 19	2019 - 20	2020 - 21	2021 - 22	2022 - 23	2023 - 24	2024 - 25	2025 - 26	2026 - 27	2027 - 28	2028 - 29	2029 - 30	2030 - 31	TOTAL
Complete (Rest of East Devon)	344	498	624	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,466
Complete (West End)	486	531	403	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,420
Extant permissions (Rest of East Devon)	-	-	-	567	650	519	239	109	272	149	100	112	50	-	-	-	-	-	2,767
Extant permissions (West End)	-	-	-	378	548	591	606	611	658	276	70	50	50	40	-	-	-	-	3,878
Sites with acknowledged development potential (Rest of East Devon)	-	-	-	1	8	47	74	40	59	113	100	88	50	50	13	-	-	-	643
Sites with acknowledged development potential (West End)	-	-	-	-	-	35	70	82	83	70	120	140	140	140	45	-	-	-	925
Strategic allocations (Rest of East Devon)	-	-	-	-	-	12	73	124	225	208	163	150	150	138	13	-	-	-	1,256
Strategic allocations (West End)	-	-	-	-	-	-	12	50	50	369	525	513	475	475	475	475	475	476	4,370
Projected windfalls (Rest of East Devon)	-	-	-	-	-	-	144	149	74	143	149	149	149	149	149	149	149	149	1,700
Projected windfalls (West End)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0
Total (Rest of East Devon)	344	498	624	568	658	578	530	422	630	613	512	499	399	337	175	149	149	149	7,832
Total (West End)	486	531	403	378	548	626	688	743	791	715	715	703	665	655	520	475	475	476	10,593
TOTALS	830	1,029	1,027	946	1,206	1,204	1,218	1,165	1,421	1,328	1,227	1,202	1,064	992	695	624	624	625	18,425

3.26 The graph below shows the breakdown of different sites making up the housing trajectory projected to 2031.



- 3.27 It should be noted that projected completions are based on an assessment of available sites and a SHLAA panel/developer assessment of what can and is available to build on. Whether house builders choose to build at these levels will be informed by market demand and commercial attractiveness to build.
- 3.28 Whilst both the above and below graphs show a flattening out or slight reduction in completions for 2016/17 and projections for 2017/18 is purely a result of the application of the methodology and calculations. In reality completions will not follow this projection line exactly, some sites projected to be completed next year may be completed in 4 years time, and conversely some projected to be built out in 4 years time may be completed next year. The key point is that over the five year period if completions were annualised (averaged out over the period), the projected completions would be significantly above the 950 per annum target set by the Local Plan.
- 3.29 In addition to this, the graph below shows the annual requirement as set out by the Understanding Data report¹ which identifies that annual dwelling requirements over the plan period are not evenly distributed but instead gradually increase over time. Annual projected completions clearly far exceed this secondary annual requirement right up until 2026-27 from which point onwards they drop down significantly. This is evidence of the fact that housing is being brought forward from later in the plan period as required by paragraph 47 of the NPPF.

Projected annual completion trajectory



¹ Demographic advice for East Devon Council (August 2015), Understanding Data, available at: <http://eastdevon.gov.uk/media/1287188/psd2015u-demograpicsunderstandingdataaug2015.pdf>

3.30 Looking back at previous completions and projected completions it is possible to see the significant increase in annual figures especially in the first ten years of the new plan period (2013 – 2023). The graph above shows that East Devon is providing the “step change” in housing delivery required by the Government.

4. Five Year Land Supply Calculations

- 4.1 Paragraph 47 of the NPPF requires Councils to *“identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land”*.
- 4.2 The point of demonstrating a five year land supply is to ensure that there is enough housing coming forward to meet requirements. On top of this, the current Government is seeking to increase housing delivery in the immediate future by requiring Councils to demonstrate a minimum of 5% extra provision but in places where delivery has been persistently below requirements 20% extra. There is no Government guidance on how or when to apply which percentage buffer or what constitutes “persistent under delivery”, which is left to local authorities to determine. The Council has in recent years applied the 20% buffer as a conservative approach, recognising that there was under delivery in the years prior to the current plan period. However, it is now reasonable for the Council to say that it is clearly delivering at around or above requirements and that the trajectory projects it to continue doing so for the next ten years and so the 5% buffer should apply.
- 4.3 Above sections of this report outline how the build out rates, approach to calculating windfalls and detailed site assessments mean that generally the projected housing supply calculations err on the conservative side.
- 4.4 The NPPF explains that to be considered deliverable in the context of the requirement to demonstrate a five year land supply, *“sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans”*.
- 4.5 Now that the new Local Plan has been adopted the Council is able to rely on all deliverable sites for its five year land supply calculations. Prior to adoption it was accepted that until adoption of the new Local Plan potentially deliverable strategic allocations in the Local Plan that had not yet gained planning permission or a resolution to grant permission could not be relied upon. That is no longer the case as the Inspector has found the plan and the allocations within it to be sound.
- 4.6 The adopted new Local Plan has a housing requirement of 17,100 new homes for the 2013 -2031 plan period, equivalent to an average of 950 dwellings per annum.

Five Year Land Supply calculation

	Item	Calculation	ROED	West End	Combined
A	Requirement (from Strategy 2 of the adopted Local Plan)		6,537	10,563	17,100
B	Annual requirement (basic)	A/18	363	587	950
C	5 Year requirement (basic)	Bx5	1,816	2,934	4,750
D	Requirement to have been delivered by 31 March 2016	Bx3	1,090	1,761	2,850
E	Completions 1 April 2013 - 31 March 2016		1,466	1,420	2,886
F	Shortfall/Surplus	D-E	- 377	341	- 36
G	5 Year requirement (excluding buffer)	C+F	1,439	3,275	4,714
H	5 Year Target (including 5% buffer)	Gx1.05	1,511	3,438	4,950

I	Annual Target (assuming 5% buffer)	H/5	302	688	990
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	Supply element at 31 March 2016 expected to deliver 1 April 2016 - 31 March 2021				
J	Extant permissions (including under construction)		2,084	2,734	4,818
K	Sites with resolution to grant permission or acknowledged development potential		170	187	357
L	Strategic allocations		209	62	271
M	Future windfalls		293	-	293
N	Total deliverable supply	J+K+L+M	2,756	2,983	5,739

O	Surplus/Deficit (assuming 5% buffer)	H-N	-1,244	455	- 789
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P	Years of land supply (assuming 5% buffer)	N/I	9.12	4.34	5.80
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- 4.7 Row P in the above assessment shows that taking account of all deliverable sites across the district as a whole, the Council is able to demonstrate **5.80 years** of land supply.
- 4.8 According to the above calculation, there is a surplus (number of dwellings above the required supply for the next five years) of 789 dwellings (row O) which is a significant buffer (in addition to the required 5% buffer) capable of allowing for non-implementation or reduced build out rates of a number of sites. This averages out at 158 dwellings per year surplus over the five year period.
- 4.9 The calculation also demonstrates the impact that West End sites have on the five year supply. Clearly, due to the scale of development at the West End, a slightly lower than 5 year supply in the West End has a big impact on the overall combined 5 year land supply for the district as a whole.

Report to: **Strategic Planning Committee**

Date of Meeting: 21/11/2016

Public Document: Yes

Exemption: None

Review date for release None



Agenda item: 8

Subject: **Draft Exmouth Sports Pitch Strategy**

Purpose of report: To update Members on progress with the Exmouth Sports Pitch Strategy, highlight the additional work that is required before a revised draft strategy can be produced and to ensure Members recognise the staff and resource implications for future delivery.

Recommendation:

- 1. Note the work to date on developing the strategy including the summary of comments received as detailed in the Consultation Statement;**
- 2. Note the requirement for significant further work on options before a revised draft strategy can be presented to Members for endorsement and published for consultation;**
- 3. Recognise the staff and resource implications for the Council in the future delivery of the strategy as a whole and specific projects; and**
- 4. Agree to a supplementary budget of £25,000 to further assess options and enable the drafting of a revised draft strategy in due course.**

Reason for recommendation: To ensure Members are fully appraised of work to date, public support and objection to plans and to ensure the revised draft strategy is produced with a thorough understanding of the issues that need addressing. To ensure Members understand the implications of delivering the strategy as a whole and in relation to specific projects in terms of staffing and resources and can start thinking about how these may be addressed.

Officer: Graeme Thompson, Planning Policy Officer, gthompson@eastdevon.gov.uk, 01395 571736

Financial implications: The sports pitch strategy has been progressed so far using existing staff resources and a supplementary estimate of £20,000 which was approved by Cabinet on 17/06/15 to engage consultants. This report requests a further supplementary estimate of £25,000 to assess the options and draft a revised strategy which will need to be met from the General Fund balance.

Legal implications: There are no direct legal implications arising from the report

Equalities impact: Low Impact

An Equalities Impact Assessment (EqIA) Screening Report accompanies the report and determines there is no need to conduct a full EqIA.

Risk: Low Risk

The strategy sets out recommendations for how the action plans for Exmouth of the adopted Playing Pitch Strategy (PPS) can be implemented. It does not obligate the Council to fund or deliver any of the projects included within it; rather it sets out the Council's preferred approach to sports pitch delivery in Honiton. Without an identified and ultimately (following revisions, further consultation and any further relevant amendments) adopted approach to this the sports pitch needs of Exmouth may not be delivered or may be delivered piecemeal and clubs may find it difficult to access grant funding.

Further work is required before a revised draft strategy can be produced for Exmouth. If the Council were to adopt the draft strategy in its current form then it would not adequately address all issues thoroughly or properly and may lead to an undeliverable strategy. Additional budget is required to do this.

Links to background information:

- [Draft Exmouth Sports Pitch Strategy](#)
- [Draft Exmouth Sports Strategy equality impact assessment](#)
- [Draft Exmouth Sports Strategy consultation statement](#)
- Appendices [1](#), [2](#), [2a](#), [2b](#), [3](#), [4](#), [5](#), [5\(E1\)](#), [5\(E4\)](#), [5\(E7\)](#), [5\(E9+E16\)](#), [5\(E11\)](#), [5\(E12\)](#), [5\(E19\)](#), [5\(EC\)](#), [5\(ED1\)](#), [5\(ED2\)](#), [5\(EG\)](#), [6](#) and [7](#).
- [EqIA Screening Report](#)
- [Consultation Statement](#)
- [East Devon Playing Pitch Strategy 2015](#)
- [Cabinet Report February 2016](#)
- [Cabinet Report June 2015](#)

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

1. Update on work to date

- 1.1 An Exmouth Sports Pitch Strategy is being developed as a means to deliver the pitch requirements set out in the district-wide Playing Pitch Strategy (PPS) which was adopted in June 2015. The strategy seeks to address the action plans identified by the PPS in response to the issues facing pitch supply in Exmouth currently and up to 2024.
- 1.2 In February 2016, Cabinet considered a report outlining work that had taken place so far on the identification of potential sites for the delivery of sports pitches in the Honiton and Exmouth areas. Cabinet resolved to agree to a work programme moving forwards that would include consultation on an initial draft strategy in May 2016. This consultation took place from Friday 27th May to Friday 8th July 2016.
- 1.3 Representations on the Draft Exmouth Sports Pitch Strategy were received from 112 different respondents including clubs, land owners, neighbours to sites, National Governing Bodies, Sport England, Natural England, the Environment Agency, AONB teams, Exmouth Town Council, Lympstone Parish Council, Devon County Council and other interested parties. The Consultation Statement which is appended as a link to this report sets out the arrangements for this consultation and a summary of the comments received. Members should read the Consultation Statement in order to understand the broad range of public engagement that has taken place to date.

- 1.4 The February Cabinet paper suggested that a final strategy might be presented to Cabinet in July 2016, however, due to staff resources, the significant draw on resources that the revisions to the Honiton strategy have required and the complexity of the issues raised in Exmouth through the consultation this is the first opportunity there has been to report back to Members. In addition to this, rather than recommending a final strategy for adoption, it is recommended that significant further work is required to thoroughly understand key issues that have been raised through the consultation which are detailed below.
- 1.5 It is intended that this additional work will take place over the next few months and result in a revised draft strategy for Exmouth being presented to Strategic Planning Committee for endorsement to consult in early 2017.

2. Key issues raised in the Draft Exmouth Sports Pitch Strategy

- 2.1 Consultation on the Draft Exmouth Sports Pitch Strategy has raised a number of issues which will require significant additional work before a revised draft strategy can be produced. The Consultation Statement should be read to understand the full range of comments that were received but key issues are detailed below. Additional work is required on these key issues as well as others.

Courtlands Cross

- 2.2 A significant number of objections were received from residents of Lypstone parish in relation to the proposed site at Courtlands Cross (E11). Objections ranged across a number of issues, some of which merit further investigation. The scale of opposition makes it all the more important that all options are fully explored and revised/final recommendations are robust (whether that means the site remains as a recommendation or not).

Meeting the needs of Exmouth Rugby Club

- 2.3 Exmouth Rugby Club (ERFC) and the RFU both advised through their consultation responses that the proposals for ERFC (splitting it across two sites: the Imperial Ground and Courtlands Cross) would be undesirable and not really address all of the issues at hand. It is important to ensure that any revised/final recommendations consider fully the requirements of the rugby club now and going forwards and so further work is required to understand these requirements and negotiate with them on what can and cannot be delivered considering the constraints of sites in and around Exmouth. It is proposed that officers and Members engage with the rugby club and the RFU at the earliest opportunity to address this and identify a way forwards.

Location of the World Rugby 22 compliant 3G Artificial Grass Pitch (AGP)

- 2.4 A significant number of objections were received to proposals for a World Rugby 22 compliant 3G AGP at Raleigh Park. The site is tightly constrained by residential areas on most sides and as such the amenity impact of intensified and extend use of the site through provision of a 3G AGP needs to be fully considered. Objections were raised with regards to access, parking and changing provision, which, for a communally accessible AGP to meet all of Exmouth's needs would be integral. In addition to this, ERFC suggested that there was actually demand for two 3G AGPs in Exmouth as they could fill one on their own. These issues will require additional investigation and work to understand where the AGP should be located to meet community needs, and whether or not there is demand for two.

2.5 In response to concerns raised by Natural England an SEA/HRA Screening Report will need conducting and this may then require full assessments to be prepared. Whilst the Screening Report for the Honiton Sports Pitch Strategy was conclusive in stating that an assessment was not required for either, Exmouth is a more sensitive location due to the presence of the Exe Estuary and Pebblebed Heaths in close proximity as well as the AONB and the larger scale of project that is being considered.

3. Staffing and resourcing issues

- 3.1 The draft strategy was produced by planning policy in conjunction with the PPS Officer Working Group. However, since the consultation the Officer Working Group has played a reduced role due to workloads. This has had issues in that the strategy is wide ranging and addresses more than just planning policy issues and has meant an increased workload for planning policy. For this reason it has not been possible to advance the Exmouth strategy at the same time as the Honiton strategy as multiple workloads and priorities (not least housing monitoring) have had to take precedence.
- 3.2 In the officer report which recommended adoption of the PPS and work to begin on addressing issues in Honiton and Exmouth back in June 2015, officers recommended that a PPS Officer Working Group be set up to deliver the Honiton strategy but that this process should be reviewed and considered whether it was appropriate or not for delivery of the Exmouth strategy.
- 3.3 Officers would now recommend that this arrangement is not working effectively and requires more investment in staff and resources. Whilst the Honiton strategy has managed to progress to a further consultation and can be brought back to Members for adoption in the early new year, the Exmouth strategy will take more time and more involvement from the Officer Working Group to be able to progress to the same stage as well as additional investment in external resources to better understand the detail of certain sites and land ownership/purchase options and implications. That being the case, officers recommend that a supplementary budget of up to £25,000 be identified from the wider economy budget to enable this additional work to take place and so that a revised draft strategy can be published in due course.
- 3.4 In addition, this is really just the start of the process. Following adoption of either the Exmouth or Honiton strategy it will be important to start implementing and delivering that strategy. The exact role which the Council will play in this has not been determined. Whilst Member have agreed that the Council "*may be open to the idea of compulsory purchasing land for the delivery of sports pitches if no other suitable alternative exists*" and have recognised resource implications going forwards (see February 2016 Cabinet report), there has been no discussion of what kind of level of involvement the Council will otherwise have in delivery.
- 3.5 Officers suggest that the Council will need to play a facilitating role at the very least which may involve co-ordinating funding bids, drawing up detailed plans for sites and negotiating with land owners at the very least. It may be that the Council needs to purchase or lease land in the first instance before transferring assets to other bodies such as clubs or Exmouth Town Council or Lympstone Parish Council for instance. If compulsory purchase is required to deliver any particular sites then this will be a significant additional resourcing issue. For Exmouth, CPO remains a distinct possibility of being required. These issues will need "bottoming out" in due course before the strategy is adopted to avoid losing momentum in projects and buy-in from other bodies.

- 3.6 In order to play even a small facilitating role additional staffing resources will be required. The Council does not currently have the expertise in-house (or at least not all in one team or person) to deliver projects and will require in time a project manager potentially with skills in planning, asset management, funding and engineering. The PPS Officer Working Group will discuss the skill set required and make a recommendation to Members in due course in the New Year.

Report to: **Strategic Planning Committee**

Date of Meeting: 21/11/2016

Public Document: Yes

Exemption: None

Review date for release None

Agenda item: 9

Subject: **Revised Draft Honiton Sports Pitch Strategy**

Purpose of report: To update Members on progress with the Honiton Sports Pitch Strategy, request endorsement for a second public consultation on a revised draft strategy and to ensure Members recognise the staff and resource implications for future delivery.

Recommendation:

- 1. Note the work to date on developing the strategy including the summary of comments received and subsequent changes made in response as detailed in the Consultation Statement;**
- 2. Endorse the Revised Draft Honiton Sports Pitch Strategy and supporting documents (SEA/HRA Screening Report, EqIA Screening Report and Consultation Statement)**
- 3. Agree a further 4 week public consultation of the Revised Draft Honiton Sports Pitch Strategy and supporting documents (SEA/HRA Screening Report, EqIA Screening Report and Consultation Statement); and**
- 4. Recognise the staff and resource implications for the Council in the future delivery of the strategy as a whole and specific projects.**

Reason for recommendation: To ensure Members are fully appraised of work to date, public support and objection to plans and to ensure the final version of the strategy and Members decision making is fully informed by thorough consultation and understanding of the issues at hand. To ensure Members understand the implications of delivering the strategy as a whole and in relation to specific projects in terms of staffing and resources and can start thinking about how these may be addressed.

Officer: Graeme Thompson, Planning Policy Officer, gthompson@eastdevon.gov.uk, 01395 571736

Financial implications: The sports pitch strategy has been progressed so far using existing staff resources and a supplementary estimate of £20,000 which was approved by Cabinet on 17/06/15 to engage consultants. This report suggests that to progress and implement the strategy in future will potentially require additional resources for staffing and other costs, such as compulsory purchase orders. These additional costs have not been quantified at this stage but will need to be met by the General Fund balance.



Legal implications: There are no direct legal implications arising from the report

Equalities impact: Low Impact

An Equalities Impact Assessment (EqIA) Screening Report accompanies the Revised Draft Honiton Sports Pitch Strategy and determines there is no need to conduct a full EqIA.

Risk: Low Risk

The strategy sets out recommendations for how the action plans for Honiton of the adopted Playing Pitch Strategy (PPS) can be implemented. It does not obligate the Council to fund or deliver any of the projects included within it; rather it sets out the Council's preferred approach to sports pitch delivery in Honiton. Without an identified and ultimately (following consultation and any further relevant amendments) adopted approach to this the sports pitch needs of Honiton may not be delivered or may be delivered piecemeal and clubs may find it difficult to access grant funding.

Links to background information:

- Revised Draft Honiton Sports Pitch Strategy
- Appendices: [1](#), [2](#), [2a](#), [2b](#), [3](#), [4](#), [5](#), [5\(HBH1H9\)](#), [5\(H4\)](#), [5\(H5\)](#), [5\(H7\)](#), and [8](#)
- Revised Appendix 6
- Revised Appendix 7
- SEA/HRA Screening Report
- EqIA Screening Report
- Consultation Statement
- [East Devon Playing Pitch Strategy 2015](#)
- [Cabinet Report February 2016](#)
- [Cabinet Report June 2015](#)

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

1. Update on work to date and arrangements for consultation

- 1.1 A Honiton Sports Pitch Strategy is being developed as a means to deliver the pitch requirements set out in the district-wide Playing Pitch Strategy (PPS) which was adopted in June 2015. The strategy seeks to address the action plans identified by the PPS in response to the issues facing pitch supply in Honiton currently and up to 2024.
- 1.2 In February 2016, Cabinet considered a report outlining work that had taken place so far on the identification of potential sites for the delivery of sports pitches in the Honiton and Exmouth areas. Cabinet resolved to agree to a work programme moving forwards that would include consultation on an initial draft strategy in May 2016. This consultation took place from Friday 27th May to Friday 8th July 2016.
- 1.3 Representations on the Draft Honiton Sports Pitch Strategy were received from 34 different respondents including clubs, land owners, neighbours to sites, National Governing Bodies, Sport England, Natural England, the Environment Agency, AONB teams, Honiton Town Council, Devon County Council and other interested parties. The Consultation Statement which supports the Revised Draft Honiton Sports Pitch Strategy and which is appended as a link to this report sets out the arrangements for this consultation, a summary of the comments received and the changes made to the strategy in response. Members should read the Consultation Statement in order to understand the broad range of public engagement that has underpinned the latest draft of the strategy.

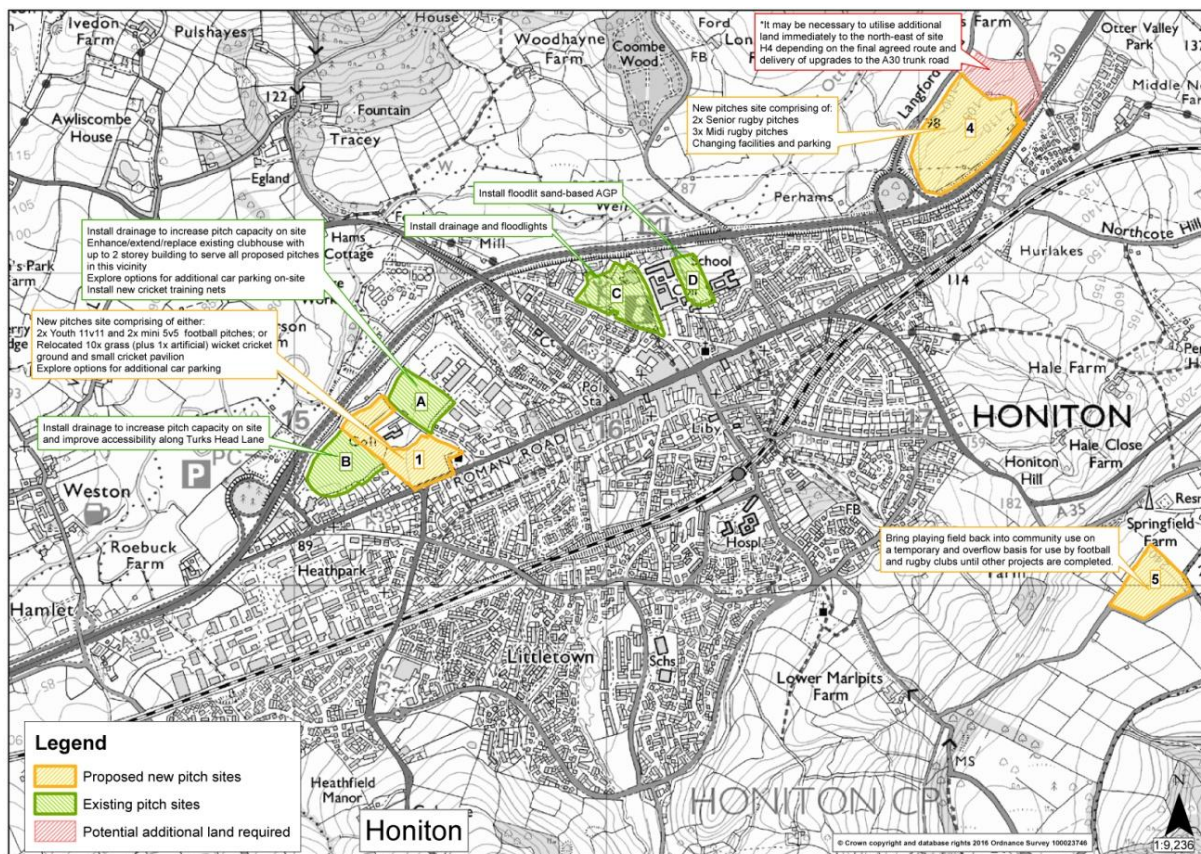
- 1.4 The February Cabinet paper suggested that a final strategy might be presented to Cabinet in July 2016, however, due to staff resources, the additional work required in terms of amending and understanding the implications of the strategy following the consultation this is the first opportunity there has been to report back to Members. In addition to this, rather than recommending a final strategy for adoption, it is recommended that a further 4 week consultation is undertaken to gauge opinion on the revised strategy and to meet the requirements for consultation with relevant bodies on the Strategic Environmental Assessment (SEA) / Habitat Regulations Assessment (HRA) Screening Report which has been produced in response to comments by Natural England on the initial draft strategy.
- 1.5 It is intended (assuming Member endorsement of the revised strategy) that consultation will take place from Tuesday 22nd November 2016 until 5pm on Tuesday 20th December 2016. A final version of the strategy will then be produced (potentially including any further relevant amendments) and presented to Strategic Planning Committee for adoption in early 2017.

2. Revised Draft Honiton Sports Pitch Strategy

- 2.1 The Revised Draft Honiton Sports Pitch Strategy recommends the following projects and sites be developed to meet the sports pitch needs of Honiton:

Site	Revised Draft recommendations
Mountbatten Park (HA)	Install drainage to increase pitch capacity on site Enhance/extend/replace existing clubhouse with up to 2 storey building to serve all proposed pitches in this vicinity Explore options for additional car parking on-site Install new cricket training nets
St. Rita's (HB)	Install drainage to increase pitch capacity on site Improve accessibility along Turks Head Lane
All Hallows (HC)	Install drainage and floodlights
Honiton Community College (HD)	Install floodlit sand-based AGP
St. Rita's extension (H1)	New pitches site comprising of <i>either</i> : 2x Youth 11v11 and 2x mini 5v5 football pitches; <i>or</i> Relocated 10x grass (plus 1x artificial) wicket cricket ground and small cricket pavilion Explore options for additional car parking
Former Showground (H4)*	New pitches site comprising of: 2x Senior rugby pitches 3x Midi rugby pitches Changing facilities and parking
Former Manor House School (H5)	Bring playing field back into community use on a temporary and overflow basis for use by football and rugby clubs until other projects are completed.

*It may be necessary to utilise additional land immediately to the north-east of site H4 depending on the final agreed route and delivery of upgrades to the A30 trunk road.



2.2 There have been a number of minor changes and two more major changes from the initial draft strategy that was consulted on from May to July. The Consultation Statement should be read to understand the full suite of changes that have been made but the two major issues and their subsequent changes are explained in more detail below.

St. Rita's extension (H1) and Mountbatten Park (HA)

2.3 The initial draft strategy recommended that the St. Rita's extension site (H1) be laid out for new youth and mini football pitches and that Mountbatten Park be improved but remain usable by both football and cricket. In response to the consultation, the senior football club explained that this would not meet their needs primarily as it would stifle them from being able to gain promotion to the Peninsula League in years to come. The cricket club were content with the proposals and suggested that potentially additional cricket wickets could also be laid out between the new youth pitches on site H1 to enable them to expand in the future. In addition to this, St. Rita's explained in their consultation response that the proposals would lead to an unacceptable impact on their existence as a retreat mainly due to increased noise in close proximity to their buildings. As owners of the site, they would strongly object to the proposals and so a Compulsory Purchase Order would be required at significant expense (potentially both in terms of financial costs and reputation).

2.4 Despite the above issues, the St. Rita's expansion site remains the most sustainable and suitable site for additional sports pitches in general. It is well located to the town, directly adjacent to other existing sports pitches which would improve viability for clubs, and it would have far less of an impact on the surrounding landscape and biodiversity than some other options.

2.5 That being the case, the revised draft strategy continues to recommend that site H1 is pursued, but recommends two alternative scenarios; one where the site is used for football pitches (as per the initial draft consultation), and one where the site is used for a relocated cricket ground thus allowing Mountbatten Park to be developed into a Peninsula League standard ground in years to come.

- 2.6 Delivery of pitches in this location is a matter of balance and compromise between the needs and ambitions of the senior football club, the cricket club and the landowner. Whilst scenario one would work for the cricket club and youth football, it would not work for senior football or the landowner. On the other hand, scenario two would work for the senior and youth football clubs and potentially be more amenable to the landowner, but would stifle the ambitions of the cricket club. By consulting on a recommendation that includes both options it will be possible to gauge the opinions of all parties concerned and feed this into any future negotiations with the landowner.

Former Showground (H4)

- 2.7 Following the consultation on the initial draft strategy, Devon County Council launched a consultation on highway realignment and improvement for the A30 between Honiton and Devonshire Inn. An element of this consultation proposed a new link road linking what would become the old A30 Monkton Road with Langford Road. This new road would cut directly across the Former Showground. Whilst the alignment for the link road shown on the consultation plans was understood to be relatively indicative, it clearly has the potential to undermine the delivery of sports pitches at the Former Showground as shown in the plans drawn up by STRI (see Appendix 5 – H4).
- 2.8 Initial discussions with the County Council have intimated that they would like to accommodate plans for the sports pitches as much as possible within reason and it appears that a suitable solution to accommodate both plans may be possible, but the final design and decision will rest with Highways England and the Department for Transport. If the new link road is required then it is expected that it would be necessary to expand the site required for sports pitches to encompass the adjoining field immediately to the north-east of the field identified as site H4 as well. Further detailed design work and collaboration is required but it is hoped that this may then enable the new link road and sports pitches to be delivered without compromising one another and allow for an improved landscape impact of the pitches which has been highlighted as a potential issue by the Blackdown Hills AONB team.
- 2.9 The strategy has been amended to reflect the above situation and now identifies an additional area of land immediately to the north-east of site H4 which would be utilised if necessary to accommodate the potential new link road. The main thrust of the strategy remains the same, however, that this is the location for additional rugby pitches, and if the link road is not required then plans for site H4 would likely be more straightforward.

3. Staffing and resourcing issues

- 3.1 The revised draft strategy has been mainly produced by the planning policy officer with the PPS Officer Working Group taking a reduced role since the initial strategy was published for consultation in the summer. This has had issues in that the strategy is wide ranging and addresses more than just planning policy issues and has meant an increased workload for planning policy. For this reason the revised strategy has taken longer to complete than would have been hoped and has meant that revisions to the Exmouth strategy have had to be delayed (see separate report) as multiple workloads and priorities (not least housing monitoring) have had to take precedence.
- 3.2 In the officer report which recommended adoption of the PPS and work to begin on addressing issues in Honiton and Exmouth back in June 2015, officers recommended that a PPS Officer Working Group be set up to deliver the Honiton strategy but that this process

should be reviewed and considered whether it was appropriate or not for delivery of the Exmouth strategy.

- 3.3 Officers would now recommend that this arrangement is not working effectively and requires more investment in staff and resources. Whilst the Honiton strategy has progressed to a further consultation and can be brought back to Member for adoption in the early new year, this is just the start of the process. Following adoption of any strategy it will be important to start implementing and delivering that strategy. The exact role which the Council will play in this has not been determined. Whilst Member have agreed that the Council "*may be open to the idea of compulsory purchasing land for the delivery of sports pitches if no other suitable alternative exists*" and have recognised resource implications going forwards (see February 2016 Cabinet report), there has been no discussion of what kind of level of involvement the Council will otherwise have in delivery.
- 3.4 Officers suggest that the Council will need to play a facilitating role at the very least which may involve co-ordinating funding bids, drawing up detailed plans for sites and negotiating with land owners at the very least. It may be that the Council needs to purchase or lease land in the first instance before transferring assets to other bodies such as clubs or Honiton Town Council for instance. If compulsory purchase is required to deliver any particular sites then this will be a significant additional resourcing issue. These issues will need "bottoming out" in due course before the strategy is adopted to avoid losing momentum in projects and buy-in from other bodies.
- 3.5 In order to play even a small facilitating role additional staffing resources will be required. The Council does not currently have the expertise in-house (or at least not all in one team or person) to deliver projects and will require in time a project manager potentially with skills in planning, asset management, funding and engineering. The PPS Officer Working Group will discuss the skill set required and make a recommendation to Members in due course in the New Year.



East Devon District Council

East Devon Playing Pitch Strategy

Revised Draft Honiton Sports Pitch Strategy

October 2016

EXECUTIVE SUMMARY

This Revised Draft Honiton Sports Pitch Strategy assesses a number of options and makes draft recommendations on how to deliver on the sports pitch needs for Honiton to 2024 as identified in the East Devon Playing Pitch Strategy.

The report assesses a number of sites against a methodology and then recommends ways to meet the sports pitch needs of Honiton. The table below summarises these recommendations which are discussed in more detail within the strategy and identified on the plan found at Appendix 7.

Site	Revised Draft recommendations*
Mountbatten Park (HA)	<ul style="list-style-type: none"> • Install drainage to increase pitch capacity on site • Enhance/extend/replace existing clubhouse with up to 2 storey building to serve all proposed pitches in this vicinity • Explore options for additional car parking on-site • Install new cricket training nets
St. Rita’s (HB)	<ul style="list-style-type: none"> • Install drainage to increase pitch capacity on site • Improve accessibility along Turks Head Lane
All Hallows (HC)	<ul style="list-style-type: none"> • Install drainage and floodlights
Honiton Community College (HD)	<ul style="list-style-type: none"> • Install floodlit sand-based AGP
St. Rita’s extension (H1)	<ul style="list-style-type: none"> • New pitches site comprising of <i>either</i>: <ul style="list-style-type: none"> ○ 2x Youth 11v11 and 2x mini 5v5 football pitches; <i>or</i> ○ Relocated 10x grass (plus 1x artificial) wicket cricket ground and small cricket pavilion • Explore options for additional car parking
Former Showground (H4)	<ul style="list-style-type: none"> • New pitches site comprising of: <ul style="list-style-type: none"> ○ 2x Senior rugby pitches ○ 3x Midi rugby pitches ○ Changing facilities and parking
Former Manor House School (H5)	<ul style="list-style-type: none"> • Bring playing field back into community use on a temporary and overflow basis for use by football and rugby clubs until other projects are completed.


*It is important to note that the recommendations in this strategy are not a substitute for planning permission and do not mean that such proposals would necessarily gain planning permission. All planning applications are considered on their own merits against the development plan and any relevant material considerations at the time.

Public consultation

If you have any comments regarding this Revised Draft Honiton Sports Pitch Strategy then please send representations to the contact details below by **5pm on Tuesday 20th December 2016**. Any comments received after this point will not necessarily be taken into account.

 localplan@eastdevon.gov.uk

 Planning Policy, East Devon District Council, Knowle, Sidmouth, Devon, EX10 8HL.

 01395 571533

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- Appendix 1 – Stage 1 sites – Honiton
- Appendix 2 – STRI Stage 1 Report
- Appendix 3 – Stage 2 sites – Honiton
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- Appendix 5 – STRI Stage 2 Report and potential site plans
- Appendix 6 – Site by site sustainability and suitability assessment
- Appendix 7 – Revised draft recommendations plan
- Appendix 8 – Honiton Development Trust plans for Tower Hill

INTRODUCTION

- I.1 The East Devon Playing Pitch Strategy (PPS) was adopted in June 2015. The PPS is a robust evidence base which considers strategic and site specific issues for sports pitches around the district and recommends action plans for their resolution.
- I.2 This report responds to the PPS action plans with regards to sports pitch development in Honiton. It does not aim to review the core data or information that went into the PPS, rather it takes that information from it and aims to deliver solutions to the issues which have been highlighted.
- I.3 Honiton is a market town in the central part of East Devon district. In 2012 it had an estimated population of 11,608¹. It's location in the Otter river valley on the edge of the Blackdown Hills and East Devon AONBs, sandwiched between the A30 trunk road and floodplain to the north and west and the hills of the East Devon AONB to the south and east makes it a particularly difficult place to find relatively flat land suitable for sports pitch development.
- I.4 The PPS highlighted the following strategic action plans for Honiton for **F**ootball, **R**ugby, **C**ricket, **H**ockey and **O**ther users:

Action Ref.	Sport	Action
HO.1	R	Explore possibilities for the rugby club to move to a new site capable of providing a total of 3x senior pitches, 5x mini/midi pitches, floodlit grass training areas and appropriate ancillary facilities preferably all on the same site. Definite plan of action to be agreed through the ongoing PPS Steering group by December 2015. If no alternative options are found to be deliverable then Tower Hill proposals should be explored more fully. Should the rugby club stay at All Hallows, efficient drainage must be installed.
HO.2	O	Ensure that All Hallows remains available for Honiton Community College to use.
HO.5	F C	Explore the possibility of moving the senior football club to a new site capable of providing 2 stand-alone, well-drained football pitches with suitable ancillary facilities. Cricket and mini football pitches could remain at Mountbatten. Definite plan of action to be agreed through the ongoing PPS Steering group by December 2015. If no alternative options are found to be deliverable then Tower Hill proposals should be explored more fully.
HO.13	F	Explore options for delivering additional youth football pitches at St Rita's and levelling and draining existing pitches. If this is not possible then consider alternative options. Definite plan of action to be agreed through the ongoing PPS Steering group by December 2015.
HO.18	F C R H O	Explore the possibility of addressing all Honiton pitch issues on alternative sites better related to the existing town and outside of the AONB first but if there are no realistic alternatives then some pitches may need to be delivered on Tower Hill.
HO.20	H O	Encourage and support the provision of a full size, floodlit, <u>sand-based</u> AGP at Honiton Community College available for community use outside of school times, along with suitably accessible changing facilities for such community use (accessible without the main school building being open). Pitch must be suitable for local football and rugby teams to conduct non-contact all weather floodlit training.

¹ PPSA (2012) "2012 PPSA population estimate for East Devon"

I.5 This subsequent report sets out recommendations on how to implement the actions and resolve the core issue of undersupply of sports pitches in Honiton.

I.6 The PPS included an appendix which covered Honiton pitch issues in greater detail than other locations. This appendix showed that in 2014 there was demand for the following sports pitches in total in Honiton with no overmarking (assumes capacity of provision at “standard” quality):

Pitch type	Sport	Number
Adult 11v11	Football	1
Youth 11v11	Football	2
Youth 9v9	Football	2
Mini 7v7	Football	1
Mini 5v5	Football	1
Grass wicket	Cricket	9
Senior rugby	Rugby	2
Mini/Midi rugby	Rugby	4
Sand-based AGP	Hockey	1

I.7 It then showed that by 2024 there would be the following demand for sports pitches in total in Honiton.

Pitch type	Sport	Number	Increase
Adult 11v11	Football	2	+1
Youth 11v11	Football	2	0
Youth 9v9	Football	3	+1
Mini 7v7	Football	2	+1
Mini 5v5	Football	2	+1
Grass wicket	Cricket	6	0
Junior grass wicket	Cricket	5	+2
Senior rugby	Rugby	3	+1
Mini/Midi rugby	Rugby	5	+1
Sand-based AGP	Hockey	1	0

I.8 Currently the following provision exists:

Pitch type	Sport	Number (overmarked)	Under/over supply on 2014 reqs	Under/over supply on 2024 reqs
Adult 11v11	Football	2	+1	0
Youth 11v11	Football	2	0	0
Youth 9v9	Football	1(1)	-1	-2
Mini 7v7	Football	0(2)	-1	-2
Mini 5v5	Football	0(2)	-1	-2
Grass wicket	Cricket	10 +1 artificial	+2	0
Senior rugby	Rugby	2	0	-1
Mini/Midi rugby	Rugby	0	-4	-5
Sand-based AGP	Hockey	0	-1	-1

I.9 In addition to the above it is important to note that whilst there are potentially sufficient numbers of adult 11v11 and youth 11v11 football pitches there is an ongoing issue of shared use with the cricket ground at Mountbatten Park which may require either the football pitches or cricket pitch to relocate.

I.10 With so many additional pitches required to meet both current (2014) and projected (2024) demands it is important to think strategically and holistically about the provision of new pitches in Honiton. This means exploring options for wholesale relocation of clubs/facilities as well as potentially just improvements to existing and additional pitches to supplement existing and weighing up the pros and cons of each option.

Methodology

I.11 A methodology was worked up by an officer working group to consider the site options for new sports pitches. This involved 4 stages broken down into 9 steps.

Stage 1 – Identification of sites

- Step A – Objective search for potential sites to take sports pitch development
- Step B – Rationalisation through basic feasibility assessment

Stage 2 – Site assessments

- Step C – Site surveys
- Step D – Potential site plans
- Step E – Basic sustainability and suitability assessment

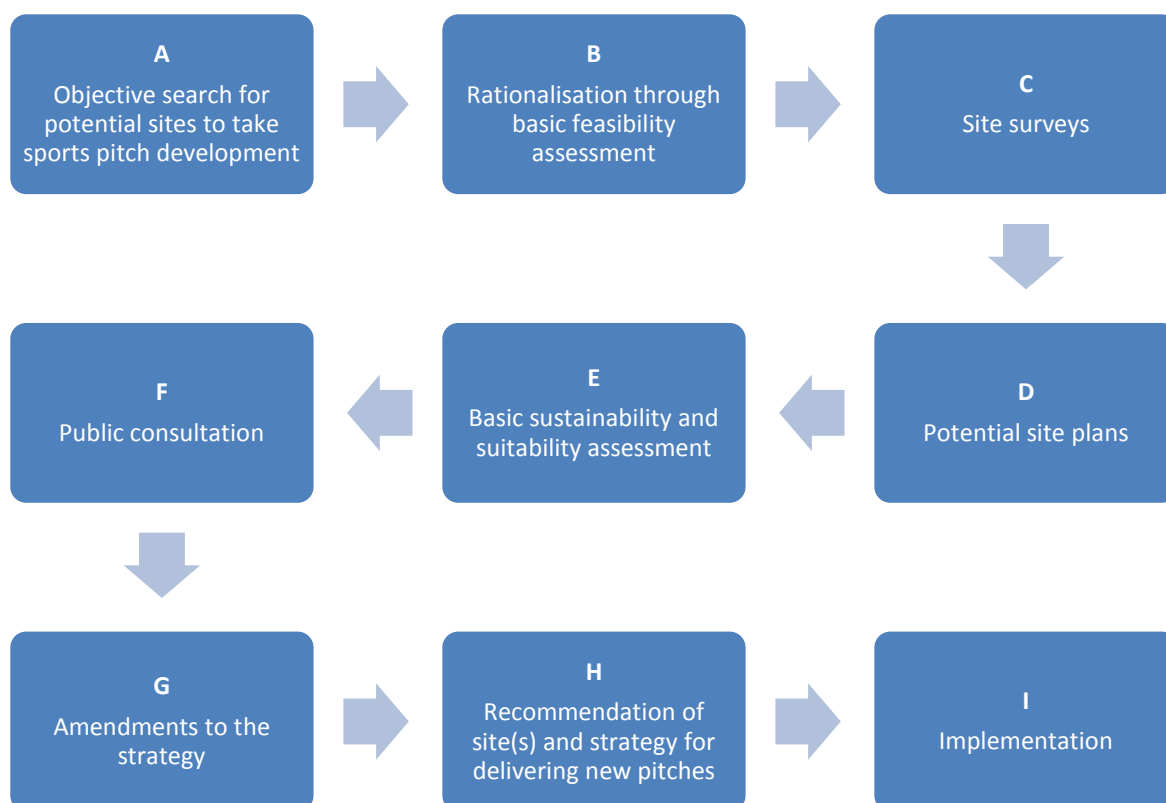
Stage 3 – Finalising recommendations

- Step F – Public consultation
- Step G – Amendments to strategy
- Step H – Recommendation of site(s) and strategy for delivering new pitches

Stage 4 – Implementation

- Step I - Implementation

The diagram below sets out the general process of this methodology.



- I.12 Following this process would ensure there was a clear audit trail and robust evidence base as to how and why options were selected and developed. Having such a clear evidence base should help to streamline the planning application process, site acquisition process and delivery process further down the line.

Policy context

National policy

- I.13 Paragraph 73 of the National Planning Policy Framework (NPPF) requires planning policies on sport and recreation and their application to be underpinned by robust evidence:

'Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up to date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.'

- I.14 The Playing Pitch Strategy and the Open Space Study provide the robust evidence base required by paragraph 73 and these are translated into policy in Strategy 43 of the new Local Plan (2013-2031).

- I.15 Paragraph 74 of the NPPF protects open spaces including playing pitches from development unless certain criteria are met:

'Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements, or*
- The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.'*

East Devon Local Plan (2013-2031)

- I.16 Policy RC1 of the new Local Plan (2013-2031) builds on NPPF paragraph 74 in protecting existing open space sites from development.
- I.17 Policy RC2 allows for the provision of new or enhancing of existing recreation facilities including playing pitches where certain criteria are met. Compliance with this policy will be key for delivery of new sports pitch sites at Honiton.
- I.18 Policy RC4 allows for the provision of new recreation facilities in the countryside and on the coast where certain criteria are met. This policy may apply where sites are more remote from the main urban area of Honiton.

- I.19 Policy RC5 allows for new community buildings and developer contributions to be sought towards their provision. This covers sports clubhouse facilities which may be required on new sites.
- I.20 Policy RC6 allows for new or enhanced community facilities to be provided where certain criteria are met. Compliance with this policy will be key where there is a requirement for built facilities on site such as changing rooms, clubhouse etc.
- I.21 Policy RC7 requires new community facilities to be capable of dual use where appropriate. It will be expected that any new built facilities are designed to be usable by other community groups as well as the specific sports club(s) that they serve. This will ensure effective and efficient use of land and space as well as potentially enabling greater viability for the club/owner of the facility.
- I.22 In addition to sports and community facility specific policies, proposals for new sports pitch sites will need to have due consideration to design, environment and transport policies amongst others.
- I.23 Strategy 3 sets the Local Plan’s objective for sustainable development.
- I.24 Strategy 4 sets out how social and community facilities which would include sports clubs are an integral part of creating balanced communities.
- I.25 Strategy 5B requires all developments to contribute towards or be located in suitable locations to allow sustainable travel.
- I.26 Strategy 6 sets out when development within Built-up Area Boundaries (BuABs) will be permitted. No new sites are proposed within the Honiton BuAB, however All Hallows is within the BuAB.
- I.27 Strategy 7 restricts development in the countryside to only allow for it when it is in accordance with specific policies and criteria. All sites being considered are outside of the Honiton Built-up Area Boundary (BuAB) and are therefore within the countryside.
- I.28 Strategy 23 sets out proposals and ambitions for development at Honiton. Key points from the strategy in relation to sports pitch development are an aspiration for the town “to remain compact enough to minimise car travel and not to extend into a ribbon development”, and to “support the schools, health and other service providers to meet their accommodation needs and local aspirations for new and improved facilities”. The supporting text to the strategy also states in the list at paragraph 11.6 that “We will enhance Honiton by: Directing new retail, leisure, tourist and major community uses to the town centre, unless there are no suitable sites available...Improving sporting cultural and community facilities to serve Honiton and the surrounding rural area by requiring new provision in any large new development and supporting community initiatives to develop these...Encouraging the provision of sports pitches on hill top land to the South of the town in line with community aspirations”. It is important to note the preference to direct development to sites within and well related to the existing built form of the town, but that if no suitable sites exist that meet this then proposals for sports pitches at Tower Hill to the south of Honiton will be supported and encouraged. Tower Hill proposals are considered alongside all other sites in this report.
- I.29 Strategy 46 requires developments to conserve and enhance the quality and local distinctiveness of the natural and historic environment. It applies across the district but is of particular importance in relation to Areas of Outstanding Natural Beauty (AONBs).

- I.30 Strategy 47 requires developments to conserve and enhance biodiversity and geodiversity and minimise fragmentation of habitats. It protects internationally and nationally designated sites from direct or indirect adverse effect and sets out how effects or potential effects will be mitigated.
- I.31 In terms of the development management policies of the plan, in addition to policies RC1, RC2, RC4, RC5, RC6, and RC7 (covered above), policies D1, D2, D3, EN7, EN13, EN14, EN16, EN21, EN22, TC2, TC4, TC7 and TC9 are of particular note and sites will be considered against these. In summary, proposals will need to respect local design and distinctiveness; not adversely impact on and where applicable mitigate impact on amenity, biodiversity and landscape; be safely designed; respect trees and hedgerows where relevant; consider sites of potential archaeological importance, quality of agricultural land, control of pollution, potentially contaminated land, potential for flooding, and surface run-off implications of development; and ensure that the site is accessible by a range of transport modes, accessible by persons with reduced mobility and that a suitable amount of car parking is provided for.

Sports guidance

- I.32 In addition to specific policies there are a number of important guidance documents that will need to be considered and taken account of at a more detailed stage of planning including (though not limited to) the following:
- The FA Guide to Pitch and Goalpost Dimensions (FA)
 - Facilities Guidance Note 2: Grass Pitches for Rugby (RFU)
 - Recommended Guidelines for the construction, preparation and maintenance of cricket pitches and outfielders at all levels of the game (TS4) (ECB)
 - Successful Management of Dual Use Cricket and Football Sites (ECB, FA, Sport England and Institute of Groundsmanship)
 - Natural Turf for Sport (Sport England)
 - Pavilions and Clubhouses (Sport England)
 - Facilities Guidance Note 5: Changing Rooms and Clubhouses (RFU)
 - Pavilions and Clubhouses (TS5) (ECB)
 - Artificial Surfaces for Outdoor Sport (Sport England)
 - Accessible Sport Facilities (Sport England)
 - Artificial Sports Lighting (Sport England)

SEA/HRA Screening

- I.33 Officers have conducted a Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA) Screening Report of the Revised Draft Honiton Sports Pitch Strategy which concludes that neither SEA or HRA is required to accompany the strategy. This screening report will be available for consultation alongside the revised draft strategy.

Consultation

- I.34 A Draft Honiton Sports Pitch Strategy was consulted on for 6 weeks from 27th May 2016 to 8th July 2016. Representations were received from 34 different people and organisations on a range of issues and regarding a number of the sites that were considered. In response to this a number of changes were made to this strategy. The

Consultation Statement sets out the consultation that has taken place and the changes made in response to representations that have been made.

