

# Agenda for Strategic Planning Committee

## Tuesday, 4 September 2018, 4.30pm



### [Members of the Strategic Planning Committee](#)

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

[View directions](#)

**Contact:** Tabitha Whitcombe, 01395 517542 (or group number 01395 517546): Issued 23 August 2018

East Devon District Council  
Knowle  
Sidmouth  
Devon  
EX10 8HL

DX 48705 Sidmouth

Tel: 01395 516551

Fax: 01395 517507

[www.eastdevon.gov.uk](http://www.eastdevon.gov.uk)

- 1 [Public speaking](#)
- 2 Minutes of the Strategic Planning Committee meeting held on 24 July 2018 (pages 3-8)
- 3 Apologies
- 4 Declarations of interest - Guidance is available online to Councillors and co-opted members on making [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 **Principles For Accommodating The Future Growth Needs Of East Devon** (Pages 9-26)  
This report outlines the government requirements for levels of future housing delivery in the district and the likely implications for jobs growth that will be needed. The report considers the constraints and issues across the district which will influence where growth can be accommodated and considers some principles that can be established to guide future decision making.
- 8 **Greater Exeter Strategic Plan – Update and Vision** (pages 27-43)  
This report provides an update on the progress of preparing the Greater Exeter Strategic Plan (GESP) and to recommend that a public consultation on a new vision for the plan, together with engagement on homes and infrastructure matters is held in October and November 2018.
- 9 **Publication of the new revised National Planning Policy Framework (July 2018)** (pages 44-58)  
This report provides summary information and commentary on the newly published (July 2018) revised National Planning Policy Framework.

10 **Statement of Community Involvement (SCI)** (pages 59-65)

This report outlines the outcome of consultation on the updated Statement of Community Involvement.

11 **Interim Masterplan to support planning applications at the Exeter Science Park and the adjacent Redhayes development to facilitate a potential land use exchange** (pages 66-70)

This report outlines the interim Masterplan which, with members endorsement, will be used to guide and inform two planning applications to ensure that, in the event of a land exchange, the new development coming forward is compatible and complementary to the Science Park and the adjacent mixed use development at Redhayes.

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[Decision making and equalities](#)

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## **EAST DEVON DISTRICT COUNCIL**

### **Minutes of a meeting of the Strategic Planning Committee held at Knowle, Sidmouth on 24 July 2018**

#### **Attendance list at end of document**

The meeting started at 2pm and ended at 3.27pm.

#### **\*8 Public speaking**

The Chairman welcomed everyone present to the meeting. There were no members of the public present who wished to address the Committee.

#### **\*9 Minutes**

The minutes of the Strategic Planning Committee meeting held on 26 June 2018 were confirmed and signed as a true record.

#### **\*10 Declarations of interest**

None

#### **\*11 Review of the East Devon Area of Special Control of Advertisements**

The report presented to the committee outlined the need for a review of the East Devon Area of Special Control of Advertisements and set out guiding principles and an action plan for the review.

In an Area of Special Control of Advertisements (ASCA) there are stricter controls than in other areas on the type, size and height of advertisements that may be displayed. ASCA are designated for their special scenic, historic, architectural or cultural features.

The ASCA was originally designated by Devon County Council in 1964 and was modified in 1986 and 2002. Significant changes have occurred since 2002 that could affect the ASCA including the continued growth of the towns, the development of Cranbrook and the designation of the Enterprise Zone. There is a legal requirement to review an ASCA at least every five years.

The review only needs to reflect changes since designation, since the reasons for the original designation will still be valid unless there have been significant changes in circumstance. In the interest of consistency, it would be sensible to consider excluding the main built up areas of the seven main towns from the ASCA. The main existing built up area of Cranbrook should be considered for exclusion in a similar way to the other main towns, but further thought will need to be given to the extent to which potential expansion areas could be excluded in this review.

Plans will be produced showing a revised ASCA boundary following the guiding principles set out in the briefing paper. These will be considered by this Committee prior to consultation. Following consultation, responses will be considered before the revised boundary is put forward for consideration by this Committee and Full Council. Confirmation of the revised ASCA would then need to go through set legal procedures that include submission of the proposals to the Secretary of State. It may then be necessary for the changes to be considered by an Inspector at an inquiry and further consultation may also be necessary.