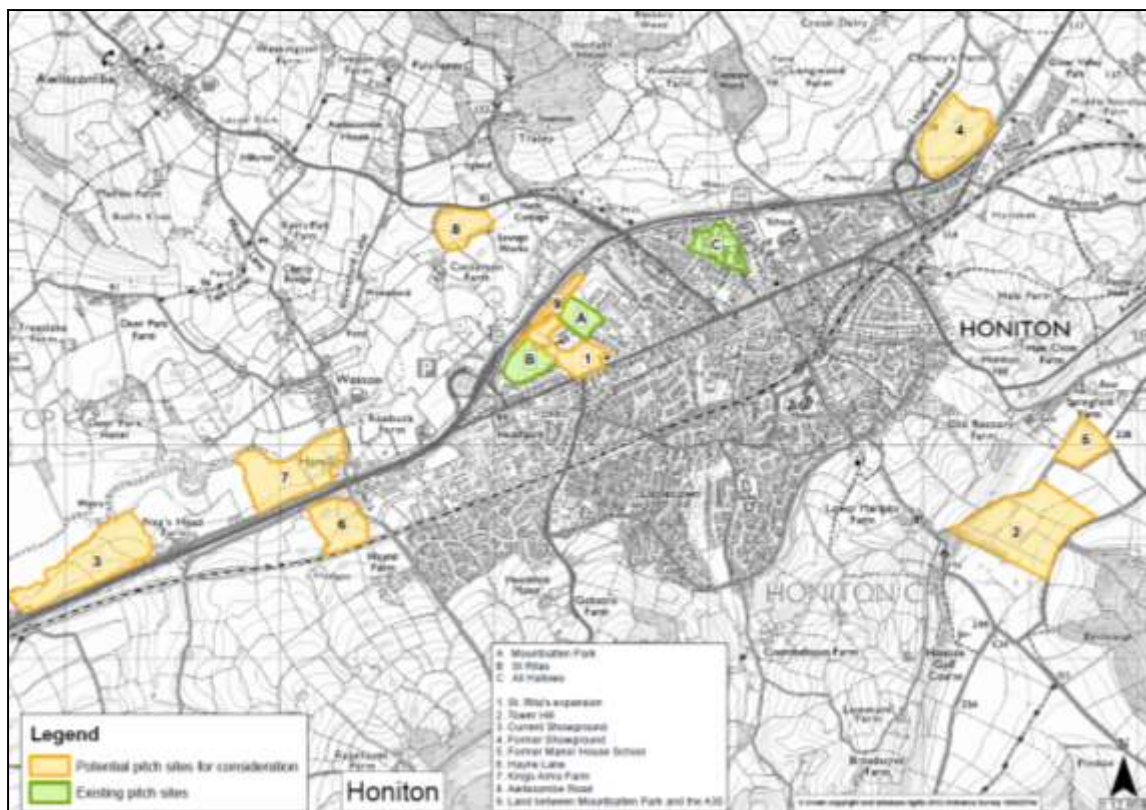
- I.35 A Revised Draft Honiton Sports Pitch Strategy, along with SEA/HRA Screening Report, Consultation Statement and Equalities Impact Assessment will be consulted on for 4 weeks from Tuesday 22nd November 2016 to Tuesday 20th December 2016.

STAGE 1 – IDENTIFICATION OF SITES

Step A - Objective search for potential sites to take sports pitch development

- 1A.1 The process began by doing desk-based map searches for land that might be suitable for sports pitches. The criteria here was that land: should not be too steeply sloped; preferably out of the floodplain; and relatively close to the town; or that the site had been identified by third parties during the PPS process. There was not a requirement for sites to be located within the Honiton Town Council administrative area but they did have to be relatively close to the town.
- 1A.2 Honiton Town Council was invited to identify sites they felt ought to be considered in October 2015. At that stage a number of sites were suggested which aligned with sites already identified as potentials by officers. Later, during the Draft Strategy consultation in Summer 2016, a further site on land between Macauley Close and Northcote Hill Road was floated by the Town Council, however, officers considered the site to be likely to fail at Step B (rationalisation) due to the flattest part of the site being in the floodplain, the remainder being relatively sloped and an irregular shape which would not allow for suitable sports pitch development. The site would also be difficult to gain access to. That being the case it was not considered any further.
- 1A.3 As a result the following sites were identified as potential sites to take sports pitch development at Honiton. These are identified on the plan below which is replicated at a more legible scale in Appendix 1. No other possible land areas met the basic tests of suitability set out in paragraph 1A.1 above. It should be noted that the Honiton Community College playing field (referred to as site HD elsewhere in this strategy) was not considered as it has already been identified for the location of a floodlit sand-based AGP in the PPS.

Site ref	Site name
<u>Existing pitch sites</u>	
HA	Mountbatten Park
HB	St. Rita's
HC	All Hallows
<u>Potential new sites</u>	
H1	St. Rita's extension
H2	Tower Hill
H3	Current showground
H4	Former showground
H5	Former Manor House School playing field
H6	Hayne Lane
H7	Kings Arms Farm
H8	Awliscombe Road
H9	Land between Mountbatten Park and the A30



Plan showing Stage 1 potential sites for consideration (reproduced at Appendix 1).

Step B - Rationalisation through basic feasibility assessment

- 1B.1 Following the objective identification of sites with potential to take sports pitch development the Council appointed consultants STRI (Sports Turf Research Institute) in November 2015 to provide technical expertise on the project.
- 1B.2 All existing and potential sites were visited by both officers and consultants to see first-hand what potential each site had for sports pitch development. The consultants then produced an initial assessment report (available at Appendix 2 and from here on referred to as the STRI Stage 1 report) considering agronomic² issues and site potential.
- 1B.3 Sites were assessed against a standard methodology which considered key aspects of the site location, access, general topography, current vegetation, soil type and drainage characteristics, size of the site and other mitigating risks or factors that would make the site difficult to potentially develop. Each aspect was weighted and scored appropriately with the resultant overall score for each site providing a guide as to whether a site would be feasible or not. Sites were scored out of 100, with sites scoring 56 or more being considered worth taking forwards to the next stage (full surveys and plans to be drawn up) and sites scoring 55 or less considered as “Poor Quality” or “Unacceptable” and therefore being removed from the process as they would have little prospect of being feasible for sports pitch development.

Overall Weighted and Adjusted Scores /100				
Unacceptable	Poor Quality	Unsatisfactory	Acceptable	Good Quality
≤ 30	30 - 55	56 - 70	71- 85	> 85

Stage 1 feasibility assessment scoring matrix

- 1B.4 Those sites identified as being in the “Unsatisfactory” category would require significant works and investment to bring them up to sports pitch standards, but it would be feasible. Sites identified as “Acceptable” would possibly need improvement and investment. Sites identified as “Good Quality” would require few or no works and investment.
- 1B.5 The table below summarises the findings of the STRI Stage 1 Report listed in priority and score order. It should be noted that the scores and comments on potential works required and potential pitch numbers were based solely on the consultant’s opinion having carried out non-technical site visits. Surveys and plans to be drawn up as part of Stage 2 would refine the detail of what works would be required and potentially how many pitches could be delivered on site.

Priority	Site	Site ref	Score	Key reasons	Potential works required	Potential pitch numbers
1	Land between Mountbatten Park and A30	H9	76	Narrow strip of land possible use for mini pitches	Drainage and surface works	2x mini
1	St Rita’s extension	H1	75	Good site but next to St.	Drainage and	2x adult

² Agronomy is the science of soil management

Priority	Site	Site ref	Score	Key reasons	Potential works required	Potential pitch numbers
				Rita's	surface works	
1	All Hallows	HC	75	Space for 2 pitches, very wet and soft	Drainage	2x adult
1	St Rita's	HB	65	Undulating site with some expansion possible, access poor and soft	Drainage	2x adult 1x junior
2	Former Showground	H4	63	Good site but with slopes and large pylon	Levelling and drainage	4x adult
3	Mountbatten Park	HA	82	Football and cricket with limited space, pitches wet	Drainage	2x adult
3	Former Manor House School	H5	64	Site reasonable but out of town and now part of an exclusive pavilion development	Limited works but may need drainage	2x adult
3	Kings Arms Farm	H7	61	Large site but on edge of town and on floodplain	Drainage and surface works	3x adult
3	Tower Hill	H2	58	Large site able to accommodate a number of pitches, out of town	Drainage and infrastructure	5x adult
4	Honiton Showground	H3	57	Large site but out of town and on floodplain	Reject	
5	Hayne Lane	H6	50	Steeply sloped and pylon across site	Reject	
5	Awliscombe Road	H8	34	Steeply sloped, out of town and with large pylon	Reject	

Honiton Showground (H3)

1B.6 Honiton Showground (site H3) was recommended for rejection despite the fact it scored 57/100 in exception to the methodology . Most of the site was steeply sloped and considered nearly impossible to re-grade, with the only areas of the site that might be suitable lying within the floodplain. In addition to this the soil was stoney and made of a silty clay loam which would drain poorly. The location of the site, at best 1km from the western edge of Heathpark industrial estate to the eastern edge of the site, but more significantly around 3.2km from the town centre to the centre point of the site weighed heavily against taking this site any further forwards and with such a borderline score it was considered appropriate to reject the site at Stage 1.

Hayne Lane (H6)

1B.7 Hayne lane (site H6) was recommended for rejection. The site is steeply sloped and would need significant re-grading. If the site were to be re-graded then this would result in only being able to accommodate two pitches. In addition to this there is a low voltage pylon that crosses the site which would need to be diverted or undergrounded, the site is currently divided up by multiple hedgerows, the soil is stoney and made of a silty clay loam which would drain poorly, and it is located right on the western end of the town, around 2km from the town centre to the centre point of the site. It was considered that it would be unfeasible to develop the site for sports pitches without significant costs that would not outweigh the benefits considering that other better sites exist.

1B.8 This site is owned by East Devon District Council. It was originally purchased for recreational purposes with the intention for the site to host new sports pitches for the town. A covenant exists on the site's title deeds restricting usage to recreation. Having purchased the site in 1999, the Council subsequently looked into ways to

bring the site into recreational use but the topography of the site and the need to divert or underground the pylon meant that it simply was not feasible to deliver. As such, the intended recreational use has not been possible to deliver. The new Local Plan (2013-2031) now allocates the land for employment use.

Awliscombe Road (H8)

1B.9 Awliscombe Road (site H8) was recommended for rejection. The site is steeply sloped and were it to be re-graded then there would likely be only room for a single pitch. In addition to this the site is out of town, it has a pylon crossing the southern corner of the site, and the soil is stoney and made of a slity clay loam which would drain poorly. It was considered that it would be unfeasible to develop the site for sports pitches.

Sites proceeding to Stage 2

1B.10 Mountbatten Park (site HA), St Rita's (site HB) and All Hallows (site HC) are existing pitch sites and all scored relatively highly. All Hallows and St Rita's were both recommended as priority 1 sites for investment and improvement in terms of needing drainage urgently to be able to continue in their current usage. Mountbatten Park was listed as a priority 3 site despite its high score. The lower priority reflects the fact from an agronomic/sports turf specialist point of view it is capable of continuing in its current usage but ideally it will require adequate drainage to be installed.

1B.11 Land between Mounbatten Park and the A30 (site H9) and St. Rita's extension (site H1) were both recommended as priority 1 sites with significant potential to provide sports pitches with relatively minimal drainage and surface works to bring them up to standard. They appeared to show the best prospects for new pitch delivery from an agronomic/sports turf perspective.

1B.12 The Former Showground (site H4) was recommended as a priority 2 site identified as requiring significant levelling and drainage works to bring it into use for sports pitches, but of such a size, gentle slope, location and with limited stones in the soil to make it a realistic prospect for sports pitch delivery. Benefits here would likely outweigh the costs. It's location the opposite side of the A30 to the rest of the town, high voltage powerline cutting across the southern corner of the site, and silty clay loam soil make up detract slightly from the positives but overall it was considered a feasible site to take forward to Stage 2.

1B.13 The Former Manor House School (site H5) was recommended as a priority 3 site. Whilst being a large flat site with limited stone and weed cover, it's silty clay loam soil and drainage potential plus location out of town and current usage for weddings and other events meant that its overall score was compromised. Had the site been closer to town and the current use been known to not be an issue it may have scored higher.

1B.14 Kings Arms Farm (site H7) was recommended as a priority 3 site. Whilst being a large site with extensive flatter areas, close to town with good access, the pitches would have to be delivered on the floodplain, a powerline across part of the site could cause an issue and the stoney soil with a silty clay loam make up would drain poorly. The site holds some potential, although the fact that pitches would have to be delivered on the floodplain would potentially be an issue.

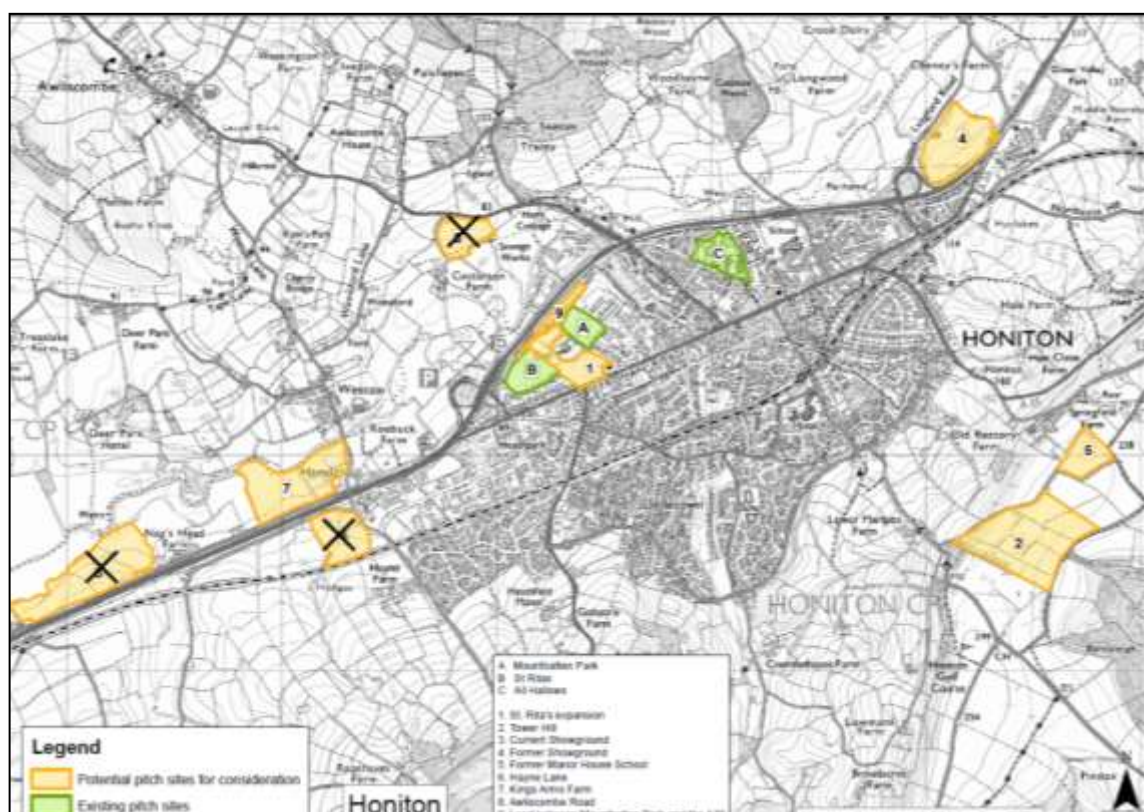
- 1B.15 Tower Hill (site H2) was recommended as a priority 3 site, however, similar to the Honiton Showground site it may have also been considered suitable for rejection due to its borderline score, location and potential costs of delivery. However, there is a known willing land owner and project that has been worked up by Honiton Development Trust and the PPS specifically states that if no other suitable sites are found through this strategy then Tower Hill will become the preferred option. That being the case, Tower Hill has remained in the process at this stage.
- 1B.16 The STRI Stage 1 Report also included commentary on how Devon hedgerows, stoney soil issues and the floodplain impact on the delivery of sports pitches in general. All three can pose potential constraints to pitch development.
- 1B.17 In some circumstances hedgerows can be removed or even moved to facilitate development, however more detailed ecological assessment of the hedgerows in question would be required to understand whether this could be possible. Older hedgerows supporting a wide range of biodiversity or forming key links between biodiversity rich areas would always be more sensitive to movement or removal.
- 1B.18 Stoney soil is a recurrent issue across most of the sites assessed in Honiton. Whilst some stones can be removed or buried effectively some smaller stones can remain which can cause significant injuries. The report suggests installing a “sand cap” if pitches are delivered on sites with particularly stoney soil.
- 1B.19 The floodplain of the River Otter is a particular challenge. Most of the flatter areas of land around Honiton are within the floodplain. Potentially, technically pitches can be provided on the floodplain, however, there are a number of important issues to be taken account of. It is important to remember the functional purpose of floodplains and as such the fact that little built form or land re-forming could take place within them without express consent of the Environment Agency. In addition to this, when rivers flood they potentially can contaminate land as they bring with them pesticides, sewage and other contaminants and put pitches out of action whilst the problem is resolved at sometimes significant expense. Drainage systems for pitches can also be capped off by silt which then would potentially need removing from the system. Above all though, pitches delivered on floodplains may well be out of action for extended periods of the year as and when the river floods. The only site remaining in the process where this is an issue is Kings Arms Farm (H7) part of which has flooded on a number of occasions over recent years. It remains in the process for now so that the pros and cons can be weighed up against other sites.

STAGE 2 – SITE ASSESSMENTS

Step C – Site Surveys

2C.1 Six potential sites and three existing sites were taken forward into Stage 2. The map below shows these sites with the sites that dropped out of the process at Stage 1 crossed out. The map is replicated at a more legible scale in Appendix 3.

Site ref	Site name
<u>Existing pitch sites</u>	
HA	Mountbatten Park
HB	St. Rita's
HC	All Hallows
<u>Potential new sites</u>	
H1	St. Rita's extension
H2	Tower Hill
H4	Former showground
H5	Former Manor House School playing field
H7	Kings Arms Farm
H9	Land between Mountbatten Park and the A30



Plan showing Stage 2 sites for consideration (reproduced at Appendix 3).

2C.2 Of these sites it was considered necessary to get full Computer Aided Design (CAD) surveys completed for sites HB, H1, H4, H7 and H9. Where sites were considered flat or simple enough to develop drawings without the need to understand the topography any further, surveys were not carried out. In this case only the Former Manor House School site (H5) was considered not to need a survey for that reason out of the potential new sites.

- 2C.3 It was considered unnecessary to survey Mountbatten Park (HA) or All Hallows (HC) as they are both flat sites hosting existing pitches and the only works necessary to improve the sites would be the installation of new drainage systems and improved maintenance. St. Rita's (HB) was felt necessary to survey to understand whether the site could be levelled out to address the undulating surface of the existing pitches or even provide additional pitches.
- 2C.4 Tower Cross (H2) was not surveyed as plans already exist as part of the Honiton Development Trust proposals for a sports hub on the site.
- 2C.5 The Honiton Community College playing field (HD) was not surveyed nor plans produced as it has already been identified for the delivery of a floodlit sand-based AGP through the PPS.

Step D – Potential site plans

- 2D.1 After conducting the relevant site surveys, potential site plans were drawn up for each of the Stage 2 sites with the exception of Tower Hill (H2) for which plans already existed showing the intentions of Honiton Development Trust.
- 2D.2 For potential new sites the intention was for plans to show what and how many pitches plus ancillary facilities could be accommodated on each site. The process would look to maximise provision on each site by showing a range of grass pitch types and sizes that could be delivered. This would enable officers to understand how the required pitch combinations for the town could be delivered across a combination of sites if necessary. For existing pitch sites plans would show how site capacity could be maximised.
- 2D.3 At the end of Stage 1, a number of technical experts were consulted to understand what technical constraints there may be to sports pitch development on a number of the sites. Comments were sought (where relevant) from Devon County Council's Highways and Historic Environment teams, and the District Council's Landscape Architect and Countryside and Environmental Health teams. The full comments from these consultees were passed to the consultants (STRI) to help inform their site plans. Comments received for each site are detailed in Appendix 4 in full.
- 2D.4 Consultants STRI were required to provide a second report (from here on referred to as the STRI Stage 2 Report – found at Appendix 5 to this report) to which the site plans would be appended, and which would detail what pitches each site could accommodate, how that would be made possible and the reasons for this. The report was also required to include indicative costings on the delivery of the plans (excluding land purchase costs).
- 2D.5 The potential site plans for each site are discussed below. It should be noted that these are *potential* site plans and show what potentially *could* be accommodated on each site according to STRI as agronomic and sports turf experts. It is not to say that such plans would be acceptable in all cases and is not a signal that the Council intends to deliver or would support delivery of such plans on any site at this stage. They and this report are also not a substitute for planning permission and do not mean that such proposals would necessarily gain planning permission. All planning applications are considered on their own merits against the development plan and any relevant material considerations.
- 2D.6 The plans themselves should be viewed alongside the following explanations which can be accessed as part of the STRI Stage 2 Report at Appendix 5 to this strategy.
- 2D.7 The discussion below explains what was required of the consultants (STRI), what the plans show, what alternative options there potentially could be, and the approximate costs for delivery of the pitches themselves (including associated earthworks, primary drainage systems, cultivations, sand amelioration, secondary drainage, seed bed preparation, seeding, initial maintenance and a 10% contingency), and appropriate clubhouse and car parking facilities. It should be noted that STRI are specialist agronomic and sports turf experts and as such costings for any ancillary facilities are outside their area of expertise and provided as ballpark figures based on experiences elsewhere. Costings do not include VAT, removal of excess spoil, Sustainable Urban Drainage Systems (SUDs), diversion of existing utilities/services such as powerlines, or other ancillary requirements such as covered stands, perimeter rails, etc. Land

costs and ownerships are also not covered here and are considered later in the report.

Mountbatten Park (HA)

- 2D.8 STRI were not required to produce plans to show accommodation of additional pitches on this existing pitches site as it is already used to its full potential. However, the site requires primary sports pitch drainage for the football pitches which is indicatively costed at around £45,000.
- 2D.9 If additional pitches were laid out on sites adjacent to Mountbatten Park then the existing clubhouse facilities would need to be extended/replaced. Further plans will be necessary to understand exactly how this may be accommodated on site, but in principle it could be possible. However, additional car parking could need to be provided on an alternative site (H1 or H9).

St. Rita's (HB)

- 2D.10 STRI were required to produce a plan showing how this existing pitches site could be levelled and pitch space maximised. The plans show how potentially the site could be levelled to accommodate 2x youth 11v11 and 2x mini 5v5 football pitches. Currently, the site accommodates 2x youth 11v11s and 1x youth 9v9 with various other pitches overmarking these base pitches. The STRI report explains that it may not be considered cost beneficial to carry out the full suite of levelling works shown in their plan and in fact improve the worst of the undulations and drainage.
- 2D.11 If the plans shown were to be delivered the indicative costs for the pitches would be £148,000. However, if just drainage were to be installed then costs would likely be in the region of £61,000.

All Hallows (HC)

- 2D.12 STRI were not required to produce plans to show accommodation of additional pitches on this existing pitches site as it is already used to its full potential. However the STRI Stage 1 report states that the site desperately requires drainage to be installed and this is anticipated to cost in the region of £100,000 for combined primary and secondary drainage covering the entire playing field.

St. Rita's extension (H1)

- 2D.13 STRI were required to produce a plan showing two adult football pitches being delivered on the land immediately to the south-east of the St. Rita's Centre with the hope that overspill car parking could possibly be accommodated in the eastern most edge of the site. However, this was not possible due to the dimensions of the site and requirement to retain and respect the existing hedgerows and trees on site.
- 2D.14 The plans show provision of 2x U15/16 youth 11v11 football pitches delivered in this area with a further 2x mini 5v5 pitches in the field to the west of the St. Rita's Centre, between the centre and the existing pitches site (HB). The STRI Stage 2 Report explains that alternatively the area to the south-east of the centre could accommodate a single adult 11v11 pitch and 2x mini 5v5 pitches.
- 2D.15 Whilst no car parking or clubhouse facilities are shown as being deliverable on this site, it could potentially be possible to deliver either/or facility on the land immediately

to the north-west of the St. Rita’s Centre on the south side of Turk’s Head Lane if necessary.

2D.16 Indicative costs for this work would be approximately £157,000 for the pitches. If just the area to the south-east of the centre were delivered then this would cost in the region of £130,000.

Tower Hill (H2)

2D.17 Plans already existed showing how a range of pitches could be delivered at Tower Hill (see Appendix 8). As such STRI were not required to produce any further plans. The Honiton Development Trust plans for Tower Hill show a total of 3x senior rugby pitches, 3x midi rugby pitches, 2x adult football pitches, 3x youth 11v11 football pitches, 2x mini 5v5 football pitches, a standalone cricket ground, a second cricket square overmarking midi rugby pitches and a small MUGA (Multi-Use Games Area) together with a clubhouse and car parking facilities.

2D.18 As these plans were drawn up a number of years ago (2009) many of the pitch sizes are no longer in conformity with relevant FA / RFU/ECB/ Sport England standards, however the plans give an idea of what could in theory be accommodated on site.

2D.19 A feasibility report produced by Business Information Point (BIP) was produced in 2012 to accompany these plans and this suggested the following costs as minimums. The costs do not include car parking, land purchase, off-site infrastructure improvements, or internal fittings and fixtures for the clubhouses. The figure for groundwork, pitch drainage and establishment was provided by STRI in June 2011 and discussion with them has highlighted that this cost would likely only be revised upwards as a result of inflation and works that have been carried out to the field since that original estimate was provided.

	Total Estimate Cost £ (excl VAT)
Ground work, pitch drainage and establishment	£600,000
Pavillion, changing rooms	£1,606,330
Machinery store, changing rooms	£312,457

Former Showground (H4)

2D.20 STRI were required to produce a plan showing multiple senior and midi sized rugby pitches, clubhouse and car parking. Plans show a total of 2x senior rugby pitches and 3x midi rugby pitches capable of being delivered on site. It had been hoped to provide for more pitches than this on this site, however, the significant slope requires major cut and fill re-profiling to create flat platforms for the pitches and the powerlines at the southern end of the site are a major constraint to expansion of the platform to accommodate more pitches.

2D.21 Indicative costs for this work would be approximately £475,000 for the pitches and £650,000 for the clubhouse and car parking.

Former Manor House School (H5)

2D.22 STRI were required to produce a plan showing delivery of a cricket square with football and/or rugby pitches overmarking the outfield. Plans were also required to show expansion of car parking provision and extension to the existing cricket pavilion.

2D.23 The plans show that it would be possible to accommodate an 8x wicket cricket ground with a senior rugby pitch and an adult football pitch overmarking the outfield. It would not be possible to accommodate 2x senior rugby pitches as the south-western end of the site is too narrow to fit the full length required.

2D.24 Indicative costs for this work would be around £101,000 for the pitches. Clubhouse and car parking extensions would be in addition to this.

Kings Arms Farm (H7)

2D.25 STRI were required to produce a plan showing delivery of a range of football and rugby pitches of varying sizes together with a clubhouse and car parking. As the majority of the site is within the floodplain of the River Otter, only the area closest to the road was surveyed and only this area was modelled for pitch provision, however, additional pitches could potentially be delivered on the floodplain although there would be risks involved with this.

2D.26 The plans show provision of 1x adult 11v11, 1x youth 11v11, 1x mini 7v7 and 1x mini 5v5 football pitch delivered on cut and fill platforms above the floodplain plus an indicative location for a clubhouse and car parking. The STRI Stage 2 Report explains that potentially there could be room for up to two adult sized pitches to be laid out in the floodplain if necessary, however these would obviously be at risk of flooding and potentially be out of action for long periods at the wettest times of the year.

2D.27 Indicative costs for the plans would be approximately £205,000 for the pitches and £350,000 for the clubhouse and car parking. If pitches were laid out in the floodplain as well then there would likely be some additional costs involved for this, however the effectiveness of installing drainage would be questionable and no groundworks would be required so costs could be minimal at the outset.

Land between Mountbatten Park and the A30 (H9)

2D.28 STRI were required to produce a plan showing delivery of mini football pitches and potentially a clubhouse and additional car parking to meet the expanded needs of all the sites in this vicinity. The site is only just wide enough to accommodate mini 5v5 football pitches and could not fit any larger format pitches.

2D.29 The plans show provision of 3x mini 5v5 football pitches plus an indicative area that could potentially accommodate a clubhouse and additional car parking.

2D.30 Indicative costs for this work would be around £55,500 for the pitches and £200,000 for the clubhouse and car parking.

Step E – Basic sustainability and suitability assessment

- 2E.1 In addition to understanding whether it is technically feasible to deliver pitches on sites and what pitches might be able to be accommodated on them, it is key to assess the basic sustainability and suitability of the sites to host sports pitches. Essentially this means conducting a basic policy test and considering a number of pros and cons for each of the sites.
- 2E.2 The policy context for delivering sports pitches at Honiton is set out in the introduction to this strategy. These are the key policies and the key guidance that any new sports pitch proposal at Honiton will need to be considered against. Some policies will apply to some sites and not others, whilst other policies will apply to all.
- 2E.3 The full basic sustainability and suitability assessment for each relevant site can be found at Appendix 6, however, the section below discusses the key issues at hand for each site, makes conclusions about their suitability and sustainability in planning terms and recommends whether pitches should be delivered on sites or not. All potential new sites have been assessed. Existing pitch sites are automatically considered to be appropriate for simply grass pitch provision.
- 2E.4 It should be noted that this assessment and recommendation in this strategy is not a substitute for planning permission and does not prejudice the formal consideration of any submitted application taking into account the comments and views of any statutory consultees, interested 3rd parties, policies laid out in the East Devon Local Plan (as well as other policy guidance), and the views of the Service Lead - Planning and the Chairman and Development Management Committee.
- 2E.5 Following the site by site assessments, the various costs involved with delivering each site are compared and sport by sport and overarching conclusions are made explaining why pitches should be delivered on specific sites. This is followed by a table setting out the draft recommendations and explanation of how they meet the requirements for sports pitches in Honiton to 2024.

General Environmental Health comments

- 2E.6 When consulted, the Council's Environmental Health team gave some general advice that would apply to any site regarding floodlighting, hours of use, dogs, and drainage outfall:
- Lighting – It is always possible to design, install and maintain lighting so that it does not overspill into gardens or cause nuisance through windows. What needs to be achieved is to conform with the Institute of Lighting Engineers standards for the avoidance of light pollution – this is not the same as just achieving illumination levels which is what designers usually do.
 - Hours – all weather pitches provide important extra time for exercise and this can only be welcomed. We see elsewhere that evening hirings usually end at 9pm or 10pm at latest. At this time both the noise level dies down and the lighting is switched off. The use therefore does not encroach on the night hours of 11pm to 7am. There will be some people noise but the impact of this should be balanced against the health and well-being benefit of providing better facilities over longer hours.
 - Dogs – I strongly recommend that dogs are prohibited from all playing pitches from the outset. This is easier where the pitches are fenced and a nearby alternative for dog walking off lead is preferable, but we can help with this in

due course. Any pitches which are leased to private clubs and the like can be subject to their own rules and enforcement.

- Drainage of the pitches is of course essential and again care must be taken where the pitches are on previously developed land. All drainage must go to a suitable running outfall and this must be evaluated if not already in significant use – it would not be appropriate just to assume that a nearby dry ditch is in a fit state to accept piped run-off. We are also happy to help with this too if you wish us to look at specific sites.

St. Rita's extension (H1)

2E.7 The PPS specifically identifies in action plan HO.13 that options for delivering additional youth football pitches at St. Rita's should be explored. It would be possible to lay out two of the largest youth 11v11s plus 2x mini 5v5s on additional land at St. Rita's. It may also be possible to accommodate additional grass cricket wickets between the youth 11v11 pitches. This would enable the youth football club to spread current and future usage out over additional pitches (reducing the impact on the quality of existing pitches) and the cricket club to expand in the future. It would not be possible to accommodate two FA compliant adult pitches without unreasonable impact on protected trees and hedgerows, (although a single adult pitch would be possible). U15/16 Youth 11v11 pitches, at 91m x 55m (excluding run-offs) would be slightly smaller than the pitches at Mountbatten Park. An option could be for the adult football club to utilise the pitches when the cricket season takes over at Mountbatten Park, reducing the issues of ground sharing that currently exist. However, the football club has raised issue with this and explained that they would not be able to compete at Peninsula League level (which is the club's ambition) on smaller than official adult sized pitches or on the current arrangement of using an adult pitch overmarking a cricket outfield (they require sole occupancy for football). That being the case, another option might be to consider relocating the cricket ground to site H1, and then improving Mountbatten Park (HA) to allow development of a Peninsula League standard football ground in due course. This would enable the adult football club's current and future needs to be met on one site, and the increased quality and capacity provided by drainage and sole occupancy would enable additional junior football to be met through overmarking the adult pitches with youth/mini pitches. This would also address the issue of adult football and cricket sharing their home ground. This option would, however, be less appealing to the cricket club who's ambitions to expand would be tempered and who would not be able to take advantage of potential sponsorship and catering/bar functions and the important revenue stream these bring at the main clubhouse. Co-location with existing pitches makes the sustainability and viability credentials of the site for the delivery of sports pitches in general impossible to overlook.

2E.8 In addition to this, the potential cost of laying out pitches on this site as proposed by the STRI plans is relatively low at an estimated £157,000 because the land is fairly flat already, therefore requiring less re-profiling. The costs may vary for the above mentioned alternative including a relocated and suitably prepared cricket square. Additional changing and car parking facilities would need to be accommodated through a review of the existing provision at Mountbatten Park (HA). If the above alternative arrangement were pursued then it could be possible to move the first XI football pitch on Mountbatten Park (HA) slightly north-west (over what is currently the cricket square). This should provide room to construct additional car parking to the south-east of the pitches along Ottery Moor Lane.

- 2E.9 The site is located outside the floodplain, on land classified as “urban” in agricultural land terms and less sensitive in landscape terms than some other sites being considered. Having said that, the amenity impact on neighbouring properties would be more significant than others.
- 2E.10 Floodlights are not proposed for this site, however added noise pollution during daylight hours, particularly on weekends and summer evenings could potentially be an amenity issue for neighbouring properties. Having said that, the site would be unlikely to add significantly to the noise pollution created by the pre-existing sports facilities and would likely be dwarfed by the noise pollution of the A30 dual carriageway. When taken in the wider cost/benefit of providing pitches in town on this site or on a site more removed from the town, the benefits clearly outweigh the potentially slightly increased noise pollution impact on the amenity of neighbouring properties. Some additional boundary planting could help as a noise buffer.
- 2E.11 Despite all of the obvious benefits of the site, the owners of the site have stated that they would not be willing to let any further land at St. Rita’s be used for sports pitches. In essence this means they would not be open to selling or leasing the land for such purpose. The reason for this was that the St. Rita’s Centre is a retreat / convention centre and any further increase in sports provision around it would be at odds with the peaceful and reflective nature of its use. However, the benefits of the site’s location would appear to clearly outweigh any increases in noise pollution when the pitches were in use. The main concerns of the retreat are the location of pitches in close proximity to the centre and the general impact that intensified use of land surrounding the centre might have on the peaceful and reflective nature of the centre’s use. It might be possible to reduce the impacts on the centre by exchanging the football pitches shown on the STRI plans with a relocated cricket ground which may have a less significant impact in terms of noise and in any case only be used from May to September.

Recommendation

2E.12 The St. Rita’s extension site should be progressed as a priority site for the provision of additional sports pitches to meet the needs of Honiton in conjunction with improvements to existing pitches and ancillary facilities at St. Rita’s and Mountbatten Park. Two alternative options exist for use of the site:

- (1) 2x Youth 11v11 and 2x mini 5v5 football pitches (as per the plans produced by STRI); *or*
- (2) A relocated 10x grass (plus 1x artificial) wicket cricket ground and small pavilion building

In order to progress this site it may be necessary to exercise a Compulsory Purchase Order (CPO) depending on further negotiations with the landowner. Which option is pursued will be at least partly dependent on these negotiations..

Tower Hill (H2)

2E.13 The PPS has specific action plans regarding Honiton Development Trust’s Tower Hill proposals. It explicitly states in HO.18: to “explore the possibility of addressing all Honiton pitch issues on alternative sites better related to the existing town and outside of the AONB first but if there are no realistic alternatives then some pitches may need to be delivered on Tower Hill”, and in HO.19: “Only support the development of such a facility if all clubs involved are willing to move, a sustainable travel plan can be developed and it would not adversely affect existing club, viability of other clubs and facilities in the area and access to open access pitches in Honiton and surrounding villages”.

- 2E.14 Clearly, the site could potentially accommodate a significant number of pitches, but this would come at a high price, financially, environmentally and socially. The 2012 BIP Report suggests that excluding land costs their plans would cost more than £2.5 million. Considering these cost estimates were made in 2012, this is likely to have increased with inflation.
- 2E.15 The above assessment clearly shows how development of sports facilities at Tower Hill would be contrary to multiple policies of the Local Plan. The lack of accessibility by sustainable means, potential impact on the local road networks and significant anticipated impact on the landscape and AONB make the site wholly inappropriate for sports pitch delivery. Considering the alternative options that are assessed in this report it is therefore not an appropriate site to take sports pitch development.

Recommendation

- 2E.16 No sports pitches should be delivered on this site.

Former Showground (H4)

- 2E.17 Whilst the Former Showground is located on high quality agricultural land within the AONB and potentially has issues regarding safe accessibility by foot/bike, it clearly is well related to the town and has potential to deliver significant numbers of pitches to help meet the sporting needs of the town. It is moderately sensitive to development in landscape terms, and whilst being within the AONB it is potentially less sensitive than other parts of the AONB due to its close proximity to the town and A30 Honiton bypass. The fact that it is high quality agricultural land is a drawback of the site, however, other sites of lower quality agricultural land are not suitable for other reasons outlined in this report and therefore development of this site for sports pitches would be possible. A suitable safe pedestrian/cycle access would likely need to be achieved for this site to be progressed.
- 2E.18 Particular care would need to be given to the design of any built facilities due to its AONB location to ensure that they are reflective of their surroundings and do not cause unnecessary intrusion into the landscape. The cut and fill banking should also be minimised as much as possible and effectively mitigated through design and screening to reduce the impact of such an engineered landform in this location. It may be that RFU/Sport England cross fall gradient guidelines need to be exceeded to achieve a suitable outcome. The Blackdown Hills AONB team highlighted concerns with the impact of this site on the wider AONB as part of the consultation on the draft strategy.
- 2E.19 In addition to this, during the consultation, Devon County Council published plans for the improvement and re-alignment of the A30 trunk road from Honiton to Devonshire Inn. These plans showed potential for a new link road linking what would then become the old A30 Monkton Road to Langford Road cutting directly across this site. If delivered exactly as proposed through their consultation plans then it would undermine the ability of the site to deliver sports pitches as proposed in the draft strategy. Initial discussions with the County Council have intimated that they would like to accommodate plans for the sports pitches as much as possible within reason and it appears that a suitable solution to accommodate both plans may be possible, but the final design and decision will rest with Highways England. If there is a requirement to accommodate the new link road then it is expected that it would be necessary to also need to utilise the adjoining field immediately to the north-east of the field identified as site H4. That may then enable the new link road to be delivered but also improve the landscape impact of the pitches.

2E.20 By splitting out the pitches across two separate fields, it would be possible to create multiple different “platforms” rather than siting them all on a single level. This would mean a less engineered and harsh reprofiling of the land could be possible which it is hoped would help to address concerns voiced by the Blackdown Hills AONB.

2E.21 As things stand there are two potential ways of achieving a safe pedestrian/cycle access to the site:

- Utilise Clapper Lane which passes under the A30 approximately 400m west of where Langford Road appears on the north side of the A30. In this option, a new footpath/cycleway would need to be laid along the north side of the A30 between Clapper Lane and Langford Road.
- Improve existing footways and crossing points on the A30/A35 junction bridge and run a new footpath along the remainder of Langford Road to the site entrance.

However, it is perhaps unlikely that either of these arrangements would be supported by the County Council highways department on safety grounds. The only other option would be to potentially consider a new bridge over the A30 as part of the plans to improve/re-align the A30 in this location, though this would be at significant cost and the realistic number of people likely to access the site by foot/cycle in that situation would need to be weighed up to understand if it was of reasonable cost/benefit.

2E.22 The cost of delivering pitches in this location would be significant, mainly due to the sheer quantity of earthworks required to create a flat platform(s) for the pitches. However, in combination with existing facilities at All Hallows it could provide enough pitch space for current and future rugby needs in Honiton for years to come.

2E.23 The site would not be large enough to host all of Honiton RFC’s required rugby pitches on its own without continued reliance on All Hallows and its location within the AONB means it would not be a suitable location for floodlights. Therefore this option is reliant on retention and improvement of All Hallows as Honiton RFC’s main ground capable of being floodlit if necessary.

2E.24 The owners of the site (who also own the field immediately to the north-east which may potentially also be required) have stated that they would potentially be open to the idea of making the site available for sports pitches.

Recommendation

2E.25 The Former Showground should be progressed as a priority site for the provision of additional rugby pitches to meet the needs of Honiton in conjunction with improvements to existing pitches and ancillary facilities at All Hallows. In order to progress this it may be necessary to exercise a Compulsory Purchase Order (CPO) depending on further negotiations with the landowner.

Former Manor House School (H5)

2E.26 The Former Manor House School site (H5) has many of the same issues as Tower Hill (H2), being located almost immediately next door to it. The difference here is the former use as a school playing field and the scale of development. Pitches could be simply marked out on this site and be used by clubs without a need for planning permission due to its current use being as a playing field (albeit that it has no user at present) and lack of need for engineering works. However, if drainage needed installing, additional car parking and a new clubhouse were required to enable intensification of the use of the playing field as modern sports pitches then this would require permission and it is unlikely that an increase in traffic and noise pollution in this tranquil AONB setting would be appropriate. The existing pavilion would need to

be utilised and any extensions kept to a minimum and designed in keeping with the original building to have any likelihood of being considered appropriate.

- 2E.27 That being the case, it might be possible for the site to be utilised as temporary or even permanent overspill sports pitch provision. However, the pitches would be unlikely to be able to be improved or ancillary facilities extended. This may put clubs off wanting to use the site as part of a permanent solution.
- 2E.28 In addition to this, the site could host at most 1x adult 11v11 football pitch and 1x senior rugby pitch overmarking an eight wicket cricket ground. If football or rugby pitches were laid out here then clubs would have to maintain multiple sites for their pitches which might be considered to be unviable. The cricket club could potentially move to this site wholesale and increase the number of wickets to 11 meaning that current issues regarding sharing at Mountbatten could be resolved and they would only need to maintain one site. However, they would then be detached from the town and this would discriminate against users that do not have access to a car. This may have serious membership issues which in turn could undermine the long term viability of the club.
- 2E.29 The fact that the site has previously been used as a school playing field and therefore could be used as sports pitches without a need for planning permission means it makes sense for this site to be made available as a temporary solution to pitch issues in Honiton until the sites for the permanent solution are completed, however, long term it is not a suitable location for sports pitches.
- 2E.30 The owner of the site has indicated that it would be able to be used for sports pitches, so long as use did not encumber the existing/proposed wedding and educational businesses running out of the pavilion. Further negotiation would be required to reach a suitable arrangement.

Recommendation

- 2E.31 The Former Manor House School site (H5) should be considered as a temporary solution for sports pitches in the Honiton area usable by any of the sports clubs in the town with the existing pavilion/toilets available for users as changing facilities/clubhouse. Once permanent sites have been completed then the site could either continue as an unimproved playing field, be returned to its natural state or an agricultural field. The site is not suitable for the long term permanent location of sport pitches to meet the needs of Honiton considering the other options that are available.

Kings Arms Farm (H7)

- 2E.32 Kings Arms Farm (site H7) is a good site for sports pitch delivery in many ways (easily accessible, close to town, minimal land re-profiling required, outside the AONB and not on high quality agricultural land. Delivery of pitches as per the plans prepared by STRI could be possible and would potentially be able to accommodate all of the additional football pitch requirements but in a less suitable location in comparison to St. Rita's. The area on which STRI have identified pitches being constructed (out of the floodplain) could only accommodate up to 2x senior rugby pitches which would not meet the needs of the rugby club. Delivery of more pitches than this would require use of the floodplain which is undesirable and in fact unsuitable. If new pitches are not available during the wettest periods of the year (the time of peak demand) then there is little point to their provision and regular flooding would result in higher maintenance costs. Indeed, Strategy 43 of the Local Plan which sets out the amounts and types of open space required for new housing development specifically rules out delivery of open space (excluding natural and

semi-natural greenspace) within floodzone 2. That being the case, only the smaller area of the site which lies outside the floodplain could reasonably be acceptable for sports pitch use.

- 2E.33 This part of the site is not big enough to accommodate the number of rugby pitches required for the town or a cricket ground and as such could only accommodate additional football pitches. The site could potentially accommodate a better mix of football pitch sizes than St. Rita's extension (H1), however it would clearly not have the same accessibility and co-location credentials.

Recommendation

- 2E.34 No pitches should be delivered here unless it proves impossible to deliver additional pitches at St. Rita's extension (H1), additional capacity at Mountbatten Park (HA) and St. Rita's (HB) or that provision does not satiate demand.

Land between Mountbatten Park and the A30 (H9)

- 2E.35 As with delivering additional pitches on site H1 (extension to St. Rita's), additional pitches here would have the benefit of close links and good access to the town as well as the existing pitches and facilities at Mountbatten Park and St. Rita's. Delivering pitches here would have very few detrimental impacts so long as they were designed correctly and could ensure that more sensitive landscapes were protected.
- 2E.36 However, the site is only able to accommodate 3x mini 5v5 football pitches which means it would be limited to use by under 7s / under 8s. No other pitch types (football, rugby or cricket) could fit on this site. The site is therefore not that flexible in terms of ability to be used by multiple age ranges or sports. It would not be prohibitively expensive to lay pitches out on this site, but the benefits of doing so would be fairly minimal. The STRI potential plans for site H1 show how two additional mini 5v5 pitches could be accommodated on land directly to the west of the St. Rita's Centre. If these are provided alongside the larger format provision potentially proposed to the south of the centre, then there would likely be little demand for additional mini 5v5 pitches on site H9. If, however, these pitches are not delivered or the alternative arrangement of a relocated cricket ground on site H1 is pursued then there may be an increased likelihood of needing this site (H9) to deliver some mini football pitches depending on how much capacity can be increased at Mountbatten Park (HA) and St. Rita's (HB) through other improvements.
- 2E.37 The plans show how potentially extended clubhouse or car parking facilities could be accommodated on the site as well as pitches. If delivering additional car parking or clubhouse facilities on sites HA and/or H1 turns out not to be possible then it may be necessary to deliver some extended facilities here, but this need will have to be subject to more detailed site planning across all of the Mountbatten Park and St. Rita's sites.
- 2E.38 In response to the consultation on the draft strategy, the owners of the site stated that they would not be willing to allow use of their land for sports pitch related uses. That being the case, if it transpired that the site were required for the delivery of additional mini soccer pitches then CPO might be required.

Recommendation

- 2E.39 Consider this site as a backup in case plans for other sites in the vicinity do not create sufficient capacity to accommodate all mini football. Depending on the exact plans for extension and improvement of clubhouse and car parking facilities at

Mountbatten Park, additional facilities could potentially be accommodated here. However, if required, a CPO would likely be needed to acquire the site.

Mountbatten Park (HA)

2E.40 The existing Mountbatten Park pitches site (HA) currently hosts a 10x grass + 1x artificial grass wicket cricket square with 2x adult 11v11 football pitches overmarking the outfield. Mini 7v7 football pitches further overmark the second XI pitch. The key issues identified for this site by the PPS are the need for sports pitch drainage and the ongoing difficulties associated with sharing the site between football and cricket. With appropriate drainage the site has potential to be an excellent facility in an easily accessible location within the town and as such should be retained and enhanced. The indicative costs for primary drainage only on this site would be around £45,000.

2E.41 In terms of football and cricket sharing issues there would appear to be three realistic options:

- 1) Honiton Cricket Club relocate to the Former Manor House School playing fields (H5) and Mountbatten Park is then used solely by Honiton Football club; or
- 2) Mountbatten Park continues to be used by both the cricket and football club but when the cricket season starts the football club utilise the youth 11v11 football pitches that potentially could be laid out on site H1.
- 3) Honiton Cricket Club relocates onto site H1 and Mountbatten is then used solely for football but would need to cater for some additional usage by the Honiton Youth Football Club.

Considering the sustainability issues with utilising site H5 and the significant benefits in terms of sustainability and viability in using sites HA and H1 in combination it is clear that either option 2 or option 3 would be preferable.

2E.42 In addition to this, to cater for an intensification and increase in use of facilities and pitches in this vicinity as recommended above then the existing clubhouse and car parking facilities at Mountbatten will need to be extended or replaced. If the cricket club relocated onto site H1, then that site would need to host a small cricket pavilion containing changing rooms and room for teas etc. The existing clubhouse buildings on Mountbatten Park could then be enhanced/extended or replaced with a new up to two storey building containing sufficient changing for all the intended football pitches and social facilities for both sports. Furthermore, relocation of the cricket ground would enable the two adult football pitches on Mountbatten Park to be squeezed a little closer together (closing the gap currently taken up by the cricket square) and this could create room for additional car parking alongside Ottery Moor Lane. These options will need to be explored further at a more detailed stage of planning.

Recommendation

2E.43 Install primary drainage to increase pitch capacity and enhance/extend/replace the existing clubhouse facilities with an up to two storey building capable of accommodating users of all pitches on sites HA, HB and H1. Explore options for accommodating additional car parking on-site.

St. Rita's (HB)

2E.44 The existing pitches site at St. Rita's (HB) currently hosts 2x youth 11v11 and 1x youth 9v9 football pitches with various smaller format pitches overmarking these. The site slopes off fairly significantly in the corners which means that one of the youth 11v11 pitches and the youth 9v9 pitch exceed Sport England/FA guidelines. The plans produced by STRI show how potentially the site could be levelled to provide for

an adult 11v11, youth 11v11 and mini 7v7 within guidelines but it would be impossible to expand the provision any further due to the existence of a large pipe running across the site. It therefore would appear to not necessarily be cost beneficial to level the site completely but the worst undulations could be ironed out and primary and secondary drainage installed for around £61,000.

2E.45 The site is easily accessible (although the access track could potentially be improved), has very limited landscape impact and is already in use as sports pitches. Continuation of pitch provision in this location is an obvious choice, and if additional pitches are located on adjoining fields (H1) and the existing pitches on Mountbatten Park (HA) are improved then in combination with the above mentioned drainage improvements, all of Honiton's football needs can be met in one hub location.

Recommendation

2E.46 Retain and enhance the site through the installation of primary and secondary drainage. Explore options for improving the access track to site HB as part of more detailed plans for enhancement of clubhouse and car parking facilities in this vicinity.

All Hallows (HC)

2E.47 The existing All Hallows pitches site (HC) currently hosts 2x senior rugby pitches and there is no room to lay out additional pitches. The site currently hosts all of Honiton RFC's teams, however is significantly overused as a result of this. Honiton Community College also uses the site. As a site in the town centre with easy access to all members of the community it is an ideal location for a sports club to exist. In order to continue being used by the rugby club and the school sports pitch drainage would need to be installed as a priority project at an indicative cost of around £100,000 for full primary and secondary drainage.

2E.48 As explained above there are no sites capable of taking the entire pitch requirements of Honiton RFC on a single site except for potentially Tower Hill, however this would be an unsustainable location contrary to a number of policies in the Local Plan. The only site capable of taking multiple rugby pitches otherwise that is entirely outside of the floodplain is the Former Showground (H4) however floodlights would likely not be appropriate in this location. Honiton RFC require a floodlit pitch to progress further through leagues and to enable training on winter evenings and as such All Hallows provides the most suitable location for this provision. Whilst the amenity of neighbouring properties would need to be a key consideration in the design and exact location of the floodlights, as well as the impact on various heritage assets within the town (including the Grade II* listed St. Paul's Church amongst others), All Hallows represents the least sensitive location for floodlights in comparison to any new sites in wider landscape terms due to its location within the urban fabric adjacent to existing small floodlit hard courts and outside of the AONB. The full impact of floodlights on the AONB, heritage assets and amenity of neighbours will need to be fully considered as part of any planning application, but in principle it would appear to be the least sensitive location for floodlights between All Hallows and the Former Showground sites.

2E.49 One drawback of All Hallows in terms of sport is its open community access. This means that it is used for casual recreation and more importantly dog walkers. Despite significant action on behalf of the Council and the rugby club to deter dog walkers from using the pitches themselves and to pick up, the issue of dog fouling remains a concern. Due to their location in the town centre, and the lack of other available green spaces in this vicinity it is vital that All Hallows remains available for other community users including dog walkers, however, management of this will be vital.

Recommendation

2E.50 Retain and enhance grass rugby pitches at All Hallows through the installation of primary and secondary sports pitch drainage and floodlights.

Sports

Football

2E.51 Currently the senior football club uses the pitches at Mountbatten Park (HA). The youth football club uses the pitches at St. Rita's (HB) plus mini pitches overmarking the second XI adult pitch on Mountbatten Park. In addition to improvements of the existing pitches (drainage, clubhouse and access to St. Rita's existing pitches), the senior club need access to an adult pitch all year round so that their season is not cut short by the cricket season and the youth club need access to additional pitches as they simply don't have enough capacity at present. The obvious solution is for additional pitches and/or capacity in close proximity to the existing pitches to encourage a football hub complex. The St. Rita's extension (H1) and Land between Mountbatten Park and the A30 (H9) present the opportunity to deliver this in a location that is less harmful than any other, will encourage club viability, and mean that users can easily walk to the site. Provision of these pitches would need to be accompanied by drainage and surface improvements to both existing sites, improvements to the access track round to the existing St. Rita's pitches, and the extension/replacement of clubhouse and parking facilities.

2E.52 A further issue is that the senior football club have aspirations to compete at Peninsula League level and this will in time require them to have access to a full-sized adult sized pitch all year round, full perimeter rail, covered stand and ability to install floodlights in due course. Sharing with the cricket club at Mountbatten Park restricts their ability to progress in this regard, even if they had access to additional pitches on site H1 for once the cricket season starts. That being the case, a preferential arrangement *could* be to relocate the cricket club to site H1. This would free up additional capacity on the ground which in combination with drainage and surface improvements on Mountbatten Park and the existing St Rita's pitches could then accommodate all football activity on the existing sites. It would, however, be less desirable for the cricket club.

2E.53 Other options for resolution of football issues in Honiton could have been on the Former Showground site (H4) or on land at Kings Arms Farm (H7). The Former Showground site would be suitable, however it would require additional clubhouse/changing facilities to be provided and it is the only suitable site capable of taking anywhere near the number of senior rugby pitches that are required for the town without using the floodplain. STRI potential plans for Kings Arms Farm show that more and a better range of football pitches could be provided here than on either site H1 or H9 without utilising the floodplain but it would mean splitting the club between the existing sites and one on the edge of the town and needing to provide additional clubhouse/changing facilities in a less accessible location. The benefits of co-locating all pitches at Mountbatten Park and St. Rita's far outweigh any other factor here.

2E.54 The combination of either additional football pitches on site H1 and new sports pitch drainage and surface improvements at Mountbatten Park (HA) and St. Rita's existing pitches (HB) or the improvements to the existing pitches in combination with the relocation of the cricket ground should ensure sufficient pitch space for football in Honiton for years to come. The table below sets out how the football demands for Honiton to 2024 could be met in comparison with the requirements arising from the

PPS. Potential provision on site H1 is shown in brackets as is the overall supply if site H1 is used for football. This shows sufficient adult 11v11 and youth 11v11 pitches but under provision of youth 9v9, mini 7v7 and mini 5v5 pitch sizes if cricket is re-located to H1, but over-provision of youth 11v11 and sufficient provision of mini 5v5s if football provision is made on site H1. However, the PPS requirements were based on all pitches being of “standard” quality. The combined improvement of pitches at Mountbatten Park and St. Rita’s existing plus the relocation of the cricket ground would enable “good” quality pitches with higher capacity. Therefore, in this scenario it would likely be possible to meet the football pitch requirements for Honiton without laying out any additional pitches. If in due course additional capacity were required, either additional youth/mini pitches overmarking the relocated cricket ground on site H1 or additional mini pitches on site H9 could be considered.

Site	Adult 11v11	Youth 11v11	Youth 9v9	Mini 7v7	Mini 5v5
Mountbatten Park (HA)	2				
St. Rita’s (HB)		2	1		
St. Rita’s extension (H1)		(2)			(2)
TOTAL	2	2 (4)	1	0	0 (2)
Required by 2024	2	2	3	2	2
Difference	+0	+0 (+2)	-2	-2	-2 (+0)

2E.55 The clubhouse at Mountbatten Park would need to be either extended or preferably replaced with an up to two storey building comprising sufficient changing accommodation for all of the pitches across sites HA, HB and H1 and additional car parking provision made in the vicinity.

2E.56 Subject to agreement with the landowner, the Former Manor House School playing fields (H5) could be made available as temporary overflow provision until the above recommendations are completed.

Cricket

2E.57 Currently the cricket club uses Mountbatten Park (HA). The main issue for the cricket club is sharing with football, the state of the outfield at the start of the season and the outdated clubhouse facilities. The cricket club are also in urgent need of new cricket practice nets. The provision of additional football pitches on the extension to St. Rita’s (H1) plus installation of drainage on Mountbatten Park and improved clubhouse facilities would enable a more effective football-cricket sharing arrangement to be established and ensure the outfield is in good condition at the start of the cricket season. During the initial consultation, this arrangement was supported by the cricket club, however objected to by the senior football club who felt it did not address their key issues. In addition to this, comments from the St. Rita’s Centre explained that these proposals would have an unacceptable impact on the centre’s existence as a retreat. That being the case, an alternative arrangement whereby the cricket ground is relocated across the road to St. Rita’s (site H1) would allow the cricket club to continue to run in its current format, address issues regarding sharing of facilities, and may lead to a more acceptable arrangement for the landowner and neighbours of the site. In order to deliver this, a small cricket pavilion would be required on the site but social facilities could remain at Mountbatten Park as part of an extended/replaced clubhouse facility there. This would be less acceptable to the cricket club than the original plans as detailed in the sections above but may resolve more issues with the football club and be more acceptable and ultimately deliverable with the landowner.

2E.58 The only other possible option for cricket would be to wholesale move the club to the Former Manor House School playing fields (H5), however, this would be unlikely to be appropriate in terms of club membership which would likely decline as a result of the out of town location and inability to walk to the site. Kings Arms Farm (H7) would only be able to accommodate a cricket square in the floodplain which would likely not be appropriate and have significantly higher maintenance costs per annum. The Former Showground (H4) is large enough to accommodate a cricket ground, however this would make it difficult to accommodate the required number of rugby pitches on the site and considering that is the only suitable site capable of taking enough rugby pitches that would not be a realistic opportunity.

Rugby

2E.59 Currently the rugby club uses the pitches at All Hallows (HC). The main issue is that there are simply not enough pitches to accommodate all of the clubs needs and the pitches are of poor quality due to overuse and in desperate need of sports pitch drainage. The only site that has potential for the entire relocation of the rugby club is Tower Hill (H2), however, the above assessment is clear that Tower Hill is not a suitable or sustainable option. This means that the rugby club will have to be split across two sites in order to have access to a suitable number of pitches to support the number of teams it currently has and will need to have in the future. The Former Showground (H4) is the only suitable site large enough to take a significant number of additional rugby pitches without them being located in the floodplain. However, floodlights would likely not be appropriate in this location and full perimeter rail could be unlikely due to landscape impacts in the AONB. As such it would be important for the rugby club to retain All Hallows as the location for its main floodlit pitch which would be much less sensitive to such provision.

2E.60 The only other option would be to deliver additional rugby pitches at Kings Arms Farm (H7), however only a maximum of 1x senior and perhaps 2x midi pitches could be provided outside of the floodplain. For any further pitches (which the PPS states are required) then these would have to be delivered on the floodplain which has the potential to mean significant extra expense on an annual basis and acceptance that the pitches may not be available at the wettest time of the year (when they would need to be available the most). No other sites considered would be large enough to host senior rugby pitches. Delivering multiple rugby pitches of both senior and midi size and minimal changing provision at the Former Showground site (H4) in combination with drainage works and floodlights at All Hallows should ensure that Honiton has enough rugby pitch provision for years to come.

2E.61 The potential impact of plans for the realignment and upgrading of the A30 trunk road between Honiton and Devonshire Inn would mean that additional land immediately adjacent to the Former Showground site would likely need to be utilised in addition to site H4 itself in order to deliver the full suite of additional rugby pitches that are required in combination with the proposed new link road.

Overarching conclusion

2E.62 Through the improvements to the existing pitches at Mountbatten Park (HA) and St. Rita's (HB) and either the provision of additional football pitches or relocating the cricket ground to the St. Rita's extension site (H1) all of the adult and junior football needs for Honiton should be capable of being accommodated in a single hub location. The co-location of pitches on a site located within the town that is easily accessible significantly outweighs the benefits of being able to accommodate more pitches on other sites which are more remote, less suitable, sensitive to

development, more readily available and which would require new clubhouse facilities to be delivered in the open countryside.

2E.63 Delivery of these plans would require an element of compromise on the part of either the senior football club or the cricket club depending on the final pitch arrangements for the St. Rita’s extension site (H1). However, the sustainability and suitability of this site cannot be overlooked. In either scenario, the cricket club would be able to continue at its current levels, although if they were to remain at Mountbatten Park then it may be possible to deliver additional wickets on site H1 to enable the club to grow. This would not be possible if the club relocated to site H1 in full. The final pitch arrangements for site H1 will be determined in due course, informed in part at least through negotiations with the landowner.

2E.64 Delivery of additional senior and midi rugby pitches on the Former Showground (H4) in addition to retention and enhancement of the existing rugby pitches at All Hallows (HC) through drainage and floodlighting would be the most appropriate way to meet the needs of rugby in Honiton to 2024. The benefits of locating additional pitches close to town and outside of the floodplain on a less sensitive site in landscape terms outweigh the possible benefits of using more remote, sensitive sites at Tower Hill (H2) or which would require use of the floodplain at Kings Arms Farm (H7).

Draft Recommendations

2E.65 The table below shows the proposed total pitch provision for Honiton assuming that the recommendations of this report and the PPS are implemented. The alternative scenarios for sites HA and H1 are indicated through brackets and italics.

Site	Football	Cricket	Rugby	AGP
Mountbatten Park (HA)	2x adult 11v11	<i>(10x grass 1x artificial)</i>		
St. Rita’s (HB)	2x youth 11v11 1x youth 9v9			
All Hallows (HC)			2x senior rugby	
Honiton Community College				1x full size sand-based AGP
St. Rita’s extension (H1)	<i>(2x youth 11v11 2x mini 5v5)</i>	10x grass 1x artificial		
Former Showground (H4)			2x senior rugby 3x midi rugby	

2E.66 The table below shows the proposed provision against the requirements of the PPS by 2024. Whilst on the surface proposed provision does not appear to meet requirements, it is likely (whichever scenario is followed with regards to sites HA and H1) that the increased quality and capacity of pitches and the provision of an additional senior rugby pitch, will allow for more flexible spaces capable of being more intensively used and mean that all demand should be met in full.

Pitch type	Sport	Requirement by 2024	Proposed provision	Under/over supply
Adult 11v11	Football	2	2	0
Youth 11v11	Football	2	2 (4)	0 (+2)
Youth 9v9	Football	3	1	-2
Mini 7v7	Football	2	0	-2
Mini 5v5	Football	2	0 (2)	-2 (0)
Grass wicket	Cricket	11	10+1	0
Senior rugby	Rugby	3	4	+1
Mini/Midi rugby	Rugby	5	3	-2
Sand-based AGP	Hockey	1	1	0

Land ownership and interest

- 2E.67 The draft recommendations set out in the table above are based on an objective assessment of the best locations for the delivery of sports pitches in and around Honiton to meet demands. This means they have not considered whether or not there is a willing landowner, the potential cost of purchasing or leasing that land, or who should enter into any such negotiations.
- 2E.68 Mountbatten Park (HA) and All Hallows (HC) are in Council ownership. However, St. Rita's (HB and H1) and the Former Showground site (H4) are not and are in private ownership.
- 2E.69 The Council currently leases the existing St. Rita's pitches (HB) and the lease is expiring. Whilst the landowners may be willing to extend the current lease they have been explicitly clear that they do not wish to see any further land in their ownership surrounding the St. Rita's Centre (H1) to be used for sports pitches as this would conflict with their purpose as a retreat. Comments submitted to the draft strategy consultation suggest that the main issue here is the potential amenity impact of the proposed football pitches on site H1 (particularly significant noise from football that would be in such close proximity to their buildings which are used as a retreat for convalescing priests amongst other uses). It is hoped that the identification of an alternative option whereby the cricket ground could relocate to site H1 instead might be more acceptable to St. Rita's and open up more constructive negotiations as the cricket season lasts only from May to September and is typically less noisy. However, this may still not be considered acceptable by the landowners. That being the case, it may be that a Compulsory Purchase Order (CPO) would be required to acquire this land.
- 2E.70 The owners of the Former Showground (H4) have stated that they would potentially be interested in accommodating pitch provision on their land.
- 2E.71 The owners of Tower Hill (H2) have stated that they would be willing to sell their land, however the above assessment clearly shows that delivering sports pitches in this location would be unsuitable and unsustainable.
- 2E.72 Despite multiple attempts, the owners of the Kings Arms Farm site (H7) have not responded to enquiries over the availability of their land to date, however, the assessment above suggests that this site would not be suitable for pitch provision when considering other more suitable and sustainable sites.

- 2E.73 The owners of the Former Manor House School playing fields (H5) have said that they would be willing to let their land be used for sports pitches so long as that use did not compromise the current/proposed use of the site for weddings and educational purposes. The above assessment recommends exploring whether the site could be used on a temporary and overflow basis until permanent solutions are delivered.
- 2E.74 The owners of the Land between Mountbatten Park and the A30 (H9) have stated that they would not be willing to allow use of their land for sports pitches. The strategy outlines that this site would be suitable, however, recommends other options in the first instance. If in due course through review of this strategy this site becomes required then CPO would likely be needed to acquire it.
- 2E.75 The purpose of the sustainability and suitability assessment is to ensure that the most appropriate sites are recommended for delivery. Therefore it essentially would not support delivery of pitches on alternative sites unless they were proven to be less sensitive or more suitable than those that have been recommended or the undesirable impacts could be mitigated effectively and appropriately.

STAGE 3 – FINALISING RECOMMENDATIONS

Step F – Public consultation

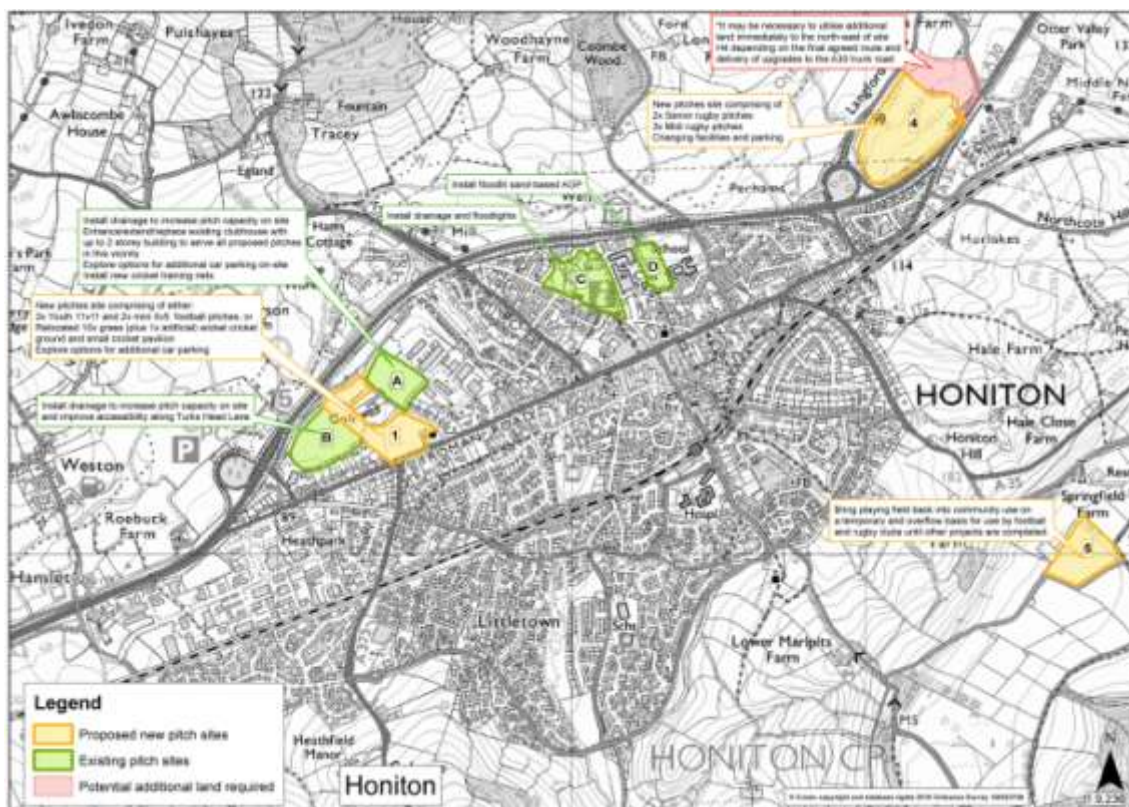
- 3F.1 An initial draft strategy was consulted on from Friday 27th May 2016 through to Friday 8th July 2016. Statutory consultees, Sport England, relevant National Governing Bodies, sports clubs, town and parish councils, neighbours of sites and other interested parties were invited to comment and the consultation was published on the planning policy section of the East Devon Website together with a press release which was subsequently reported on in local newspapers so anyone could make a representation.
- 3F.2 The consultation received representations from 34 separate people, clubs or organisations regarding a range of sites, however, understandably most received were with regards to the Former Showground (H4) and the St. Rita’s extension site (H1). Comments were received objecting to and supporting the proposals with a range of views expressed, however no realistic or suitable alternatives were suggested.
- 3F.3 Key issues arising from the consultation were taken into account and the strategy revised in response. The Consultation Statement details the consultation which took place, summaries of comments received and changes made to the strategy in response.

Step G – Amendments to the strategy

- 3G.1 Comments made in response to the initial draft strategy consultation have informed the production of this revised draft of the strategy. In particular the concerns of Honiton Town FC, the landowners of the St. Rita’s extension site (H1), Devon County Council and the Blackdown Hills AONB team have been taken into account in revised recommendations for Mountbatten Park (HA), St. Rita’s extension (H1) and the Former Showground (H4). The full set of changes are set out in the Consultation Statement but key changes with regards to recommendations at Mountbatten Park (HA), St. Rita’s (H1) and the Former Showground (H4) are explained below.
- 3G.2 The revised draft strategy revises the recommendations regarding Mountbatten Park (HA) and the St. Rita’s extension site (H1) to allow for the development of two alternative scenarios. These alternative options have been put forward in response to comments made during the consultation and recognise that there is a balance to be struck between the demands and aspirations of the senior football club, the cricket club and the potential deliverability of site H1.
- 3G.3 The revised strategy acknowledges the significance of the impacts that development of the Former Showground could have on the AONB and wider landscape. It explains that combined with the new link road being proposed as part of the project to upgrade and realign the A30 trunk road, it may be necessary to utilise the field immediately to the north-east of site H4 and to separate out the pitches on site to enable a more natural (or at least less harsh) landform to be developed.

Step H – Recommendation of site(s) and strategy for delivering new pitches

3H.1 The table and plan below set out the revised draft recommendations to meet Honiton’s current and future sports pitch demands as set out in the PPS based on the sustainability and suitability of the options available.



Plan showing revised draft recommendations for pitch sites in Honiton (reproduced at Appendix 7)

Site	Revised Draft recommendations
Mountbatten Park (HA)	<ul style="list-style-type: none"> • Install drainage to increase pitch capacity on site • Enhance/extend/replace existing clubhouse with up to 2 storey building to serve all proposed pitches in this vicinity • Explore options for additional car parking on-site • Install new cricket training nets
St. Rita’s (HB)	<ul style="list-style-type: none"> • Install drainage to increase pitch capacity on site • Improve accessibility along Turks Head Lane
All Hallows (HC)	<ul style="list-style-type: none"> • Install drainage and floodlights
Honiton Community College (HD)	<ul style="list-style-type: none"> • Install floodlit sand-based AGP
St. Rita’s extension (H1)	<ul style="list-style-type: none"> • New pitches site comprising of <i>either</i>: <ul style="list-style-type: none"> ○ 2x Youth 11v11 and 2x mini 5v5 football pitches; <i>or</i> ○ Relocated 10x grass (plus 1x artificial) wicket cricket ground and small cricket pavilion • Explore options for additional car parking
Former Showground (H4)*	<ul style="list-style-type: none"> • New pitches site comprising of: <ul style="list-style-type: none"> ○ 2x Senior rugby pitches

	<ul style="list-style-type: none"> ○ 3x Midi rugby pitches • Changing facilities and parking
Former Manor House School (H5)	<ul style="list-style-type: none"> • Bring playing field back into community use on a temporary and overflow basis for use by football and rugby clubs until other projects are completed.

*It may be necessary to utilise additional land immediately to the north-east of site H4 depending on the final agreed route and delivery of upgrades to the A30 trunk road.

3H.2 These recommendations are based on officer assessment of the sustainability and suitability of the sites that have been considered, public consultation and ongoing dialogue with landowners, clubs, National Governing Bodies and local Members.


3H.3 These recommendations and this strategy will be considered by the Council's Strategic Planning Committee in November 2016 and then subject to further consultation due to the nature of the changes from the initial draft.

3H.4 Consultation on the Revised Draft Honiton Sports Pitch Strategy will run from **Tuesday 22nd November until 5pm on Tuesday 20th December 2016**. Any comments received after this point will not necessarily be taken into account.

Comments should be sent (preferably by email) to:

 localplan@eastdevon.gov.uk

 Planning Policy, East Devon District Council, Knowle, Sidmouth, Devon, EX10 8HL.

 01395 571533.

3H.5 It is intended that following consultation and any necessary amendments the final strategy will then be considered by Strategic Planning Committee in early 2017 and then be adopted as the Council's strategy for the delivery of sports pitches in Honiton. Adoption will ensure that the strategy acts as corporate policy across all areas of the Council and will act as evidence in the determination of planning applications. This essentially means it is planning guidance on the same level as the Playing Pitch Strategy and the Open Space Study and would be a material consideration on any future planning applications for sports pitches at Honiton or on land recommended for their delivery. In addition to this, the strategy will form part of the evidence base used in negotiating developer contributions (be they through S106 or CIL) from relevant housing sites in the Honiton area.

3H.6 It is important to note that the recommendations of this strategy are not a substitute for planning permission and do not mean that such proposals would necessarily gain planning permission. All planning applications are considered on their own merits against the development plan and any material considerations at the time (of which this would be one).

STAGE 4 – IMPLEMENTATION

Step I – Implementation

- 4I.1 Following adoption of the final strategy, the projects will move into the implementation stage. This will involve negotiating purchase/lease arrangements for the land; working up planning applications for the various sites; identifying and applying for funding streams; hiring contractors; working with clubs, NGBs and the public to ensure that projects deliver what is needed; and ultimately building out new facilities and improvements.
- 4I.2 This will be an ongoing project that will take a number of years to be fully realised. The significant costs involved plus the potential need to CPO land in order to deliver against the strategy means that unfortunately some of the larger projects may well take a long time to come to fruition. Conversely, some smaller projects including renewals of leases and improvements to existing facilities could be progressed relatively quickly.
- 4I.3 This strategy will need to be kept under review in response to progress against the recommendations. If, after five years it has not been possible to make progress on certain projects due to land ownership issues etc then the strategy will need to consider whether alternative sites should be progressed or not, noting the reasons why this strategy has chosen one site over another in the first place. However, until that point the strategy should be seen as the definitive plan for delivery of sports facilities at Honiton.
- 4I.4 The exact role of the Council going forwards is yet to be determined; however, at the least it would appear reasonable for the Council to perform a facilitating role. Where delivery requires CPO then the Council will perhaps have to take a more in-depth role due to the fact that other organisations would not be in a position to do so.
- 4I.5 The table below sets out the list of projects recommended by this strategy and the potential approximate costs for delivery. Some costs (for instance those for leasing or purchasing land) are unknown at present, and considering some may require CPO they are likely to be significant. Other costs are taken from the approximate costings set out in the STRI Stage 2 Report or are based on research / experience of similar projects.
- 4I.6 The Council is not obligated to fund or deliver any of these projects, however it will work closely with key partners towards their realisation.

Site	Project	Approximate cost
Mountbatten Park (HA)	Install primary sports pitch drainage system	£45,000
	Enhance/extend/replace clubhouse with an up to two storey extended facility to cater for all cricket, adult and junior football use across Mountbatten Park and St. Rita's	Unknown
	Explore options for additional car parking on-site	£30,000
	Purchase of new moveable goals, nets etc (including new cricket practice nets)	Unknown
St. Rita's (HB)	Renew lease or purchase land	Unknown

	Install primary and secondary sports pitch drainage system	£61,000
	Explore options for improvement of access track	£75,000
All Hallows (HC)	Install primary and secondary sports pitch drainage system	£100,000
	Install floodlights	£50,000
	Complete improvements to existing clubhouse	£65,000
Honiton Community College (HD)	Install floodlit sand-based AGP	£720,000
St. Rita's Extension (H1)	Lease or purchase land	Unknown
	Level and drain platform for the laying out of either 2x youth 11v11 and 2x mini 5v5 football pitches or a relocated cricket ground	£157,000
	Purchase of new moveable goals, nets etc	Unknown
	Explore options for additional car parking	£30,000
	Potential construction of new cricket pavilion	Unknown
Former Showground (H4)	Lease or purchase land	Unknown
	Level and drain platform(s) for the laying out of 2x senior and 3x midi rugby pitches	£475,000
	Construction of new changing facilities and car parking	£650,000
	Purchase of new goals etc	Unknown
	Improvements to foot/cycle access	Unknown

4I.7 These projects should be prioritised as follows. Timescales are indicative and cannot be guaranteed:

Priority	Project	Site	Timescale for delivery
1	Install primary and secondary sports pitch drainage system	All Hallows (HC)	2017/18
2	Install primary sports pitch drainage system	Mountbatten Park (HA)	2018/19
3	Renew lease or purchase land Install primary and secondary sports pitch drainage system	St. Rita's (HB)	2018/19
4	Complete improvements to existing clubhouse	All Hallows (HC)	2018/19
5	Install floodlit sand-based AGP	Honiton Community College (HD)	2019/20
6	Lease or purchase land Level and drain platform for the laying out of either 2x youth 11v11 and 2x mini 5v5 football pitches or a relocated cricket ground Potential construction of new cricket pavilion	St. Rita's extension (H1)	2020/21
7	Explore options for additional car parking on-site Enhance/extend/replace clubhouse with an up to two storey extended facility to cater for all cricket, adult and junior football use across Mountbatten Park and St. Rita's	Mountbatten Park (HA)	2020/21

8	Explore options for improvement of access track	St. Rita's (HB)	2020/21
9	Install floodlights	All Hallows (HC)	2021/22
10	Lease or purchase land Level and drain platform(s) for the laying out of 2x senior and 3x midi rugby pitches Construction of new changing facilities and car parking Purchase of new goals etc Improvements to foot/cycle access	Former Showground (H4)	2023/24

The assessments below consider how the potential new sites around Honiton meet or do not meet with relevant policies of the East Devon Local Plan (2013-31). It should be noted that this is a *basic* sustainability and suitability assessment and does not prejudice the formal consideration of any submitted planning application taking into account the comments and views of any statutory consultees, interested third parties, policies of the Local Plan (and other policy guidance) or the views of the Service Lead – Planning, Development Management Committee or the chairman of DMC. It is intended to be a guide to help determine which are the most appropriate sites to deliver sports pitches on taking account of the main policy issues that exist.

Policies are only considered against sites where they are considered relevant / apply at this stage. Other policies and material considerations may also apply and just because this assessment does not refer to them does not mean that they would not apply. For instance, once more detailed plans are produced for any site, more detailed design policies such as D1 and D2 of the Local Plan will become more relevant and so are not considered at this stage.

A Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA) Screening Report accompanies the revised draft strategy and concludes that the strategy does not require a full SEA or HRA. This basic sustainability and suitability assessment considers potential sites against policies of the Local Plan which has been subject to SEA and HRA and it clearly considers the most sustainable and least harmful way to deliver the required sports pitches for Honiton. So long as the recommendations of this strategy conform with the policies of the Local Plan (and this assessment considers this for each site) then it is considered that they would effectively be covered by the SEA/HRA for the Local Plan. It may be that individual site plans and projects would need to be subject to SEA/EIA at the planning application stage once detailed plans have been drawn up.

A basic sustainability and suitability assessment has not been carried out for existing sports pitch sites in the town as generally it is considered to be more sustainable and suitable to retain them for use as sports pitches than to provide replacement facilities elsewhere.

St. Rita’s extension (H1)

Site ref	H1	Site name	St. Rita’s extension
Highways comments			The junction from Otter Moor Lane on High Street would be suitable for the number of pitches. Ottery Moor lane going to the industrial estate should be able to handle the extra capacity. Due to this site being more with in the town, this is likely to encourage sustainable transport. On checking the DCC collision data it appears there is one slight collision at the junction of Ottery Moor lane & High Street.
Archaeology comments			This site lies to the north of the Roman road running from Exeter to Honiton and there is the potential for archaeological deposits to be present on the site. Depending on the scope of works required the Historic Environment Team may recommend that any consent should be conditional upon a programme of archaeological work being undertaken in mitigation for any impact on the historic environment.
Landscape comments			Due to its urban context, its close proximity to other sport facilities and already established buffer planting the delivery of sport pitches on this site would have moderate to minor landscape and visual impact, with the majority of the impact being related to the local amenity of close by residents and people walking along Ottery Moor Lane and Exeter Road/ Honiton High Street. Careful consideration should be given to the design of the boundaries with adjoining neighbours to limit the impact on these residents and by-passers.
Arboricultural and ecological comments			The majority of the existing hedgerows and trees should be considered as constraints and any pitch layout or development will need to respect these.
Strategy 3 – Sustainable Development			<i>Conserving and enhancing the environment</i> – Site H1 is on the urban fringe. Providing sports pitches on the additional land at St. Rita’s (so long as they are designed appropriately and sensitively) would minimise harm to biodiversity and the quality and character of the landscape. The drainage outfalls would feed into outfalls already in significant use and not add to potential issues of surface water flooding and in fact reduce the risk on-site through installation of sports pitch drainage. The site is not on previously developed land, however no such suitable sites exist at Honiton.
			<i>Prudent natural resource use</i> – The location of site H1 would discourage travel by vehicular transport (be that car or bus) and would encourage walking and cycling to the site thereby reducing reliance on fossil fuels and carbon emissions. Location immediately adjacent to the existing facilities at Mountbatten Park would mean that additional clubhouse/changing facilities would not need to be provided, but existing facilities would need to be enhanced / extended.
			<i>Promoting social well being</i> – Providing sports pitches on this site would promote social wellbeing as it would on any of the sites, however, clearly easy access to facilities by foot/cycle within the fabric of the town could be considered to have better social wellbeing outcomes.
			<i>Encouraging sustainable economic development</i> – Whilst sports pitches are not economic development in themselves, it is important to ensure that sports clubs are sustainable and viable in the long term. Provision of sport pitches on site H1 could enable all football and cricket pitches to continue to be located in one place, minimising maintenance costs and transport costs and encouraging use of the social facilities at Mountbatten Park.
			<i>Taking a long term view of our actions</i> – As with delivery of sports facilities on any of the sites, this will be about ensuring that current and future generations have access to sufficient sports facilities, though clearly the ease of access to any facilities delivered on this site would be preferable.
Strategy 4 – Balanced Communities			As with any of the sites being considered, the delivery of sports pitches on this site would help to secure social and community facilities which help

	contribute towards a balanced community. Clearly, however, pitches delivered in the heart of the community could have a better outcome in creating a balanced community.
Strategy 5B – Sustainable Transport	Site H1’s location on the edge of the town enables users to access the site by foot, bike and public transport (bus stops on Exeter Road), reducing the need to travel by car. Accessibility of the site is good and safe by all modes of transport. Some users will still need to access the site by car and increasing the number of pitches may well lead to an increase in vehicle movements. Comments from the local highways authority state that these could be accommodated by the local road network.
Strategy 7 – Development in the Countryside	Despite being located seemingly within the town, site H1 is technically in the open countryside, albeit on the urban fringe and physically abutting the Built-up Area Boundary. Policy RC2 allows for sports facilities to be developed on land within and adjoining urban or built-up areas where certain criteria are adhered to. These criteria are considered against that policy further on in this assessment. Considering the site’s location alongside existing sports facilities and seemingly (though not technically) within the urban area, sports pitch development here would not harm the distinctive landscape, amenity or environmental qualities of the landscape within which it is located.
Strategy 23 – Development at Honiton	Sports pitch development in this location would minimise car travel and would not encourage ribbon development. It would support the needs and aspirations of the sports clubs operating out of Mountbatten Park and St. Rita’s who have expressed a desire to stay within the town in a location that is easily accessible by foot. The site would also broadly align with the aim to direct new leisure uses to the town centre and improving sporting and community facilities to serve Honiton. Clearly, however, it is at odds with the aim to support the provision of sports pitches on hill top land to the south of the town, though whether there is really a community aspiration for this any longer is unclear.
Strategy 46 – Landscape Conservation and Enhancement and AONBs	Site H1 is within the wider Clyst Lowland Farmlands Landscape Character Area though shows little in the way of the distinctive characteristics associated with this character area. The site is located within the Urban Landscape Character Type for Honiton which reflects the fact that the landscape is seen in the context of the town. Delivering additional sports pitches in this location would protect other more sensitive landscape areas (including but not limited to the AONB) from potentially inappropriate change. Pitch development and any associated additional car parking or clubhouse facilities would need to take account of hedgerows which do reflect a distinctive characteristic of the Clyst Lowland Farmlands and local built heritage especially.
Strategy 47 – Nature Conservation and Geology	Mature hedgerows and associated trees are likely to act as bat flight corridors and navigation beacons. Therefore harm to these important features should be avoided.
D3 – Trees and Development Sites	The whole of site H1 is covered by an area TPO, however this does not necessarily mean that all trees on the site are of high value. Consultation with the Council’s arboricultural officers has highlighted that the majority of the existing hedgerows and trees should be treated as constraints with specific trees mentioned for their great value. The plans produced by STRI show the cut embankment for the eastern most youth 11v11 pitch on the site south-east of the St. Rita’s Centre encroaching potentially a little close to the mature oak tree located in that corner of the site. Depending on the extent of the tree root protection area in this location it may not be possible to level the pitch as much as shown in which case the fall across the pitch would need to slightly exceed Sport England/FA requirements.
EN7 – Proposals Affecting Sites which may potentially be of Archaeological Importance	Consultation with the County Council’s Historic Environment team has highlighted that archaeological work may be required on the site due to it’s proximity to the Roman road (Exeter Road), however, with the ground works recommended for the site by STRI being so minimal that may not be required. At the very least a full desk based archaeological assessment of the site will be required.

EN13 – Development on High Quality Agricultural Land	Site H1 is designated as “urban” in terms of agricultural land grading. That being the case this policy is not directly relevant, though clearly delivery of sports pitches in this location could avoid the need to use high quality agricultural land.
EN14 – Control of Pollution	Sports pitches must be maintained and this may include occasional use of pesticides, however this would be in small doses perhaps once a year. The STRI Stage 1 report highlights that the site is high in agricultural weeds. This may mean that initially more weed control is required. Any planning application for the delivery of sports pitches on this site would need to explain the likely impact of this on the drainage outfall and subsequent watercourses. In addition to this, sports pitch usage creates noise pollution, however, this is likely to be restricted to weekends and perhaps one or two nights per week. Floodlights would not be intended to be installed on the site and so usage would never extend too late into an evening. Existing sports pitch usage at St. Rita’s does not tend to receive many complaints in terms of noise pollution, with traffic along the A30 and Exeter Road perhaps being of a more significant nature, however increased noise pollution may have some detrimental impact on immediate neighbours to the site if not carefully considered. Floodlights are not proposed for the site.
EN16 – Contaminated Land	Site H1 is not on or in such close proximity to any contaminated land for this policy to apply.
EN21 – River and Coastal Flooding	Site H1 is within floodzone 1 and therefore not located within the floodplain. As such it is not necessary to carry out a sequential test.
EN22 – Surface Run-off Implications of New Development	Sports pitch development will not create significant surface run-off implications and as such no remedial measures such as SUDS are required, however, any new sports pitches would have sports drainage installed and the implications of this drainage would need to be considered.
RC2 – New Open Space, Sports Facilities and Parks	The delivery of sports pitches on site H1 (which adjoins the urban area of Honiton) would be unlikely to unduly affect the character and appearance of the area or the visual and physical amenities enjoyed by adjoining residential areas. In fact, the delivery of sports pitches here could positively secure the site from being developed for housing or other uses in the future which could have a negative effect on these. The facilities would be accessible by public transport, bicycle and foot. The location of additional car parking to serve these pitches would need to be subject to a holistic review of the clubhouse and parking facilities for all of the sports facilities in this locale as a whole and so could be located elsewhere in the vicinity. Cycle storage would most likely be located at the clubhouse at Mountbatten Park. The local highways authority raised no concerns over the accessibility of the site in general. Specific location of the parking would be subject to the above mentioned review. Delivering sports pitches on this site would not be to the detriment of the most versatile agricultural land, nature conservation interest and the conservation of areas of landscape, scientific, archaeological or historic interest, subject to the outcomes of any desk-based archaeological assessment.
TC2 – Accessibility of New Development	Site H1 is well located for access by public transport, bicycle and foot. It is well related to other sports facilities and the urban areas from which users will travel and so will minimise the need to travel by car. Any more detailed plans as part of a planning application would need to provide adequate provision for access by those with reduced mobility.
TC4 – Footpaths, Bridleways and Cycleways	The site is easily accessible by public footpaths along Ottery Moor Lane and is bordered by a walkable track Turks Head Lane on the northern side of the site.
TC7 – Adequacy of Road Network and Site Access	Consultation with the local highways authority has raised no concerns about the accessibility of this site or the adequacy of the local road network to accommodate it.
TC9 – Parking Provision in New Development	Policy TC9 does not require a specified number of parking spaces for sports pitch development. Whilst the key advantage of this site is it’s location which should minimise travel by car there will inevitably be a need to accommodate car parking and potentially an increased need as the population and as such

	the size of the sports clubs grows. Parking would need to be subject to review alongside provision at Mountbatten Park to ensure that enough spaces are provided in total. Guidance from Sport England and NGBs may help in this regard.
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Tower Hill (H2)

Site ref	H2	Site name	Tower Hill
Highways comments			Tower Road is narrow with no footpaths or street lighting. The visibility of existing access would be need to be increased and the width of the access may also need to be widened. On checking the DCC collision data it appears there are two slight collision at junction of Tower Road & Northleigh Hill Road. It also shows four slight collisions at the junction of Tower Road and the A35. 200 Meters away from the junction of Tower Road & the A35 two slight one serious and one Fatal have taken place.
Archaeology comments			The Historic Environment Record records the find of prehistoric cremations in the surrounding landscape. Depending on the nature and scope of the proposed groundworks for the use of the site as a sports pitch more detailed archaeological information may be required to support any planning application for development here. This information may take the form of a geophysical survey and/or evaluation of the proposed development site.
Landscape comments			Due to its siting within the AONB, the required groundworks, the removal of internal hedge banks and trees and the introduction of built form on the site, the delivery of sport pitches on this site would have an overall major to moderate adverse landscape and visual impact.
Arboricultural and ecological comments			The layout in general respects the physical presence of the trees and hedgerows on the site. However the proposed clubhouse is directly on top of one of the hedgebanks... The intensive layout of sports pitches within the retained field boundary hedgebanks will inevitably impact on the ecological value of these features. There is very little in the way of unused margins which could act as buffers between the hedgebanks and the playing areas.
Strategy 3 – Sustainable Development			<i>Conserving and enhancing the environment</i> – Site H2 is in the open countryside within the East Devon AONB. Providing sports pitches on this site could potentially have a significant detrimental effect on the local environment, biodiversity and the quality and character of the landscape, especially if the site were developed to the scale of the plans produced for Honiton Development Trust. Potentially a smaller appropriately and sensitively designed development could have less of an impact, however the initial draw of the site was its potential ability to host so many pitches and the viability of such reduced proposals would likely be questionable and other sites better related to the town could accommodate a smaller number of pitches. The site is located entirely out of the floodzone and any sports pitches would have sports pitch drainage installed would reduce the risk on-site through installation of sports pitch drainage. The site is not on previously developed land, however no such suitable sites exist at Honiton.
			<i>Prudent natural resource use</i> – The location of site H2 would encourage travel by personal car and would not be accessible by walking, cycling or public transport. It would therefore increase reliance on fossil fuels and carbon emissions. New clubhouse facilities would need to be provided on this site.
			<i>Promoting social well being</i> – Providing sports pitches in general would promote social wellbeing, however, clearly the fact that the facilities cannot easily be accessed by foot/cycle and that they are divorced from the town itself could be considered to discourage social well being, especially compared to the status quo.
			<i>Encouraging sustainable economic development</i> – Whilst sports pitches are not economic development in themselves, it is important to ensure that sports clubs are sustainable and viable in the long term. Provision of all the sport pitches for the town on site H2 as envisaged by Honiton Development Trust could potentially create a more economically sustainable and viable facility than having multiple smaller facilities dotted around the town. However, if participation dropped off as a result of not being able to access the facilities then this may have the opposite effect.

	<i>Taking a long term view of our actions</i> – As with delivery of sports facilities on any of the sites, this will be about ensuring that current and future generations have access to sufficient sports facilities. Clearly the accessibility issues with this site would weigh against it.
Strategy 4 – Balanced Communities	As with any of the sites being considered, the delivery of sports pitches on this site would help to secure social and community facilities which help contribute towards a balanced community. Clearly, however, pitches delivered in the heart of the community could have a better outcome in creating a balanced community. Delivery of pitches in this location would alienate users that do not have access to a private car and potentially lead to a more unbalanced community.
Strategy 5B – Sustainable Transport	Site H2’s location distant from the town, at the top of a steep hill and down a series of narrow country lanes would discourage access by sustainable transport modes and mean that effectively all users of the site would arrive by personal car. There would be an increase in vehicle movements that could potentially be beyond what the local road network could safely accommodate at peak times.
Strategy 7 – Development in the Countryside	Site H2 is located in the open countryside a good distance from the Honiton Built-up Area Boundary. Policy RC4 allows for sports facilities to be developed in the countryside where certain criteria are adhered to. These criteria are considered against that policy further on in this assessment. Being so removed from the urban area and in such a sensitive landscape setting (AONB), sports pitch development here (and perhaps more specifically the clubhouse, car parking, traffic and noise generate by) would harm the distinctive landscape, amenity and environmental qualities of the landscape within which it is located.
Strategy 23 – Development at Honiton	Sports pitch development in this location would not meet the aspiration to minimise car travel and would in fact increase the need to travel by car. It would not encourage ribbon development, but would not focus development on the existing urban fabric. Honiton Development Trust’s plans would support the needs and aspirations of the sports clubs in that they would provide additional and potentially enhanced pitches; however clubs have expressed a desire to stay within the town in a location that is easily accessible by foot which this site is not. Whilst the supporting text to the policy implicitly supports provision of sports pitches on this site, it clearly says this is in line with community aspirations and it is no longer clear whether there is really a community aspiration for relocation to Tower Hill any longer.
Strategy 46 – Landscape Conservation and Enhancement and AONBs	Site H2 is within the wider East Devon Central Ridges Landscape Character Area and shares many of the distinctive characteristics associated with this character area. The site is located within the Open Inland Planned Plateaux Landscape Character Type and again shares many of the distinctive characteristics of the character type. Delivering additional sports pitches in this location would detract from the distinctive landscape character of the area. This may be able to be reduced through careful design, but it could never be considered insignificant in such a location. Unless no other more suitable alternatives exist, the site could not satisfy this strategy.
Strategy 47 – Nature Conservation and Geology	As a site in an isolated location far away from any existing urban environment, this site is likely to be particularly sensitive in terms of biodiversity. The existing hedgerows will provide a valuable matrix of ecological habitats and corridors as well as acting as bat flight corridors and navigation beacons. The site includes two ponds (which may only be seasonal) and the biodiversity value of these should be assessed.
D3 – Trees and Development Sites	The Council’s arboricultural officers have considered the plans of Honiton Development Trust and feel that whilst many of the proposed pitch locations appear to respect existing trees and hedgerows, the proposed clubhouse would be directly on top of an existing hedgebank. In addition to this, with the intensive use of the site for so many sports pitches, the likelihood of users cutting through or damaging hedges, and the impact on biodiversity would be unacceptable.

EN7 – Proposals Affecting Sites which may potentially be of Archaeological Importance	Consultation with the County Council’s Historic Environment team has highlighted that prehistoric cremations have been discovered in the wider landscape surrounding this site and considering the scale of the proposals by Honiton Development Trust it is likely that geophysical surveys and archaeological work would be required on the site.
EN13 – Development on High Quality Agricultural Land	Site H2 is located on Grade 4 agricultural land. That being the case this policy is not directly relevant, though the delivery of sports pitches in this location could avoid the need to use high quality agricultural land.
EN14 – Control of Pollution	Sports pitches must be maintained and this may include occasional use of pesticides, however this would be in small doses perhaps once a year. However, with so many pitches located in one place the cumulative effect of this treatment could potentially be significant. The STRI Stage 1 report highlights that the site is low in agricultural weeds although this may be due to the fact it is arable farmland treated with weed kill accordingly. Any planning application for the delivery of sports pitches on this site would need to explain the likely impact of this on the drainage outfall and subsequent watercourses. In addition to this, sports pitch usage creates noise pollution. Whilst this is likely to be restricted to weekends and evenings, this could potentially be a significant pollutant to the peaceful and tranquil landscape of the AONB, especially in such a large concentration. If the site were to be used for the relocation of all Honiton sports clubs then there would likely be a requirement for floodlights to serve any artificial surface or grass pitches capable of meeting higher league requirements. Floodlights in this location, no matter how well designed or mitigated would create unacceptable levels of pollution into the AONB which could have a significant impact on local biodiversity. The hill top location would also make it likely for floodlighting to be clearly visible across the Otter Valley and into the Blackdown Hills AONB.
EN16 – Contaminated Land	Site H2 is not on or in such close proximity to any contaminated land for this policy to apply.
EN21 – River and Coastal Flooding	Site H2 is within floodzone 1 and therefore not located within the floodplain. As such it is not necessary to carry out a sequential test.
EN22 – Surface Run-off Implications of New Development	Sports pitches themselves will not create significant surface run-off implications and as such no remedial measures such as SUDS are likely to be required. However, any new sports pitches would have sports drainage installed and the implications of this drainage would need to be considered. The construction of clubhouse facilities, car parking and an access drive may merit some form of SUDS considering the scale of the development.
RC4 – Recreation Facilities in the Countryside and on the Coast	Sports pitch development does not by definition need a countryside location (unlike potentially a shooting range, golf course, gliding club or equine development for example). However, if there were no sites within or adjoining the urban area suitable for sports pitch development then that may then mean that the facilities required a countryside location. However this is not the case as evidenced by the assessments of other site contained within this report. In addition to this, the proposals of Honiton Development Trust would not be in scale with the character, environmental characteristics or setting of the area and would conflict with countryside, nature and landscape policies as set out above. The site would not be safely accessible considering the volume of traffic that would be generated and parking would be unlikely to be discreetly located even with mitigation. There are no existing buildings on site and so new buildings would be required for the clubhouse. The clubhouse would need to be extensive rather than limited in scale in order to serve all of the town’s sports clubs as proposed by Honiton Development Trust.
RC5 – Community Buildings	The site’s location in the open countryside means that any clubhouse facility available to the wider community would not comply with this policy.
RC6 – Local Community Facilities	This policy allows for local community facilities in the open countryside where they meet the listed criteria and there is a proven need for the facility. Should this site be chosen as the best option then there would be a proven need for the facility as without changing facilities/clubhouse the site would

	not be viable or usable. However, the clubhouse facility proposed in Honiton Development Trust plans would not be compatible with the character of the surrounding area due to its countryside location with minimal if any development in the immediate vicinity. The proposal would not be well related to the built form of the town. The site would not be accessible by foot or bike and the traffic generated would struggle to be safely accommodated on local road. The proposal would not be detrimental to the amenity of neighbouring residents as there are none, however it would be detrimental to the wider countryside amenity.
RC7 – Shared Community Facilities	The clubhouse building proposed on site would be available for all clubs to use and also other community groups to aid with income generation.
TC2 – Accessibility of New Development	Site H2 would not be accessible by pedestrians, cyclists or public transport and would not be located close to the residential areas from which people are travelling. That being the case it would not be a suitable location for such a development.
TC4 – Footpaths, Bridleways and Cycleways	The site is not currently accessible by footpath, bridleway or cycle path. For the site to potentially be acceptable it would have to provide new footpaths and cycleways connecting the site to the town. However, in reality the steepness of the hill would likely discourage the majority of users from accessing the site via foot or bike even if such provision were available.
TC7 – Adequacy of Road Network and Site Access	Consultation with the local highways authority has raised the issue of Tower Road being narrow with no footpaths or street lighting plus the existing access visibility is less than adequate. In addition to this there have been a number of road traffic incidents on junctions in the local road network. The amount of traffic generated by this development would only serve to increase the likelihood of such incidents in the future and there is limited ability to improve the road network accordingly.
TC9 – Parking Provision in New Development	Policy TC9 does not require a specified number of parking spaces for sports pitch development. The location of the site means that all users would need to travel to it by private car and as such significant parking provision would be required. Guidance from Sport England and NGBs may help in this regard.

Former Showground (H4)

Site ref	H4	Site name	Former Showground
Highways comments			The visibility splay would need some slight improvements, with the hedge row being moved back in places and being cut. Whilst it would be possible to walk or cycle to the site it may not be safe to do so. Most of the route would not be street lit and may not have footways or cycleway in places. There appears to be one slight collision on Langford road.
Archaeology comments			This site occupies a large area on the edge of a floodplain and in an area that would have been attractive for early settlement. Depending on the nature and scope of the proposed groundworks for the use of the site as a sports pitch more detailed archaeological information may be required to support any planning application for development here. This information may take the form of a geophysical survey and/or evaluation of the proposed development site.
Landscape comments			Due to its siting within the AONB, the extent of the required groundworks and construction works, the loss of high value agricultural land and the site's existing green framework the delivery of sport pitches on this site would have an overall moderate adverse landscape and visual impact.
Arboricultural and ecological comments			The old hedgebank running SE-NW through the north eastern part of the site has moderate to high ecological value. There is an actively flowing watercourse associated with the eastern half, an outlier badger set in the central section and a mature broadleaved trees and small copse at the south eastern end.
Strategy 3 – Sustainable Development			<i>Conserving and enhancing the environment</i> – Site H4 is on the edge of the urban area but quite clearly removed from the main bulk of the town by the A30 Honiton bypass. Providing sports pitches here could potentially have some harm to biodiversity and the quality and character of the landscape unless designed appropriately and sensitively. The drainage outfalls from any sports pitch drainage would feed into the existing culvert at the south-western end of the site or the small watercourse following the hedgeline at the north-eastern end of the site and not add to potential issues of surface water flooding. This would reduce the surface water flood risk on-site. The site is not on previously developed land, however no such suitable sites exist at Honiton.
			<i>Prudent natural resource use</i> – The location of site H4 is close to town, however is relatively difficult to reach safely by foot or bike due to the A30/A35 junction arrangements. This means that unless a new foot/cycle bridge was installed, it probably would not discourage that many people from travelling by vehicular transport (be that car or bus) thereby not reducing reliance on fossil fuels or carbon emissions. The site would be accessible by public transport with the bus to Taunton passing by the entrance to the site. Location here, isolated from other sports facilities would mean that a clubhouse or at least changing facilities would be required on site rather than relying on existing facilities.
			<i>Promoting social well being</i> – Providing sports pitches on this site would promote social wellbeing as it would on any of the sites. If the facilities could be accessed by a safe pedestrian/cycle access then the site could be considered to have better social wellbeing outcomes than some other sites due to its proximity to the majority of the town's population.
			<i>Encouraging sustainable economic development</i> – Whilst sports pitches are not economic development in themselves, it is important to ensure that sports clubs are sustainable and viable in the long term. Whilst the site is not big enough to meet all of the rugby club's needs in one location it can provide for the majority of them in conjunction with the retention and improvement of facilities at All Hallows. Location immediately adjacent to the urban area could encourage any clubhouse facilities to be available for other community groups helping the club to achieve a long term income stream.

	<p><i>Taking a long term view of our actions</i> – As with delivery of sports facilities on any of the sites, this will be about ensuring that current and future generations have access to sufficient sports facilities. In conjunction with existing facilities in the town, the site could deliver the majority of the town’s requirements for rugby for years to come.</p>
<p>Strategy 4 – Balanced Communities</p>	<p>As with any of the sites being considered, the delivery of sports pitches on this site would help to secure social and community facilities which help contribute towards a balanced community. Clearly, however, pitches delivered in the heart of the community could have a better outcome in creating a balanced community. Pitches in this location would be in fairly close proximity to the population from which users would travel, although location on the opposite side of the A30 could be a barrier to access by foot/bike for some people.</p>
<p>Strategy 5B – Sustainable Transport</p>	<p>Considering site H4’s location on the edge of the town it has a relatively poor accessibility by foot and bike. Provision of safe foot/cycle access could reduce the need to travel by car but it could be at significant extra cost depending on the option taken. The Honiton to Taunton bus passes by the entrance to the site and potentially a new stop could be provided here, otherwise the closest stop would be on Monkton Road, the other side of the A30. Some users will still need to access the site by car and the proposed development would lead to an increase in vehicle movements. Comments from the local highways authority suggest that these could be accommodated by the local road network but visibility splays would need to be improved on Langford Road.</p>
<p>Strategy 7 – Development in the Countryside</p>	<p>Site H4 is located adjacent to the Built-up Area Boundary (separated by the A30 Honiton bypass) and so technically within open countryside. Unlike site H1 which physically abuts the BuAB and feels physically part of the town, site H4 feels less part of the urban fringe and more part of the open countryside, mainly due to the dividing barrier of the A30. Policy RC2 allows for sports facilities to be developed on land within and adjoining urban or built-up areas where certain criteria are adhered to. These criteria are considered against that policy further on in this assessment. The site’s location could perhaps be argued to divert from the pattern of the settlement in terms of its containment between the A30 and the higher land to the south and west of the town. However, ignoring the existence of the A30, the town has historically grown in the area of land between the floodplain and the hills and as such this site would continue that development. Having said that, the A30 does form a significant cut-off to the town and developing this site (even for sports pitches) could potentially be seen as a departure from the traditional form of the settlement in landscape terms. So long as potential re-profiling of the land is kept to a minimum and any built facilities are minimised and located in the least sensitive part of the site (probably the south-west corner) then this could minimise landscape impact.</p>
<p>Strategy 23 – Development at Honiton</p>	<p>Sports pitch development in this location could minimise car travel in comparison to some options so long as safe/suitable foot/cycle access could be achieved. Development of the site could be said to mildly encourage ribbon development as it is located at one end of the town, however it is still in relatively close proximity to the town centre unlike some sites under consideration. It would support the needs and aspirations of Honiton sports clubs who have expressed a desire to stay within the town and assuming that safe/suitable access can be achieved in a location that is easily accessible by foot. The site would also support the aim for improving sporting and community facilities to serve Honiton. Clearly, however, it is at odds with the aim to support the provision of sports pitches on hill top land to the south of the town, though whether there is really a community aspiration for this any longer is unclear.</p>
<p>Strategy 46 – Landscape Conservation and Enhancement and AONBs</p>	<p>Site H4 is within the wider Blackdown Hills Landscape Character Area though shows little in the way of the distinctive characteristics associated with this character area. The site is located within the Upper Undulating Farmed and Wooded Slopes Landscape Character Type and shares some of</p>

	<p>the distinctive characteristics. The site is generally seen in the context of Honiton rather than the Blackdowns due to its location immediately adjacent to the town and the A30 on the southern side of the River Otter. The site is within the AONB and so the strategy would only permit sports pitch development in this location if it could not reasonably be accommodated elsewhere. The only site capable of hosting additional rugby pitches outside of the AONB would be Kings Arms Farm (site H7), however the pitches would have to be delivered in the floodplain which may be considered unreasonable. This site is perhaps therefore more appropriate and would have the least harmful impact on AONB landscapes out of all of the options within the AONB. Pitch development and any associated additional car parking or clubhouse facilities would need to respect the landscape setting and reduce landscape impact to minimal. STRI’s potential plans show significant cut and fill re-profiling on the site resulting in large embankments. This may not be appropriate in landscape terms and therefore the pitches may be required to be delivered at slightly outside RFU/Sport England cross fall guidelines for the gradient of the pitches to have an acceptable impact.</p>
<p>Strategy 47 – Nature Conservation and Geology</p>	<p>The north-eastern border of the site contains a badger sett and small watercourse. The plans for the site show the cut and fill embankments at a fair distance from the location of the badger sett but impacts would have to be fully understood at a more detailed stage of planning. The presence of badgers on site are not necessarily a great mix with sports pitches as they can cause significant damage to the playing surface. If possible the sett should be retained and impacts mitigated, however it may be more appropriate to consider relocating the sett to a less sensitive location.</p>
<p>D3 – Trees and Development Sites</p>	<p>Consultation with the Council’s arboricultural officers has highlighted the hedgebank running along the north-eastern boundary of the site as likely to be important under Hedgerow Regulations. The hedgebank has a small associated watercourse and a badger sett about half way along which combined with its “important” status means that it is unlikely to be suitable for removal or relocation and therefore any plans for the site need to respect it. The STRI potential plans show this hedgerow being avoided but potential impacts on the hedgerows forming the north-west and south-east borders of the site. These boundaries are less sensitive, having been created as part of the development of the A30 Honiton bypass, but if necessary the cut and fill embankments could be delivered at steeper gradients or pitches could be delivered just beyond Sport England/RFU cross fall guidelines to reduce the impact.</p>
<p>EN7 – Proposals Affecting Sites which may potentially be of Archaeological Importance</p>	<p>Consultation with the County Council’s Historic Environment team has highlighted that the site would have been attractive for an early settlement in the area and so depending on the nature and scope of the proposed groundworks for the use of the site as a sports pitch more detailed archaeological information may be required to support any planning application for development here. The plans proposed by STRI suggest significant re-profiling of the land and as such it is likely that a geophysical survey and archaeological work would be required.</p>
<p>EN13 – Development on High Quality Agricultural Land</p>	<p>Site H4 is located on Grade 2 agricultural land. That being the case, policy EN13 protects it from development not associated with agriculture or forestry unless there is an overriding need and certain tests are met. In this case, the PPS demonstrates an overriding need to find sites for sports pitch delivery in the Honiton area, and this report clearly explains why (other than site H1 which is also recommended), sites on land of lower quality agricultural land (sites H2, H5 and H7) are not suitable for sports pitch delivery or could not accommodate the number of pitches required. In addition to this the benefits of sports pitch provision close to the town could potentially justify the loss of such high quality agricultural land.</p>
<p>EN14 – Control of Pollution</p>	<p>Sports pitches must be maintained and this may include occasional use of pesticides, however this would be in small doses perhaps once a year. However, with so many pitches located in one place the cumulative effect of this treatment could potentially be significant. The STRI Stage 1 report</p>

	<p>highlights that the site is low in agricultural weeds and the field is in pastoral use so is unlikely to have been treated with weedkill. Any planning application for the delivery of sports pitches on this site would need to explain the likely impact of this on the drainage outfall and subsequent watercourses. In addition to this, sports pitch usage creates noise pollution. Whilst this is likely to be restricted to weekends and evenings, this could potentially be a significant pollutant. Whilst the site’s location within the Blackdown Hills AONB means it is potentially sensitive to noise pollution, it is immediately next to the A30 and close enough to the main urban area to be unlikely to have any significant additional impact on the amenity of the area. The site is not necessarily as peaceful or tranquil as other sites within the AONB. Floodlights in this location would likely create unacceptable levels of pollution in the AONB and wider landscape and so should be avoided.</p>
EN16 – Contaminated Land	<p>Part of site H4 is identified as being potentially contaminated land. This is recorded as an “active landfill”, however it is understood to relate to the construction of the A30 Honiton bypass and the forming of embankments to facilitate the A30/A35 junction. That being the case, it is unlikely that a full contaminated land assessment would be required as there would be no potential for harm to future users of the site.</p>
EN21 – River and Coastal Flooding	<p>The majority of site H4 is within floodzone 1 and therefore not located within the floodplain. A small amount of the site at the western end (along the existing watercourse and culvert) is within floodzone 2 and 3 but development would not be proposed in this area. As such it is not necessary to carry out a sequential test.</p>
EN22 – Surface Run-off Implications of New Development	<p>Sports pitches themselves will not create significant surface run-off implications and as such no remedial measures such as SUDS are likely to be required. However, any new sports pitches would have sports drainage installed and the implications of this drainage would need to be considered. The construction of clubhouse facilities, car parking and an access drive may potentially merit some form of SUDS considering the scale of the development, though at present this is not expected.</p>
RC2 – New Open Space, Sports Facilities and Parks	<p>The delivery of sports pitches on site H4 (which adjoins the urban area of Honiton) could (if not carefully designed) unduly affect the character and appearance of the area. That being the case, careful designing of built facilities, re-profiling of land and screening of more intrusive elements of the development must be important factors of any development in this location. In fact, the delivery of sports pitches here could positively secure the site from being developed for housing or other uses in the future which could have a more significant negative effect on the character and appearance of the area. Access to the facilities by bicycle and foot will need to be improved to ensure they can be reached safely by these modes. Buses stop on Monkton Road which is a short walk from the site, and also pass along Langford Road heading towards Dunkeswell. Potentially the formation of a new bus stop on Langford Road could be explored. The STRI potential site plans show where car parking could be accommodated on this site. This would likely be required to be provided in the form of grasscrete or similar to reduce the landscape impact. Cycle storage would need to be located at the clubhouse. The local highways authority raised no concerns over the accessibility of the site in general other than the potential need to improve the visibility splays of the site entrance on Langford Road and the safety accessing the site by foot/bike. Whilst the site is located on Grade 2 agricultural land of potential archaeological interest in the AONB this assessment shows how it is of less overall harm and of greater overall benefit than other potential sites under consideration.</p>
RC5 – Community Buildings	<p>The site’s location adjacent to the BuAB means that it would potentially be a suitable location for a community building such as a clubhouse.</p>
RC6 – Local Community Facilities	<p>This policy allows for local community facilities on sites adjoining BuABs where they meet certain criteria. Any facility would need to reflect the character of the site and surroundings and be located in the south-eastern corner to minimise landscape impact and be seen in the context of the</p>

	existing town. As with requirements of other policies considered here, a safe pedestrian/cycle access would need to be provided. There are no immediate neighbours whose amenity would be affected.
RC7 – Shared Community Facilities	The clubhouse building proposed on site would need to be available for other community groups to use. This would aid with income generation and being close to town would likely be well used by other groups.
TC2 – Accessibility of New Development	Site H4 is located close to the urban areas from which users will travel and so with suitable improvements to foot/cycle access would minimise the need to travel by car. Without these improvements, however, development of this site would potentially not be suitable. Any more detailed plans as part of a planning application would need to provide adequate provision for access by those with reduced mobility.
TC4 – Footpaths, Bridleways and Cycleways	A footpath does exist along Monkton Road, over the A30 bridge down to Langford Road, however, this is not a particularly safe route for pedestrians due to the volume and nature of the traffic which the A30/A35 junction hosts. No other footpaths or cycleways serve the site. In order for the site to be progressed a suitable safe access for pedestrians and cyclists would need to be provided linking the site to the town side of the A30.
TC7 – Adequacy of Road Network and Site Access	Consultation with the local highways authority has suggested that visibility splays for the Langford Road entrance to the site would likely need to be improved. In addition to this pedestrian/cycle access would need to be improved as per comments above. No concerns were raised about the adequacy of the local road network to accommodate sports pitch development on this site.
TC9 – Parking Provision in New Development	Policy TC9 does not require a specified number of parking spaces for sports pitch development. Whilst the location of this site should minimise travel by car (so long as safe pedestrian/cycle access can be achieved) there will inevitably be a need to accommodate car parking on site. Guidance from Sport England and NGBs may help in this regard.

Former Manor House School (H5)

Site ref	H5	Site name	Former Manor House School
Highways comments	The access road would need widening allowing two cars can pass one another. Cuckoo Down Lane is narrow with very few intervisibility passing places.		
Archaeology comments	The Historic Environment Record records the find of prehistoric cremations in the surrounding landscape. Depending on the nature and scope of the proposed groundworks for the use of the site as a sports pitch more detailed archaeological information may be required to support any planning application for development here. This information may take the form of a geophysical survey and/or evaluation of the proposed development site.		
Landscape comments	Due to the limited scale of the development, the delivery of sport pitches on this site would have an overall minor to negligible adverse landscape and visual impact.		
Arboricultural and ecological comments	The hedgebanks and associated trees around the boundaries should be considered as minor constraints at the periphery of the site.		
Strategy 3 – Sustainable Development	<p><i>Conserving and enhancing the environment</i> – Site H5 is in the open countryside within the East Devon AONB. Providing sports pitches on this site could potentially have a significant detrimental effect on the local environment, biodiversity and the quality and character of the landscape if not appropriately and sensitively designed. The site has, however, previously been used for sports pitches and only in recent years has this use ceased. Therefore reintroducing sports use to the site may be considered to have less of an impact than on a similar site that had not had such a previous use. The site is located entirely out of the floodzone and any sports pitches would have sports pitch drainage installed would reduce the risk on-site through installation of sports pitch drainage. The site is not on previously developed land, however no such suitable sites exist at Honiton.</p>		
	<p><i>Prudent natural resource use</i> – The location of site H5 would encourage travel by personal car and would not be accessible by walking, cycling or public transport. It would therefore increase reliance on fossil fuels and carbon emissions. A pavilion already exists on the site, however the owners do not wish for it to be used by clubs if the site is used for sports pitches in the future as this would clash with current uses. A new clubhouse may therefore required to be provided on this site.</p>		
	<p><i>Promoting social well being</i> – Providing sports pitches in general would promote social wellbeing, however, clearly the fact that the facilities cannot easily be accessed by foot/cycle and that they are divorced from the town itself could be considered to discourage social well being, especially compared to the status quo.</p>		
	<p><i>Encouraging sustainable economic development</i> – Whilst sports pitches are not economic development in themselves, it is important to ensure that sports clubs are sustainable and viable in the long term. The site is only large enough to accommodate a couple of adult pitches which would be isolated from other pitch facilities in the town. This would have cost implications for any club using the facility in terms of transporting ground maintenance equipment and having to maintain two separate sites. If a club were able to move wholesale to the site (and therefore only need to maintain the one site) this could be viable, however they would be located well outside the town. If participation dropped off as a result of users not being able to access the facilities then this may in fact have the opposite effect.</p>		
	<p><i>Taking a long term view of our actions</i> – As with delivery of sports facilities on any of the sites, this will be about ensuring that current and future generations have access to sufficient sports facilities. Clearly the accessibility issues with this site would weigh against it. However, the fact that the site has been used for sports pitches in the past would potentially reduce the impact in comparison to brand new provision.</p>		

<p>Strategy 4 – Balanced Communities</p>	<p>As with any of the sites being considered, the delivery of sports pitches on this site would help to secure social and community facilities which help contribute towards a balanced community. Clearly, however, pitches delivered in the heart of the community could have a better outcome in creating a balanced community. Delivery of pitches in this location would alienate users that do not have access to a private car and potentially lead to a more unbalanced community.</p>
<p>Strategy 5B – Sustainable Transport</p>	<p>Site H5’s location distant from the town, at the top of a steep hill and down a series of narrow country lanes would discourage access by sustainable transport modes and mean that effectively all users of the site would arrive by personal car. There would be an increase in vehicle movements that could potentially be beyond what the local road network could safely accommodate at peak times.</p>
<p>Strategy 7 – Development in the Countryside</p>	<p>Site H5 is located in the open countryside a good distance from the Honiton Built-up Area Boundary. Policy RC4 allows for sports facilities to be developed in the countryside where certain criteria are adhered to. These criteria are considered against that policy further on in this assessment. Having said that, the site is an existing playing field, formerly belonging to the Manor House School but not currently in sports use. It is therefore protected for that use by policy RC1. Being so removed from the urban area and in such a sensitive landscape setting (AONB), new sports pitch development here (and perhaps more specifically the clubhouse, car parking, traffic and noise generate by) would harm the distinctive landscape, amenity and environmental qualities of the landscape within which it is located. As the site is a former school playing field it would be difficult to resist its continued use as sports pitches, however, the associated impacts must be understood. Use as community sports pitches would likely have more significant traffic and noise impacts than use of the field by a small private school as was previously the case. Development of additional buildings or car parking in this location could potentially have detrimental impacts.</p>
<p>Strategy 23 – Development at Honiton</p>	<p>Sports pitch development in this location would not meet the aspiration to minimise car travel and would in fact increase the need to travel by car. It would not encourage ribbon development, but would not focus development on the existing urban fabric. Formalising sports pitches in this location would support the needs and aspirations of the sports clubs in that they would provide additional and potentially enhanced pitches; however clubs have expressed a desire to stay within the town in a location that is easily accessible by foot which this site is not. Whilst the supporting text to the policy implicitly supports provision of sports pitches on hill top land to the south of the town, it clearly says this is in line with community aspirations and it is no longer clear whether there is really a community aspiration for this any longer.</p>
<p>Strategy 46 – Landscape Conservation and Enhancement and AONBs</p>	<p>Site H5 is within the wider East Devon Central Ridges Landscape Character Area and shares many of the distinctive characteristics associated with this character area. The site is located within the Open Inland Planned Plateaux Landscape Character Type and again shares many of the distinctive characteristics of the character type. Delivering new sports pitches in this location would detract from the distinctive landscape character of the area, however, as the site is a former school playing field this issue is less clear cut than for site H2 for instance which shares many of the same characteristics otherwise. So long as formalising pitches on this site did not impact on any of the distinctive characteristics of the landscape area then it may not be as intrusive as on site H2. However, the site is still within the AONB and formalising sports pitches in this location would lead to an unacceptable increase in traffic and noise in a tranquil landscape. Unless no other more suitable alternatives exist, it would be difficult for this site to satisfy this strategy.</p>
<p>Strategy 47 – Nature Conservation and Geology</p>	<p>As a site in an isolated location far away from any existing urban environment, this site is likely to be particularly sensitive in terms of biodiversity. The mature hedgerows and associated trees are likely to be bat</p>

	flight corridors and act as navigation beacons. This being the case these features should be retained and respected.
D3 – Trees and Development Sites	Consultation with the Council’s arboricultural officers has highlighted the hedgebanks and associated trees as minor constraints at the periphery of the site. Pitch provision would need to respect these as much as possible. Due to the fact that this is a flat site and would require no re-profiling to create platforms for the pitches, STRI’s potential plans show pitches that do not interfere with the hedgerows or trees forming the boundaries to the site. However, if an extension were required for the clubhouse and car parking then there could be some impacts on the north-western boundary.
EN7 – Proposals Affecting Sites which may potentially be of Archaeological Importance	Consultation with the County Council’s Historic Environment team has highlighted that prehistoric cremations have been discovered in the wider landscape surrounding this site. As the site is relatively flat there would likely be no re-grading works required, with potentially the installation of sports pitch drainage being the only surface works. Therefore more in-depth archaeological assessment such as geophysical surveys may not be required, however there still is a chance that they may be.
EN13 – Development on High Quality Agricultural Land	Site H5 is located partly on Grade 4 and partly on Grade 3 agricultural land. Without a more in-depth survey it is not known whether the Grade 3 area falls into Grade 3a (good) or 3b (moderate). If 3b then this policy is not directly relevant, though the delivery of sports pitches in this location could avoid the need to use high quality agricultural land. Even if 3a, the site is a former playing field and is not in agricultural use and so it would be unlikely to be considered a loss of high quality agricultural land.
EN14 – Control of Pollution	Sports pitches must be maintained and this may include occasional use of pesticides, however this would be in small doses perhaps once a year. The STRI Stage 1 report highlights that the site is low in agricultural weeds, perhaps a legacy of the site’s former use as sports pitches, however it is a sign that only limited use of weedkill might be necessary. Any planning application for the delivery of sports pitches on this site would need to explain the likely impact of this on the drainage outfall and subsequent watercourses. In addition to this, sports pitch usage creates noise pollution. Whilst this is likely to be restricted to weekends and evenings, this could potentially be a significant pollutant to the peaceful and tranquil landscape of the AONB. Whilst the site has been previously used for school sports pitches, they served a small private school and would have had far less intensive use than formalised community sports pitches for club use. This increase in noise pollution could be significant in its impact on the tranquil AONB landscape in this location. Whilst not intended for this location, it is important to note that floodlights, no matter how well designed or mitigated would create unacceptable levels of pollution into the AONB which could have a significant impact on local biodiversity. The hill top location would also make it likely for floodlighting to be clearly visible across the Otter Valley and into the Blackdown Hills AONB.
EN16 – Contaminated Land	Site H5 is not on or in such close proximity to any contaminated land for this policy to apply.
EN21 – River and Coastal Flooding	Site H5 is within floodzone 1 and therefore not located within the floodplain. As such it is not necessary to carry out a sequential test.
EN22 – Surface Run-off Implications of New Development	Sports pitches themselves will not create significant surface run-off implications and as such no remedial measures such as SUDS are likely to be required. However, any new sports pitches would have sports drainage installed and the implications of this drainage would need to be considered. It is unlikely that any new clubhouse facilities or extended car parking if required would merit the provision of SUDS either but for instance additional car parking could be provided on a porous surface to avoid increasing surface run-off.
RC4 – Recreation Facilities in the Countryside and on the Coast	New sports pitch development does not by definition need a countryside location (unlike potentially a shooting range, golf course, gliding club or equine development for example). However, if there were no sites within or adjoining the urban area suitable for sports pitch development then that may

	<p>then mean that the facilities required a countryside location. However, the fact that this is a former school playing field means that this site would not require planning permission for continued use as sports pitches. Installation of sports pitch drainage to enable intensified use of the site, new clubhouse/changing facilities and extended parking would require planning permission and as such would probably be assessed against this policy as they would introduce an increased usage of the site and associated impacts. A significant increase in traffic and noise pollution would not be in scale with the character, environmental characteristics or setting of the area and would conflict with countryside, nature and landscape policies as set out above. The site would not be safely accessible considering the volume of traffic that would be generated if usage were increased significantly. The existing pavilion would need to be used for changing/clubhouse provision as additional buildings in this location would not be appropriate.</p>
RC5 – Community Buildings	<p>Provision of a new community building (clubhouse) in this location would not comply with the policy due to the site’s open countryside location. Therefore the existing pavilion would need to be used.</p>
RC6 – Local Community Facilities	<p>This policy allows for local community facilities in the open countryside where they meet the listed criteria and there is a proven need for the facility. There is no proven need for a new building as the existing pavilion was constructed for the purpose of being changing facilities/clubhouse for the playing field.</p>
RC7 – Shared Community Facilities	<p>Sharing of the pavilion with other community groups and businesses would meet the aims of this policy. Whether this site is an appropriate location for the current/proposed uses which have prompted the owner to state that the pavilion could not be used by any sports clubs using the site is not commented on here.</p>
TC2 – Accessibility of New Development	<p>Site H5 would not be accessible by pedestrians, cyclists or public transport and would not be located close to the residential areas from which people are travelling. That being the case it would not be a suitable location for such a development.</p>
TC4 – Footpaths, Bridleways and Cycleways	<p>The site is not currently accessible by footpath, bridleway or cycle path. For the site to potentially be acceptable it would have to provide new footpaths and cycleways connecting the site to the town. However, in reality the steepness of the hill would likely discourage the majority of users from accessing the site via foot or bike even if such provision were available.</p>
TC7 – Adequacy of Road Network and Site Access	<p>Consultation with the local highways authority has raised the issue that the access road would need widening allowing two cars can pass one another and that Cuckoo Down Lane is narrow with very few intervisibility passing places. In addition to this, the local road network has no footpaths or street lighting.</p>
TC9 – Parking Provision in New Development	<p>Policy TC9 does not require a specified number of parking spaces for sports pitch development. The location of the site means that all users would need to travel to it by private car and as such significant parking provision would be required. Guidance from Sport England and NGBs may help in this regard.</p>

Kings Arms Farm (H7)

Site ref	H7	Site name	Kings Arms Farm
Highways comments	Existing access, no work should be needed. Walking and cycling would be possible but would be un safe in places as the not all of the route is street lit nor does the whole rout have footways or cycle ways.		
Archaeology comments	This site lies in an area of high archaeological potential, adjacent to the Roman Exeter-Honiton road and in an area where there is a concentration of prehistoric activity. Any proposals for development here must be supported by the results of a programme of archaeological work to enable an understanding of the presence and significance of any heritage assets that may be affected by development here. This information would take the form of a <u>geophysical survey and evaluation of the proposed development site</u> .		
Landscape comments	Due to its siting within the countryside, the extent of the required groundworks and construction works and the site’s existing green framework the delivery of sport pitches on this site would have an overall moderate adverse landscape and visual impact.		
Arboricultural and ecological comments	So long as the hedgerows and associated features are retained the site has no other constraints.		
Strategy 3 – Sustainable Development	<p><i>Conserving and enhancing the environment</i> – Site H7 is in the open countryside though is located outside of either AONB. Delivery of sports pitches here would have less landscape harm than some other options, though would require careful planning regarding the banking on the northern edge of any pitches located outside of the floodplain and any built facilities to ensure no harm. Some pitches could be located entirely out of the floodzone, though this would necessitate some engineering works within the floodzone to create level platforms for the pitches, the flooding impact of which need to be understood. Additional pitches could be delivered on the floodplain, however by definition these would be at risk to seasonal river flooding and the subsequent impacts of this. Any sports pitches would have sports pitch drainage installed and this could reduce the risk of on-site surface water flooding. The site is not on previously developed land, however no such suitable sites exist at Honiton.</p>		
	<p><i>Prudent natural resource use</i> – Site H7 could be accessed by foot and bike, though the distance from the majority of the population and safety of roads would perhaps make such journeys unlikely. The site would be accessible by public transport with the main bus connecting Honiton, Ottery St. Mary, Cranbrook and Exeter running past the entrance the site. The site is likely to encourage a reasonable amount of travel by personal car, though with improvements to foot and cycle access that could be reduced. In comparison to some options, delivering pitches on this site could result in less reliance on fossil fuels and carbon emissions. A new clubhouse would be required in this location in order for any new pitches to be usable by clubs.</p>		
	<p><i>Promoting social well being</i> – Providing sports pitches on this site would promote social wellbeing as it would on any of the sites. If the facilities could be accessed by a safe pedestrian/cycle access then the site could be considered to have better social wellbeing outcomes than some other sites due to its proximity to the town, although it is still divorced from the majority of the town’s population.</p>		
	<p><i>Encouraging sustainable economic development</i> – Whilst sports pitches are not economic development in themselves, it is important to ensure that sports clubs are sustainable and viable in the long term. The site is capable of taking a better spread of pitch sizes than the St. Rita’s extension site (H1), however it’s detached location from existing facilities could prove unsustainable for the clubs using the site as two separate facilities would need maintaining. If additional pitches were delivered in the floodplain then this may make the site more viable and sustainable for any users in the long term, however, this would be tempered by the additional maintenance and repair costs associated</p>		

	<p>with regular flooding.</p> <p><i>Taking a long term view of our actions</i> – As with delivery of sports facilities on any of the sites, this will be about ensuring that current and future generations have access to sufficient sports facilities. In conjunction with existing facilities in the town, the site could deliver the majority of the town’s requirements for football for years to come, or if pitches were delivered on the floodplain it could deliver for rugby.</p>
Strategy 4 – Balanced Communities	<p>As with any of the sites being considered, the delivery of sports pitches on this site would help to secure social and community facilities which help contribute towards a balanced community. Clearly, however, pitches delivered in the heart of the community could have a better outcome in creating a balanced community. Whilst being adjacent to the urban area of Honiton, this site is not that close to the majority of the population due to Heathpark industrial estate lying between the site and the bulk of the town’s housing. Having said that, a large housing site and employment allocation are located at this end of the town and the site could be closely associated with creating a balanced community at this end of the town.</p>
Strategy 5B – Sustainable Transport	<p>Considering site H7’s location on the edge of the town it has a relatively poor accessibility by foot and bike (though probably a little better than site H4). Provision of safe foot/cycle access could reduce the need to travel by car but it could be a significant extra cost. The main Honiton to Exeter bus passes by the main entrance to the site and there is a stop just to the east of the site. Some users will still need to access the site by car and the proposed development would lead to an increase in vehicle movements. Comments from the local highways authority suggest that these could be accommodated by the local road network and site access.</p>
Strategy 7 – Development in the Countryside	<p>Site H7 is located adjacent to the Built-up Area Boundary (separated by the A30 Honiton bypass) and so technically within open countryside. Unlike site H1 and similarly to site H4, site H7 feels less part of the urban fringe and more part of the open countryside, mainly due to the dividing barrier of the A30. Policy RC2 allows for sports facilities to be developed on land within and adjoining urban or built-up areas where certain criteria are adhered to. These criteria are considered against that policy further on in this assessment. The site’s location broadly aligns with the Local Plan’s allocation for employment and recent housing permissions extending the pattern of Honiton’s development in this direction. Having said that, the A30 does form a significant cut-off to the town and developing this site (even for sports pitches) could potentially be seen as a departure from the traditional form of the settlement in landscape terms. So long as potential re-profiling of the land is kept to a minimum / soft and any built facilities are minimised and located in the least sensitive part of the site (probably the alongside the road) then this could minimise landscape impact.</p>
Strategy 23 – Development at Honiton	<p>Sports pitch development in this location could minimise car travel in comparison to some options so long as safe/suitable foot/cycle access could be achieved. Development of the site could be said to mildly encourage ribbon development as it is located at one end of the town, however it is in line with the employment allocation and recent housing permission west of Hayne Lane and does not seek to extend the town any further west. It would broadly support the needs and aspirations of Honiton sports clubs who have expressed a desire to stay within the town and assuming that safe/suitable access can be achieved in a location that is relatively easily accessible by foot. The site would also support the aim for improving sporting and community facilities to serve Honiton. Clearly, however, it is at odds with the aim to support the provision of sports pitches on hill top land to the south of the town, though whether there is really a community aspiration for this any longer is unclear.</p>
Strategy 46 – Landscape Conservation and Enhancement and AONBs	<p>Site H7 is within the wider Clyst Lowland Farmlands Landscape Character Area and does possess some of the distinctive characteristics associated with this character area. Most of the site is located within the Unsettled Farmed Valley Floors Landscape Character Type which it typically shares many of</p>

	<p>the distinctive characteristics of. Part of the site (the area upon which the STRI plans show pitches being delivered) is within the Upper Undulating Farmed and Wooded Slopes Landscape Character Type though the site shares relatively few distinctive characteristics with this LCT. As with site H4, this site can be seen in the context of Honiton due to its location immediately adjacent to the town and the A30 on the southern side of the River Otter, however, due to the more open nature of the landscape at this end of the town the site can also be seen quite clearly in the context of the valley floor landscape. The site is outside the AONB and so the strategy would prefer sports pitch development in this location in comparison to other options within the AONB unless it could not reasonably be accommodated here. The site could accommodate pitches outside the floodplain without much issue, however only a few football pitches of varying sizes or a couple of rugby pitches could be delivered on site in this situation. It would only be able to accommodate the required number of rugby pitches for the town they would need to be provided on the floodplain which is not necessarily appropriate. Pitch development and any associated additional car parking or clubhouse facilities would need to respect the landscape setting and reduce landscape impact to minimal.</p>
Strategy 47 – Nature Conservation and Geology	<p>The hedgerow and trees forming the western boundary to the site are likely to act as bat flight corridors and navigation beacons and as such should be retained and respected. STRI’s potential plans show a good buffer from this boundary.</p>
D3 – Trees and Development Sites	<p>Consultation with the Council’s arboricultural officers has highlighted that so long as the hedgerows and associated features are retained the site has no other constraints. The site is therefore relatively unconstrained in comparison to others. The plans produced by STRI show little or no impact on the hedgerows and so there is anticipated to be no impact here.</p>
EN7 – Proposals Affecting Sites which may potentially be of Archaeological Importance	<p>Consultation with the County Council’s Historic Environment team has highlighted that the site lies in an area of high archaeological potential, adjacent to the Roman Exeter-Honiton road and in an area where there is a concentration of prehistoric activity. A geophysical survey would be required at minimum even with relatively minimal land re-profiling.</p>
EN13 – Development on High Quality Agricultural Land	<p>Site H7 is located on Grade 4 agricultural land. That being the case this policy is not directly relevant, though the delivery of sports pitches in this location could avoid the need to use high quality agricultural land.</p>
EN14 – Control of Pollution	<p>Sports pitches must be maintained and this may include occasional use of pesticides, however this would be in small doses perhaps once a year. However, with a number of pitches located in one place (especially if any were delivered on the floodplain) the cumulative effect of this treatment could potentially be significant. Use of such treatments on land within the floodplain itself is likely to be resisted or restricted by the Environment Agency. The STRI Stage 1 report highlights that the site is low in agricultural weeds and the field is in pastoral use so is unlikely to have been treated with weedkill. Any planning application for the delivery of sports pitches on this site would need to explain the likely impact of this on the drainage outfall and subsequent watercourses. In addition to this, sports pitch usage creates noise pollution. Whilst this is likely to be restricted to weekends and evenings, this could potentially be a significant pollutant. Whilst the site’s location is not within an AONB it is still open countryside. However, it is immediately next to the A30 and close enough to the main urban area to be unlikely to have any significant additional impact on the amenity of the area. Floodlights in this location would likely create unacceptable levels of pollution in the wider landscape and have an impact on the setting of both the East Devon and Blackdown Hills AONBs and so should be avoided.</p>
EN16 – Contaminated Land	<p>Site H7 is not on or in such close proximity to any contaminated land for this policy to apply.</p>
EN21 – River and Coastal Flooding	<p>The majority of site H7 is within floodzone 2 and 3 and therefore located within the floodplain of the River Otter. A relatively small strip of the site adjacent the road is outside of the floodplain within floodzone 1. The plans</p>

	<p>produced by STRI propose pitches being delivered on land outside of the floodplain and on land raised out of it through earthworks. Delivery of pitches as per these plans may not merit a sequential test, however would require agreement from the Environment Agency due to the engineering works within the floodplain required to raise land out of the floodplain and thus the potential for impact on flooding up and down stream. Delivery of pitches on the part of the site within floodzones 2 and 3 would potentially require a sequential test to be carried out, although if this just meant basic surface works and no engineering works or hard surfacing within the floodplain then it may not be required. If a sequential test were required then pitches would only be able to be delivered within the floodplain here if no reasonably available sites in floodzone 1 existed.</p>
EN22 – Surface Run-off Implications of New Development	<p>Sports pitches themselves will not create significant surface run-off implications and as such generally no remedial measures such as SUDS would be likely to be required. However, in this location so close to the floodplain it may potentially be necessary for some kind of attenuation to hold back the outfall from the sports pitch drainage system at certain times. The construction of clubhouse facilities, car parking and an access drive may also merit some form of SUDS considering the location of the site.</p>
RC2 – New Open Space, Sports Facilities and Parks	<p>The delivery of sports pitches on site H7 (which adjoins the urban area of Honiton) could (if not carefully designed) unduly affect the character and appearance of the area. That being the case, careful designing of built facilities, re-profiling of land and screening of more intrusive elements of the development must be important factors of any development in this location. In fact, the delivery of sports pitches here could positively secure the site from being developed for housing or other uses in the future which could have a more significant negative effect on the character and appearance of the area. Access to the facilities by bicycle and foot will need to be improved to ensure they can be reached safely by these modes. Buses pass the entrance to the site along the old A30 and there is a bus stop just to the east of the site. The STRI potential site plans show where car parking could be accommodated on this site. This would likely be required to be provided in the form of grasscrete or similar to reduce the landscape impact. Cycle storage would need to be located at the clubhouse. The local highways authority raised no concerns over the accessibility of the site in general other than safe access by foot/bike. Whilst the site is located on Grade 4 agricultural land outside the AONB, adjacent the town in a relatively easily accessible location it would require delivery of pitches on the floodplain to be at a scale large enough to accommodate the rugby needs of the town, in which case better options out of the floodplain exist. If only the land outside the floodplain were developed for pitches then there would only be room for a few football pitches and the location of St. Rita's extension is far more sustainable and appealing.</p>
RC5 – Community Buildings	<p>The site's location adjacent to the BuAB means that it would potentially be a suitable location for a community building such as a clubhouse.</p>
RC6 – Local Community Facilities	<p>This policy allows for local community facilities on sites adjoining BuABs where they meet certain criteria. Any facility would need to reflect the character of the site and surroundings, be located close to the road and well screened to minimise landscape impact and be seen in the context of the existing town. As with requirements of other policies considered here, a safe pedestrian/cycle access would need to be provided. The amenity of immediate neighbours would need to be considered.</p>
RC7 – Shared Community Facilities	<p>The clubhouse building required for the site would need to be available for other community groups to use. This would aid with income generation and being close to town would likely be well used by other groups.</p>
TC2 – Accessibility of New Development	<p>Site H7 is located relatively close to the urban areas from which users will travel in comparison to some options however it is still a reasonable distance from the majority. With suitable improvements to foot/cycle access, and considering the accessibility by bus, car access could still be minimised. Any more detailed plans as part of a planning application would need to provide</p>

	adequate provision for access by those with reduced mobility.
TC4 – Footpaths, Bridleways and Cycleways	A footpath does exist on the Hayne Lane bridge over the A30 and this extends most of the way towards the site, however it would need to be completed to the site entrance. The footpath would also need to be linked up from the southern side of the bridge up to Heathpark Industrial Estate and the western end of Old Elm Road. No other footpaths or cycleways serve the site. In order for the site to be progressed this footpath would need to be completed and potentially streetlighted.
TC7 – Adequacy of Road Network and Site Access	Consultation with the local highways authority has suggested that pedestrian/cycle access would need improvements as per comments above but that the site access itself is acceptable and no concerns were raised about the adequacy of the local road network to accommodate sports pitch development on this site.
TC9 – Parking Provision in New Development	Policy TC9 does not require a specified number of parking spaces for sports pitch development. Whilst the location of this site should minimise travel by car (so long as safe pedestrian/cycle access can be achieved) there will inevitably be a need to accommodate car parking on site. Guidance from Sport England and NGBs may help in this regard.

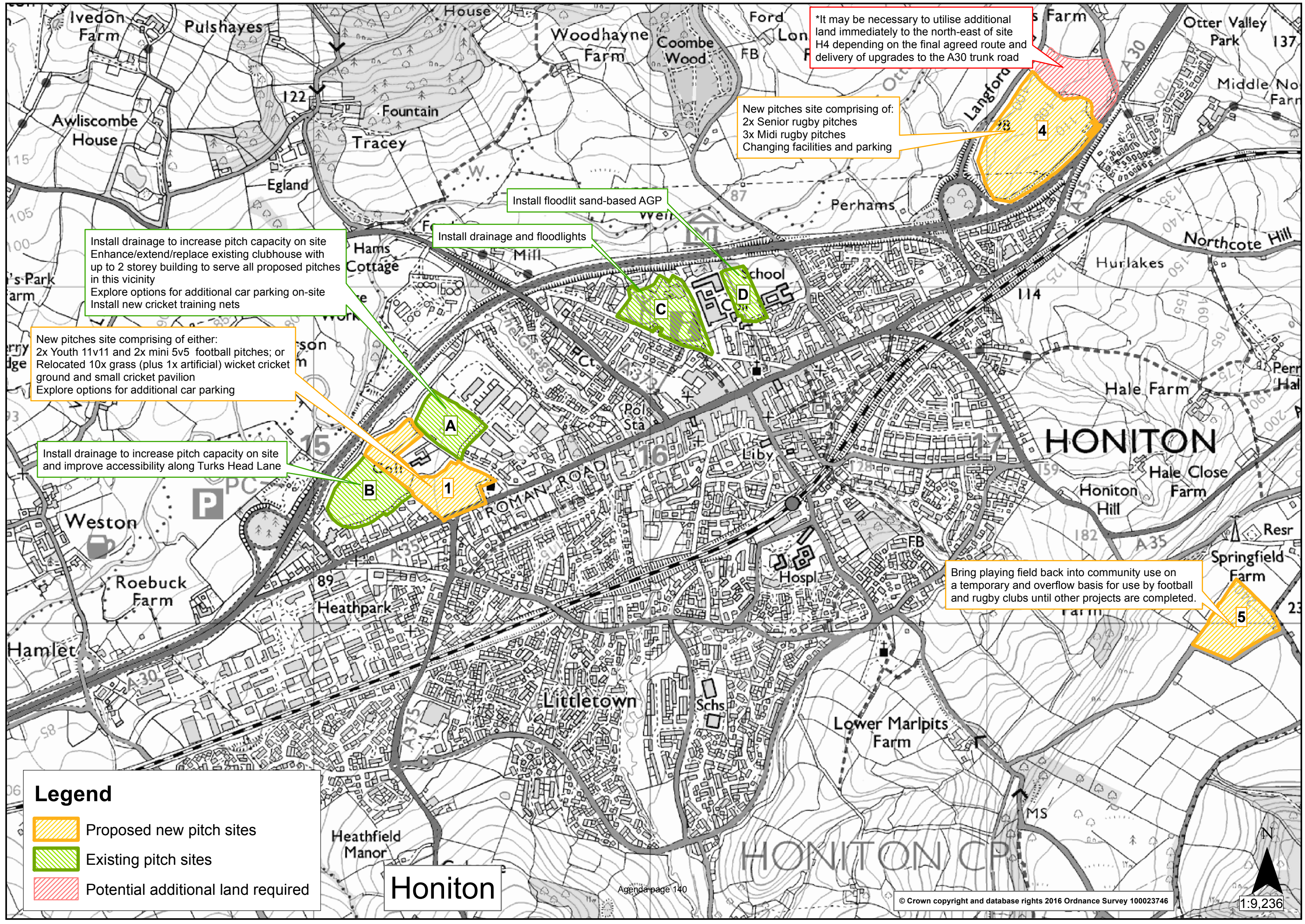
Land between Mountbatten Park and the A30 (H9)

Site ref	H9	Site name	Land between Mountbatten Park and the A30
Highways comments			The junction from Otter Moor Lane on High Street would be suitable for the number of pitches. Ottery Moor lane going to the industrial estate should be able to handle the extra capacity. Due to this site being more with in the town, this is likely to encourage Sustainable transport. On checking the DCC collision data it appears there is one slight collision at the junction of Ottery Moor lane & High Street.
Archaeology comments			No anticipated archaeological impact.
Landscape comments			Due to its urban context, its location just south of the A30, its close proximity to other sport facilities and the already established buffer planting the delivery of the proposed type of sport pitches on this site would have a minor adverse landscape and visual impact.
Arboricultural and ecological comments			Due to the narrow nature of the site the necessary buffer zones and habitat margins to the NW and SE boundaries will impact on the overall developable area. Shade cast by the trees to the South will affect the playing surface of any courts or pitches.
Strategy 3 – Sustainable Development			<i>Conserving and enhancing the environment</i> – Site H9 is on the urban fringe. Providing sports pitches on the strip of land between Mountbatten park and the A30 (so long as they are designed appropriately and sensitively) would minimise harm to biodiversity and the quality and character of the landscape. The installation of sports pitch drainage would not add to potential issues of surface water flooding and would in fact reduce the risk on-site. The site is not on previously developed land, however no such suitable sites exist at Honiton.
			<i>Prudent natural resource use</i> – The location of site H9 would discourage travel by vehicular transport (be that car or bus) and would encourage walking and cycling to the site thereby reducing reliance on fossil fuels and carbon emissions. Location immediately adjacent to the existing facilities at Mountbatten Park would mean that additional clubhouse/changing facilities would not need to be provided, but existing facilities would need to be enhanced / extended. Plans show how potentially extended facilities could be accommodated on this site to serve the hub as a whole.
			<i>Promoting social well being</i> – Providing sports pitches on this site would promote social wellbeing as it would on any of the sites, however, clearly easy access to facilities by foot/cycle within the fabric of the town could be considered to have better social wellbeing outcomes.
			<i>Encouraging sustainable economic development</i> – Whilst sports pitches are not economic development in themselves, it is important to ensure that sports clubs are sustainable and viable in the long term. Provision of sport pitches on site H9 in conjunction with existing facilities and new pitches on site H1 could enable all football and cricket pitches to continue to be located in one place, minimising maintenance costs and transport costs and encouraging use of the social facilities at Mountbatten Park.
			<i>Taking a long term view of our actions</i> – As with delivery of sports facilities on any of the sites, this will be about ensuring that current and future generations have access to sufficient sports facilities, though clearly the ease of access to any facilities delivered on this site would be preferable.
Strategy 4 – Balanced Communities			As with any of the sites being considered, the delivery of sports pitches on this site would help to secure social and community facilities which help contribute towards a balanced community. Clearly, however, pitches delivered in the heart of the community could have a better outcome in creating a balanced community.
Strategy 5B – Sustainable Transport			Site H9’s location on the edge of the town enables users to access the site by foot, bike and public transport (bus stops on Exeter Road), reducing the need to travel by car. Accessibility of the site is good and safe by all modes of transport. Some users will still need to access the site by car and increasing

	the number of pitches may well lead to an increase in vehicle movements. Comments from the local highways authority state that these could be accommodated by the local road network.
Strategy 7 – Development in the Countryside	Despite being located seemingly within the town, site H9 is technically in the open countryside, albeit on the urban fringe and physically abutting the Built-up Area Boundary. Policy RC2 allows for sports facilities to be developed on land within and adjoining urban or built-up areas where certain criteria are adhered to. These criteria are considered against that policy further on in this assessment. Considering the site’s location alongside existing sports facilities and seemingly (though not technically) within the urban area, sports pitch development here would not harm the distinctive landscape, amenity or environmental qualities of the landscape within which it is located.
Strategy 23 – Development at Honiton	Sports pitch development in this location would minimise car travel and would not encourage ribbon development. It would support the needs and aspirations of the sports clubs operating out of Mountbatten Park and St. Rita’s who have expressed a desire to stay within the town in a location that is easily accessible by foot. The site would also broadly align with the aim to direct new leisure uses to the town centre and improving sporting and community facilities to serve Honiton. Clearly, however, it is at odds with the aim to support the provision of sports pitches on hill top land to the south of the town, though whether there is really a community aspiration for this any longer is unclear.
Strategy 46 – Landscape Conservation and Enhancement and AONBs	Site H9 is within the wider Clyst Lowland Farmlands Landscape Character Area though shows little in the way of the distinctive characteristics associated with this character area. The site is located within the Urban Landscape Character Type for Honiton which reflects the fact that the landscape is seen in the context of the town. Delivering additional sports pitches in this location would protect other more sensitive landscape areas (including but not limited to the AONB) from potentially inappropriate change. Pitch development and any associated additional car parking or clubhouse facilities would need to take account of hedgerows which do reflect a distinctive characteristic of the Clyst Lowland Farmlands and local built heritage especially.
Strategy 47 – Nature Conservation and Geology	The hedgerows and hedgebanks forming the boundaries to this site provide valuable ecological habitats and corridors. Together with associated trees the would likely act as bat flight corridors and navigation beacons. That being the case all should be retained wherever possible.
D3 – Trees and Development Sites	Consultation with the Council’s arboricultural officers has highlighted that pitch layouts would need to respect existing hedgerows in this location. An area TPO covers the trees lining the south-eastern edge of the site. The hedgerows and hedgebanks forming the boundaries to this site provide valuable ecological habitats and corridors. That being the case all should be retained wherever possible. STRI’s potential plans show the pitches platform potentially impacting on these hedgebanks which could be mitigated through smaller run-offs or allowing pitches to be slightly outside FA/Sport England cross fall guidelines, however it would still be tight. In order to access the part of the site identified for possible clubhouse and car parking there would have to be some loss of existing outgrown hedgerows.
EN7 – Proposals Affecting Sites which may potentially be of Archaeological Importance	Consultation with the County Council’s Historic Environment team has highlighted that there is likely to be no archaeological impact arising from this site.
EN13 – Development on High Quality Agricultural Land	Site H9 is located on Grade 4 agricultural land. That being the case this policy is not directly relevant, though the delivery of sports pitches in this location could avoid the need to use high quality agricultural land.
EN14 – Control of Pollution	Sports pitches must be maintained and this may include occasional use of pesticides, however this would be in small doses perhaps once a year. The STRI Stage 1 report highlights that the site is high in agricultural weeds. This may mean that initially more weed control is required. Any planning

	<p>application for the delivery of sports pitches on this site would need to explain the likely impact of this on the drainage outfall and subsequent watercourses. In addition to this, sports pitch usage creates noise pollution, however, this is likely to be restricted to weekends and perhaps one or two nights per week. Floodlights would not be intended to be installed on the site and so usage would never extend too late into an evening. Existing sports pitch usage at St. Rita’s and Mountbatten Park does not tend to receive many complaints in terms of noise pollution, with traffic along the A30 and Exeter Road perhaps being of a more significant nature. Floodlights are not proposed for the site.</p>
EN16 – Contaminated Land	Site H9 is not on or in such close proximity to any contaminated land for this policy to apply.
EN21 – River and Coastal Flooding	Site H9 is within floodzone 1 and therefore not located within the floodplain. As such it is not necessary to carry out a sequential test.
EN22 – Surface Run-off Implications of New Development	Sports pitch development will not create significant surface run-off implications and as such no remedial measures such as SUDS are required, however, any new sports pitches would have sports drainage installed and the implications of this drainage would need to be considered.
RC2 – New Open Space, Sports Facilities and Parks	<p>The delivery of sports pitches on site H9 (which adjoins the urban area of Honiton) would be unlikely to unduly affect the character and appearance of the area or the visual and physical amenities enjoyed by adjoining residential areas. In fact, the delivery of sports pitches here could positively secure the site from being developed for housing or other uses in the future which could have a negative effect on these. The facilities would be accessible by public transport, bicycle and foot. The STRI potential site plans show how additional car parking could be accommodated on this site if it were necessary, however the location of this would need to be subject to a holistic review of the clubhouse and parking facilities for all of the sports facilities in this locale as a whole and so could be located elsewhere in the vicinity. Cycle storage would most likely be located at the clubhouse at Mountbatten Park. The local highways authority raised no concerns over the accessibility of the site in general. Specific location of the parking would be subject to the above mentioned review. Delivering sports pitches on this site would not be to the detriment of the most versatile agricultural land, nature conservation interest and the conservation of areas of landscape, scientific, archaeological or historic interest, subject to the outcomes of any desk-based archaeological assessment.</p>
RC5 – Community Buildings	The site’s location adjacent to the BuAB means that it would potentially be a suitable location for a community building such as a clubhouse.
RC6 – Local Community Facilities	This policy allows for local community facilities on sites adjoining BuABs where they meet certain criteria. Any facility would need to reflect the character of the site and surroundings and grouped with other buildings as much as possible to limit sporadic development. The facility could be easily accessible by all modes of transport, though the suitability of the track section of Ottery Moor Lane which leads to this site would need to be assessed as to whether it is suitable for accessing any car parking. The amenity of neighbouring properties would need to be considered.
RC7 – Shared Community Facilities	If a new clubhouse building were provided on site it would need to be available for other community groups to use. This would aid with income generation and being in such an accessible location would likely be well used by other groups.
TC2 – Accessibility of New Development	Site H9 is well located for access by public transport, bicycle and foot. It is well related to other sports facilities and the urban areas from which users will travel and so will minimise the need to travel by car. Any more detailed plans as part of a planning application would need to provide adequate provision for access by those with reduced mobility.
TC4 – Footpaths, Bridleways and Cycleways	The site is easily accessible by public footpaths along Ottery Moor Lane.
TC7 – Adequacy of Road	Consultation with the local highways authority has raised no concerns about

Network and Site Access	the accessibility of this site or the adequacy of the local road network to accommodate it.
TC9 – Parking Provision in New Development	Policy TC9 does not require a specified number of parking spaces for sports pitch development. Whilst the key advantage of this site is its location which should minimise travel by car there will inevitably be a need to accommodate car parking and potentially an increased need as the population and as such the size of the sports clubs grows. Parking would need to be subject to review alongside provision at Mountbatten Park to ensure that enough spaces are provided in total. Guidance from Sport England and NGBs may help in this regard.



*It may be necessary to utilise additional land immediately to the north-east of site H4 depending on the final agreed route and delivery of upgrades to the A30 trunk road

New pitches site comprising of:
 2x Senior rugby pitches
 3x Midi rugby pitches
 Changing facilities and parking

Install floodlit sand-based AGP

Install drainage and floodlights




Install drainage to increase pitch capacity on site
 Enhance/extend/replace existing clubhouse with up to 2 storey building to serve all proposed pitches in this vicinity
 Explore options for additional car parking on-site
 Install new cricket training nets

New pitches site comprising of either:
 2x Youth 11v11 and 2x mini 5v5 football pitches; or
 Relocated 10x grass (plus 1x artificial) wicket cricket ground and small cricket pavilion
 Explore options for additional car parking

Install drainage to increase pitch capacity on site and improve accessibility along Turks Head Lane

Bring playing field back into community use on a temporary and overflow basis for use by football and rugby clubs until other projects are completed.

Legend

-  Proposed new pitch sites
-  Existing pitch sites
-  Potential additional land required

Honiton

Draft for Consultation from
22/11/2016 until 20/12/2016



Revised Draft Honiton Sports Pitch Strategy

Strategic Environmental Assessment and
Habitat Regulation Screening Report

Revised Draft Honiton Sports Pitch Strategy - 2016

Strategic Environmental Assessment and Habitat Regulation Screening Report

How to comment on this Document

You are invited to make comments on the revised draft Honiton Sports Pitch Strategy and any of the documents that support it as listed below:

- Strategic Environmental Assessment and Habitat Regulations Screening Report
- Equalities Impact Assessment Screening Report
- Consultation Statement

These documents will be available online at <http://eastdevon.gov.uk/planning/planning-policy/environment-and-green-infrastructure/open-space/honiton-sports-pitch-strategy/> and at the Council Offices in Sidmouth. Copies of the revised draft strategy will also be available at:

- Honiton Library, 50 New Street, Honiton, EX14 1BS
- Honiton Town Council, The Beehive, Dowell Street, Honiton, EX14 1LZ

The feedback we receive on this revised draft will be used to inform any subsequent revisions if considered necessary.

You can comment:

by email at localplan@eastdevon.gov.uk

or by post to: Planning Policy, East Devon District Council, The Knowle, Station Road,
Sidmouth, EX10 8HL

All comments should be received by the 5pm on 20th December 2016 so that they can be taken into account before the next stage. All comments received will be available to view on our website however private postal and email addresses and phone numbers will be redacted.

Revised Draft Honiton Sports Pitch Strategy

Strategic Environmental Assessment and Habitat Regulations Assessment

Draft Screening Report

Prepared by Officers of East Devon District Council

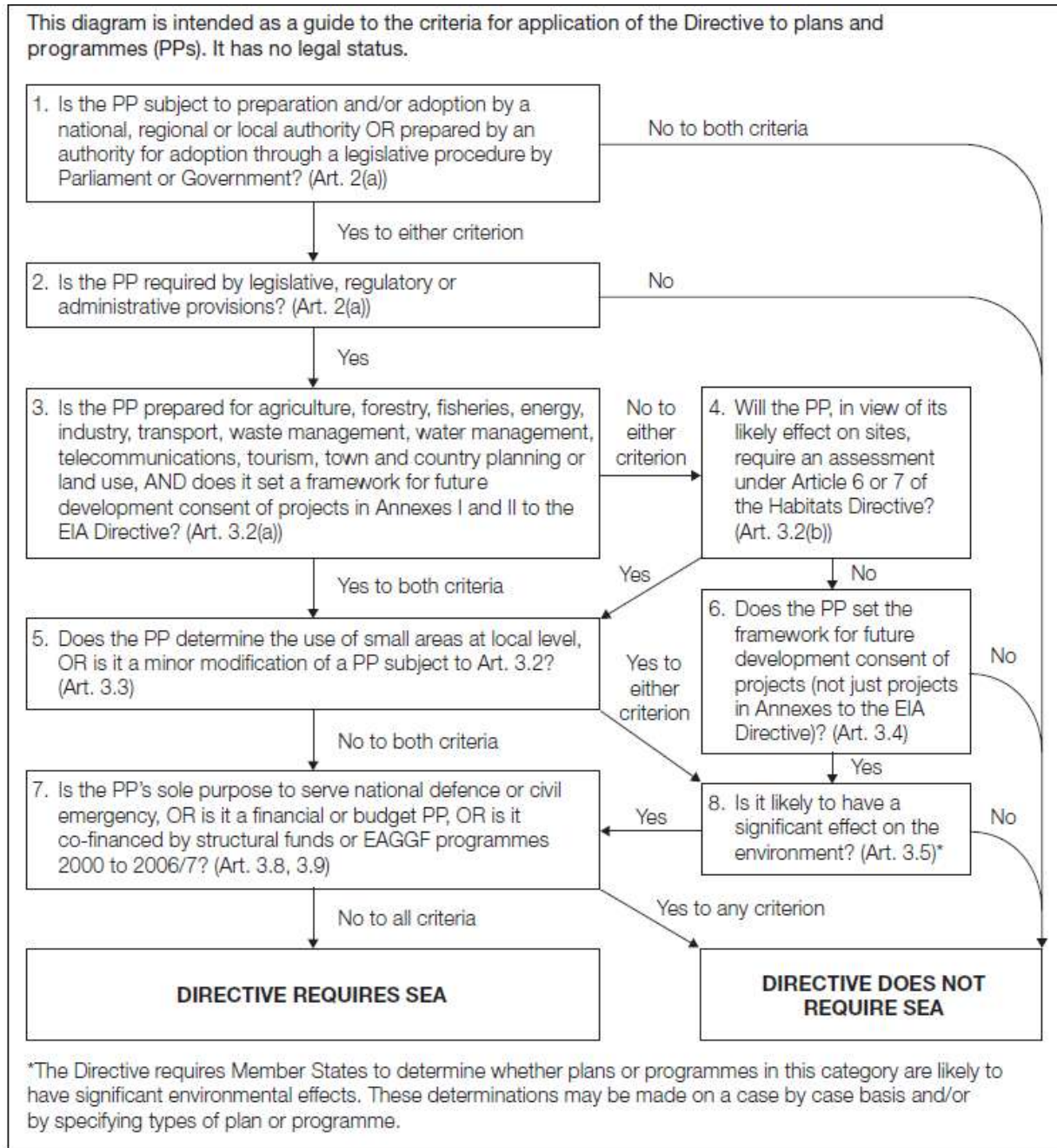
1.0 Introduction

- 1.1 The purpose of this report is to assess the draft proposals in the Revised Draft Honiton Sports Pitch Strategy (hereafter referred to as the strategy) to determine whether it requires a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004. An SEA is required under this legislation for all plans which may have a significant effect on the environment.
- 1.2 This report will also screen to determine whether or not the SPD requires a Habitats Regulations Assessment (HRA) in accordance with Article 6(3) of the EU Habitats Directive and with Regulation 61 of the Conservation of Habitats and Species Regulations 2010. An HRA is required when it is deemed that the implementation of the plan is likely to cause significant negative effects on protected European Sites (Natura 2000 sites).
- 1.3 The conclusion of the assessment is that the strategy is unlikely to have a significant effect on the environment so an SEA is not required to accompany it. It is also unlikely to have a negative impact on any Natura 2000 sites so should not be subject to HRA.
- 1.4 This report has been sent to the three statutory consultees designated in the Regulations (Historic England, Environment Agency and Natural England) to elicit their views on the findings. When responses are received a final report will be produced to incorporate their comments.

2.0 SEA screening

- 2.1 The basis for Strategic Environmental Assessments and Sustainability Appraisal legislation is European Directive 2001/42/EC and was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations. Detailed Guidance of these regulations can be found in the Government publication 'A Practical Guide to the Strategic Environmental Assessment Directive' (ODPM 2005).
- 2.2 The objective of SEA is '*to provide for a high level of protection of the environment and contribute to the integration of environmental considerations into the preparation and adoption of development plans.... with a view to promoting sustainable development*' EU Directive 2001/42/EC (Article 1).
- 2.3 Although there is no definitive guidance stating that a strategy such as this will require an SEA, Local Authorities are legally obliged to advise as to whether an SEA is required.
- 2.4 To ascertain if SEA is required, a "screening" exercise has been undertaken by East Devon District Council evaluating the proposals the strategy against the criteria set out in the SEA Directive. This criterion is set out in the SEA Directive and can be found in Figure 1.
- 2.5 Should the screening report reach the conclusion that that plan will have a significant impact on the environment; a full SEA should be undertaken.
- 2.6 If the conclusion is that a full SEA is not required, any significant variations or additions to the strategy will also be subject to screening.
- 2.7 An SEA has been undertaken as part of the adopted East Devon Local Plan 2013-2031 and has been taken into account whilst undertaking this screening assessment.

Figure 1: Application of the SEA Directive to plans and programmes



3.0 Revised Draft Honiton Sports Pitch Strategy

- 3.1 The Honiton Sports Pitch Strategy has been developed in response to action plans arising from the district-wide East Devon Playing Pitch Strategy 2015 (PPS). It is intended to be a document designed to guide the delivery of sports pitches to meet the needs of Honiton to 2024 as identified by the PPS. The strategy is intended to set out the Council’s evidence-based preferred approach to meeting these needs and will be adopted as a corporate strategy of the Council to help guide investment and decision making and a material consideration in determining planning applications. It is not intended to become formal a SPD or DPD and does not “allocate” land for development.
- 3.2 The strategy is needed to inform investment decisions by the Council, clubs, Sport England, National Governing Bodies for sports and others and to ensure provision is considered strategically and not delivered piecemeal. The strategy adds detail to the adopted PPS which was produced to meet the need to evidence planning policies with robust and up to date local assessments of need as set out in paragraph 73 of the National Planning Policy Framework (NPPF). The PPS is referenced in strategy 43 of the East Devon Local Plan. Strategy 43 states that “provision of outdoor sports pitch requirements (grass and artificial) will be guided by the Playing Pitch Strategy”. The strategy also adds detail to Strategy 23 of the Local Plan which refers to leisure and recreation facilities, social and community facilities and infrastructure being required in Honiton. The Local Plan also sets out criteria against which the development of new open space, sports and recreation facilities will be considered in Policies RC2 and RC4. The Local Plan was itself subject to SEA and HRA. Whilst the strategy makes recommendations on where new sports pitch sites should be delivered and how existing sites should be enhanced, these recommendations are based on an assessment of the sites against relevant Local Plan policies and ultimately are just recommendations and do not allocate or determine that such sites will be permitted. As it is specific to individual sites it is considered very unlikely to have a significant environmental effect. Should this circumstance change it will be important to rescreen the strategy to take any changes into account.

Figure 2: Screening assessment against the criteria for whether the strategy requires an SEA.

Stage	Y/N	Reason
Is the strategy subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Y	The strategy will be prepared and adopted by East Devon District Council however will not be adopted through a legislative procedure.
Is the strategy required by legislative, regulatory or administrative provisions? (Art. 2(a))	N	The strategy is not <i>required</i> by any legislative, regulatory or administrative provisions. The NPPF which <i>may</i> be considered an administrative provision sets out that policies should be based on robust and up to date assessments of need. The PPS (alongside other documents) provided this evidence for the Local Plan policies relating to sports pitches. This strategy adds to that evidence base. Whilst the NPPF <i>may</i> constitute an administrative provision, it does not require the strategy nor the characteristics set out in the Government’s Practical Guide to the SEA Directive in that that it be publicly available, prepared in a formal way and involve consultation with

		interested parties. The Council has <i>chosen</i> to produce this strategy and <i>chosen</i> to make it publicly available, prepare it in a formal way and consult relevant parties.
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Directive Does Not Require SEA

3.3 If it was considered that the answer to the above criterion was YES:

Is the SPD prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))	N	The strategy is prepared for Town and Country Planning and land use but does not provide the framework for development of a nature or scale that would fall within Annex I or II of the EIA Directive.
Will the strategy, in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive? (Art. 3.2(b))	N	See section 4.0 of this Screening Report below.
Does the strategy set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)? (Art. 3.4)	N	The European Commission guidance (paragraph 3.23) states that plans and programmes which set the framework for future development consent of projects would normally contain ‘criteria or conditions which guide the way a consenting authority decides an application for development consent’. As a material consideration in the determination of planning applications the strategy will not become part of or hold the same weight as the development plan. Whilst it makes recommendations over the future development of sports facilities, it cannot set a framework including criteria and conditions for the future determination of planning applications.
Is it likely to have a significant effect on the environment? (Art. 3.5)	N	See screening assessment for environmental effects in figure 3 of this report.

3.4 Under step 8 of the Application of the SEA directive (Figure 1), in order to establish whether a plan requires an SEA, it was necessary to conduct a thorough assessment of whether the SPD was likely to have a significant effect on the environment.

3.5 The table below sets out the criteria by which the strategy should be judged, as outlined in Article 3.5 of the SEA Directive.

Figure 3: Environmental impact screening assesment

Criteria for determining the likely significance of effects (Schedule 1 of SEA regulations)	Is the strategy likely to have a significant environmental effect?	Justification for Screening Assessment
The degree to which the plan or programme sets a framework for	N	The strategy adds detail to Strategies 23 and 43 of the East Devon Local Plan.

<p>projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.</p>		<p>The Local Plan sets out criteria against which new open space/recreation sites/site extensions will be considered in Policies RC2 and RC4, the strategy considers a number of potential sites and scenarios against these and other policies of the Local Plan to ensure that pitch provision is considered strategically and not piecemeal and that sustainability and suitability criteria required by the Local Plan policies have been considered appropriately. The strategy suggests ways in which environmental improvements could be made as part of the development of sites which would reduce the harm which could otherwise occur. The strategy does not allocate any sites and all recommendations within it will still need to be subject to planning applications where necessary and any requirements therein.</p>
<p>The degree to which the plan or programme influences other plans and programmes including those in a hierarchy.</p>	<p>N</p>	<p>The strategy adds detail to the adopted East Devon Local Plan. Recommendations within the strategy are considered against and allowed for within the policies of the Local Plan. It must also be compatible with EU law and the ECHR obligations. It is not considered to have a particular influence on any plans other than as a material consideration in determining future planning applications for development of sites recommended by the strategy or for sports pitch development to meet the needs of Honiton in other locations.</p>
<p>The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.</p>	<p>N</p>	<p>The strategy contributes towards the achievement of sustainable development by considering potential options for sports pitch development against one another and the development plan and recommending the most suitable and sustainable options. It explains why other options would be less sustainable or have a more significant impact on the environment.</p>
<p>Environmental problems relevant to the plan or programme.</p>	<p>N</p>	<p>There are no significant environmental problems that the strategy is likely to impact.</p>

The relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).	N	These community legislation types are not relevant to the strategy and will not need to be considered beyond the requirement for refuse/recycling storage, SUDS and waste water management as required by the local Plan (and the guidance of South West Water/the Environment Agency).
The probability, duration, frequency and reversibility of the effects.	N	Whilst the strategy relates to the development of sites any effects of subsequent proposals, there is no guarantee of delivery (especially considering the significant financial costs and need for land assembly etc). Use of sites as sports facilities is likely to be long in duration including potentially in perpetuity, however frequency of use of any new sites is likely to be mainly restricted to weekends and some evenings meaning that impacts are not continuous or sustained. Whilst recommendations of the strategy include some built facilities including clubhouses/changing facilities and car parking, these are minimal and not considered to be significant. The majority of developments recommended in the strategy would comprise leveling and reprofiling of land, installation of sports pitch drainage and the sowing of new grass turf. Whilst it would be irreversible to return a leveled field back to its natural topography exactly, it would be possible for grass pitches to return to a semi-natural environment if necessary.
The cumulative nature of the effects.	N	The cumulative effects of the strategy are not considered to have a significant effect on the environment.
The trans-boundary nature of the effects.	N	The strategy only makes recommendations for specific sites, the scale and location of which are mainly determined by the Local Plan as evidenced by the assessment of sites against Local Plan policies contained within the strategy. The scale of development it will impact upon is unlikely to have a significant effect on neighbouring areas.
The risks to human health or the environment (e.g. due to	N	The main risks to human health or the environment relate to a small increase

accidents).		in traffic movements and protection of biodiversity. However, recommended sites have been chosen in part as a result of their locations which will reduce the need to travel by car and their reduced impact on biodiversity. Recommendations and Local Plan policies recognise the need to ensure safe pedestrian and cycle access and reduce/mitigate impacts on biodiversity. The provision of sports pitches will have a positive impact on human health through the promotion of sports participation and associated disease/illness prevention.
The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected).	N	The strategy is concerned only with the development of sports pitch facilities in and around the town of Honiton which in 2012 had an estimated population of 11,608, though clearly facilities will serve a larger hinterland to an extent. If there are any effects they will be localised and are not considered to be wide ranging as per the meaning of the regulations.
The value and vulnerability of the area likely to be affected due to: special natural characteristics or cultural heritage; exceeded environmental quality standards or limit values; intensive land-use. the effects on areas or landscapes which have a recognised national, Community or international protection status.	N	The strategy recommends one site for development that is located within the Blackdown Hills AONB and certain developments on other sites recommended in the strategy may impact upon either the Blackdown Hills AONB or the East Devon AONB to an extent due to intervisibility. However, Local Plan policies (which have been subject to SEA and HRA) allow for such development where certain criteria have been met and the strategy considers the options for development against these criteria. Special natural characteristics have been considered through landscape assessments and assessment against Local Plan policies. Impacts on cultural heritage in the built environment have been considered and both Historic England and the County Council's Historic Environment teams have been consulted as part of the consultation process. Land use is not expected to be overly intensive in the meaning of the regulations. There are no significant impacts expected.

3.6 Conclusion

3.7 The strategy does not require a Strategic Environmental Assessment

4.0 Habitat Regulations Screening Assessment

4.1 The Revised Draft Honiton Sports Pitch Strategy has been used to undertake this initial screening assessment. As the conclusion is that a full Habitat regulations screening is not required, any variations or additions to the Document may require a further screening. A screening report was produced as part of the production of the adopted Local Plan and has been taken into account in undertaking this screening assessment.

4.2 The Conservation (Natural Habitats &c.) Regulations 1994 (The Habitats Regulations) transpose the requirements of the European Habitats Directive 92/43/EEC into UK law. The Habitats Directive and Regulations afford protection to plants, animals and habitats that are rare and vulnerable in a European context.

4.3 Habitats Regulations Assessment (HRA) is a systematic process through which the performance of a plan or project can be assessed for its likely impact on the integrity of a European Site. European Sites, also referred to as Natura 2000 sites, consist of Special Protection Areas (SPA), Special Areas of Conservation (SAC); Potential Special Protection Areas and candidate Special Areas of Conservation (pSPA and cSAC); and listed or proposed Ramsar sites.

4.4 Article 6(3) of the Habitats Directive states:

‘Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans and projects, shall be subject to appropriate assessment of its implications for the site in view of the site’s conservation objectives’.

4.5 As the strategy covers just Honiton and its immediate surrounds and there are no European sites in close proximity or likely to be affected by the recommendations of the strategy or cumulative impacts in combination with other plans and projects it is not considered necessary to conduct an appropriate assessment.

4.6 Natural England will be consulted on this document by the District Council.

Screening Criteria Questions

1. Is the strategy directly connected with, or necessary to the management of a European site for nature conservation?

No

2. Does the strategy propose new development or allocate sites for development?

The strategy recommends preferred sites for sports pitch development but does not allocate

development- the criteria against which sites will be assessed is already established in the adopted East Devon Local Plan. The strategy supports and adds detail to Local Plan policies by assessing options for sports pitch development against plan policies and recommending the most suitable and sustainable options. A detailed assessment of potential impacts will be carried out when specific sites come forward through the planning system.

The objectives in the strategy accord with the Local Plan for the District which is subject to an HRA. A screening opinion was provided by Land Use Consultants early in the Plan production process and an HRA was completed by Footprint Ecology before, and informed, the adopted Local Plan. It indicated that the Local Plan will have sufficient policy provisions to enable the subsequent delivery of necessary measures to avoid and mitigate adverse effects on the integrity of European Sites.

3. Are there any other projects or plans that together with the strategy could impact on the integrity of a European Site?

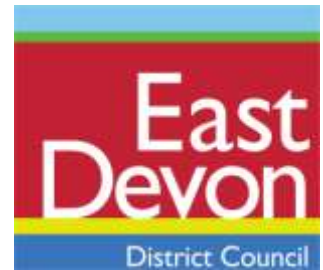
No

4.7 Conclusion

4.8 The strategy does not require a Habitat Regulation Assessment.

4.9 The strategy is unlikely to have an adverse effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2010 (d), alone or in combination with other plans and projects. It does not propose a level of development significantly over and above that in the adopted Local Plan (which was itself subject to HRA).

Draft for Consultation from
22/11/2016 until 20/12/2016



Revised Draft Honiton Sports Pitch Strategy

Equality Impact Assessment

Revised Draft Honiton Sports Pitch Strategy - 2016

How to comment on this document

You are invited to make comments on the revised draft Honiton Sports Pitch Strategy and any of the documents that support it as listed below:

- Strategic Environmental Assessment and Habitat Regulations Screening Report
- Equalities Impact Assessment Screening Report
- Consultation Statement

These documents will be available online at <http://eastdevon.gov.uk/planning/planning-policy/environment-and-green-infrastructure/open-space/honiton-sports-pitch-strategy/> and at the Council Offices in Sidmouth. Copies of the revised draft strategy will also be available at:

- Honiton Library, 50 New Street, Honiton, EX14 1BS
- Honiton Town Council, The Beehive, Dowell Street, Honiton, EX14 1LZ

The feedback we receive on this revised draft will be used to inform any subsequent revisions if considered necessary.

You can comment:

by email at localplan@eastdevon.gov.uk

or by post to: Planning Policy, East Devon District Council, The Knowle, Station Road,
Sidmouth, EX10 8HL

All comments should be received by the 5pm on 20th December 2016 so that they can be taken into account before the next stage. All comments received will be available to view on our website however private postal and email addresses and phone numbers will be redacted.

Revised Draft Honiton Sports Pitch Strategy

Equality Impact Assessment

Screening Report

Prepared by Officers of East Devon District Council

1.0 Introduction

- 1.1 The purpose of this report is to assess the draft proposals in the Revised Draft Honiton Sports Pitch Strategy (hereafter referred to as the strategy) to determine whether it requires a full Equality Impact Assessment (EqIA). An EqIA is required for all plans which may have a significant effect on a group with a protected characteristic under the Equality Act 2010.
- 1.2 The conclusion of the assessment is that the strategy is unlikely to have a significant negative effect under the Equality legislation so should not be subject to a full EqIA.
- 1.3 This report will be subject to public consultation along with the revised strategy.

Equality Impact Assessment Form

1. **Name of the current or proposed new or changed, policy, strategy, procedure, project or service being assessed:**
Revised Draft Honiton Sports Pitch Strategy
2. **Team responsible for completing the Equality Impact Assessment:**
Planning Policy, East Devon District Council
3. **What is the main aim or purpose of the current or proposed new or changed, policy, strategy, procedure, project or service and what are the intended outcomes?**
The East Devon Playing Pitch Strategy 2015 (PPS) assesses supply and demand for sports pitches across the district to 2024 and identifies a need for improvements to existing and additional sports

pitches to meet the needs of Honiton. The main aim and purpose of the Revised Draft Honiton Sports Pitch Strategy (the strategy) is to identify the most appropriate ways to deliver against the action plans of the PPS. It assesses options for and subsequently recommends sites for the delivery of new sports pitches and associated facilities and improvements to existing sports pitch sites to meet the needs identified by the PPS. The intention is that the strategy will inform the delivery of such improvements to provision in Honiton.

4. What existing sources of evidence will you use to help you identify the likely impacts on different groups of people?

Public consultation on the draft and revised draft strategies;
Pitch user surveys conducted in support of the Playing Pitch Strategy 2015;
Open space user surveys conducted in support of the Open Space Study 2012;
“Accessible Sports Facilities” Sport England Design Guidance Note 2010;
“Artificial Sports Lighting” Sport England Design Guidance Note 2012;
Consultation with Environmental Health officers;
Site visits.

5. Are there gaps in evidence which make it difficult or impossible to form an opinion on how the existing or proposed policy, strategy, procedure, project or service does or might affect different groups of people? If so what are the gaps and how and when do you intend to collect the additional information?

There is a sufficient breadth and depth of information to allow the strategy to be produced and the potential impacts on differing groups to be reasonably assessed.

A range of evidence bases were consulted in developing the strategy (see above).

Officers consulted widely on the initial draft strategy and will do so on the revised draft strategy including contacting clubs, landowners, town and parish councils, Sport England, National Governing Bodies for sports, immediate neighbours to sites, interest groups and others.

Officers met with and discussed key issues by correspondence with relevant individual key stakeholders.

The strategy has assessed impacts on a strategic level, but further assessment may be required once site specific proposals have been worked up in detail in support of future planning applications.

6. Having analysed the initial and additional sources of information including feedback from any consultation, is there any evidence that the policy, strategy, procedure, project or service has or is likely to have an adverse equality impact on, and/or that there are known or anticipated different needs or requirements, for any of these different groups of people?

The strategy is likely to have some impact on the amenity of immediate neighbours to sites if they are developed in due course as recommended. In some cases this may be an adverse impact, however, it is not possible to assess the full impacts until more specific and detailed plans are produced in support of planning applications. In addition to this, whilst specific neighbours to specific sites and specific users of facilities may have relevant protected characteristics as defined by Section 149 of the Equality Act 2010, “neighbours” as a “group” and “facility users” as a group do not. Production of the strategy has been carried out in accordance with the Public Sector Equality Duty and had due regard to the needs of groups with relevant protected characteristics as set out in Section 149 of the Equality Act 2010 in that all people and groups of people have had the opportunity to comment on the draft strategy and will have the opportunity to comment on the revised draft strategy irrelevant of whether they have relevant protected characteristics or not.

More detailed plans in due course will require further assessment to ensure that proposed facilities are accessible for disabled and able users alike and this is reflected in the strategy.

7. **Is a full EqIA required?**

A full EqIA is not required because:

The proposals are not likely to result in negative equality impacts that would require justification or mitigation. The strategy recommends ways to resolve existing sports pitch issues and meet the needs of Honiton to 2024. In doing so it recommends projects to be delivered in due course.

Planning applications for these and other projects will be required to meet the policies of the Local Plan which as referred to in the strategy includes the need to ensure facilities are accessible to all potential users.

There is unlikely to be negative public opinion or media coverage about the proposed changes. As with any document dealing with land use planning, negative public opinion is likely to be received about specific sites. However, this is not likely to be the result of adverse equalities impact on any groups with protected characteristics. The strategy considers strategic issues in relation to sports pitch delivery but recognises that there may be more localised issues in relation to detailed plans. These issues will be considered and assessed at the point of a planning application being made and are already covered by the Local Plan.

An opportunity has not been missed to promote equality of opportunity and further details do not need to be provided of action that can be taken to remedy this.



East Devon District Council
Revised Draft Honiton Sports Pitch Strategy

Consultation Statement

October 2016

Introduction

The Revised Draft Honiton Sports Pitch Strategy has been developed as a means of implementing the action plans identified in the district-wide East Devon Playing Pitch Strategy 2015 (PPS) which was adopted in June 2015 following appropriate consultation as set out in the [PPS Consultation Statement](#).

Playing Pitch Strategy

The Playing Pitch Strategy (PPS) was produced by a Steering Group comprising of officers and Members from the Council, Sport England, the FA, RFU, ECB, England Hockey and Active Devon, with other representatives being brought in at relevant times. The Steering Group met from the outset of the project on a regular basis and continues to meet periodically to consider implementation and review. Town and Parish Councils, local sports clubs and schools were surveyed in 2013/14 and so their comments helped shape the PPS from the very start. During the drafting of the PPS, it became obvious that there was a need to focus in on supply and demand for football pitches in Honiton. Following publication of the first draft of the PPS in October 2014 it was considered necessary to organise a meeting with sports clubs in Honiton to understand pitch related issues and the opinions of clubs in more depth.

To this end, a public meeting was held in Honiton on 20th November 2014 to discuss these issues with local club representatives. The meeting was attended by representatives of Honiton Town Football Club, Honiton Youth Football Club, Honiton Rugby Football Club, Honiton Cricket Club, Honiton Hornets Hockey Club, Dunkeswell Rovers Football Club, Offwell Rangers Football, Awliscombe United Football Club, Feniton Football Club, Honiton Running Club, Honiton Tennis Club, Honiton Community College, Honiton Town Council, the Football Association, England Netball, the Midweek Herald, local District Councillors and officers from East Devon District Council so potentially all of the key players were there to discuss issues. At the meeting and in correspondence with attendees following it, the planning policy officer requested that all clubs that were in attendance took the time to respond to the PPS pitch users survey which was still available on the Council's website even if they had done so previously to ensure that all of the correct information was gathered. They were encouraged to read through the relevant sections of the Draft PPS and provide comment if any specific things needed amending. New responses were received from a number of clubs and these were used to inform the second draft of the PPS which then included a Honiton specific appendix

A second Draft PPS was subsequently considered and endorsed for consultation by the Council's Cabinet in February 2015. The Draft PPS was subject to consultation from Friday 13 February 2015 until 12 Noon on Monday 16 March 2015. A number of changes were made to the strategy in response to comments received. More details of the comments received and changes made can be found in the [PPS Consultation Statement](#). The revised draft was then considered by Cabinet in June 2015 and subsequently adopted.

Early stages

Following adoption of the PPS, officers began exploring site options for the delivery of new sports pitches in and around Honiton in August 2015 (Step A of the methodology). As part of this, officers met with representatives of Honiton Town Council in October 2015 to discuss the project and outline potential points of engagement. The town council suggested a few potential sites to consider which aligned with sites already identified as potentials by officers.

Having identified potential sites to consider, the Council identified the relevant land owners through interrogation of Land Registry title deeds and wrote to them in November 2015 to let them know that their land was being considered and to find out if they had any interest in their land being used for sports pitch development. Minimal responses were received.

Following the initial identification of sites, the Council then appointed consultants STRI to assist in the rationalisation of options (Step B of the methodology).

Following this, as the project moved into Stage 2 of the methodology in December 2015 officers consulted Devon County Council’s Highways and Historic Environment teams, and East Devon District Council’s Landscape Architect and Countryside and Environmental Health teams over the potential sites. The comments that were received are detailed in Appendix 4 to the strategy.

The owners of sites proceeding to Stage 2 were then written to again in early February 2016 requesting access to their land to perform CAD surveys to help inform the production of site plans for consideration and informing them of a report being taken to Cabinet later in February detailing progress on the project to date. Where there was no response to this letter a further letter was sent in late February 2016 enclosing a notice of intended entry to the land. At this stage Honiton Town FC, Honiton Youth FC, Honiton Cricket Club, Honiton Rugby Club, Honiton Hockey Club, Honiton Town Council and Honiton Community College were also written to informing them of the report to February Cabinet detailing progress on the project.

Draft Honiton Sports Pitch Strategy (May 2016)

Following production of potential site plans, officers conducted a basic sustainability and suitability assessment and produced a Draft Honiton Sports Pitch Strategy which was consulted on from Friday 27th May 2016 to 5pm on Friday 8th July 2016 (six weeks).

The following consultees were written to by email or letter inviting them to make comments on the draft strategy:

Land owners of sites being considered	Honiton Primary School	Exeter City Council
Neighbours of sites being considered	Honiton Development Trust	Heart of the SW LEP
EDDC services	Devon FA	CPRE
Ward Members	Devon RFU	National Trust
Honiton Town Council	Devon Cricket Board	RSPB
Awliscombe Parish Council	The FA	Devon Wildlife Trust
Offwell Parish Council	The RFU	Forestry Commission
Gittisham Parish Council	The ECB	Woodland Trust
Buckerell Parish Council	England Hockey	Devon Local Nature Partnership
Monkton Parish Council	Sport England	South West Water
Farway Parish Council	Active Devon	Western Power Distribution
Luppit Parish Council	LED Leisure	Wales and West Utilities
Combe Raleigh Parish Meeting	Blackdown Hills AONB	National Grid
Honiton Town FC	East Devon AONB	Network Rail
Honiton Youth FC	Natural England	Office of Rail and Road

Honiton RFC	Environment Agency	Devon and Somerset Fire and Rescue Service
Honiton Cricket Club	Highways England	Devon and Cornwall Police
Honiton Hockey Club	Historic England	NHS East Devon CCG
Feniton FC	Devon County Council (Highways)	Vodafone and O2
Awliscombe United FC	Devon County Council (Environment)	EE
Dunkeswell Rovers	Devon County Council (Historic Environment)	Three
Offwell Rangers	Devon County Council (Education)	The Coal Authority
Honiton Community College	Teignbridge District Council	Marine Management Organisation

These invites were accompanied by a press release which was published on the East Devon website midway through the consultation on 10th June at <http://eastdevon.gov.uk/news/2016/06/council-consults-on-its-draft-sports-pitch-strategies-for-honiton-and-exmouth/>. The press release was sent to all local media contacts ahead of publication and as such the strategy was reported on by local newspapers/outlets including [View News](#), the [Midweek Herald](#) and [Bay FM](#). The [Devon FA](#) also reported it on their website.

The draft strategy was published on the East Devon website on the Planning Policy webpages and available to view at the Council offices reception in hard copy. An officer also attended a meeting of Honiton Town Council to present the strategy and answer questions.

Comments were received from a total of 34 respondents. These comments are summarised in the following table:

Site	Summary of comments
General	<ul style="list-style-type: none"> • How will any of the plans be implemented? • Land between Macaulay Close and Northcote Hill Road should be considered. • Disappointed not to have been involved more from the start. • Methodology does not allow for critically analysing effects on immediate surrounding neighbours. • There is no local identified need for additional sports pitches. • The strategy has clearly looked at all sites from each possible angle to ensure the most viable sites have been chosen. • The sites highlighted in Honiton have identified hub sites which meet the current and proposed future demand agreed as part of the East Devon PPS. • Moveable goals at any hub site to ensure flexibility at the site and allow pitches to be rotated to maintain the standard of the playing surface. • Support the delivery of additional sports facilities to meet the needs identified in the adopted Playing Pitch Strategy. • Concerned that the strategy is not accompanied by a Sustainability Appraisal (SA) or Strategic Environmental Assessment (SEA).
Mountbatten Park (HA)	<ul style="list-style-type: none"> • Need for additional car parking • Need for new cricket nets at Mountbatten. • The existing pitch is 104m x 62m (not 91m x 55m). Honiton Town FC are

Site	Summary of comments
	<p>looking at progressing to the Peninsula League and as such need to use an adult sized pitch for <u>all</u> games and in time will need to develop the ground to meet league standards.</p> <ul style="list-style-type: none"> • Drainage needs improving • Only support improvements to clubhouse/changing at a single storey level. • Support plans for a two storey clubhouse/changing building.
St. Rita's (HB)	<ul style="list-style-type: none"> • Improvements to Turks Head Lane would need capital grants as maintained as an unsurfaced track by Honiton Town Council. • St. Rita's confirm that they wish for this site to continue being used for junior football.
All Hallows (HC)	<ul style="list-style-type: none"> • Concern about the health risks of continued sports pitch use and dog fouling at All Hallows. • Support the recommendation to install drainage and floodlights which are seen as urgent improvements to the rugby club. • Honiton RFC wish to remain at All Hallows and understand that joint use of the site with the Former Showground site is the best option. • Support for floodlighting at All Hallows. • Impacts of the floodlighting on the wider AONB need to be considered. • Current usage is bad enough for neighbours shouldn't increase it further. • Tower Cross should be used instead.
Honiton Community College (HD)	<ul style="list-style-type: none"> • Should feature more significantly and explicitly in the document. • Locating the AGP at the school will enable multi-sport use for curriculum sport, aid security, maintenance and management issues, and hopefully allow the hockey club to use changing facilities at All Hallows.
St. Rita's extension (H1)	<ul style="list-style-type: none"> • A 3x wicket cricket square (or single artificial if necessary) should be considered between the football pitches on H1 to supplement existing at Mountbatten. • Concern about the additional traffic and parking • Honiton Town FC would not use youth sized pitches here as Peninsula League requirements do not allow. Also would not move as they like the atmosphere of Mountbatten Park. • Understand the logic behind recommending additional land at St. Rita's but a lack of landowner interest and the intentions of that land owner to retain it as undeveloped means that CPO at residential value would likely be required and that is not supported. • Use of additional land at St. Rita's would impact on the peaceful running of the religious retreat and threaten its existence. • The benefits do not clearly outweigh the disbenefits as far as neighbouring uses are concerned (St. Rita's). • Increased usage at St. Rita's would have a detrimental noise impact on neighbouring properties. • St. Rita's have a right to object as it would negatively impact on the entire purpose of the retreat as a place for spiritual and emotional contemplation. • The site should not be referred to as "urban". • Tawny Owls, Buzzards, Rooks and other birds feed, nest and breed on the site. • Concern that allowing sports use would be the thin end of the wedge and it would actually end up being sold off for housing in years to come.
Tower Hill (H2)	<ul style="list-style-type: none"> • Tower Cross is the answer, perfect for everyone. • Tower Cross proposals were worked up based on Sport England

Site	Summary of comments
	<p>guidance to provide multi-sports hub clubs; these plans do not bring the clubs together to be a unifying force in the town.</p> <ul style="list-style-type: none"> • The need for sports facilities outweigh individual preferences. • Tower Road is narrow, dangerous and there are frequent accidents. • People would be forced to travel in cars. Walking would never be an option (dangerous and difficult). • Chaos, plus noise and air pollution caused by construction traffic would be unacceptable. • Impacts would be unacceptable in an AONB. • Expansion to Honiton Golf Club was refused due to being in the AONB, impacts on hedgerows, rights of way and access. This would have similar issues. • Clubhouse/bar/maintenance building and parking infrastructure would be required at significant cost and at the detriment of the AONB.
<p>Current Showground (H3)</p>	<ul style="list-style-type: none"> • No less sustainable than St. Rita's • Partly floodplain and any development would need to be limited to prevent waterlogged pitches. • The site contains a public footpath which would be almost impossible to divert.
<p>Former Showground (H4)</p>	<ul style="list-style-type: none"> • Support as most suitable site despite being in AONB but needs safe pedestrian/cycle access and additional bus stop outside the site to be provided. • Support identification of the former showground for rugby pitches • The school could also use these to help alleviate pressures on All Hallows. • Access by foot/bike is poor and a footpath/cycleway would be required. • Site assessment sheet branded the site "unsatisfactory" is this an issue? • AONB location restricts floodlighting – impact on club/usage • AONB impacts need considering. • High grade agricultural land needs considering. • Provision is piecemeal and would be better all together on one site (Tower Cross or similar). • This site is impacted on by the proposed A30 improvements. • Concern that would set precedent for additional development in this area and within the AONB. • Noise impacts on the AONB. • Clubhouse not acceptable within the AONB. Use by other functions would not be acceptable. • Traffic impacts greater than acknowledged and A30/35 junction not suitable for pedestrian access. • There would be an amenity impact on some residents on Langford Road and beyond. Have their human rights been considered? • Impacts of a new footpath on amenity and security of existing properties. • Impact on the floodplain. • Impact on local economy and local farms that are diversifying to meet tourism needs. • Early delivery should be considered. • Small amount of floodplain within the site and on Langford Road should not be considered as a constraint for pitches themselves but clearly need to consider the impact of flooding on access to the site. There should be no raising of land within the floodplain and impacts of excavation works should be fully considered due to historic landfill on site.

Site	Summary of comments
Former Manor House School (H5)	<ul style="list-style-type: none"> • Support sensitive use of the site for sports pitches. • Access can be improved through provision of Eastern by-pass. • Access is poor and dangerous.
Hayne Lane (H6)	<ul style="list-style-type: none"> • No less sustainable than St. Rita's • Why did EDDC purchase this land for sports pitches if it is not suitable? The Council could sell it now for employment land and use the proceeds towards pitches on other sites.
Kings Arms Farm (H7)	<ul style="list-style-type: none"> • No less sustainable than St. Rita's • Agree that floodplain at Kings Arms Farm makes that site unsuitable. • Gittisham Football Club previously used part of the land. • South West Water infrastructure within the overall site requiring access to be maintained together with existing ground cover over it.
Awliscombe Road (H8)	<ul style="list-style-type: none"> • No less sustainable than St. Rita's
Land between Mountbatten Park and the A30 (H9)	<ul style="list-style-type: none"> • Would require much improved access through existing gateways • The lane needs resurfacing. • No development should block daylight from neighbouring property. • Protective fencing would be required to stop balls being lost into neighbouring property and the A30. • Support the potential of the site to meet children's needs. • Dog fouling should be policed and dogs should be kept on leads. • Site was required as a landscaped buffer to the planning permission for housing at Ottery Moor Lane and should not be developed. • Noise levels from the A30 were considered too high for the siting of a play area on this site and so it is unsuitable for sports pitches. • Strategy highlights the inflexibility of the site for pitches due to its width. • Not cost-beneficial.

Revised Draft Honiton Sports Pitch Strategy (October 2016)

Following receipt of the above comments through the consultation officers contacted a number of key stakeholders to better understand concerns they had raised through their representations. In turn, the following changes were then made from the initial draft strategy to the revised draft strategy.

Page	Paragraph	Change	Reason for change												
Front Cover		Amended name of document to read “ <u>Revised</u> Draft Honiton Sports Pitch Strategy” and date to <u>October</u> 2016.	Version control and clarity												
3	First para	Amended name of document	Version control and clarity												
3	Table	Amended recommendations:	To align with the recommendations made in the strategy. Note – individual amendments to recommendations are dealt with elsewhere in this table of changes as this change relates solely to the executive summary table.												
		<table border="1"> <thead> <tr> <th>Site</th> <th><u>Revised</u> Draft recommendations*</th> </tr> </thead> <tbody> <tr> <td>Mountbatten Park (HA)</td> <td> <ul style="list-style-type: none"> Install drainage to increase pitch capacity on site and replace <u>Enhance/extend/replace</u> existing clubhouse with <u>up to</u> 2 storey building to serve all proposed pitches in this vicinity <u>Explore options for additional car parking on-site</u> <u>Install new cricket training nets</u> </td> </tr> <tr> <td>St. Rita’s (HB)</td> <td> <ul style="list-style-type: none"> Install drainage to increase pitch capacity on site <u>Improve accessibility along Turks Head Lane</u> </td> </tr> <tr> <td>All Hallows (HC)</td> <td> <ul style="list-style-type: none"> Install drainage and floodlights </td> </tr> <tr> <td>Honiton Community College (<u>HD</u>)</td> <td> <ul style="list-style-type: none"> Install floodlit sand-based AGP </td> </tr> <tr> <td>St. Rita’s extension (H1)</td> <td> <ul style="list-style-type: none"> New pitches site comprising of <u>either</u>: <ul style="list-style-type: none"> 2x Youth 11v11 <u>and 2x mini 5v5</u> football pitches; <u>or</u> <u>Relocated 10x grass (plus 1x artificial) wicket cricket ground and small cricket pavilion</u> </td> </tr> </tbody> </table>		Site	<u>Revised</u> Draft recommendations*	Mountbatten Park (HA)	<ul style="list-style-type: none"> Install drainage to increase pitch capacity on site and replace <u>Enhance/extend/replace</u> existing clubhouse with <u>up to</u> 2 storey building to serve all proposed pitches in this vicinity <u>Explore options for additional car parking on-site</u> <u>Install new cricket training nets</u> 	St. Rita’s (HB)	<ul style="list-style-type: none"> Install drainage to increase pitch capacity on site <u>Improve accessibility along Turks Head Lane</u> 	All Hallows (HC)	<ul style="list-style-type: none"> Install drainage and floodlights 	Honiton Community College (<u>HD</u>)	<ul style="list-style-type: none"> Install floodlit sand-based AGP 	St. Rita’s extension (H1)	<ul style="list-style-type: none"> New pitches site comprising of <u>either</u>: <ul style="list-style-type: none"> 2x Youth 11v11 <u>and 2x mini 5v5</u> football pitches; <u>or</u> <u>Relocated 10x grass (plus 1x artificial) wicket cricket ground and small cricket pavilion</u>
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3	Final para	Amended name of document and consultation dates.	Version control and clarity						
9	I.6	Added text: “This appendix showed that in 2014 there was demand for the following sports pitches in total in Honiton with no overmarking (<u>assumes capacity of provision at “standard” quality</u>):”.	To be clear that calculations of pitch demand for Honiton contained within the PPS were based on an assumption that they were of “standard” quality as defined by the Sport England PPS methodology.						
9	I.9	Amended spelling of cricket	Accuracy						
10	I.10	Added text: “This means exploring options for wholesale relocation of clubs/facilities as well as potentially just <u>improvements to existing and</u> additional pitches to supplement existing and weighing up the pros and cons of each option”.	To be clear that meeting demands was not simply a case of providing more pitches but also a case of improving existing and the combined effect.						
13	I.32	Added text: <ul style="list-style-type: none"> ● <u>Accessible Sport Facilities (Sport England)</u> ● <u>Artificial Sports Lighting (Sport England)</u> 	To ensure that future more detailed stages of planning facilities take account of these guidance documents.						
13	I.33	Added paragraph: <p><u>“SEA/HRA Screening</u></p> <p><u>I.33 Officers have conducted a Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA) Screening Report of the</u></p>	To reflect the fact that an SEA/HRA Screening Report has been completed and its conclusions.						

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		<u>Revised Draft Honiton Sports Pitch Strategy which concludes that neither SEA or HRA is required to accompany the strategy. This screening report will be available for consultation alongside the revised draft strategy.</u>	
13-14	I.34-I.35	<p>Added paragraphs: <u>“Consultation</u></p> <p>I.34 <u>A Draft Honiton Sports Pitch Strategy was consulted on for 6 weeks from 27th May 2016 to 8th July 2016. Representations were received from 34 different people and organisations on a range of issues and regarding a number of the sites that were considered. In response to this a number of changes were made to this strategy. The Consultation Statement sets out the consultation that has taken place and the changes made in response to representations that have been made.</u></p> <p>I.35 <u>A Revised Draft Honiton Sports Pitch Strategy, along with SEA/HRA Screening Report, Consultation Statement and Equalities Impact Assessment will be consulted on for 4 weeks from Tuesday 22nd November 2016 to Tuesday 20th December 2016.</u></p>	To explain the consultation that previously took place, the fact that this consultation statement sets out a summary of comments and changes made in response to them and to explain the dates of and documents included in the next consultation.
15	1A.2	<p>Amended text: “Honiton Town Council was invited to identify sites they felt ought to be considered in October 2015, however none were suggested. <u>At that stage a number of sites were suggested which aligned with sites already identified as potentials by officers. Later, during the Draft Strategy consultation in Summer 2016, a further site on land between Macauley Close and Northcote Hill Road was floated by the Town Council, however, officers considered the site to be likely to fail at Step B (rationalisation) due to the flattest part of the site being in the floodplain, the remainder being relatively sloped and an irregular shape which would not allow for suitable sports pitch development. The site would also be difficult to gain access to. That being the case it was not considered any further.</u>”</p>	To better reflect the involvement of Honiton Town Council at an early stage and in response to comments made during the consultation. Also to explain that the site between Macauley Close and Northcote Hill Road was considered in response to the suggestion made during the consultation
15	1A.3	Added text:	To explain the consideration of Honiton

Page	Paragraph	Change	Reason for change
		<u>“It should be noted that the Honiton Community College playing field (referred to as site HD elsewhere in this strategy) was not considered as it has already been identified for the location of a floodlit sand-based AGP in the PPS.”</u>	Community College Playing Field and the PPS action plan to deliver a sand-based AGP there in response to comments made during the consultation.
17	1B.4	Added text: “Those sites identified as being in the “Unsatisfactory” category would require significant works and investment to bring them up to sports pitch standards, <u>but it would be feasible.</u> ”	To clarify that just because a field (in its current state) was identified as “unsatisfactory” doesn’t mean that it would not be feasible to develop it into sports pitches in response to comments made during the consultation.
22	2C.5	Added paragraph: “ <u>2C.5 The Honiton Community College playing field (HD) was not surveyed nor plans produced as it has already been identified for the delivery of a floodlit sand-based AGP through the PPS.</u> ”	To explain the consideration of Honiton Community College Playing Field and the PPS action plan to deliver a sand-based AGP there in response to comments made during the consultation.
24	2D.9	Amended text: “However, additional car parking would could need to be provided on an alternative site (H1 or H9)”	To better reflect the potential ability of Mountbatten Park to accommodate additional car parking.
28	2E.7	Amended text: “ St. Rita’s extension (H1) The PPS specifically identifies in action plan HO.13 that options for delivering additional youth football pitches at St. Rita’s should be explored. It would be possible to lay out two of the largest youth 11v11s plus 2x mini 5v5s on additional land at St. Rita’s. <u>It may also be possible to accommodate additional grass cricket wickets between the youth 11v11 pitches.</u> This would enable the youth football club to spread current <u>and future</u> usage out over additional pitches (reducing the impact on the quality of existing pitches) and <u>the cricket club</u> to expand in the future. FA compliant adult pitches cannot quite be accommodated on St. Rita’s-It would not be possible to accommodate two FA compliant adult pitches without unreasonable impact	To reflect comments made by Honiton Town FC and Honiton Cricket Club during the consultation and consider options of how these issues could be addressed.

Page	Paragraph	Change	Reason for change
		<p>on protected trees and hedgerows, (although a single adult pitch would be possible. However U15/16 Youth 11v11 pitches, at 91m x 55m (excluding run-offs) these pitches would be of a similar size to slightly smaller than the pitches at Mountbatten Park which were provided as adult sized pitches before the latest guidelines came into place. An option could be for the adult football club could to therefore utilise the pitches when the cricket season takes over at Mountbatten Park, reducing the issues of ground sharing that currently exist. However, the football club has raised issue with this and explained that they would not be able to compete at Peninsula League level (which is the club’s ambition) on smaller than official adult sized pitches or on the current arrangement of using an adult pitch overmarking a cricket outfield (they require sole occupancy for football). That being the case, another option might be to consider relocating the cricket ground to site H1, and then improving Mountbatten Park (HA) to allow development of a Peninsula League standard football ground in due course. This would enable the adult football club’s current and future needs to be met on one site, and the increased quality and capacity provided by drainage and sole occupancy would enable additional junior football to be met through overmarking the adult pitches with youth/mini pitches. This would also address the issue of adult football and cricket sharing their home ground. This option would, however, be less appealing to the cricket club who’s ambitions to expand would be tempered and who would not be able to take advantage of potential sponsorship and catering/bar functions and the important revenue stream these bring at the main clubhouse. Co-location with existing pitches makes the sustainability and viability credentials of the site <u>for the delivery of sports pitches in general</u> impossible to overlook.”</p>	
28	2E.8	<p>Amended text: “In addition to this, the potential cost of laying out pitches on this site <u>as proposed by the STRI plans</u> is relatively low at an estimated £157,000 because the land is fairly flat already, therefore requiring less re-profiling. <u>The costs may vary for the above mentioned alternative including a relocated and suitably prepared cricket square.</u> Additional changing and car parking facilities would need to be accommodated through a review of the existing</p>	<p>To reflect the amendments made in paragraph 2E.7 (above) and the fact that the costs suggested by STRI may vary in that case. Also to reflect the way that additional car parking could potentially be accommodated at Mountbatten Park in this scenario in</p>

Page	Paragraph	Change	Reason for change
		<p>provision at Mountbatten Park (HA). It may be that additional car parking could be accommodated on this site to the north-east of the St. Rita's Centre to enable a replacement/extension to the existing clubhouse on Mountbatten Park. If the above alternative arrangement were pursued then it could be possible to move the first XI football pitch on Mountbatten Park (HA) slightly north-west (over what is currently the cricket square). This should provide room to construct additional car parking to the south-east of the pitches along Ottery Moor Lane.</p>	<p>response to comments made during the consultation.</p>
29	2E.11	<p>Added text: <u>"The main concerns of the retreat are the location of pitches in close proximity to the centre and the general impact that intensified use of land surrounding the centre might have on the peaceful and reflective nature of the centre's use. It might be possible to reduce the impacts on the centre by exchanging the football pitches shown on the STRI plans with a relocated cricket ground which may have a less significant impact in terms of noise and in any case only be used from May to September."</u></p>	<p>To reflect comments made by St. Rita's during the consultation regarding the impact of use of site H1 on the centre's existence and nature and to explain how the alternative scenario of delivering cricket provision on the field might present a way to reduce impacts to a potentially acceptable level.</p>
29	2E.12	<p>Amended text: "The St. Rita's extension site should be progressed as a priority site for the provision of additional football sports pitches to meet the needs of Honiton in conjunction with improvements to existing pitches and ancillary facilities at St. Rita's and Mountbatten Park. <u>Two alternative options exist for use of the site:</u> (1) <u>2x Youth 11v11 and 2x mini 5v5 football pitches (as per the plans produced by STRI); or</u> (2) <u>A relocated 10x grass (plus 1x artificial) wicket cricket ground and small pavilion building</u> In order to progress this <u>site</u> it may be necessary to exercise a Compulsory Purchase Order (CPO) depending on further negotiations with the landowner. <u>Which option is pursued will be at least partly dependent on these negotiations.</u>"</p>	<p>In response to the comments of the senior football club and cricket club and to recognise that there are alternative options for the use of the site but that fundamentally it is the most sustainable and suitable location for new sports pitches in Honiton and cannot be overlooked. Also in response to the comments of St. Rita's and to recognise that negotiation with the landowner will play a key role in determining the future use of the site.</p>
30	2E.17	<p>Added text: "Whilst the Former Showground is located on high quality agricultural land</p>	<p>To better reflect the fact that whilst access to site H4 by foot and bike is not</p>

Page	Paragraph	Change	Reason for change
		within the AONB and <u>potentially</u> has issues regarding <u>safe</u> accessibility by foot/bike”	particularly good/safe at present, there are potentially options to improve this.
30	2E18	Added text: <u>“The Blackdown Hills AONB team highlighted concerns with the impact of this site on the wider AONB as part of the consultation on the draft strategy.”</u>	To reflect comments made by the Blackdown Hills AONB team during the consultation.
30	2E.19	Added paragraph: “ <u>2E.19 In addition to this, during the consultation, Devon County Council published plans for the improvement and re-alignment of the A30 trunk road from Honiton to Devonshire Inn. These plans showed potential for a new link road linking what would then become the old A30 Monkton Road to Langford Road cutting directly across this site. If delivered exactly as proposed through their consultation plans then it would undermine the ability of the site to deliver sports pitches as proposed in the draft strategy. Initial discussions with the County Council have intimated that they would like to accommodate plans for the sports pitches as much as possible within reason and it appears that a suitable solution to accommodate both plans may be possible, but the final design and decision will rest with Highways England. If there is a requirement to accommodate the new link road then it is expected that it would be necessary to also need to utilise the adjoining field immediately to the east of the field identified as site H4. That may then enable the new link road to be delivered but also improve the landscape impact of the pitches.”</u>	To reflect updated circumstances regarding the site arising from Devon County Council’s consultation on improvements to the A30 between Honiton and Devonshire Inn and latest discussions between District Council and County Council officers about the alignment of plans in this regard.
30	2E.20	Added paragraph: “ <u>2E.20 By splitting out the pitches across two separate fields, it would be possible to create multiple different “platforms” rather than siting them all on a single level. This would mean a less engineered and harsh reprofiling of the land could be possible which it is hoped would help to address concerns voiced by the Blackdown Hills AONB.”</u>	To explain how concerns raised during consultation with regards to potential impact on the AONB could be reduced.
31	2E.21	Amended text:	To reflect the fact that Devon County

Page	Paragraph	Change	Reason for change
		“The only other option would be to potentially consider a new bridge over the A30 as part of possible the plans to improve/re-align the A30 in this location”	Council’s plans have now been publicly consulted on.
31	2E.22	Amended text: “The cost of delivering pitches in this location would be significant, mainly due to the sheer quantity of earthworks required to create a flat platform(s) for the pitches.”	To reflect the fact that it might be necessary to deliver pitches across more than one “platform” in response to the changes above.
31	2E.24	Amended text: “The owners of the site (who also own the field immediately to the north-east which may potentially also be required) have been contacted to gauge interest in making the site available for sports pitches but the Council has had no response despite multiple attempts. It is therefore not known whether it will be possible to purchase or lease this site for the purpose of delivering sports pitches without the need to use Compulsory Purchase Order (CPO) powers stated that they would potentially be open to the idea of making the site available for sports pitches. ”	To reflect recent correspondence with the site owner and make reference to the ownership of the potential additional land mentioned above.
32	2E.31	Added text: “The site is not suitable for the long term <u>permanent</u> location of sport pitches to meet the needs of Honiton <u>considering the other options that are available.</u> ”	To better qualify comments already made with regards to site H5.
33	2E.34	Added text: “No pitches should be delivered here unless it proves impossible to deliver <u>additional</u> pitches at St. Rita’s extension (H1), <u>additional capacity at Mountbatten Park (HA) and St. Rita’s (HB) or that provision does not satiate demand.</u> ”	To better reflect the status of this site considering the amended recommendations for Mountbatten Park and St. Rita’s.
33	2E.36	Amended text: “However, the site is only able to accommodate 3x mini 5v5 football pitches which means it would be limited to use by under 7s / under 8s. No other pitch types (football, rugby or cricket) could fit on this site. The site is therefore not that flexible in terms of ability to be used by multiple age ranges or sports. It would not be prohibitively expensive to lay pitches out on this site, but the benefits of doing so would be fairly minimal. The <u>STRI potential</u> plans for site H1 show how two additional mini 5v5 pitches can <u>could</u> be accommodated	To better reflect the status of this site considering the amended recommendations for Mountbatten Park and St. Rita’s.

Page	Paragraph	Change	Reason for change
		on land directly to the west of the St. Rita’s Centre. If these are provided alongside the larger format provision <u>potentially proposed</u> to the south of the centre, then there would likely be little demand for additional mini 5v5 pitches on site H9. <u>If, however, these pitches are not delivered or the alternative arrangement of a relocated cricket ground on site H1 is pursued then there may be an increased likelihood of needing this site (H9) to deliver some mini football pitches depending on how much capacity can be increased at Mountbatten Park (HA) and St. Rita’s (HB) through other improvements.</u> ”	
33	2E.37	Amended text: “If delivering additional car parking or clubhouse facilities on sites HA and/or H1 is turns out not <u>to be</u> possible then it may be necessary to deliver some extended facilities here”	Clarification.
33	2E.38	Added paragraph: “ <u>2E.38 In response to the consultation on the draft strategy, the owners of the site stated that they would not be willing to allow use of their land for sports pitch related uses. That being the case, if it transpired that the site were required for the delivery of additional mini soccer pitches then CPO might be required.</u> ”	In response to comments made by the landowner during the consultation.
33	2E.39	Amended text: “Consider this site as a backup in case other landplans for other sites in the vicinity do not create sufficient capacity to accommodate all mini football. at St. Rita’s extension (H1) capable of taking mini pitches is not deliverable or additional mini pitches are required. Depending on the exact plans for extension and improvement of clubhouse and car parking facilities at Mountbatten Park, additional facilities could <u>potentially</u> be accommodated here. <u>However, if required, a CPO would likely be needed to acquire the site.</u> ”	To reflect the status of this site considering the amended recommendations for Mountbatten Park and St. Rita’s and response from the owner regarding availability of the site.
34	2E.41	Amended text: “In terms of football and cricket sharing issues there would appear to be two <u>three</u> realistic options: 1) Honiton Cricket Club relocate to the Former Manor House	To reflect an additional, preferred option to address issues with football and cricket sharing use of Mountbatten Park in response to comments by Honiton

Page	Paragraph	Change	Reason for change
		<p>School playing fields (H5) and Mountbatten Park is then used solely by Honiton Football club; or</p> <p>2) Mountbatten Park continues to be used by both the cricket and football club but when the cricket season starts the football club utilise the youth 11v11 football pitches that are proposed-potentially could <u>to</u> be laid out on site H1.</p> <p>3) <u>Honiton Cricket Club relocates onto site H1 and Mountbatten is then used solely for football but would need to cater for some additional usage by the Honiton Youth Football Club.</u></p> <p>Considering the sustainability issues with utilising site H5 and the significant benefits in terms of sustainability and viability in using sites HA and H1 in combination it is clear that <u>either</u> option 2 <u>or option 3</u> would be preferable.”</p>	<p>Town FC and St. Rita’s during the consultation and the amended recommendations for site H1 above.</p>
34	2E.42	<p>Amended text:</p> <p>“In addition to this, if more pitches are laid out on site H1 to cater for an intensification and increase in use of facilities and pitches in this vicinity as recommended above then the existing clubhouse and car parking facilities at Mountbatten will need to be extended or replaced. It is unlikely that any additional car parking could be accommodated on site HA, however if <u>If the cricket club relocated onto site H1, then that site would need to host a small cricket pavilion containing changing rooms and room for teas etc. the</u> The existing clubhouse buildings <u>on Mountbatten Park were</u> could then be enhanced/extended or replaced with a new <u>up to</u> two storey building containing sufficient changing and social facilities for all the intended <u>football pitches and social facilities for both sports</u> then this could be accommodated on site HA. Furthermore, relocation of the cricket ground would enable the two adult football pitches on Mountbatten Park to be squeezed a little closer together (closing the gap currently taken up by the cricket square) and this could create room for <u>Additional additional</u> car parking would need to be provided on site H1 or otherwise site H9 alongside Ottery Moor Lane. These options will need to be explored <u>further</u> at a more detailed stage of planning.”</p>	<p>To reflect the impact on the need for and delivery of ancillary facilities.</p>
34	2E.43	<p>Added text:</p> <p>“Install primary drainage <u>to increase pitch capacity</u> and <u>enhance/extend/</u>replace the existing clubhouse facilities with an <u>up to</u> two</p>	<p>Clarification and to better reflect the potential to accommodate additional car parking at Mountbatten Park.</p>

Page	Paragraph	Change	Reason for change
		storey building capable of accommodating users of all pitches on sites HA, HB and H1. <u>Explore options for accommodating additional car parking on-site.</u>	
35	2E.45	Added text: “and the existing pitches on Mountbatten Park (HA) <u>are improved</u> then in combination with the above mentioned drainage improvements.”	Clarification.
35	2E.49	Added text: “ <u>The full impact of floodlights on the AONB, heritage assets and amenity of neighbours will need to be fully considered as part of any planning application, but in principle it would appear to be the least sensitive location for floodlights between All Hallows and the Former Showground sites.</u> ”	In response to comments made during the consultation regarding the impact of floodlighting at All Hallows.
35	2E.50	Added paragraph: “ <u>2E.50 One drawback of All Hallows in terms of sport is its open community access. This means that it is used for casual recreation and more importantly dog walkers. Despite significant action on behalf of the Council and the rugby club to deter dog walkers from using the pitches themselves and to pick up, the issue of dog fouling remains a concern. Due to their location in the town centre, and the lack of other available green spaces in this vicinity it is vital that All Hallows remains available for other community users including dog walkers, however, management of this will be vital.</u> ”	In response to comments made during the consultation regarding dog fouling at All Hallows and the recreation ground’s availability to all community users.
36	2E.51	Amended text: “the senior club need access to additional pitches an adult pitch all year round so that their season isn’t is not cut short by the cricket season and the youth club need access to additional pitches as they simply don’t have enough capacity at present. The obvious solution is for additional pitches <u>and/or capacity</u> in close proximity to the existing pitches to encourage a football hub complex.”	In response to comments made by Honiton Town FC during the consultation and to clarify what is required to meet footballing needs in Honiton.
36	2E.52	Added paragraph: “ <u>2E.53 A further issue is that the senior football club have aspirations to</u>	In response to comments made by Honiton Town FC during the consultation and in response to

Page	Paragraph	Change	Reason for change
		<p><u>compete at Peninsula League level and this will in time require them to have access to a full-sized adult sized pitch all year round, full perimeter rail, covered stand and ability to install floodlights in due course. Sharing with the cricket club at Mountbatten Park restricts their ability to progress in this regard, even if they had access to additional pitches on site H1 for once the cricket season starts. That being the case, a preferential arrangement could be to relocate the cricket club to site H1. This would free up additional capacity on the ground which in combination with drainage and surface improvements on Mountbatten Park and the existing St Rita's pitches could then accommodate all football activity on the existing sites. It would, however, be less desirable for the cricket club."</u></p>	<p>amended recommendations for sites HA and H1.</p>
36	2E.53	<p>Amended text: "The benefits of providing additional<u>co-locating all</u> pitches at <u>Mountbatten Park and</u> St. Rita's far outweigh any other factor here."</p>	<p>In response to amendments to recommendations for sites HA and H1 above.</p>
36-37	2E.54	<p>Amended text: "The combination of new pitches (2x Youth 11v11 and 2x Mini 5v5)<u>either additional football</u> pitches on site H1 or potentially more if using site H9, and new sports pitch drainage <u>and surface improvements</u> at Mountbatten Park (HA), and new sports pitch drainage plus minor levelling of undulations at <u>and</u> St. Rita's existing pitches (HB) or the improvements to the existing pitches in combination with the relocation of the cricket ground should ensure sufficient pitch space for football in Honiton for years to come. The table below sets out how the football demands for Honiton to 2024 could be met <u>in comparison with the requirements arising from the PPS. Potential provision on site H1 is shown in brackets as is the overall supply if site H1 is used for football.</u> This shows exceeding of the<u>sufficient adult 11v11 and youth 11v11 requirement</u> pitches but under provision of youth 9v9 and, <u>mini 7v7 and mini 5v5</u> pitch sizes <u>if cricket is re-located to H1, but over-provision of youth 11v11 and sufficient provision of mini 5v5s if football provision is made on site H1.</u> however these could easily be laid out overmarking the youth 11v11 pitches on H1 which are above requirements <u>However, the PPS requirements were based on all pitches being of "standard" quality. The</u></p>	<p>In response to amendments to recommendations for sites HA and H1 above and to explain how football provision should still meet requirements through improvements to existing pitches and relocation of the cricket ground even if no additional football pitches are provided.</p>

Page	Paragraph	Change	Reason for change																																										
		<p><u>combined improvement of pitches at Mountbatten Park and St. Rita’s existing plus the relocation of the cricket ground would enable “good” quality pitches with higher capacity.</u> Therefore, it in this scenario it would likely be possible to meet the football pitch requirements for Honiton without using site H9 <u>laying out any additional pitches. If in due course additional capacity were required, either additional youth/mini pitches overmarking the relocated cricket ground on site H1 or additional mini pitches on site H9 could be considered.</u></p> <table border="1"> <thead> <tr> <th>Site</th> <th>Adult 11v11</th> <th>Youth 11v11</th> <th>Youth 9v9</th> <th>Mini 7v7</th> <th>Mini 5v5</th> </tr> </thead> <tbody> <tr> <td>Mountbatten Park (HA)</td> <td>2</td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>St. Rita’s (HB)</td> <td></td> <td>2</td> <td>1</td> <td></td> <td></td> </tr> <tr> <td>St. Rita’s extension (H1)</td> <td></td> <td>(2)</td> <td></td> <td></td> <td>(2)</td> </tr> <tr> <td>TOTAL</td> <td>2</td> <td>2(4)</td> <td>1</td> <td>0</td> <td>0(2)</td> </tr> <tr> <td>Required by 2024</td> <td>2</td> <td>2</td> <td>3</td> <td>2</td> <td>2</td> </tr> <tr> <td>Difference</td> <td>+0</td> <td>+0(+2)</td> <td>-2</td> <td>-2</td> <td>-2(+0)</td> </tr> </tbody> </table>	Site	Adult 11v11	Youth 11v11	Youth 9v9	Mini 7v7	Mini 5v5	Mountbatten Park (HA)	2					St. Rita’s (HB)		2	1			St. Rita’s extension (H1)		(2)			(2)	TOTAL	2	2(4)	1	0	0(2)	Required by 2024	2	2	3	2	2	Difference	+0	+0 (+2)	-2	-2	-2 (+0)	
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37	2E.55	<p>Amended text: “The proposed two youth 11v11 pitches on site H1 would measure 91m x 55m (excluding run-offs) which is a similar size to the pitches at Mountbatten Park which are used by the adult club. That being the case, the adult club could utilise these pitches in April-May and September when the cricket club is using Mountbatten Park. The clubhouse at Mountbatten Park would need to be either extended or preferably replaced with <u>an up to</u> two storey building comprising sufficient changing accommodation for all of the pitches across sites HA, HB and H1 and additional car parking provision made on either site H1 or H9 <u>in the vicinity.</u>”</p>	To reflect comments made by Honiton Town FC regarding use of youth sized pitches by the adult team and the size of pitches at Mountbatten Park. In response to comments about the size of replacement/extended clubhouse provision at Mountbatten Park and the potential options for additional car parking.																																										
37	2E.56	<p>Amended text: “Subject to agreement with the landowner, the Former Manor House School playing fields (H5) could be made available as temporary <u>overflow</u> provision</p>	To better reflect the status of site H5 in relation to amendments to recommendations for other sites.																																										

Page	Paragraph	Change	Reason for change
		until the permanent new pitches <u>above recommendations</u> are completed.”	
37	2E.57	<p>Amended text: “Currently the cricket club uses Mountbatten Park (HA). The main issue for the cricket club is sharing with football, the state of the outfield at the start of the season and the outdated clubhouse facilities. <u>The cricket club are also in urgent need of new cricket practice nets.</u> The provision of additional football pitches on the extension to St. Rita’s (H1) plus installation of drainage on Mountbatten Park and improved clubhouse facilities should<u>would</u> enable a more effective football-cricket sharing arrangement to be established and ensure the outfield is in good condition at the start of the cricket season. <u>During the initial consultation, this arrangement was supported by the cricket club, however objected to by the senior football club who felt it did not address their key issues. In addition to this, comments from the St. Rita’s Centre explained that these proposals would have an unacceptable impact on the centre’s existence as a retreat. That being the case, an alternative arrangement whereby the cricket ground is relocated across the road to St. Rita’s (site H1) would allow the cricket club to continue to run in its current format, address issues regarding sharing of facilities, and may lead to a more acceptable arrangement for the landowner and neighbours of the site. In order to deliver this, a small cricket pavilion would be required on the site but social facilities could remain at Mountbatten Park as part of an extended/replaced clubhouse facility there. This would be less acceptable to the cricket club than the original plans as detailed in the sections above but may resolve more issues with the football club and be more acceptable and ultimately deliverable with the landowner.</u>”</p>	In response to comments by Honiton Cricket Club and Honiton Town FC and the amended recommendations above.
38	2E.60	<p>Amended text: “Delivering multiple rugby pitches of both senior and midi size and minimal clubhouse <u>changing</u> provision at the Former Showground site (H4)”</p>	In response to comments regarding impact of introducing built form to the AONB and to reflect the fact that the main clubhouse will remain at All Hallows with only minimal provision for changing etc being made at the Former Showground.
38	2E.61	Added paragraph:	In response to comments and plans

Page	Paragraph	Change	Reason for change
		<u>2E.61</u> “The potential impact of plans for the realignment and upgrading of the A30 trunk road between Honiton and Devonshire Inn would mean that additional land immediately adjacent to the Former Showground site would likely need to be utilised in addition to site H4 itself in order to deliver the full suite of additional rugby pitches that are required in combination with the proposed new link road.”	produced by Devon County Council.
38	2E.62	Amended text: “Through the delivery of additional sports pitches recommended for St. Rita’s extension (H1) plus improvements to the existing pitches at Mountbatten Park (HA) and St. Rita’s (HB) and either the provision of additional football pitches or relocating the cricket ground to the St. Rita’s extension site (H1) all of the adult and junior football needs for Honiton could <u>should be capable of being</u> accommodated in a single hub location.”	In response to amended recommendations above.
39	2E.63	Amended text: “Delivery of these plans would require the sharing of the new youth 11v11 pitches on the St. Rita’s Extension site (H.1) by both the adult and youth football clubs. Whilst technically the pitches would not meet FA size standards as permanent adult pitches, they could be used as back-up pitches for the beginning and end of the season when cricket takes precedence at Mountbatten Park. With this arrangement the cricket club could continue in its current location which has capacity to meet the clubs needs to 2024, an element of compromise on the part of either the senior football club or the cricket club depending on the final pitch arrangements for the St. Rita’s extension site (H1). However, the sustainability and suitability of this site cannot be overlooked. In either scenario, the cricket club would be able to continue at its current levels, although if they were to remain at Mountbatten Park then it may be possible to deliver additional wickets on site H1 to enable the club to grow. This would not be possible if the club relocated to site H1 in full. The final pitch arrangements for site H1 will be determined in due course, informed in part at least through negotiations with the landowner.”	To reflect the amended recommendations above and explain the balance of compromises to be made between the football and cricket club.
39	2E.65	Amended text:	To reflect the amended

Page	Paragraph	Change	Reason for change																																			
		<p>“The table below shows the proposed total pitch provision for Honiton assuming that the recommendations of this report and the PPS are implemented. <u>The alternative scenarios for sites HA and H1 are indicated through brackets and italics.</u></p> <table border="1" data-bbox="517 437 1491 1267"> <thead> <tr> <th data-bbox="517 437 855 480">Site</th> <th data-bbox="855 437 1014 480">Football</th> <th data-bbox="1014 437 1173 480">Cricket</th> <th data-bbox="1173 437 1332 480">Rugby</th> <th data-bbox="1332 437 1491 480">AGP</th> </tr> </thead> <tbody> <tr> <td data-bbox="517 480 855 616">Mountbatten Park (HA)</td> <td data-bbox="855 480 1014 616">2x adult 11v11</td> <td data-bbox="1014 480 1173 616">(10x grass 1x artificial)</td> <td data-bbox="1173 480 1332 616"></td> <td data-bbox="1332 480 1491 616"></td> </tr> <tr> <td data-bbox="517 616 855 751">St. Rita’s (HB)</td> <td data-bbox="855 616 1014 751">2x youth 11v11 1x youth 9v9</td> <td data-bbox="1014 616 1173 751"></td> <td data-bbox="1173 616 1332 751"></td> <td data-bbox="1332 616 1491 751"></td> </tr> <tr> <td data-bbox="517 751 855 823">All Hallows (HC)</td> <td data-bbox="855 751 1014 823"></td> <td data-bbox="1014 751 1173 823"></td> <td data-bbox="1173 751 1332 823">2x senior rugby</td> <td data-bbox="1332 751 1491 823"></td> </tr> <tr> <td data-bbox="517 823 855 991">Honiton Community College</td> <td data-bbox="855 823 1014 991"></td> <td data-bbox="1014 823 1173 991"></td> <td data-bbox="1173 823 1332 991"></td> <td data-bbox="1332 823 1491 991">1x full size sand- based AGP</td> </tr> <tr> <td data-bbox="517 991 855 1126">St. Rita’s extension (H1)</td> <td data-bbox="855 991 1014 1126">(2x youth 11v11 2x mini 5v5)</td> <td data-bbox="1014 991 1173 1126">10x grass 1x artificial</td> <td data-bbox="1173 991 1332 1126"></td> <td data-bbox="1332 991 1491 1126"></td> </tr> <tr> <td data-bbox="517 1126 855 1267">Former Showground (H4)</td> <td data-bbox="855 1126 1014 1267"></td> <td data-bbox="1014 1126 1173 1267"></td> <td data-bbox="1173 1126 1332 1267">2x senior rugby 3x midi rugby</td> <td data-bbox="1332 1126 1491 1267"></td> </tr> </tbody> </table> <p data-bbox="517 1267 1491 1302">”</p>	Site	Football	Cricket	Rugby	AGP	Mountbatten Park (HA)	2x adult 11v11	(10x grass 1x artificial)			St. Rita’s (HB)	2x youth 11v11 1x youth 9v9				All Hallows (HC)			2x senior rugby		Honiton Community College				1x full size sand- based AGP	St. Rita’s extension (H1)	(2x youth 11v11 2x mini 5v5)	10x grass 1x artificial			Former Showground (H4)			2x senior rugby 3x midi rugby		<p>recommendations above.</p>
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39-40	2E.66	<p>Amended text: “The table below shows the proposed provision against the requirements of</p>	<p>To reflect the amended recommendations above and explain</p>																																			

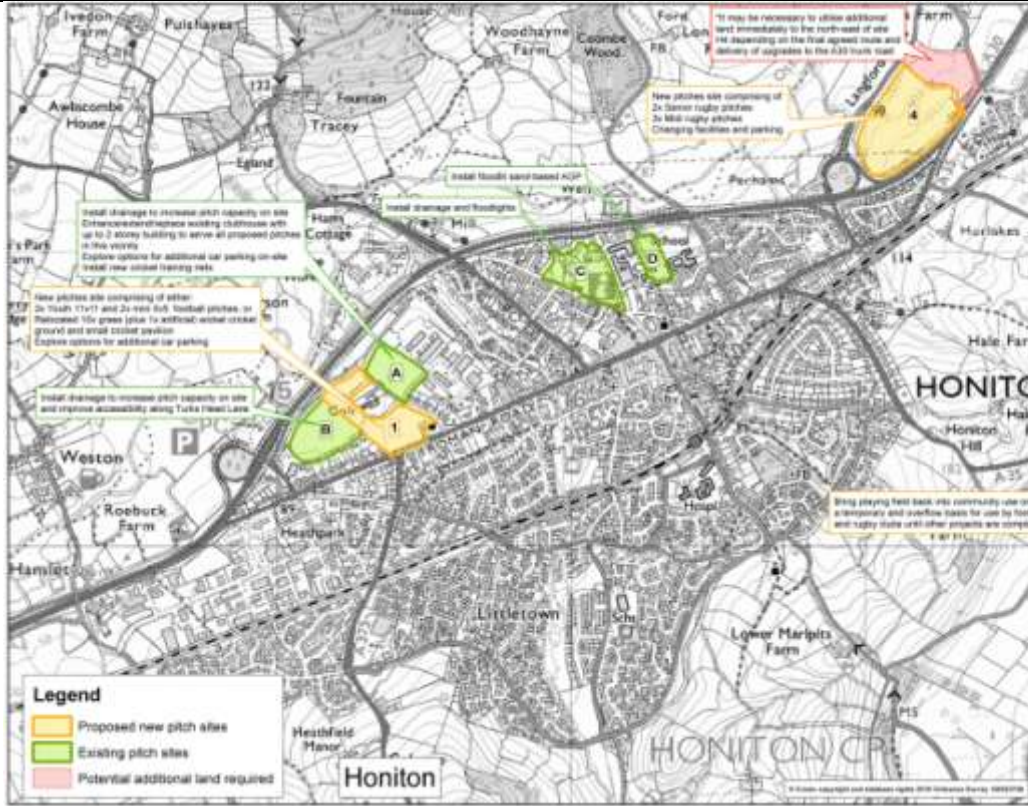
Page	Paragraph	Change	Reason for change																																																		
		<p>the PPS by 2024. Whilst less youth 9v9 and mini 7v7 football pitches and midi rugby pitches are proposed than are required, this could be seen as being countered by the provision of more youth 11v11 football pitches on the surface proposed provision does not appear to meet requirements, it is likely (whichever scenario is followed with regards to sites HA and H1) that the increased quality and capacity of pitches and the provision of an additional senior rugby pitch, which are will allow for more flexible spaces capable of having smaller sized pitches marked out over them being more intensively used and mean that all demand should be met in full.</p> <table border="1"> <thead> <tr> <th>Pitch type</th> <th>Sport</th> <th>Requirement by 2024</th> <th>Proposed provision</th> <th>Under/over supply</th> </tr> </thead> <tbody> <tr> <td>Adult 11v11</td> <td>Football</td> <td>2</td> <td>2</td> <td>0</td> </tr> <tr> <td>Youth 11v11</td> <td>Football</td> <td>2</td> <td>2 (4)</td> <td>0 (+2)</td> </tr> <tr> <td>Youth 9v9</td> <td>Football</td> <td>3</td> <td>1</td> <td>-2</td> </tr> <tr> <td>Mini 7v7</td> <td>Football</td> <td>2</td> <td>0</td> <td>-2</td> </tr> <tr> <td>Mini 5v5</td> <td>Football</td> <td>2</td> <td>0 (2)</td> <td>-2 (0)</td> </tr> <tr> <td>Grass wicket</td> <td>Cricket</td> <td>11</td> <td>10+1</td> <td>0</td> </tr> <tr> <td>Senior rugby</td> <td>Rugby</td> <td>3</td> <td>4</td> <td>+1</td> </tr> <tr> <td>Mini/Midi rugby</td> <td>Rugby</td> <td>5</td> <td>3</td> <td>-2</td> </tr> <tr> <td>Sand-based AGP</td> <td>Hockey</td> <td>1</td> <td>1</td> <td>0</td> </tr> </tbody> </table>	Pitch type	Sport	Requirement by 2024	Proposed provision	Under/over supply	Adult 11v11	Football	2	2	0	Youth 11v11	Football	2	2 (4)	0 (+2)	Youth 9v9	Football	3	1	-2	Mini 7v7	Football	2	0	-2	Mini 5v5	Football	2	0 (2)	-2 (0)	Grass wicket	Cricket	11	10+1	0	Senior rugby	Rugby	3	4	+1	Mini/Midi rugby	Rugby	5	3	-2	Sand-based AGP	Hockey	1	1	0	<p>how requirements could still be met through higher quality provision.</p>
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40	2E.69	<p>Added text: “Comments submitted to the draft strategy consultation suggest that the main issue here is the potential amenity impact of the proposed football pitches on site H1 (particularly significant noise from football that would be in such close proximity to their buildings which are used as a retreat for convalescing priests amongst other uses). It is hoped that the identification of an alternative option whereby the cricket ground could relocate to site H1 instead might be more acceptable to St. Rita’s and open up more constructive negotiations as the cricket season lasts only from May to September and is typically less noisy. However, this may still not be</p>	<p>To reflect comments made by St. Rita’s during the consultation and the hoped impact that ammended recommendations may have on negotiations with the landowner.</p>																																																		

Page	Paragraph	Change	Reason for change
		considered acceptable by the landowners.	
40	2E.70	Amended text: “Despite multiple attempts, t <u>he owners of the Former Showground (H4) have not responded to enquiries over the availability of their land to date. Therefore, depending on further progress it may be that CPO would be required in this instance as well.</u> have stated that they would potentially be interested in accommodating pitch provision on their land.”	To reflect latest correspondence with the landowner over the availability of the site.
41	2E.73	Added text: “The above assessment recommends exploring whether the site could be used on a temporary <u>and overflow</u> basis”	To reflect clarified recommendations in relations to site H5 above.
41	2E.74	Added paragraph: <u>2E.74 “The owners of the Land between Mountbatten Park and the A30 (H9) have stated that they would not be willing to allow use of their land for sports pitches. The strategy outlines that this site would be suitable, however, recommends other options in the first instance. If in due course through review of this strategy this site becomes required then CPO would likely be needed to acquire it.”</u>	To reflect comments made by the landowner in response to the consultation and the recommendations with regards to site H9.
42	3F.1-3F.5	Deleted paragraphs: 3F.1 “The plan (reproduced at a more legible scale at Appendix 7) and table below set out the draft recommendations to meet Honiton’s current and future sports pitch demands as set out in the PPS based on the sustainability and suitability of the options available. 3F.2—The draft recommendations above are based on officer assessment of the sustainability and suitability of the sites that have been considered. However, it is important to understand the views of key stakeholders including the clubs, the National Governing Bodies (NGBs) for the relevant sports, Sport England, other statutory consultees, land owners, the town council and neighbouring parish councils, neighbours to the sites and the general public. Consultation with these persons and bodies should help to ensure that the final recommendations and the final strategy are well evidenced and generally supported by the community.	Text was related to previous consultation arrangements.




Page	Paragraph	Change	Reason for change
		<p>3F.3— It is important to note that at the point of going out to consultation the draft recommendations contained in this strategy have not been considered by Elected Members of the Council. At various stages in the PPS process Members clearly stated that they wanted to understand the views of the clubs and community before making any decisions on where any future sports facilities for Exmouth should be located. That being the case, officers felt that it was appropriate to consult on draft recommendations and amend them in light of comments made before taking the final recommended strategy to Members for adoption.</p> <p>3F.4— It is also important to note that the recommendations in this strategy are not a substitute for planning permission and do not mean that such proposals would necessarily gain planning permission. All planning applications are considered on their own merits against the development plan and any relevant material considerations of which this strategy would be one.</p> <p>3F.5— Consultation will run from Friday 27th May 2016 until 5pm on Friday 8th July 2016. Any comments received after this point will not necessarily be taken into account. Comments should be sent to Planning Policy preferably by email to localplan@eastdevon.gov.uk, otherwise in the post to Planning Policy, East Devon District Council, Knowle, Sidmouth, Devon, EX10 8HL.”</p>	
42	3F.1-3F.2	<p>Added paragraphs:</p> <p><u>3F.1 “An initial draft strategy was consulted on from Friday 27th May 2016 through to Friday 8th July 2016. Statutory consultees, Sport England, relevant National Governing Bodies, sports clubs, town and parish councils, neighbours of sites and other interested parties were invited to comment and the consultation was published on the planning policy section of the East Devon Website together with a press release which was subsequently reported on in local newspapers so anyone could make a representation.</u></p> <p><u>3F.2 The consultation received representations from 34 separate people,</u></p>	To explain the consultation which took place on the initial draft strategy.

Page	Paragraph	Change	Reason for change
		<p><u>clubs or organisations regarding a range of sites, however, understandably most received were with regards to the Former Showground (H4) and the St. Rita’s extension site (H1). Comments were received objecting to and supporting the proposals with a range of views expressed, however no realistic or suitable alternatives were suggested.</u></p> <p><u>3F.3 Key issues arising from the consultation were taken into account and the strategy revised in response. The Consultation Statement details the consultation which took place, summaries of comments received and changes made to the strategy in response.”</u></p>	
42	3G.1	<p>Amended text: “Following the public consultation the strategy will be amended where relevant to take into account comments made. It is important that final recommendations have been shaped by comments received during the consultation. Comments made in response to the initial draft strategy consultation have informed the production of this revised draft of the strategy. In particular the concerns of Honiton Town FC, the landowners of the St. Rita’s extension site (H1), Devon County Council and the Blackdown Hills AONB team have been taken into account in revised recommendations for Mountbatten Park (HA), St. Rita’s extension (H1) and the Former Showground (H4). The full set of changes are set out in the Consultation Statement but key changes with regards to recommendations at Mountbatten Park (HA), St. Rita’s (H1) and the Former Showground (H4) are explained below.”</p>	To reflect the changes made to the strategy in response to the consultation.
42	3G.2-3G.3	<p>Added paragraphs: <u>3G.2 “The revised draft strategy revises the recommendations regarding Mountbatten Park (HA) and the St. Rita’s extension site (H1) to allow for the development of two alternative scenarios. These alternative options have been put forward in response to comments made during the consultation and recognise that there is a balance to be struck between the demands and aspirations of the senior football club, the cricket club and the potential deliverability of site H1.</u></p>	To reflect the changes made to key recommendations within the strategy in response to the consultation.

Page	Paragraph	Change	Reason for change
		<p><u>3G.3</u> <u>The revised strategy acknowledges the significance of the impacts that development of the Former Showground could have on the AONB and wider landscape. It explains that combined with the new link road being proposed as part of the project to upgrade and realign the A30 trunk road, it may be necessary to utilise the field immediately to the north-east of site H4 and to separate out the pitches on site to enable a more natural (or at least less harsh) landform to be developed.</u></p>	
43-44	3H.1	<p>Added paragraph plan and table: <u>3H.1</u> <u>“The table and plan below set out the revised draft recommendations to meet Honiton’s current and future sports pitch demands as set out in the PPS based on the sustainability and suitability of the options available.</u></p>	<p>To set out the revised draft recommendations in response to above amendments.</p>

Page	Paragraph	Change	Reason for change				
		 <p data-bbox="510 1082 1422 1136">Plan showing revised draft recommendations for pitch sites in Honiton (reproduced at Appendix 7)</p> <table border="1" data-bbox="517 1166 1518 1361"> <thead> <tr> <th data-bbox="517 1166 831 1214">Site</th> <th data-bbox="831 1166 1518 1214">Revised Draft recommendations*</th> </tr> </thead> <tbody> <tr> <td data-bbox="517 1214 831 1361">Mountbatten Park (HA)</td> <td data-bbox="831 1214 1518 1361"> <ul style="list-style-type: none"> • Install drainage to increase pitch capacity on site • and replace <u>Enhance/extend/replace</u> existing clubhouse with <u>up to</u> 2 storey building to serve all proposed pitches in this vicinity </td> </tr> </tbody> </table>	Site	Revised Draft recommendations*	Mountbatten Park (HA)	<ul style="list-style-type: none"> • Install drainage to increase pitch capacity on site • and replace <u>Enhance/extend/replace</u> existing clubhouse with <u>up to</u> 2 storey building to serve all proposed pitches in this vicinity 	
Site	Revised Draft recommendations*						
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Page	Paragraph	Change	Reason for change
		<ul style="list-style-type: none"> • <u>Explore options for additional car parking on-site</u> • <u>Install new cricket training nets</u> 	
		<ul style="list-style-type: none"> • Install drainage to increase pitch capacity on site • <u>Improve accessibility along Turks Head Lane</u> 	
		<ul style="list-style-type: none"> • Install drainage and floodlights 	
		<ul style="list-style-type: none"> • Install floodlit sand-based AGP 	
		<ul style="list-style-type: none"> • New pitches site comprising of <i>either</i>: <ul style="list-style-type: none"> ○ 2x Youth 11v11 <u>and 2x mini 5v5</u> football pitches; <i>or</i> ○ <u>Relocated 10x grass (plus 1x artificial) wicket cricket ground and small cricket pavilion</u> ○ <u>2x Mini 5v5 football pitches</u> • <u>Explore options for A</u>additional car parking 	
		<ul style="list-style-type: none"> • New pitches site comprising of: <ul style="list-style-type: none"> ○ 2x Senior rugby pitches ○ 3x Midi rugby pitches ○ <u>ClubhouseChanging facilities</u> and parking 	
		<ul style="list-style-type: none"> • <u>Bring playing field back into community use on a temporary and overflow basis for use by football and rugby clubs until other projects are completed.</u> 	
		<p><i>*It may be necessary to utilise additional land immediately to the north-east of site H4 depending on the final agreed route and delivery of upgrades to the A30 trunk road.*</i></p>	
44	3H.2	<p>Added paragraph: <u>3H.2 “These recommendations are based on officer assessment of the sustainability and suitability of the sites that have been considered, public consultation and ongoing dialogue with landowners, clubs, National Governing Bodies and local Members.”</u></p>	Clarification
44	3H.3	Amended text:	Clarification

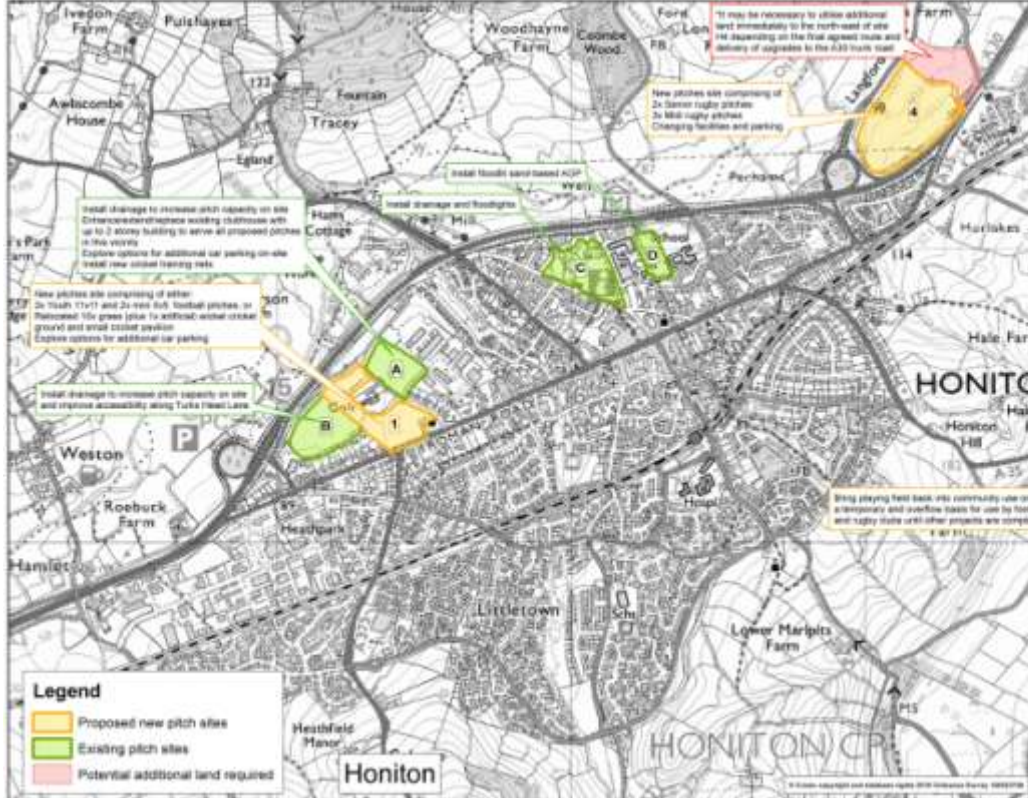
Page	Paragraph	Change	Reason for change
		“These final recommendations and <u>this</u> strategy will be considered by the Council’s <u>Strategic Planning Committee</u> later in <u>November 2016</u> and then <u>subject to further consultation due to the nature of the changes from the initial draft.</u> ”	
44	3H.4	<p>Added paragraph: <u>3H.4 “Consultation on the Revised Draft Honiton Sports Pitch Strategy will run from Tuesday 22nd November until 5pm on Tuesday 20th December 2016. Any comments received after this point will not necessarily be taken into account.</u></p> <p><u>Comments should be sent (preferably by email) to:</u></p> <p> <u>localplan@eastdevon.gov.uk</u></p> <p> <u>Planning Policy, East Devon District Council, Knowle, Sidmouth, Devon, EX10 8HL.</u></p> <p> <u>01395 571533.”</u></p>	To set out arrangements for forthcoming consultation.
44	3H.5	<p>Amended text: “<u>It is intended that following consultation and any necessary amendments the final strategy will then be considered by Strategic Planning Committee in early 2017 and it will</u> then be adopted as the Council’s strategy for the delivery of sports pitches in Honiton.”</p>	Clarification over next steps
44	3H.6	<p>Added paragraph: <u>3H.6 “It is important to note that the recommendations of this strategy are not a substitute for planning permission and do not mean that such proposals would necessarily gain planning permission. All planning applications are considered on their own merits against the development plan and any material considerations at the time (of which this would be one).”</u></p>	Clarification of the status of this strategy and the sites and projects recommended within it
45	4I.5	<p>Added text: “potential <u>approximate</u> costs for delivery.”</p>	Clarification that costs are approximate.

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		<u>9</u>	<u>Install floodlights</u>	<u>All Hallows (HC)</u>	<u>2021/22</u>	
		<u>10</u>	<u>Lease or purchase land</u> <u>Level and drain platform(s) for the laying out of 2x senior and 3x midi rugby pitches</u> <u>Construction of new changing facilities and car parking</u> <u>Purchase of new goals etc</u> <u>Improvements to foot/cycle access</u>	<u>Former Showground (H4)</u>	<u>2023/24</u>	
Appen dix 6 – Page 2	3 rd para	<p>Amended text: “At this stage it is not envisaged that this<u>A Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA) Screening Report accompanies the revised draft strategy and concludes that the strategy would does not</u> require a full Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA or Environmental Impact Assessment (EIA)HRA. This basic sustainability and suitability assessment is not intended to be a replacement for these processes, however, considers <u>potential sites against policies of the Local Plan which has been subject to SEA and HRA and</u> it clearly considers the most sustainable and least harmful way to deliver the required sports pitches for Honiton. So long as the recommendations of this strategy conform with the policies of the Local Plan (and this assessment considers this for each site) then it is considered that they would effectively be covered by the SA-SEA/HRA <u>SA-SEA/HRA</u> for the Local Plan. It may be that individual site plans and projects would need to be subject to</p>				To reflect the conclusions of the SEA/HRA Screening Report that was conducted in response to comments by Natural England during the consultation.

Page	Paragraph	Change	Reason for change
		SEA/EIA at the planning application stage <u>once detailed plans have been drawn up.</u>	
Appen dix 6 – Page 5	EN14 – Control of Pollution	Added text: “Existing sports pitch usage at St. Rita’s does not tend to receive many complaints in terms of noise pollution, with traffic along the A30 and Exeter Road perhaps being of a more significant nature, <u>however increased noise pollution may have some detrimental impact on immediate neighbours to the site if not carefully considered.</u> ”	In response to comments made during the consultation.
Appen dix 7	Map	 <p>The map displays the Honiton area with several sports pitch sites highlighted. A legend in the bottom left corner identifies three types of sites: yellow for 'Proposed new pitch sites', green for 'Existing pitch sites', and pink for 'Potential additional land required'. The map includes numerous callouts with text such as 'Install drainage to increase pitch capacity on site and improve accessibility along Tulla Head Lane', 'New pitches site comprising of either 2x 11v11 and 2x 7v7 football pitches, or 1x 11v11 green pitch, 1x artificial water cricket ground and small cricket pavilion', and 'It may be necessary to drive additional land immediately to the north-west of site 14 depending on the final agreed route and delivery of upgrades to the A30 trunk road'. The map also shows local landmarks like 'HONITON CP' and 'HONITON'.</p>	To reflect changes to recommendations as detailed above.

The revised Draft Honiton Sports Pitch Strategy was presented to the Council's Strategic Planning Committee in November 2016 with a recommendation for further consultation on changes to the strategy.

Strategic Planning Committee



Date of Meeting: 21 November 2016
Public Document: Yes
Exemption: None
Review date for release: None

Agenda item: 10

Subject: **Planning Obligations Supplementary Planning Document**

Purpose of report: With the introduction of the Community Infrastructure Levy in September the position with regard to planning obligations has become extremely complex. The report proposes guidance to clarify the position and process for those involved in the planning application process.

Recommendation: **To agree that, subject to any minor typographical amendments, the draft SPD should be subject to 6 weeks consultation**

Reason for recommendation: To obtain the agreement of Members to commence consultation

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

Financial implications: The report is for information so there are no financial implications.

Legal implications: Planning obligations are contained in legal agreements set out as deeds under section 106 of the Town and Country Planning Act 1990, as amended. Once adopted the Planning Obligations SPD will form a material consideration in the determination of planning applications.

Equalities impact: Low Impact

Risk: Medium Risk
A lack of clarity could lead to delays in determining planning applications, potential refusals and additional legal costs. There is also a risk that the amounts calculated are open to challenge.

Links to background information: Planning obligations are covered by a variety of legislation, including

- [the Growth and Infrastructure Act 2013](#)
- [the Localism Act 2011](#)
- [CIL Regulations 2010 \(as amended\)](#)
- [the Town and Country Planning Act 1990 \(as amended\)](#)

Relevant previous Committee reports:

- <http://eastdevon.gov.uk/media/1652003/200416-combined-council-agenda.pdf> (Item 10- CIL Adoption)
- <http://eastdevon.gov.uk/planning/planning-policy/infrastructure-provision-and-community-infrastructure-levy/>

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. Introduction

1.1 Members will be aware that the Community Infrastructure Levy (CIL) was introduced in September. This will apply in conjunction with other planning obligations. In order to give everyone involved in the planning process a clear understanding as to what charges will be applicable for different forms of development it is considered necessary to produce a Planning Obligations Supplementary Planning Document (SPD). This will set out clear guidance which will clarify the Council's requirements and should reduce the time taken to determine applications and the associated costs.

1. Why is guidance required?

2.1 There are now several types of planning obligation which applicants may be required to enter into, covering different matters and, in some cases, applying to different types of development. Clarification is required so that applicants understand what they are being asked to provide and why.

2.2 "Planning obligations" is the term used to describe legal contracts made under section 106 of the 1990 Town and Country Planning Act. They are generally entered into by agreement between councils and landowners. They are used for three purposes to:

- prescribe the nature of development to comply with policy (for example, requiring a given portion of housing to be affordable),
- compensate for loss or damage created by a development (for example, loss of a footpath), or
- mitigate a development's impact (for example, through contributions to mitigate against harm to the local nature reserve).

2.3 Planning obligations are linked to a decision on a planning application, and are recorded as a land charge. The planning obligation is tied to the land ownership until the obligation is fully complied with, often indefinitely.

2.4 The CIL is a charge that we levy on some types of new development in East Devon area to fund infrastructure improvements needed to support development. CIL partially replaces S.106 planning obligations.

2.5 It is now unlawful for a planning obligation to be imposed unless it meets all of the following tests:

- It is necessary to make the development acceptable in planning terms;
- It is directly related to the development; and,
- It is fairly and reasonably related in scale and kind to the development.

2.6 The purpose of the tests are to distinguish the different roles that both CIL and planning obligations have when used together to support new development. Now that CIL is in place, a planning obligation cannot be used to fund a project or type of infrastructure if there have been 5 separate obligations on or after 6 April 2010 which fund that project or type of infrastructure. To ensure that the use of planning obligations and the CIL does not overlap, planning obligations cannot be used to fund infrastructure that the Council has included in its CIL infrastructure funding list (known as its 123 list). Developers cannot therefore be asked to pay twice for the same item of infrastructure.

2.7 CIL breaks the link between the development and the development site. Unlike S.106 planning obligations CIL funds are not earmarked for particular types of infrastructure. CIL funds are pooled into a central pot from which they can be used for any infrastructure needed to support development across East Devon.

2.8 Planning obligations remain for on-site mitigation required to make a development acceptable in planning terms, including the provision of affordable housing. The principle is that all eligible developments must pay a CIL as well as, any site-specific requirement to be secured through Section 106 Agreements.

2. The Supplementary Planning Document

3.1 The draft Planning Obligations Supplementary Planning Document has been produced following extensive internal consultation, and is attached for information. This guidance adds detail to Strategy 50 of the Local Plan 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.”

3.2 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 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.

3.3 The draft SPD will be accompanied by a Strategic Environmental Assessment, Habitat Regulations Screening, Equalities Impact Assessment and Consultation Statement. These are not attached to this report but will be available to view in the Members Area prior to the meeting.

3.4 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).

3. Conclusion

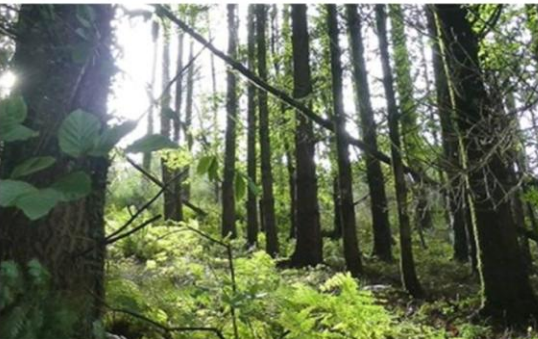
4.1 To clarify the position with regard to CIL and planning obligations it would be useful for Officers and applicants to have additional guidance to inform the decision making process. Members are asked to agree that, subject to any minor typographical amendments the attached draft SPD be subject to 6 weeks public consultation.

Draft for Consultation from

??/2016 until ??/2016



East Devon Planning Obligations Supplementary Planning Document



Draft Planning Obligations

Supplementary Planning Document- November 2016

How to comment on this draft Supplementary Planning Document

You are invited to make comments on this draft plan and any of the documents that support it as listed below:

- Strategic Environmental Assessment and Habitat Regulations Screening Report
- Equalities Impact Assessment
- Consultation Statement

These documents are available on line at [insert address](#) and at the Council Offices in Sidmouth. Copies of the draft plan will be sent to the following libraries.

- Axminster
- Budleigh Salterton
- Clyst Vale
- Colyton
- Exmouth
- Honiton
- Lyme Regis
- Ottery St Mary
- Seaton
- Sidmouth.

The feedback we receive on this draft document will be used to inform any subsequent revisions.

You can comment:

by email at localplan@eastdevon.gov.uk

or by post to: Planning Policy, East Devon District Council, The Knowle, Station Road,
Sidmouth, EX10 8HL

All comments should be received by xx 2016 so that they can be taken into account before the next stage. Comments will be available to view on our website. Respondent's names and addresses are not confidential.

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1.0 Introduction

- 1.1 Development may place demands on existing infrastructure and generate a need for new infrastructure. When new homes are built their occupants will need to use roads and sewers, new play areas may be important, community halls or new school places may be needed. In some cases private sector business will provide facilities and infrastructure, because there is money to be made in doing so, but for many essential facilities this will not be the case.
- 1.2 In the past, some development, particularly new house building, has not always been accompanied by the timely provision of the necessary social, physical and community infrastructure. We need to ensure this doesn't happen in the future. The Local Plan will play a key role in identifying infrastructure requirements, ensuring that provision and investment by providers is co-ordinated with development.
- 1.3 In order to address the impacts of development Councils will seek contributions from developers in the form of facilities, infrastructure or financial contributions. Contributions have historically been collected through 'Section 106 Agreements' (after Section 106 of the Town and Country Planning Act 1990). The Government has now introduced the Community Infrastructure Levy (CIL) which allows Councils to raise funds from developers undertaking new building projects in their area, to be used to fund a wide range of infrastructure that is needed as a result of development. This can include transport schemes, flood defences, schools, health and social care, parks, green space and leisure centres as well as local community facilities such as village halls. The Levy operates alongside traditional Section 106 Agreements as a means of collecting developer contributions. The Council sets out in the Infrastructure Delivery Plan see [insert web link](#) which items of infrastructure are expected to be funded through the Levy and which will be secured through Section 106 Agreements. This will provide clarity about the infrastructure required and ensure there is no double charging for the same item.
- 1.4 The critical document in introducing the Levy is the Charging Schedule, which sets out the charging rates (on a £ per SqM basis) for different types of development, potentially with different rates for different areas within the District. The Charging Schedule is underpinned by a robust evidence base on the impact of proposed Levy rates on development viability. [The Charging Schedule can be viewed at insert web link.](#) A summary is available later in this document.

2.0 Purpose and status of the SPD

- 2.1 The SPD will provide clarity to developers, decision makers, stakeholders and local communities regarding the basis on which planning obligations will be sought when considering planning applications in East Devon. In the form of a legal agreement, planning obligations are secured to ensure that development mitigates the impacts of, and provides for the requirements arising from, development in a sustainable way.
- 2.2 The SPD details the obligations that may be required from different types and amounts of development and sets out the basis on which the level of obligation will be calculated, where appropriate. It complements and provides further guidance to the policy approach set out in the District Council's East Devon Local Plan (Adopted January 2016) and will assist in securing the provision of high quality, sustainable new development supported by appropriate infrastructure provision. The SPD forms a material planning consideration in the determination of planning applications and will ensure that decisions are made in a consistent way.
- 2.3 The SPD will be produced in accordance with the following process:

SPD Process stage	What is involved?
<p>Stage 1 Development of evidence base</p> 	<ul style="list-style-type: none"> • Identification of the issues and collection of the information needed to prepare the SPD • Engagement with relevant stakeholders to decide on content and level of detail of the SPD
<p>Stage 2 Drafting of the SPD and consultation (Regulation 12 of Local Plan Regulations 2012)</p> 	<ul style="list-style-type: none"> • Drafting of SPD • Consultation with stakeholders and members of the public • Minimum of 4 weeks consultation
<p>Stage 3 Preparation of the SPD</p> 	<ul style="list-style-type: none"> • Formal consideration of points raised in Stage 2. • Amendment of the SPD as required. • Potentially further consultation
<p>Stage 4 Adoption of SPD by Full Council (Regulation 14 of local Plan Regulations 2012)</p>	<ul style="list-style-type: none"> • If Full Council agree, then EDDC can adopt the SPD and produce an Adoption Statement

- 2.4 The SPD will be regularly reviewed, and updated as necessary, to ensure it remains consistent and in conformity with National policy and legislation and emerging Development Plan Documents comprising East Devon's Local Plan.

3.0 The Council's Approach to Planning Obligations and CIL

3.1 In determining planning applications, East Devon District Council has regard to the provisions of the development plan and any other material considerations.

CIL

3.2 This is a non-negotiable charge and is triggered by the commencement of development.

3.3 The following types of planning applications are liable to pay CIL:

- Applications for the creation of new dwellings. This includes agricultural workers dwellings, holiday lets and student accommodation.
- Applications for extensions of 100 square metres or more to existing dwellings
- Applications for retail development (use classes A1-A5) in chargeable areas.

3.4 CIL is a tariff in the form of a standard charge on the above types of development, which in East Devon is set by the District Council to help the funding of infrastructure. The principle behind CIL is that most development has some impact on infrastructure and should contribute to the cost of providing or improving infrastructure.

3.5 CIL applies to new floor space and charges are based on the size, type and location of the new development. Developments of less than 100 square metres new build floor space will not be liable to pay CIL unless they result in the creation of a new dwelling.

3.6 Charges are calculated on Gross Internal Floor Area; refer to RICS 'Code of Measuring Practice' available to [view through our website](#).

3.7 East Devon District Council will collect the levy, co-ordinate the spending of the funds and report this to the community annually.

3.8 CIL liable applications will be charged in accordance with the rates set out in the CIL Charging Schedule. This, and the different charging zones across the District, can be viewed on the [website here](#). CIL liable applications will require a CIL Information form to be valid.

3.9 Some types of development may be eligible for Relief, including affordable housing, charitable development and self-build housing. Conditions apply to exemptions and if they are not complied with, the CIL that would have been due will be clawed back.

Regulation 123 List

3.10 The Regulation 123 List ([available to view on the website here](#)) sets out the infrastructure which money raised through CIL will be used to fund in whole or in part. Whilst CIL can also be spent on other infrastructure projects which are not identified on this list, it serves as a good guide as to what CIL money may be spent on. The local authority is not able to require planning obligations (S106 Agreements) towards any

infrastructure on that list in addition to the CIL payment. "123" refers to the Regulation within the CIL Regulations which requires the list to be produced and does not mean it is a priority 1, 2, 3 list. The Infrastructure Delivery Plan (IDP) [\(insert link\)](#) provides a guide to the specific projects that are required to deliver the Local Plan (only some of which will be funded in whole or part by CIL) and the priority for their delivery. The Strategic Planning Committee will determine the projects on which funding will be spent.

Preventing Duplication

- 3.11 From April 2015, the CIL Regulations restrict the use of pooled contributions towards items of infrastructure. At that point, no more planning obligations may be agreed in respect of a specific infrastructure project or a type of infrastructure through a Section 106 agreement or unilateral undertaking, if five or more obligations for that project or type of infrastructure have already been entered into since 6 April 2010, and it is a type of infrastructure that is capable of being funded by the levy.
- 3.12 In respect of planning obligations secured prior to 6 April 2015; these can continue to be used to fund Infrastructure items.
- 3.13 In respect of affordable housing, which cannot be funded by CIL, there is no restriction in terms of the numbers of obligations that may be pooled, but due regard must be given to the wider policies and guidance on planning obligations set out in the NPPF and NPPG.
- 3.14 To ensure developers do not pay twice for the same items, the Council have published a Regulation 123 list of infrastructure that the Council intends will be, or may be, wholly or partly funded by CIL. These types of infrastructure cannot therefore be funded through new Section 106 planning obligations.
- 3.15 In order to increase transparency and certainty as to what infrastructure may be funded from CIL (and thus what may still be secured through planning obligations), the Council's Regulation 123 list will be reviewed and amended going forward to ensure that it represents an up to date list of Infrastructure to be funded by CIL.

Planning Condition or Planning Obligation?

- 3.16 A planning condition may be imposed on a grant of planning permission to ensure that development is acceptable. Where it is not possible to address unacceptable impacts of development proposals through a planning condition the National Planning Policy Framework states that planning obligations may be used. Therefore, the Council will seek to use planning conditions in most instances and use planning obligations only where a condition will not suffice.
- 3.17 Planning Obligations are used for three purposes, to:
 - **Prescribe** the nature of development (for example, requiring a given portion of housing is affordable)

- **Compensate** for loss or damage created by a development (for example, loss of open space)
- **Mitigate** a development's impact (for example, through increased public transport provision).

3.18 Planning obligations do not just relate to financial contributions. They can:

- **restrict** the development or use of the land in any specified way, for instance by imposing an age restriction on occupiers;
- **require** specified operations or activities to be carried out in, on, under or over the land. On some sites development will only be acceptable if particular constraints can be addressed before, during or after construction. In circumstances where planning conditions cannot control issues that include flood risk, land contamination, access and disruption caused by construction works, planning obligations are likely to be sought as failure to address such issues is liable to result in planning permission being refused;
- **require** the land to be used in any specified way, for instance as public open space; or
- **require** a sum or sums to be paid to the authority on a specified date or dates or periodically. Negotiation over the level of contributions will take account of the costs and viability of the development, including any abnormal costs and other planning objectives that may affect the proposal. However, the Council also considers that costs incurred in delivering a sustainable, high quality development are to be expected, and should not reduce the ability of the site to contribute towards relevant planning objectives.

3.19 Planning obligations must be directly relevant to the proposed development.

3.20 Where a planning obligation is required it must be secured by legal agreement (under Section 106 of the Town and Country Planning Act 1990). Where the nature of the obligations required are relatively simple and it is not necessary for the Council to be a signatory. Applicants are encouraged to submit a Section 106 Unilateral Undertaking for consideration by the Council. Where a Unilateral Undertaking is not appropriate a Section 106 Agreement will be required, which will be drafted by the Council's Legal Team, unless otherwise agreed. The applicant will be required to pay the legal costs reasonably incurred in respect of preparing a Section 106 agreement or reviewing a Section 106 Unilateral Undertaking.

3.21 Applicants should agree with the Development Management Planning Officer the most appropriate mechanism to secure planning obligations at an early stage in the planning process.

4.0 Matters to be addressed through Planning Obligations

- 4.1 It is essential that developers enter into pre-application discussion with the Councils Development Management Officers at an early stage about planning obligations that may be required for their development by the Council.
- 4.2 The summary table below provides an indication on the types of planning obligations that are often agreed in relation to new development in East Devon. The table is purely a guide and does not include strategic infrastructure such as education facilities, strategic transport improvements or flood defences.

Obligations	When due
<p>On-site* Affordable Housing (designation, definition and prescription of) and/or off-site contributions</p>	<p>50% on-site housing (as a proportion of the total number of units built) to be affordable on sites capable of accommodating 1 or more units (or the minimum threshold set out in Government policy) in all areas except Axminster, Exmouth, Honiton, Ottery St Mary, Seaton and major strategic 'west-end' sites, where 25% on-site housing will be sought. On rural exceptions sites at least 66% of housing is to be affordable.</p> <p>Tenure split: Target of 70% social or affordable rent and 30% intermediate. For rural exception sites the tenure should reflect the identified need from the Rural Housing Needs Survey. If non-policy compliant tenure splits are proposed, this will need to be justified and evidenced.</p>
<p>On-site Open Space</p>	<p>On-site formal and informal Open Space (including play areas and allotments) will be sought through S106 Agreements in line with Strategy 43 of the Local Plan. Developments will be expected to provide open space on-site through S106 Agreements in line with the following thresholds:</p> <ul style="list-style-type: none"> • 9 dwellings or less will not be required to provide any specific open space typologies on-site, however developers may choose to make such provision. • 10 – 49 dwellings will be required to provide amenity open space on-site as per the open space standards. • 50 – 199 dwellings will be required to provide amenity open space, and children's and youth play space on-site as per the open space standards. • 200+ dwellings will be required to provide for all open space typologies on-site as per the open space standards. <p>It may be necessary or desirable to provide more of certain</p>

Obligations		When due
	<p>typologies and subsequently less of others depending on site specifics and an appropriate layout and arrangement will be considered during the planning application process. Where a developer considers an alternative mix is more appropriate evidence should be submitted with an application to demonstrate the justification for an alternative approach.</p> <p>Developments which do not meet these requirements will be refused planning permission where the Council considers them capable of delivering the required open space on-site unless viability assessment proves otherwise.</p>	
Off-site Open Space	<p>Generally off-site contributions towards improvement/enhancement of existing/new open spaces will be delivered through CIL and therefore S106 Agreements will not be signed towards such contributions. However, in certain circumstances where the proposed development requires replacement provision off-site (such as an application to develop on existing open space), off-site contributions may be sought either through financial contribution or specific provision through S106 Agreement. Replacement provision will need to be identified by a red line on plans accompanying the planning application indicating the applicant's ownership of the two areas of land. However this may prove problematic for developers who do not at the time of application 'own' an area of land suitable in size location and type. That being the case early consultation with the LPA to discuss requirements relating to suitable alternative provision is highlight recommended. Replacement provision must be directly related to the site and be available to the same community as the lost facility.</p>	Before development commences.
Public art	<p>Public art or contributions are most frequently sought when new development occurs in the form of major schemes that occupy prominent locations.</p>	In line with development
Trees; planting; landscaping	<p>These are defined on a case-by-case basis, reflecting the site and scheme characteristics.</p>	Before development commences
Habitat and ecological protection, creation and enhancement (including lighting requirements and requirements arising out of Habitat Regulations Assessment (excluding those European Sites mentioned in the Regulation123 List)	<p>Section 61 of the Habitat Regulations requires the LPA to assess whether a significant effect is likely and if the LPA considers it is then the LPA must undertake an Appropriate Assessment to consider whether or not the effect can be fully mitigated. The legislation says that LPAs must NOT grant consent for a development that would, either alone or in-combination with other developments, have a likely significant effect on a European wildlife site, unless full mitigation is provided. In East Devon on-site mitigation may be required as will a capital contribution via the Community Infrastructure Levy and a non-infrastructure contribution via a formal undertaking on new residential housing within a "zone of influence" from the protected sites.</p>	Before development commences or before first occupation

Obligations		When due
Site specific roads, car parking, footways and cycle paths, footbridges, public transport stops, traffic calming, junction improvements, road improvements and other transport infrastructure excluding those identified in the Regulation 123 List	Site specific highway and transport requirements are determined on a case-by-case basis. Obligations include traffic orders (around £3,000), highway and junction improvements, bus stops and walking and cycling facilities.	Before development commences
Travel planning (including measures to support and encourage modal shift)	These are defined on a case-by-case basis, reflecting the site and scheme characteristics.	To be determined in the S106 agreement
On-site renewable energy provision that primarily serves the development and/or off-site contributions (including Carbon Reduction Plans)	These are defined on a case-by-case basis, reflecting the site and scheme characteristics.	To be determined in the S106 agreement
On-site drainage, sewerage and water management requirements provision (including sustainable urban drainage) and/or off-site contributions	These are defined on a case-by-case basis, reflecting the site and scheme characteristics.	To be determined in the S106 agreement
On-site remedial action to deal with contaminated land	This would depend on the scale and nature of the contamination. Where contamination is anticipated, a contaminated land assessment will be required as part of the planning application. Remedial action would usually be required before development commences unless contamination occurs on part of the site which is to remain undeveloped, where the trigger may be before first occupation.	Before development commences
Neighbourhood Centres including A1, A3, A4, and A5 land uses	These are defined on a case-by-case basis, reflecting the site and scheme characteristics.	To be determined in the S106 agreement
Phasing of infrastructure for economic development purposes, including serviced land or buildings for B1, B2 and	These are defined on a case-by-case basis, reflecting the site and scheme characteristics.	To be determined in the S106 agreement

Obligations		When due
B8 land uses		
Other infrastructure which is directly related to the development and required to make the development acceptable in planning terms and which does not appear on the Regulation 123 List	These are defined on a case-by-case basis, reflecting the site and scheme characteristics.	To be determined in the S106 agreement
Land to enable delivery of infrastructure on-site	Where it is important to deliver specific infrastructure on an application site that serves a wider purpose than meeting just the needs of that application/site then the reservation and/or transfer of that land to enable delivery of that infrastructure in that location will be required through S106 Agreement. The infrastructure itself may be delivered by S106, CIL or other means.	In line with development and no later than 75% occupations.
Site wide masterplans that agree the spatial layout and land uses of sites including the location of specific infrastructure or land uses within the development site that are essential to the delivery of a sustainable development	These are defined on a case-by-case basis, reflecting the site and scheme characteristics.	Before development commences
Land to enable the delivery of sheltered housing or extra care housing facilities	A mix of dwellings on sites of 15 or over (Policy H2) that should include Care/Extra Care homes and other forms of specialist housing for older persons where the targets set out in Strategy 36 have not been met or a Care Needs Assessment establishes a need.	In line with development and no later than 75% occupations.
Accessible and adaptable homes	All affordable and 20% of market homes to meet part M4(2) of the Building Regulations, Category 2 accessible and adaptable dwellings (or any comparable updated nationally set standard (Strategy 36).	In line with development and no later than 75% occupations.
Phasing and timing of land uses and/or development on mixed use sites	These are defined on a case-by-case basis, reflecting the site and scheme characteristics.	Before development commences
On-site air quality management and monitoring, and/or off-site contributions to measures	This would depend on the scale and nature of the activity. Where air pollution is anticipated, an air quality assessment will be required as part of the planning application. Remedial action would usually be required either before development commences or as part of a	Before development commences

Obligations		When due
aiming for air quality enhancements	development scheme, where the trigger may be before first occupation.	
Noise and other environmental amenity and heritage asset impact reduction	These are defined on a case-by-case basis, reflecting the site and scheme characteristics.	To be determined in the S106 agreement
Considerate construction or similar schemes to limit negative environmental impacts during the construction process	These are defined on a case-by-case basis, reflecting the site and scheme characteristics.	To be determined in the S106 agreement
Planning obligation monitoring and administration support contributions	This would depend upon the scale and nature of the development. Such as where a very large development is proposed to be delivered in several phases with a wide suite of planning obligations which would place an added burden on the local planning authority requiring additional resources to cover the administration and monitoring of the site above that already provided.	Before development commences
Overage where viability considerations deem it appropriate	Overage clauses will be required in all cases where viability assessments have been provided on an open book basis and clearly demonstrate the scheme is currently unable to provide the required affordable housing contributions. This will be capped at the amount required to deliver a policy compliant scheme.	To be determined in the S106 agreement
Management Companies	These are defined on a case-by-case basis, reflecting the site and scheme characteristics.	To be determined in the S106 agreement

*On-site refers to anywhere within the red line on the map accompanying the planning application/Unilateral Undertaking/S106 Agreement. Off-site refers to anywhere outside of this line.”

5.0 Legislative and Policy Context

5.1 The National Planning Policy Framework (NPPF) sets out the Government’s planning policies for England and how these are expected to be applied. It explains that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition. This is supported by Planning Law¹.

¹ The legislative framework for planning obligations is set out in Section 106 of the Town & Country Planning Act 1990, as amended by Section 12 of the 1991 Planning and Compensation Act. Further legislation is set out in Regulations 122 and 123 of the Community Infrastructure Levy (CIL) Regulations 2010 as amended. Government policy on planning obligations is set out in Paragraphs 203 to 205 of the National Planning Policy Framework (NPPF) (March 2012).

5.2 Town and Country Planning Act 1990

The Act² states that planning obligations may:

- (a) restrict the development or use of the land in any specified way;**
- (b) require specified operations or activities to be carried out in, on, under or over the land;**
- (c) require the land to be used in any specified way; or**
- (d) require a sum or sums to be paid to the authority on a specified date or dates or periodically.**

- 5.3 Planning obligations are usually entered into as part of planning applications to ensure that developers address additional community and infrastructure needs and mitigate the social, environmental and economic impacts of new development. They usually run with the land in perpetuity and may be enforced against the original covenantor, and anyone else that acquires an interest in the land, until such time as they are discharged or otherwise modified. Planning obligations can be secured by:
- (a) Section 106 Agreements** between local planning authorities, persons with a legal interest in a piece of land and any other interested parties.
 - (b) Section 106 Unilateral undertakings** signed solely by parties with a legal interest in the land. These are appropriate when only the person with a legal interest in the land (and not the Council) needs to be bound by the agreement.

5.4 Community Infrastructure Levy Regulations

Further legislation is set out in the Planning Act 2008 (as amended) and Regulations 122 and 123 of the Community Infrastructure Levy (CIL) Regulations 2010 (as amended).

- 5.5 Regulation 122 includes the following tests that a planning obligation must satisfy:
- (a) necessary to make the development acceptable in planning terms;**
 - (b) directly related to the development;**
 - (c) fairly and reasonably related in scale and kind to the development**

- 5.6 The Government intends that CIL will be the mechanism for new development to contribute towards investment in a wide range of infrastructure that is needed as a result of new development, including strategic transport facilities, flood defences, schools, sports facilities and open spaces. Councils are no longer able to use a tariff-based approach to secure contributions through an SPD or pool Section 106 contributions from more than five developments to enable the provision of a single item of new infrastructure. Planning obligations may be used to provide affordable housing and site specific measures required to mitigate the impact of development.

5.7 East Devon Local Plan

The Council adopted the East Devon Local Plan in January 2016, which sets out the vision, strategy, objectives and development management Policies for the District up to 2031. Development that may require the provision of planning obligations should be made in accordance with the relevant policies of the East Devon Local Plan. This SPD

² Section 106 of the Town and Country Planning Act 1990 (as amended by Section 12(1) of the Planning and Compensation Act 1991)

supports the Local Plan, particularly strategy 50, and constitutes an important material consideration in the decision-making process.

- 5.8 Some local communities have produced, or are in the process of producing, Neighbourhood Plans. Once made, these plans form part of the development plan for the District and will carry the same weight as the Local Plan in decision making. Where a Neighbourhood Plan is made, 25% of any CIL raised in the Neighbourhood Plan area may be spent by the Parish Council responsible for producing the Plan in accordance with Government guidance. In areas without a 'made' Neighbourhood Plan, 15% of the CIL raised will be passed to the Parish Council to be similarly spent (up to a maximum £100 per council tax banded property in the parish, per year).

Strategy 50 - Infrastructure Delivery

The Council produced and consulted (in June/July 2013) on an Infrastructure Delivery Plan to set out how the implementation of Local Plan policies and proposals will be supported through the timely delivery of infrastructure improvements. It identifies schemes, sets out how much they will cost, indicates potential funding sources and establishes a funding gap. Developer contributions will be sought to ensure that the necessary infrastructure improvements are secured to support the delivery of development and mitigate any adverse impacts.

The Council will introduce the Community Infrastructure Levy (CIL) alongside the Local Plan. The Infrastructure Delivery Plan will inform the Council's Regulation 123 List which will establish items of infrastructure to be funded in whole or in part through the Levy

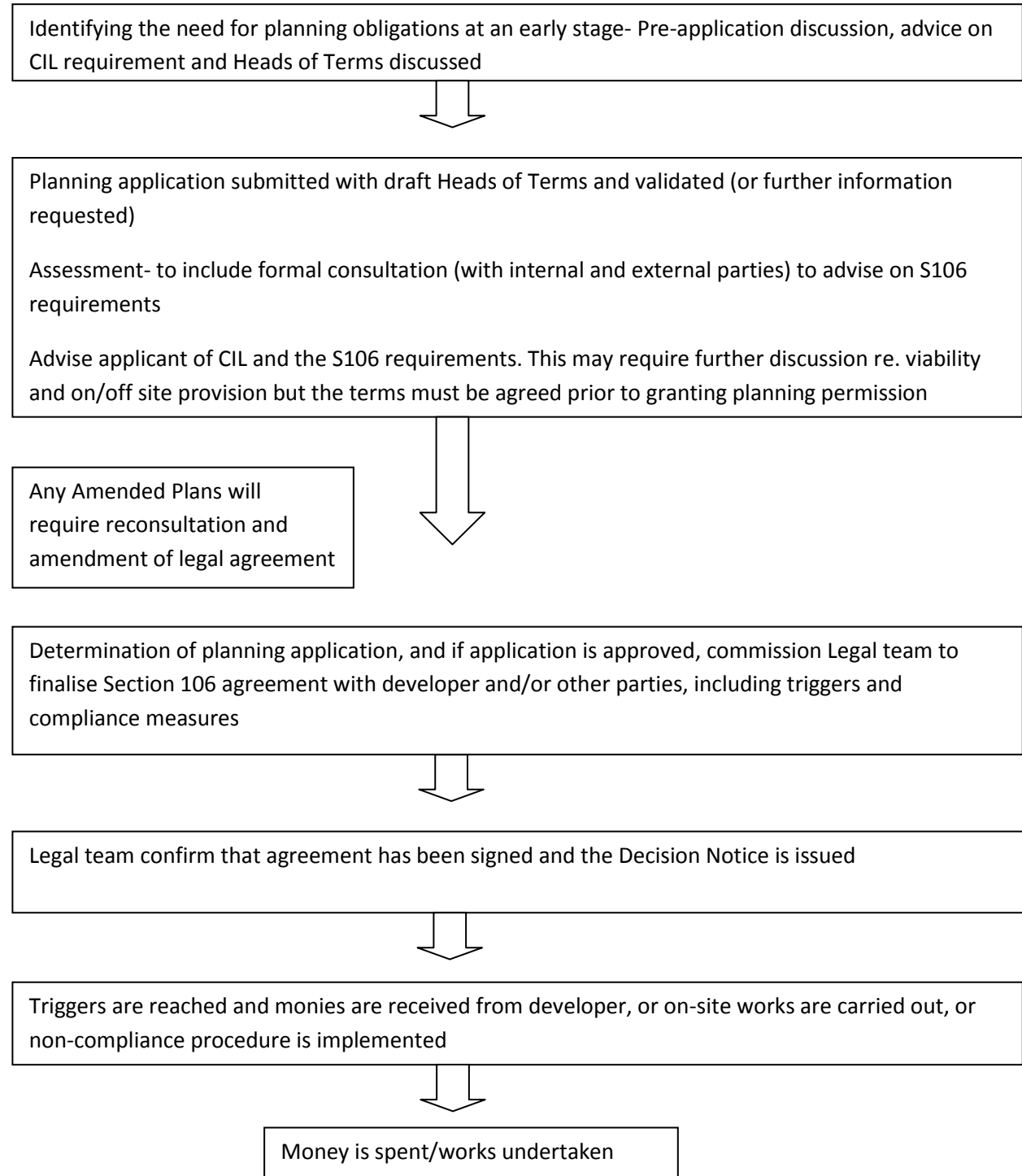
Through Section 106 Agreements and negotiations over site development and where otherwise not met through alternative committed schemes or proposals the Council will ensure that:

1. Infrastructure requirements that arise as a direct consequence of developments are met in full to serve the needs of the proposal and occupants and users.
2. The loss of, or adverse impacts on, any significant amenity or resource present on the site prior to the development is offset by the provision of alternative facilities that are of at least equal value.

Infrastructure provision should be phased to meet development and failure to provide or absence of relevant infrastructure will be grounds to justify refusal of permission.

6.0 Submitting the planning application- validation, assessment and determination

6.1 A summary of the planning obligations process that will be followed:



Validation

- 6.2 In order to reduce the delay in assessment of the planning application applicants should ensure that all information required to assess an application is submitted. Where the application does not accord with the Local Plan (and any Neighbourhood Plan) due to financial viability constraints, this will need to be demonstrated as part of the application and the application cannot be validated without it. The Validation Guidance Note may be downloaded here <http://eastdevon.gov.uk/planning/planning-permission/apply-for-planning-permission/general-validation-advice/> .

CIL

- 6.3 The CIL Additional Information Requirement Form must be submitted in order to validate the application.

Planning Obligations

- 6.4 Before planning obligations can be agreed, the Council will require the following:
- (a) Agreed heads of terms** supplied in electronic form for ease of circulation.
 - (b) Land Registry title documents** for the application site and any other land that needs to be bound by a planning obligation (for example where the use of adjoining land is to be restricted).
 - (c) A solicitor's undertaking to meet the Council's legal costs** in preparing and completing an agreement. The Council will be able to provide an estimate of costs once the heads of terms have been broadly agreed. The Councils' costs are to be paid whether or not the agreement is actually completed.
- 6.5 Where a planning obligation is required, the Council may refuse an application for planning permission if a legal agreement has not been completed by (or after) the date that the application is due for determination and the developer is responsible for agreement delays.
- 6.6 The signatories of a Section 106 agreement will be those with a legal interest in the land, East Devon District Council and, in some cases, Devon County Council and other organisations or parties (for instance Parish Councils taking on responsibility for public open space).
- 6.7 The Council has prepared model Section 106 agreements that are available **on our website**. These cover the types of obligations most commonly encountered but may not be appropriate in all cases, and it should be noted that these documents are liable to change from time to time.
- 6.8 It is not necessary for the developer's solicitor to prepare a draft agreement as it is usual for the Council to do so. Developers that do instruct their solicitor to draft a Section 106 Agreement are strongly encouraged to use the Council's standard clauses as alternative wording is likely to result in additional costs being borne by the developer and delays.
- 6.9 Please note that negotiation of a Section 106 agreement does not indicate that the Council is minded to approve a planning application and the Council's costs will still need

to be paid by the Developer where an application is refused. When the Council is minded to approve an application the decision notice will not be issued until the agreement has been completed.

Assessing and determining the application

- 6.10 The Council will usually make information submitted as part of the planning application available to the public by publishing information on the webpage, this will ensure stakeholders have an opportunity to comment.
- 6.11 Where additional information is submitted during consideration of the application we reserve the right to reconsult the public which may delay determination of the application. Please note that amendments may require submission of a new CIL application (and liability may increase) as well as amended Heads of Terms.
- 6.12 At this stage, consultation will take place formally to ensure that S106 requirements are identified and are fully covered in the appropriate legal agreement.
- 6.13 Upon the completion of a Section 106 agreement, the Council's legal fees associated with the agreement's preparation will be payable. The Council will register the agreement as a Local Land Charge and the developer may, if covenanted within the agreement, be required to register the agreement as a charge against the Title of the land. The Council will also update the statutory registers and send a copy of the completed agreement to all relevant parties including Council officers.
- 6.14 The Council will confirm the draft liability for CIL following the grant of planning permission and this is double checked and confirmed following the submission of a commencement notice. There are clear guidelines and process for CIL as defined by the Government. This is set out on [our webpages at](#) . Failure to comply with any of the process can incur surcharges and the loss of phased payments.

Appeals

- 6.15 Where an applicant pursues an appeal against the decision³ of the Council and a planning obligation is required by the Council, the draft Section 106 agreement or Unilateral Undertaking should be made available at the time the appeal is submitted in a form that is conditional upon the appeal being allowed. This will then be considered as part of any statement of common ground. This is without prejudice to the Council's position in respect of those refusal reasons which are unrelated to the contents of the obligation.

Thresholds and Site sub-division

- 6.16 The Section 106 obligations are subject to restrictions as set out below. The Council will adhere to these when seeking obligations. All Section 106 obligations must meet the CIL Regulations Tests of Lawfulness (set out in regulation 122 of the CIL Regulations 2010 and NPPF paragraph 204.) They must be;

³ Including appeals against non-determination of planning applications

- Necessary to make the development acceptable in planning terms
- Directly related to the development and
- Fairly and reasonably related in scale and kind to the development.

6.17 Affordable housing and “tariff style” contributions will only be sought on sites of 11 or more dwellings in urban areas, or 6 or more dwellings in the remainder of the district, although CIL will apply from one dwelling upwards. This is illustrated in the following tables:

6.18 Urban Areas (defined in the 1985 Housing Act as the wards of- Exmouth, Honiton, Sidmouth and Seaton)

No of houses proposed	Requirements applicable
10 and under	CIL, Habitat Regulations Mitigation (depending on location)
11+	CIL, On-Site Affordable Housing, On-site open space, Habitat Regulations Mitigation (depending on location)

6.19 Rural Area (the remainder of the District, outside the wards of- Exmouth, Honiton, Sidmouth and Seaton)

No of houses proposed	Requirements applicable
5 and under	CIL, Habitat Regulations Mitigation (depending on location)
6+	CIL, Affordable Housing contribution (commuted sum- for calculator see http://eastdevon.gov.uk/planning/planning-services/planning-development-management/unilateral-undertakings-section-106-agreements-habitat-mitigation-and-affordable-housing-contributions/), Habitat Regulations Mitigation (depending on location)
11+	CIL, On-Site Affordable Housing, On-site open space, Habitat Regulations Mitigation (depending on location)

6.20 Where sites are subdivided so that developments fall below the thresholds at which contributions will be payable the Council will consider the site, and infrastructure/mitigation required, as a whole. This will prevent a situation arising where a series of applications on a given site or land area, each fall below policy thresholds but collectively exceed thresholds.

Viability

6.21 If an application is concerned about the viability of their scheme they can seek to have the amount of Section 106 reduced on viability grounds. In order to do this we would require a full open book viability appraisal to be provided. We may use internal expertise and/or employ a specialist, such as the District Valuer, to advise on the viability appraisal, in which case the applicant can be expected to meet the Council’s costs which will vary depending on the scale and complexity of the scheme. We have provided some guidance for applicants which set out the level of information we require. This can be found here –

- Viability Guidance Note One sets out what information will be required

<http://eastdevon.gov.uk/planning/planning-services/planning-development-management/viability-guidance-notes/viability-guidance-notes-1/>

- Viability Guidance Note Two explains what efforts should be taken to improve viability

<http://eastdevon.gov.uk/planning/planning-services/planning-development-management/viability-guidance-notes/viability-guidance-notes-2/>

6.22 Mitigation of effects on a European site, required by the Habitat Regulations, and CIL contributions are non-negotiable and cannot be reduced.

Overage

6.23 Strategy 34 in the adopted Local Plan requires that where a reduced contribution is agreed for viability reasons, an overage clause will be sought in all cases. Overage is a potential right to receive future payments in respect of land. In this case, it is applied when actual values exceed the estimated value used to calculate viability and therefore a development is more profitable than originally anticipated. This ensures that a fair proportion of the contributions is actually paid.

Vacant Building Credit

6.24 Vacant building credit can be applied when a vacant building is being demolished or brought back into use. It can be applied where a building has not been abandoned. A credit, for the existing floorspace of a vacant building, can be given against the affordable housing requirement. The credit can be applied when calculating either the number of affordable housing units to be provided within the development or where an equivalent financial contribution is being provided. The credit is intended to incentivise brownfield development. In considering whether a scheme should be able to claim vacant building credit, the Council will consider:

- Whether the building has been made vacant for the sole purposes of re-development.
- Whether the building is covered by an extant or recently expired planning permission for the same or substantially the same development.

Viability at Outline

6.25 CIL regulations requires calculation of CIL liability to be based on actual net floor area. This poses a difficulty for any outline application where the actual net floor area is either not provided, or provided in relation to an indicative plan only. As it is the actual (and not an indicative) figure that would be needed to undertake the calculations in relation to CIL, exact costs for calculating CIL, and indeed for developing the scheme remain unknown at outline stage. In these cases the amount of net floor area for the development will not be pinned down until the reserved matters application. This gives rise to issues in relation to proving viability when relying on an indicative scheme at outline stage. This highlights a clear tension around accepting reduced contributions due to viability on outline applications. There are three possible options to address this issue:

- 1) Accept the use of viability appraisals at outline stage, and require the details of the scheme that justify the viability conclusions to be pinned down. For example, if a scheme was for 9 three bed houses with a total floorspace of 891 square metres, would have a viability appraisal prepared on this basis and the outline would pin this down. The completed scheme would then still need to be subject to viability appraisal on completion to assess whether or not any overage payment was due under a section 106 obligation.
- 2) Refuse to concede any reduction on contributions on viability grounds, because a viability appraisal prepared for an indicative scheme is not considered sufficiently robust to demonstrate the scheme as being unable to afford to make a full affordable housing contribution. This would mean the application could only be approved if a Section 106 agreement secured the full affordable housing contribution. The option to revisit viability would then be at reserved matters stage via a deed of variation. The options of a new full application, including a viability appraisal, would also remain.
- 3) Accept that at the moment the indicative viability indicates that there may be a viability issue with the scheme. However, this could only be confirmed at reserved matters stage, when full details of the scheme are known. A Section 106 agreement would be required that sets out the mechanisms by which the current viability appraisal would be tested, or adjusted, or redone, as required at reserved matters stage. The Section 106 agreement would also then set out the requirement for a viability appraisal of the completed scheme, and how the assessment of any overage payment was due, would be undertaken.

6.26 In light of these issues, and the Council's approach to dealing with them applicant's are strongly advised to consider the merit of committing resources to seeking to demonstrate viability at outline stage, recognizing it may only be of limited value.

Confidentiality

6.27 There is a strong public interest in financial viability appraisals being made available for scrutiny when relied upon to secure planning permission. We consider that transparency is extremely important and the public benefit of publishing all aspects of a viability appraisal outweighs any potential commercial harm to the applicant. However, applicants are advised to identify elements of a viability appraisal which could undermine their commercial position with the council through the pre-application process. The Council may require redacted versions of the information, or may carry out the redaction. The Council will advise the applicant whether the sufficient information has been made available to assess the viability of the proposed scheme.

Priorities

6.28 It is essential that developers enter into discussion with the Council's planning officers at an early stage about planning obligations that may be required for their development. It is not possible to provide an overarching priority list of planning obligations that may be sought, because the relative importance of an obligation will be dependent on the development proposal being considered. In making the judgement, Planning Officers will have regard to the Development Plan; adopted Neighbourhood Plans; advice from

statutory consultees, the financial viability of the proposals if necessary; and individual site characteristics.

Self-build and Permitted Development

- 6.29 Some types of development may not require planning permission, or may qualify for exemption from CIL requirements. This could include self-build dwellings, dwellings built or converted as permitted development or large extensions to dwellings. In some cases, it may still be necessary to enter into a Section 106 agreement and mitigation under the Habitats Regulations may still be sought.
- 6.30 Where an exemption is granted, CIL may still be payable if the status of the building subsequently changes e.g. If a self-build house is sold within the first 3 years, or is not constructed as a self-build following the grant of planning permission.

7.0 Implementing Planning Obligations and non-compliance

- 7.1 The Council starts managing and monitoring planning obligations as soon as they are signed. A small fee may be incorporated into the agreement to cover monitoring and administration costs. This is a complex process which covers thousands of legal documents, all with multiple trigger points and obligations. EDDC employs a Planning Obligation Officer dedicated to overseeing this complex programme and ensuring the successful delivery of the obligations.

Triggers for the payment of Financial, or delivery of Non-Financial, Planning Obligations

- 7.2 During the negotiation process, trigger points for each obligation will be agreed upon between the developer and the Council. There are established trigger points which are suitable for S106 agreements and triggers selected in each case will be based upon the nature of the obligation and the stage at which the mitigation is required. The established trigger points, which the Council will encourage to be used in negotiations, are:
- The date that the agreement is signed;
 - Upon or prior to commencement of the development (commencement is the Council's preferred trigger point)
 - Upon or prior to practical completion of the development; and
 - Upon or prior to occupation of the development

Delivering Non-Financial Contributions

- 7.3 The delivery of non-financial contributions, or in-kind obligations, will be monitored by the appropriate service areas responsible for project delivery, but the Planning Obligations Officer will be the primary point of contact. For example, where there is an Affordable Housing element to a legal agreement, the Council's Housing Needs and Strategy Team will monitor this section of the agreement to ensure that it is complied with.

Financial Obligations

7.4 Financial contributions will be collected in accordance with specific triggers as per the legal agreement and, if they fail to be paid, will be collected in accordance with the enforcement procedures set out later in this document.

Price Index linking

7.5 Financial contributions will be index linked to allow for the fluctuation of prices between the date the agreement is signed and the date the payment is made. This is calculated based on the indexation adjustment of the relevant index, from the date the S106 agreement is signed to the expected date of payment. The additional amount paid on top of the financial contribution adjusts the contribution in accordance with inflation.

7.6 The method of indexation should be specified within the legal agreement and will usually either be the Retail Price Index (RPI) published by the Department of Trade and Industry (DTI), the Building Cost Information Service Index (BCIS) published by the Royal Institution of Chartered Surveyors (RICS) or the Consumer price index (CPI) published by the Office for National Statistics, depending on the nature of the contribution. In the event that the index shall decrease, the contribution shall not fall below the figure set out in the S106 agreement.

7.7 The Tender Price Index of Public Sector Building Non Housing (PUBSEC) measures the movement of prices in tenders for building contracts in the public sector in Great Britain.

Bonds

7.8 Planning obligations can include financial contributions, the provision of land, buildings or services and physical works. These requirements have been identified as necessary for development to proceed and it is reasonable that the Council should take steps to secure their delivery in the event of unforeseen circumstances such as a developer going into administration. For this reason the Council may require that some or all planning obligations are secured through a performance bond. It is recognised that bonds can place a significant financial burden on developments. As such consideration may be given to alternative mechanisms for securing contributions where practicable and where there is confidence that such mechanisms will provide adequate security for the investment.

7.9 The Council will consider each planning obligation and bonding requirement on a case by case basis with consideration given to issues including:

- The nature and timing of the obligations.
- Structure of payment (s).
- Risk of non-delivery of the obligation and to the public purse.
- The value of the obligation and its importance.
- Development viability.

Interest and Enforcement of Obligations

7.10 Trigger points will vary for each individual obligation within the S106 agreement. The developer is bound to notify the Council upon commencement of the development. If the

Council is not notified and obligations become overdue the Council may seek to enforce the obligation and activate the penalty clause. This clause requires a financial penalty requiring interest to be paid when payments are overdue. As a final recourse, where obligations are not subsequently complied with, the Council may take legal action against those in breach of the S106 agreement. Non-financial obligations are also legally binding and non-compliance may also result in legal enforcement by the Council.

- 7.11 Late payments will be charged at a rate of 4% above the base lending rate. The interest due will be calculated after the indexed sum has been calculated.

8.0 Reporting of Section 106 and CIL Receipts

- 8.1 To ensure transparency, both EDDC and parish councils must publish a CIL report on an annual basis. This must be done by 31st December after the financial year end.
- 8.2 To comply with this requirement, The Planning Obligations Annual Monitoring Report will be prepared at least annually outlining the financial and non-financial obligations in a given year; those secured, monies received, obligations complied with and also any monies spent in accordance with S106 agreements or CIL. This report will be presented to Members and available to the public.

9.0 Appendix 1- Glossary of Terms

Acronym	Term	Description
	Adoption	<p>The procedure by which a plan becomes formal council responsibility. The Neighbourhood Planning Regulations also call this stage 'made' for the purposes of your Neighbourhood Plans.</p> <p>This is also the term used when a Council takes responsibility (and usually ownership) of a piece of infrastructure e.g. a road or play area</p>
	Affordable Housing	As defined in the NPPF but, specifically, housing for local people within East Devon that cannot afford to buy or rent within the open housing market. Eligibility is determined with regards to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.
	Allocation /Allocated Site	A piece of land that has had a particular use earmarked to it via the Neighbourhood Plan or Local plan. This might be for housing employment or another purpose such as amenity use.
	Bond	A debt security which can be used by the Council in the event that the Developer fails to provide the infrastructure required by a planning obligation.
BCIS	Building Costs Information Service Index	Administered by the Royal Institute of Chartered Surveyors it provides an Index identifying the inflationary % increase in the costs of construction year on year.
CIL	Community Infrastructure Levy	A charge that allows local authorities to raise funds from developers undertaking new building projects in their area. The money collected can be used to help provide a wide range of infrastructure that is needed as a result of development.
	Commencement of Development	Means the commencement of the Development by the carrying out of any material operation (as defined in Section 56 of the 1990 Act) but for the purposes of legal Agreements only shall not include operations consisting of site clearance, demolition works, archaeological investigations, investigations for the purpose of assessing ground conditions, remedial works in respect of any contamination or other adverse ground conditions, erection of any temporary means of enclosure, the display of site notices or advertisements.
EDDC/LPA	The Council	For the purposes of the SPD the Council is East Devon District Council, who are also the Local Planning Authority. This is distinct from Devon County Council or the Town and Parish Councils of East Devon.
	Consultee	In the case of planning obligations, this is a person, body or group consulted by the Council to help determine Heads of Terms for planning

Acronym	Term	Description
		obligations, for example the Highway Authority or Environment Agency. In the case of a planning application, this is a person, body or group invited to comment.
	Developer	In the case of planning obligations and for the purpose of the SPD the Developer is the owner of a piece of land. Planning obligations that apply to a developer run with the land and apply to successive proprietors unless otherwise agreed
	Development	The carrying out of building, engineering mining or other operations in, on or over or under land, or the making of any material change in the use of any buildings or other land (Town and Country Planning Act, 1990, Section 55)
DV	District Valuer	Provides professional property and valuation advice for the public, private and third sector.
	Enforcement Action	The LPA may enforce a planning obligation by injunction or, where the developer is required to carry out works on the land and 21 days notice has been given, by entering the land, doing the works itself and recovering all reasonable expenses.
	Formal and Informal Open Space	Formal Open Space- sites which have a clearly defined boundary and which are gardened frequently. Usually accommodating higher than average visitor usage (e.g. sports pitches, church grounds, parks or gardens). Informal Open Space- usually areas for unsupervised outdoor children's play (e.g. open space within housing estates, equipped play areas, skateboard parks). This will include allotments.
Permitted Development/ PD	General (Permitted Development) Order	The Town and Country Planning General (Permitted Development) Order is a statutory document that allows minor kinds of development (such as small house extensions) to be undertaken without formal planning permission.
	Heads of Terms	The key issues identified during the initial assessment of a development proposal that will need to be addressed through planning obligations.
	Infrastructure	Publicly accessible assets, systems and networks including roads, electricity, sewers, water and education services.
	Local Plan	The name for a document (or collection of documents) prepared by the local planning authority for the use and development of land and for changes to the transport system. The adopted Local Plan forms part of the Statutory Development Plans for the area.

Acronym	Term	Description
	Material Consideration	Any issue that should be taken into account when deciding a planning application or an appeal against a planning decision. Planning policies will guide planning application decisions unless other material considerations associated with need, impact and local circumstance are considered to carry greater weight.
	Mitigate	In the case of planning obligations, actions to correct for the negative impacts and effects of a development.
	Neighbourhood Plan	A planning document created by a parish or town council or a neighbourhood forum, which sets out a vision for the neighbourhood area, and contains policies for the development and use of land in the area. Neighbourhood plans must be subjected to an independent examination to confirm that they meet legal requirements, and then to a local referendum. If approved by a majority vote of the local community, the neighbourhood plan will then form part of the statutory development plan.
NPPF	National Planning Policy Framework	Sets out the Government's planning policies for England and how these are expected to be applied through local planning policy and decision making.
	Overage	Overage (also called clawback or uplift) is a potential right to receive future payments in respect of land. In this case, it is applied when actual values exceed the estimated value used to calculate viability.
	Planning Condition	Guided by Circular 11/95, planning conditions impose restrictions on the grant of planning permission. Planning obligations should only be agreed where planning conditions are not sufficient.
	Planning Obligation	In the form of a legal agreement, planning obligations apply to an area of land and are secured to ensure that developers mitigate for the impacts of, and provide for the infrastructural requirements arising from, development.
	Policy	A concise statement of the principles that a particular kind of development proposal should satisfy in order to obtain planning permission.
RPI	Retail Price Index	The retail price index (in the UK) an index of the variation in the prices of retail goods and other items. Commonly used to measure inflation.
S106	Section 106	Planning obligation under Section 106 of the Town and Country Planning Act 1990, secured by a local planning authority through negotiations with a developer to offset the public cost of permitting a development proposal. Sometimes developers can self-impose obligations to pre-empt objections to planning permission being granted. They cover things like highway improvements or open space provision.

Acronym	Term	Description
SPD	Supplementary Planning Document	Guidance which amplifies and provides more detail on the policies contained within the Local Plan. SPDs are subject to public consultation and are a material consideration in determining planning applications.
	Town and Country Planning Act 1990	Currently the main planning legislation for England and Wales is consolidated in the Town and Country Planning Act 1990: this is regarded as the 'principal act.'
	Trigger	The point (in terms of time or the extent of development) at which a planning obligation should be completed.
UU	Unilateral Undertaking	A Unilateral Undertaking is a simplified version of a planning agreement, which is relatively quick and straightforward to complete, and is entered into by the landowner and any other party with a legal interest in the development site.
	Viability	This is when a development proves to be economically feasible and sustainable in terms of the financial resources invested into it.

Report to: **Strategic Planning Committee**

Date of Meeting: 21 November 2016

Public Document: Yes

Exemption: None

Review date for release None

Agenda item: 11

Subject: **Housing and Economic Land Availability Assessment (HELAA)**

Purpose of report: To ensure Members of Strategic Planning Committee are aware of the HELAA process and timescale and endorse the new HELAA methodology.

Recommendation: **Members are asked to endorse the new HELAA methodology**

Reason for recommendation: Members should be aware of the new requirement to consider housing and employment land availability alongside one another and the process that is being worked through to this end. In the past Strategic Housing Land Availability Assessment (SHLAA) methodologies were agreed by Development Management Committee and so it is now considered appropriate to secure endorsement of the new HELAA methodology.

Officer: Graeme Thompson, Planning Policy Officer,
gthompson@eastdevon.gov.uk, 01395 571736

Financial implications: No financial implications have been identified

Legal implications: As there is a requirement for the Council to now consider housing and employment land availability together as part of the HELAA it is important the Council understands and endorses the new methodology being proposed. Other legal implications are covered in the report.

Equalities impact: Low Impact

Risk: Low Risk

Local authorities are required to assess options for future housing and employment development and are encouraged to do so through a joint HELAA process. This methodology sets out that process for the Exeter Housing Market Area and there is little risk involved.

If Members chose not to endorse the methodology or suggest amendments to it then this could risk delaying the 'call for sites' and wider timescales for the Greater Exeter Strategic Plan (GESP).

Links to background information: • [HELAA Methodology](#)

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



1. What is HELAA and why is it required?

- 1.1 A Housing and Economic Land Availability Assessment (HELAA) is an assessment of land that is likely to be available and capable of development for new housing or employment within a certain timeframe. Members may be more familiar with the term SHLAA (Strategic Housing Land Availability Assessment). Essentially the HELAA replaces this piece of work by combining the assessment of available housing and employment land into a co-ordinated assessment. The HELAA has two purposes:
- a) It identifies suitable sites with potential for housing and/or employment, investigates their potential and assesses whether they are likely to be developed (i.e. assessing suitability, availability and achievability);
 - b) It assesses the five year supply of deliverable housing sites, a key requirement under national policy and also enables the local authority to set out a housing trajectory for the plan period.
- 1.2 The assessment of sites for new housing and employment through the HELAA process and the identification of potential sites in the HELAA report does not indicate that they will be allocated for new housing or employment within a Local Plan or be granted planning permission. The HELAA instead forms part of the evidence base to inform plan-making. Any sites deemed suitable, available and achievable by the HELAA process will still be subject to public consultation, sustainability appraisal and independent examination if they are taken forward through the Local Plan preparation process. However, the HELAA may be a material consideration in the determination of planning applications.
- 1.3 The National Planning Policy Framework (NPPF) requires LPAs to evidence how housing needs can be met through assessment of deliverable housing supply for years 1-5, and developable housing supply or broad locations for growth for years 6-10 and if possible 11-15 (paragraph 47). It also requires LPAs to set criteria for the identification of employment sites and plan positively for their location (paragraph 21). The National Planning Practice Guidance (NPPG) sets out that the best way to assess both of these is through a joint process called Housing and Economic Land Availability Assessment (HELAA) (see <http://planningguidance.communities.gov.uk/blog/guidance/housing-and-economic-land-availability-assessment/>).

2. Why now?

- 2.1 As Members are aware, the Council has recently started preparatory work on a Greater Exeter Strategic Plan (GESP) along with Exeter City Council, Teignbridge District Council, Mid Devon District Council and Devon County Council. The HELAA process will support early plan preparation for the GESP and ultimately housing and employment allocations in the GESP are likely to be drawn from those sites submitted to the HELAA call for sites.
- 2.2 In addition to this, despite the fact that the East Devon Local Plan has only recently been adopted, it is good practice to continue regularly updating the district's SHLAA (now HELAA) to keep abreast of options for development and help to evidence five year land supply (particularly the future windfalls figures). It ensures that the Council is aware of deliverable options for development if through plan review it is identified that additional supply is required to meet demand.

3. HELAA Methodology

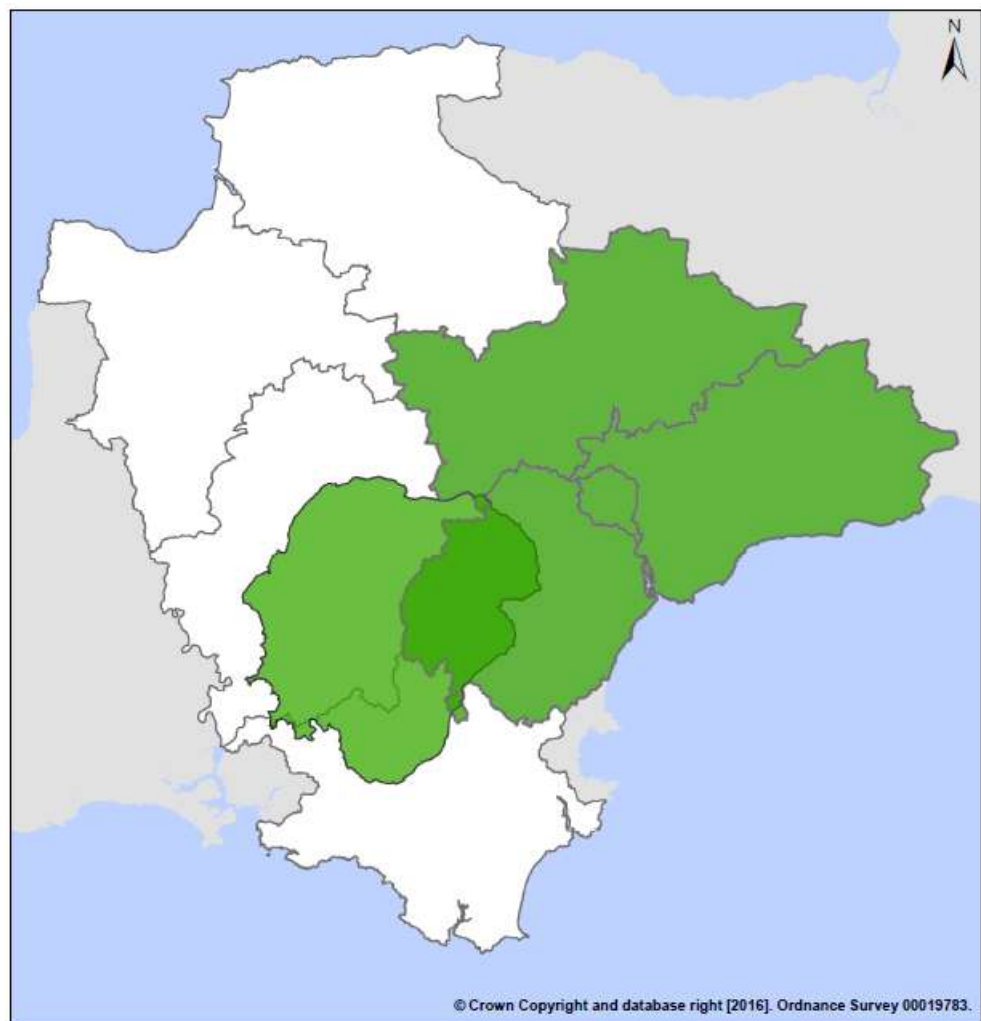
- 3.1 The local authorities making up the Exeter Housing Market Area (the GESP authorities plus Dartmoor National Park Authority) have worked to a shared SHLAA methodology since 2007. Therefore this is not new practice, and more than anything it simply updates that practice and the methodology behind it to account for the new requirement to consider housing and economic land alongside one another.

- 3.2 The methodology sets out the key steps for the HELAA:
- i. Call for sites
 - ii. Local authority assessment of 'suitability' and 'availability'
 - iii. HELAA Panel assessment of 'achievability'
 - iv. Additional steps – delivery rates and future windfall projections
 - v. HELAA report
 - vi. Review
- 3.3 The HELAA Panel plays an important role in this process and is comprised of key stakeholders with a recognised interest in the development of land for housing and employment. The panel has evolved from and expanded on the former SHLAA Panel to ensure economic development interests are represented. Membership of the panel is representative of the broad cross-section of the housing and economic development sectors, including housebuilders (volume and smaller scale schemes), social landlords, local property agents and other related professions, local community representatives and other agencies. Local community representatives may be elected members or representatives of local community or voluntary organisations. The panel operates in an advisory capacity, making use of their specialist knowledge. Local authorities will identify whether sites are 'available' and 'suitable', and the panel will then advise on 'achievability'. Panel members such as the Environment Agency and Natural England will also advise further on suitability of sites if required. The expertise and knowledge of panel members is important in helping the partner local authorities identify deliverable and developable sites which can contribute to the supply of housing and employment land. Panel members are not precluded from commenting on sites they have an interest in, however, they are required to declare an interest if they have a site under consideration and all panel members must sign and abide by the Panel Constitution and Terms of Reference.
- 3.4 An inception meeting of the HELAA Panel was held on 29th September 2016 at which the Methodology, Constitution and Terms of Reference were discussed and agreed subject to minor amendments which have now been made. As with previous iterations of the SHLAA methodologies, it is now being presented to Members for endorsement.

4. Timescale

- 4.1 For all of the GESP authorities it is intended to begin a joint "call for sites" in February 2017 alongside consultation on the initial Issues paper, Statement of Community Involvement and Sustainability Appraisal for the GESP work. Following this, officers will visit sites and assess their 'suitability' and 'availability' against the criteria set out in the methodology before the Panel starts meeting to assess the 'achievability' of sites presumably in around June/July 2017. The final HELAA report is likely to be produced in late summer/autumn 2017. Please note that Dartmoor National Park Authority are progressing a separate HELAA process as they are not involved in the GESP. Their 'call for sites' has already begun.

HELAA Methodology



Revised October 2016



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1.0 Introduction

- 1.1 Housing and Economic Land Availability Assessments (HELAA) are studies that form part of the evidence base for the preparation of Local Plans. They help identify potential sites that may be deliverable and developable for new housing and employment over a period that looks forward over the next 15 years (or the period of the Local Plan).
- 1.2 The local authorities within the Exeter housing market area (Teignbridge, Mid Devon, East Devon and Exeter, with the addition of Dartmoor) have worked together since 2007 to produce a methodology for undertaking the housing element of the HELAA (formally referred to as a Strategic Housing Land Availability Assessments (SHLAAs). This methodology is jointly published and was previously revised in 2013 and 2015. This 2016 version updates the document again, in order to reflect national changes in planning policy and guidance and incorporate the assessment of potential employment sites in addition to sites for housing.

2.0 About the Housing and Economic Land Availability Assessment (HELAA)

- 2.1 A Housing and Economic Land Availability Assessment (HELAA) is an assessment of land in a specific area that is likely to be available and capable of development for new housing or employment within a certain timeframe. The period covered by HELAA is typically 15 years (or the period of the Local Plan), beginning from the following April. The HELAA has two purposes, first, it identifies suitable sites with potential for housing and/or employment, investigates their potential and assesses whether they are likely to be developed (i.e. assessing suitability, availability and achievability). Second, the HELAA assesses the five year supply of deliverable housing sites, a key requirement under national policy and also enables the local authority to set out a housing trajectory for the plan period.
- 2.2 The assessment of sites for new housing through the HELAA process and the identification of potential housing and employment sites in the HELAA report does not indicate that the sites will be allocated for new housing within a Local Plan or be granted planning permission. The HELAA instead forms part of the evidence base to inform plan-making. Any sites deemed suitable, available and achievable by the HELAA process will still be subject to public consultation, sustainability appraisal and independent examination if they are taken forward through the Local Plan preparation process. However, the HELAA may be a material consideration in the determination of planning proposals.

3.0 National policy and guidance

- 3.1 The National Planning Policy Framework (NPPF) requires local planning authorities to significantly boost the supply of housing. The NPPF states in paragraph 47, that local authorities should:
 - *'use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as*

is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period;

- *identify and update annually a supply of specific deliverable¹ sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land. Where there has been a record of persistent under delivery of housing, local planning authorities should increase the buffer to 20% (moved forward from later in the plan period) to provide a realistic prospect of achieving the planned supply and to ensure choice and competition in the market for land;*
- *identify a supply of specific, developable² sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15;*
- *for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target.'*

3.2 In relation to the supply of employment land, the NPPF is clear that the government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Paragraph 21 states that local authorities should:

- *'set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;*
- *set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;*
- *support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances;*
- *plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;*
- *identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and*

¹ *To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans.*

² *To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.*

- *facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.*

Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.'

3.3 Preparation of a HELAA is one means by which local authorities achieve these objectives along with undertaking a Strategic Housing Market Assessment (SHMA) and Economic Development Needs Assessment (EDNA). Detailed guidance on how local planning authorities should undertake the assessment is set out in the government's *National Planning Practice Guidance: Housing and Economic Land Availability Assessment (NPPG)*. This joint methodology is to be read alongside the national guidance, and does not reiterate advice already provided.

3.4 To aid local implementation of HELAA, this methodology provides further detail on a number of matters including:

- Participation of key stakeholders in the process
- A minimum site size threshold
- A method for estimating the housing and employment potential for each identified potential site
- Two models for calculating site commencements and build out rates
- Details of information to be included in the HELAA report

4.0 The HELAA Panel

- 4.1 Integral to the preparation of HELAA is a 'panel' of key stakeholders who have a recognised interest in the development of land for housing and employment. Membership of the panel is representative of the broad cross-section of the housing and economic development sectors, including housebuilders (volume and smaller scale schemes), social landlords, local property agents and other related professions, local community representatives and other agencies. Local community representatives may be elected members or representatives of local community or voluntary organisations.
- 4.2 Many panel members will have knowledge across the whole HELAA area, and can advise all the local authorities within the partnership area. However, sometimes a different representative from the same organisation will attend instead of the named attendee, in order to provide more locally specific knowledge, depending on the location of sites being discussed at the meeting. It is envisaged that in the undertaking of joint planning work, such as the Greater Exeter Strategic Plan, joint panel meetings will be held, however individual local authorities including Dartmoor National Park may undertake their own panel meetings in order to progress local planning documents.
- 4.3 The panel operates in an advisory capacity, making use of their specialist knowledge. Local authorities will identify whether sites are 'available' and 'suitable', and the panel will then advise on 'achievability'. Panel members such as the Environment Agency and Natural England will also advise further on suitability of sites if required. The expertise and knowledge of panel members is important in helping the partner local authorities identify deliverable and developable sites which can contribute to the supply of housing and employment land. Panel members are not precluded from commenting on sites they have an interest in, however, they are required to declare an interest if they have a site under consideration. For further details on how the panel operates or to obtain a copy of its constitution and terms of reference please contact the named local authority planner for that partnership area (see section 11 for details).

5.0 Role of the Local Authorities – assessing 'suitability' and 'availability'

- 5.1 A wide variety of sources will be used to identify potential sites. A list of potential sources is set out in paragraphs 012, 037 and 038 of the *NPPG*. However, one of the principal methods for identifying such sites will be a public consultation exercise undertaken by the partner authorities. This may be undertaken jointly by one or more of the partner authorities, or individually. The 'call for sites' will be targeted at landowners, agents, developers and town and parish councils to identify sites that are not currently within the planning process. Potential infrastructure requirements and a consideration of viability and deliverability of the submission site must be clearly demonstrated through the call for sites process. Other known sites will be included, such as existing allocations, current/lapsed planning permissions, draft allocations etc. In addition, a press release will be made available to draw attention to the process. Partner authorities will set out in their HELAA Report which sites were identified

from which sources.

Minimum site size for inclusion

- 5.2 Whilst recognising that a significant amount of new development delivery, particularly for housing, takes place on small sites, the partner authorities recognise that surveying all sites (particularly where a large number are small) will be a resource-intensive process. In order to strike a balance between work that is feasible and the consideration of small sites through the HELAA, a minimum site size threshold will be set. This will be applied without exception by all partners. The threshold for housing is:
- 5 dwellings (gross) or 0.15 hectares.
- 5.3 Smaller sites of 1-4 dwellings will not be surveyed, but where planning permission has been granted these will be summarised and assumed to be available, suitable and achievable, and included in the HELAA Report's housing trajectory of potential housing delivery. This approach is in accordance with the NPPF.
- 5.4 The threshold for economic development is:
- 0.25 hectares (or 500m² of floor space).

Visiting sites

- 5.5 Ideally, all sites that meet the inclusion criteria should be visited. However, this may not be possible given the resources available, particularly if a significant number of sites are identified. Sites that have planning permission may not need a visit, if the necessary information can be obtained from planning and building control records.
- 5.6 Site surveys are to be undertaken by officers from the respective local authority. Panel members may also undertake site visits in order to provide detailed advice on the potential deliverability and developability of sites. A common pro forma to record site suitability will be used by all partner authorities. A copy can be obtained by contacting the relevant local authority HELAA contact (for details see section 11).

Estimating the development potential for each site

- 5.7 The whole area of a proposed site may not all be developable. This is because the area for development on larger sites may be reduced through the provision of access roads, strategic open space or landscaping. The development potential of individual sites may also be affected by constraints such as biodiversity conservation, protected trees or the presence of heritage assets.
- 5.8 The **gross** development area is taken to be the whole of the required site area for a development excluding any unsuitable land such as that identified as floodzone 2/3, that which is crossed by high voltage powerlines, or is of such steep topography as to be considered unusable unless it is integral to the site (ie surrounded by suitable development land within the site area). For example, if there is an area of land which is too steep for

development that is contained within the centre of a submitted site and the land surrounding it is considered to be suitable development land then it will be integral to the gross development area, however, if it is an area of such steep topography on the edge of the site then it will be excluded from the gross development area.

- 5.9 The **net** developable area is taken to be the site area which remains for the delivery of housing/employment uses including buildings for these uses, garages, gardens, driveways, amenity space, service/estate roads, parking areas, children’s play space, local centre amenities (shops) and incidental green space (Space Left Over After Planning – SLOAP), after subtracting other required land uses such as highways infrastructure, sports pitches, allotments, parks, Sustainable Urban Drainage Systems (SUDS), schools and other infrastructure requirements.
- 5.10 To reflect the realistic developable site area, indicative ‘gross to net ratios’ will be applied to all sites. Exceptions to this rule will only be acceptable where evidence justifies an alternative ratio (such as through testing against similar locations) or on advice from the HELAA panel. The ratios to be used are:

Housing

Site size	Gross to net ratio
Up to 0.4 hectare	100%
0.4 to 2 hectares	80%
2 hectares and above	60%

Employment

Development type/use	Example scheme	Gross to net ratio
Retail – larger format (A1): convenience	Large supermarket	40%
Retail – larger format (A1): comparison	Retail warehousing – edge of centre	25%
A1-A5: small retail	Convenience stores	50%
B1(a) Offices: town centre	Office building	60%
B1(a) Offices: out of town centre	Office building (business park / various)	40%
B1(a) Offices: rural	Farm diversification, rural business centres, ancillary to other rural area uses	40%

B1, B2, B8: Industrial/warehousing	Start-up / move-on unit	40%
B1, B2, B8: Industrial/warehousing	Larger industrial/ warehousing unit including offices – edge of centre	40%
C1 - Hotel	Hotel – various types – tourism-led (range dependent on market/type). 60 bed.	80%
C2 – Residential institution	Nursing home / care home	60%
Sui Generis/other		Decided case-by-case

5.11 In order to calculate the potential housing yield for each site, density assumptions will be applied to the net developable area. These assumptions should be applied unless a partner authority has set their own density standards to reflect local circumstances or specific site characteristics. Variations to the density assumptions will need to be justified by the respective partner authority. The recommended assumptions are:

Location	Density (dwellings per hectare, net)
City centre	101 and over
Town centre	51 to 100
planned urban extension	31 to 40
Suburban / rural settlement	20 to 30
New community	As yet undetermined – to be resolved through development plan policy

Each partner will make clear within the HELAA report where these locations apply in its area.

Assessing suitability for housing and economic development

5.12 A site is suitable for development if it offers a suitable location for development and would contribute to the creation of sustainable, mixed communities that are within or adjacent to existing settlements. A two stage approach is applied to determining whether potential sites are in suitable locations for housing and economic development. The following locations will be considered unsuitable and removed from the process under Stage A:

Stage A assessment criteria	
Locations considered to be unsuitable for housing and economic development	Justification
Site and potential scale of development does not accord with strategically appropriate locations through: <ul style="list-style-type: none"> • The Development Plan (e.g. saved policies, published, submitted or adopted Local Plan), or • National guidance on the sustainable location of development 	Development in locations unrelated to settlements defined through existing/emerging development plan policies may not contribute towards the creation of sustainable, mixed communities.
Where the majority of the site ³ impacts upon the following designated sites of biodiversity or geodiversity importance: <ul style="list-style-type: none"> • Site of Special Scientific Interest (SSSI) • Special Area of Conservation (SAC) • Ramsar site (wetlands of international importance) • Special Protection Area (SPA) 	National policy advises against development that would have an adverse impact on national and internationally important nature and geology conservation interests.
Flood zone 3	Comprises land within the functional floodplain or land at high probability of flooding.

5.13 Sites that have been deemed suitable under Stage A will then be considered against further criteria within Stage B. The site criteria take into account policy restrictions, physical problems or limitations, potential impacts, and the environmental conditions which would be experienced by prospective residents. While the local authorities will conduct the initial assessments of site suitability covering a range of specialist topics (such as highways, historic environment, minerals etc.), specialist advice sought from external organisations such as the Environment Agency and Natural England, may alter the local authority’s conclusions regarding environmental impacts.

³ Very large sites may include a portion of sites with Stage A constraints, and such cases the developable area or yield should be modified.

Stage B assessment criteria	
<p>Potential for impact on:</p> <ul style="list-style-type: none"> • Biodiversity, the historic, cultural and built environment • Landscape character • Mineral resources • Air quality • Water Source Protection Zones • Open space and recreation facilities • Employment land 	<p>Other considerations:</p> <ul style="list-style-type: none"> • Access to public transport, services and facilities • Highway access, pedestrian and cycle links • Land status • Constraints to delivery, including flood risk • Infrastructure capacity • Compatibility with existing and/or proposed surrounding uses, including Waste Consultation Zones.

5.14 Sites allocated in existing plans for housing or economic development or with planning permission for housing or economic development will be regarded as suitable unless there have been subsequent changes in circumstances which may affect this position. Where access to a site relies upon third party land that does not form part of another HELAA site with identified housing or economic potential, it will be regarded as undeliverable. A standard pro forma will be used by all partner authorities to assess suitability.

Assessing availability for housing and economic development

5.15 Sites brought forward during a call for sites, including those nominated by any landowner/agent/developer or the planning authority, need to be confirmed as available by the landowner/agent via a Site Proforma. Sites with planning permission subject to the completion of a S106 agreement will be assumed to be available unless the local authority has knowledge to the contrary or following advice of the panel. Further investigation may also identify legal or ownership problems, such as multiple ownerships, restrictive covenants, ransom strips, tenancies or operational requirements of landowners which could affect genuine availability.

6.0 Role of the HELAA panel – assessing ‘achievability’

6.1 It is primarily at this stage that the panel provide their input, this forming a significant element of the overall HELAA process. It is the role of the panel to advise on the ‘achievability’ of each site based on the information supplied by the local authority collated through the earlier stages of the process. The local authority partners should inform the panel whether there are known to be abnormal costs relating to infrastructure, and what requirements may exist for the provision of affordable housing, open space and other community facilities or biodiversity

considerations to make development acceptable in sustainability terms. The panel will advise whether a potential site can be determined achievable by there being a reasonable prospect that housing or economic development will be developed on the site at a particular time. The panel may also wish to adjust the housing yield for sites due to constraints or advise on the likely number of dwellings that can be accommodated.

- 6.2 Each partner authority may choose to supplement panel responses through the use of viability modelling, and/or advice from other sources where this may be relevant to help determine whether housing or employment development is an economically viable prospect for a particular site. Each authority may also examine the robustness of the findings through testing against alternative delivery scenarios.
- 6.3 The panel and local authorities will work together to consider ways to overcome constraints where they have been identified as preventing a site from being currently deliverable or developable. Due to the complexity of issues and variations across sites, it is likely this will have to be approached on a site by site basis and each partner authority must work with the consultees and other partners to consider the best course of action. Achieving a consistent approach will be important where possible.

7.0 Additional steps following the assessment of 'suitability, availability and achievability'

- 7.1 In addition to undertaking the processes outlined above to establish site suitability, availability and achievability, it is necessary to consider potential housing delivery rates and take account of potential windfall sites. This is required in order to produce a housing trajectory which will be included within the HELAA report. These further steps also feed into the calculation of the five year land supply necessary for planning purposes. The proposed approaches to these further elements of work are set out below.

Calculating delivery rates of housing sites

- 7.1 To support the role of the HELAA panel, and to subsequently enable calculation of the housing trajectory and five year housing supply, a model is used to set out the commencement and build out rate of sites. A 15 year period is used to set out the delivery period of all housing sites, which begins from the April of the year following the HELAA or HELAA review. The calculation is applied to those housing sites deemed suitable, available and achievable. Sites stipulated by the panel as unachievable are not included. The adopted approach gives regard to the capacity of the development industry to build, reflected through past rates of completion and the need for the industry to respond to increased future rates of delivery to meet likely future strategic planning provision requirements.
- 7.2 Two calculation models have been previously agreed by the joint local authorities and the HELAA panel members for the timescales within which sites are anticipated to be delivered. The 'standard model' was originally developed before the recession of 2008, whilst the 'market conditions model' reflects the current economic conditions. The market conditions model reduces the build out rate for all dwellings during periods where the panel and local

authority agree market conditions warrant. This approach recognises the difficulties arising for developers to secure finances for development of sites and to sell completed dwellings. Where there are known time constraints to delivery, the panel may choose to assume a later commencement. Similar adjustments can be taken to build out rates if the panel is aware of circumstances likely to affect the rate particular sites are constructed.

- 7.3 The standard and market conditions models, stipulating the commencement dates and build out rates for housing can be found in appendices 1 and 2 respectively. A worked example spreadsheet that applies the market condition model can be found in appendix 3.

Determining housing potential of windfall sites

- 7.4 Windfall sites are considered to be any site that is/has not been allocated in an adopted or emerging Local Plan / LDF / Neighbourhood Plan. Local authorities may make an allowance for windfall sites if there is compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Where such circumstances exist, and where there is a likely insufficient number of dwellings through the HELAA to meet development plan provision totals, a windfall allowance may be used.
- 7.5 In the past, partner authorities have applied slightly different approaches to calculating future windfall supply. However, a standardised approach has now been developed that will be used by the partner authorities for calculating the likely supply of windfall sites in future years. This approach is set out in full in Appendix 4.

Calculating delivery rates of employment sites

- 7.6 Unlike housing sites, a delivery model has not been developed to consider the rate at which employment sites could be built out. This will instead be considered on a case by case basis informed by discussions with the site proposer and advice provided by the HELAA panel. Anticipated delivery rates will be recorded within the HELAA report and used to develop an employment land delivery trajectory which will be important for planning policy monitoring purposes.

8.0 The HELAA Report

- 8.1 Each local authority will produce a report upon completion of the assessment which will form part of the planning policy evidence base. The reports may be produced jointly by one or more of the partner authorities, or individually depending on the nature of planning policy the findings are informing.
- 8.2 The report will include:
- A detailed assessment for each potential site, cross referenced to a map / plan showing the location and boundary of the site.
 - A spreadsheet listing all potential sites presenting the potential commencement of development and build out on an annual basis, grouped in five year tranches
 - An indicative housing trajectory showing potential delivery each year on sites deemed suitable, available and achievable
 - Whether a windfall allowance has been included
 - Details of residual valuation models used to supplement panel responses on achievability (if applicable)
- 8.3 Paragraph 47 of the NPPF requires local authorities to identify and update annually a supply of sites for five years worth of their housing requirements. Each partner authority will use the HELAA to review and update its calculation of the 5 year supply, which provides a 5 year look forward from April in the following year (i.e. years 1-5 of the HELAA delivery period). Each partner authority will include the calculation for the 5 year supply and the housing trajectory within their Annual Monitoring Reports.

9.0 Reviewing the assessment

- 9.1 The HELAA will need to be reviewed in whole, or in part, on a regular basis. Dependent on circumstances and resources available, this may take place annually or after another period specified in the partner authority's most recent HELAA report. A full HELAA review may require a new call for sites, whilst a part review will only require an updating of the HELAA report.
- 9.2 Both a full or part review of the assessment will provide an update on the availability and achievability of sites in the HELAA, including an evaluation of any changes in circumstances. The following information should be recorded:
- Whether sites have been completed or are under construction
 - Whether sites are the subject of planning applications or permissions
 - Progress which has been made on removing constraints to development and the achievability of sites
 - The identification of any new constraints

- Whether any previously unidentified sites have come forward that were not included in the HELAA but meet the minimum site size threshold (i.e. 5 dwellings / 0.15ha or 0.25 hectares (500m²) for employment land.)
- Summaries of small sites below the 5 dwellings / 0.15ha and 0.25ha/500m² threshold to provide important monitoring information on windfalls which can be used to inform revisions of HELAA.

9.3 It may be necessary to allocate new sites for housing in order to maintain a five year supply of specific deliverable sites. To keep the land supply up to date, and inform any reviews of strategic and/or local planning documents, a full HELAA review will need to be undertaken repeating the call for sites and a more comprehensive survey.

9.4 If the assessment or subsequent reviews highlight that insufficient sites have been identified to meet development plan targets, a ‘broad locations’ approach can be taken, which will locate general directions of growth for new development. If this approach is taken it will need to be justified in the HELAA report and any estimates of potential housing supply will need to have regard to the nature and scale of opportunities within the area identified and market conditions.

10.0 Documentation

10.1 Each partner authority will seek to use the same documentation format throughout the HELAA process to ensure consistency of approach. The following list sets out the common documents that are in use by all the partner authorities:

- Potential Development Site Pro Forma (New Sites)
- Potential Development Site Pro Forma (Availability Review)
- Site Suitability Appraisal Pro Forma
- Spreadsheet for presentation of potential sites
- HELAA Panel constitution and terms of reference

10.2 Copies of the documentation are available on request from the local authority HELAA contacts listed below.

11.0 Partner authority HELAA contacts

11.1 Should you require further information about any aspect of the joint HELAA methodology or associated work undertaken by the partner authorities, please contact the following:

Local authority	Name and role	Telephone number	Email address
Dartmoor National Park Authority	Dan Janota, Senior Forward Planner	01626 832093	djanota@dartmoor.gov.uk
Devon County Council	Christina Davey Senior Planning Officer	01392 382262	Christina.davey@devon.gov.uk

East Devon District Council	Graeme Thompson, Planning Policy Officer	01395 571736	GThompson@eastdevon.gov.uk
Exeter City Council	Katharine Smith, Principal Project Manager (Housing Delivery)	01392 265283	katharine.smith@exeter.gov.uk
Mid Devon District Council	Poie-Yee Li, Forward Planning Officer	01884 234 922	PLi@middevon.gov.uk
Teignbridge District Council	Tristan Peat, Principal Planning Officer – Planning Policy	01626 215710	tristan.peat@teignbridge.gov.uk

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Appendix 1: Standard model for calculating housing delivery rates

Size of site (no. of dwellings)	Commencement of sites			Build out rate
	Sites where dwellings are under construction	Sites where dwellings have planning permission	Suitable sites without planning permission	
1-15 dwellings (assumes one developer)	Commence in Year 1	Commence in Year 1	Commence in Year 3	1 st year - 25 dwellings maximum 2 nd year onward - 50 dwellings per year maximum
16-500 dwellings (assumes one developer)	Commence in Year 1	Commence in Year 2	Commence in Year 3	1 st year - 25 dwellings maximum 2 nd year onward - 50 dwellings per year maximum
501-1000 dwellings (assumes two developers)	Commence in Year 1	Commence in Year 3	Commence in Year 4	1 st year - 25 dwellings maximum 2 nd year onward - 100 dwellings per year maximum
1001+ dwellings (assumes three developers)	Commence in Year 1	Commence in Year 3	Commence in Year 4	1 st year - 25 dwellings maximum 2 nd year onward - 150 dwellings per year

NB. These figures provide a general guideline. Different commencement dates or build out rates may be chosen for selected sites by the HELAA panel if warranted due to site specific issues, or if landowners have identified sites as being available at a later date.

Appendix 2: Market conditions model for calculating housing delivery rates

Size of site (no. of dwellings)	Commencement of sites			Build out rate	
	Sites where dwellings are under construction	Sites where dwellings have planning permission	Suitable sites without planning permission	Years 1-5	Years 6+
1-15 dwellings (assumes one developer)	Commence in Year 1	Commence in Year 1	Commence in Year 3	1 st year - 12 dwellings maximum 2 nd year onward - 25 dwellings per year maximum	1 st year - 25 dwellings maximum 2 nd year onward - 50 dwellings per year maximum
16-500 dwellings (assumes one developer)	Commence in Year 1	Commence in Year 2	Commence in Year 3	1 st year - 12 dwellings maximum 2 nd year onward - 25 dwellings per year maximum	1 st year - 25 dwellings maximum 2 nd year onward - 50 dwellings per year maximum
501-1000 dwellings (assumes two developers)	Commence in Year 1	Commence in Year 3	Commence in Year 4	1 st year - 12 dwellings maximum 2 nd year onward - 50 dwellings per year maximum	1 st year - 25 dwellings maximum 2 nd year onward - 100 dwellings per year maximum
1001+ dwellings (assumes three developers)	Commence in Year 1	Commence in Year 3	Commence in Year 4	1 st year - 12 dwellings maximum 2 nd year onward - 75 dwellings per year	1 st year - 25 dwellings maximum 2 nd year onward - 150 dwellings per year

NB. These figures provide a general guideline. Different commencement dates or build out rates may be chosen for selected sites by the HELAA panel if warranted due to site specific issues, or if landowners have identified sites as being available at a later date.

Appendix 3: Worked example spreadsheet

Applying the market conditions model to calculate commencements and build out rates over the 15 year HELAA period.

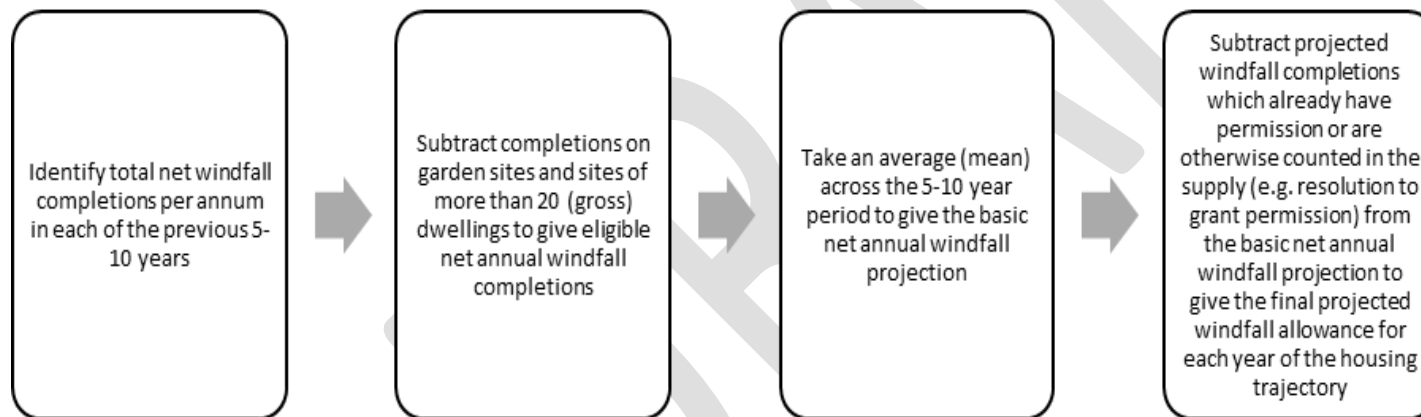
SHLAA site ref / planning application ref	Address	Net Site Area (ha)	Min Yield	Max Yield	Yield Mid Point	Suitable	Available	Achievable	2013/14	2014/15	2015/16	2016/17	2017/18	Yield Yrs 1-5	2018/19	2019/20	2020/21	2021/22	2022/23	Yield Yrs 6-10	2023/24	2024/25	2025/26	2026/27	2027/28	Yield Yrs 11-15	15 years +	Running total	Constraints to development or reasons for exclusion	Potential for constraints to be overcome	Comments
SHLAA/1	East Brook	65	1000	1500	1500	✓	✓	X						0						0						0	0	Infrastructure costs are high			
SHLAA/2	Lea Meadow	8.2	287	451	300	✓	✓	✓			12	25	25	62	50	50	50	50	38	238						0	300				
SHLAA/3	Long Barracks	6	210	330	200	✓	✓	✓						0	25	50	50	50	25	200						0	200	Concerns over infrastructure	Policies are flexible and allows for negotiation		
SHLAA/4	Court Acre	3.84	134	211	173	✓	✓	✓			12	25	25	62	50	50	11			111						0	173				
11/10001/FUL	Hilltop Close	0.32	11	18	14	✓	✓	✓	12	2				14						0						0	14			PP granted for 14d	
12/12001/FUL	Coombe Tracy	3	105	165	135	✓	✓	✓		12	25	25	25	87	48					48						0	135			PP granted for 135d	
12/12151/FUL	The Haywain	0.3	10	17	13	✓	✓	✓	12	1				13						0						0	13			PP granted 13d	
13/00012/FUL	Fearnly Drive	0.5	15	25	20	✓	✓	✓		12	8			20						0						0	20			PP granted for 20d	
11/01025/FUL	Gold Road	1.12	39	62	50	✓	✓	✓	12	25	13			50						0						0	50			Site under construction	
11/11217/FUL	Small Street	8.5	300	460	380	✓	✓	✓	12	25	25	25	25	112	50	50	50	18		168						0	280			Site under construction	
11/01088/FUL	Castle Avenue	0.72	25	40	32	✓	✓	✓	12	20				32						0						0	32			Site under construction	
12/15113/FUL	Phoenix Garage	0.24	8	13	11	✓	✓	✓	11					11						0						0	11			Site under construction	

Appendix 4: Determining housing potential of windfall sites

The approach assesses net windfall completions per annum over the previous 5-10 years depending on availability of data, takes an average (mean) over that timeframe to identify a basic net annual windfall projection going forwards, then subtracts windfall supply already in the system.

Windfall completions and projections are required to exclude “garden sites” as directed by the NPPF. However, this approach also recommends excluding windfall completions on sites of 20 or more gross dwellings. This reflects the fact that overall historical windfall completions are likely to have been uplifted by larger sites permitted prior to current Local Plan periods and/or not being able to demonstrate five year land supply which are perhaps less likely to be realised going forwards. This sets out a conservative approach to windfall projections that accords with the NPPF requirement.

Process:



Worked example:

Gross site size	Total net windfall dwelling completions		
	1-20	21+	TOTAL
2006/07	187	10	197
2007/08	135	17	152
2008/09	125	5	130
2009/10	130	2	132
2010/11	135	8	143
2011/12	156	5	161
2012/13	134	9	143
2013/14	181	12	193
2014/15	180	20	200
2015/16	178	18	196

Gross site size	Eligible net windfall dwelling completions (exc. 21+ gross sites and garden sites)		
	1-20	21+	TOTAL
2006/07	153	N/A	153
2007/08	123	N/A	123
2008/09	93	N/A	93
2009/10	113	N/A	113
2010/11	109	N/A	109
2011/12	125	N/A	125
2012/13	102	N/A	102
2013/14	137	N/A	137
2014/15	148	N/A	148
2015/16	153	N/A	153
Average (rounded)	126	N/A	126

Five year supply	Year				
	1	2	3	4	5
Total sites with permission	208	135	167	244	265
<i>Of which sites of 20 or less gross dwellings and not on garden sites</i>	194	121	28	2	0
Total sites with resolution to grant subject to S106	0	12	7	0	0
<i>Of which sites of 20 or less gross dwellings and not on garden sites</i>	0	12	3	0	0
Basic windfall projection (A)	126	126	126	126	126
<i>Total eligible net windfalls in the system (B)</i>	194	133	31	2	0
Adjusted windfall projection (A-B)	0	0	95	124	126

Appendix 5: Housing for older people

The NPPG states that “LPAs should count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement (para 039)”.

On this basis, the partner authorities will include all completed homes for elderly people, and developable or deliverable sites that are proposed or have planning permission for housing for older people, in their supply figures as follows:

TYPE OF ACCOMMODATION	COUNTED AS	JUSTIFICATION
<p>Extra care or sheltered home (a self-contained flat/house, usually forming part of a larger extra care development, with nursing care provided on-site; or a house on a sheltered housing development with a warden on-site)</p>	<p>1 extra care home / sheltered home = 1 dwelling</p>	<p>The DCLG’s ‘Definitions of General Housing Terms’ (14/11/12) states that “a dwelling is a self-contained unit of accommodation, where all rooms (including kitchen, bathroom and toilet) are behind one door which only one household can use” (https://www.gov.uk/definitions-of-general-housing-terms).</p>
<p>Nursing / residential care home (‘traditional’ residential institution, where residents have their own bedroom but all other facilities are shared)</p>	<p>2 bedrooms = 1 dwelling</p>	<p>Data obtained via a telephone survey by the partner authorities of 35 nursing and residential care homes from across the Exeter HMA in late 2014 highlighted that, on average, 95% of residents are permanent, with the remainder housed on a temporary “respite” basis.</p> <p>Responses to the telephone survey and</p>

		<p>supplementary information provided by Devon County Council suggest that just over half (52%) of nursing/care home residents previously lived alone.</p> <p>Applying 52% to the 95% of residents who are permanent gives a final figure of 50% of nursing/care home residents that, in moving to a home, have 'freed up' a dwelling. As a result, 2 bedrooms in a nursing/care home is assumed to equate to 1 dwelling.</p>
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