Discussion covered:

- Clarification was sought as to whether there are alternatives to publishing an article in the London Gazette. In response, it was advised that this is a national legislative requirement.
- That the ASCA does not supersede the Area of Outstanding Natural Beauty regulations.
- Clarification was sought as to whether other County and District Councils uphold ASCAs. In response, it was advised that ASCAs are authority specific.
- Clarification was sought as to whether there are restrictions regarding telephone box advertisement. In response, it was advised that regulations couldn't stop localised parish notices from being placed in a telephone box. However, commercial advertisements in telephone boxes must adhere to stricter regulations.
- That the review of ASCAs should include ward members.
- Clarification was sought as to whether current advertisements that do not meet the requirement of the reviewed ASCA will be removed. In response, it was advised that the review will only alter the boundaries rather than the current specific advertisement regulations. Therefore, current advertisements will not be affected. Any advertisement coming forward will need to conform to the updated ASCA.
- Clarification was sought as to whether shop fronts are included in the review of the ASCA. In response, it was advised that there are current design guides for shop fronts; this is primarily in Exmouth which is undertaken by the Town Council. The ASCA only affects the advertisements themselves and not the shopfronts that they are fixed to.
- Clarification was sought as to whether the review of the ASCA would look at expanding the regulated areas within the built-up area boundaries. In response, it was advised that the report highlights the current situation and the discrepancies between built-up area boundaries, town centre boundaries and ASCA boundaries.
- Clarification was sought as to whether localised advertisements can be allowed in an ASCA. In response, it was advised that advertisements are permitted in an ASCA, however they must adhere to the restrictions.

**RESOLVED:**

1. that a review of the Area of Special Control of Advertisements be undertaken;
2. that revised plans are prepared to show any modifications to the Area of Special Control of Advertisements that are found to be necessary be agreed;
3. that any modifications to the ASCA prior to public consultation be considered by this Committee.

**\*12 Baxter's Farm, Musbury, Development Brief**

The report presented to the committee introduced the development brief, which will inform any development proposals for Baxter's Farm that may be put forward following its inclusion within the Built-Up Area Boundary for Musbury. Although the site is not allocated for development in the Villages Plan or the East Devon Local Plan (2013-2031), inclusion within the boundary raises the likelihood that development will come forward, particularly in view of the local support for redevelopment of the site for residential use. A need for smaller, more affordable houses and the possibility of a community orchard have been suggested as priorities for the village and this site presents an opportunity to deliver these aspirations.

The Development Brief constitutes a 'Supplementary Planning Document' (SPD) and will follow the production and adoption process for this type of guidance. Consultation will commence as soon as possible on the draft brief. Consultation will last 6 weeks and will be advertised on our website, by email to interested parties/statutory consultees and through a press release. The brief will then be revised and consulted on again in light of any comments received. Members will then have the opportunity to consider the final document and decide whether it should be adopted. Member's attention was drawn to a letter received from Devon County Council as owners of the site stating that they note the reference to the potential use of part of the site for a gypsy and traveller site. They state that they are exploring alternative sites in the locality where they believe provision would be more appropriate.

Discussion covered:

- Some members highlighted the need for affordable housing to be included in the development brief.
- Some members highlighted that if affordable housing cannot be included in this site then other sites should provide an allocation of affordable housing for Musbury.
- Concern that acquiring affordable homes through barn conversions is increasingly difficult.
- That the development should be in keeping with the surrounding area of Musbury.
- Concern that there would be no affordable housing for agricultural workers and first time buyers in Musbury. This would cause local people to move away and affect the future of the village. Members were advised that another development in Musbury that has a resolution to grant subject to a S106 agreement provides for the affordable housing need in the village.
- Clarification was sought as to whether additional requirements can be included in the development brief stating the need for affordable homes. In response, it was advised that this requirement can only be through guidance and not policy as their currently is not a planning policy to support this when a development is fewer than ten properties.
- That officer's craft a paragraph, to be included in the development brief, which reflects current housing demand and need in Musbury.

**RESOLVED:**

1. that delegated authority be given to officers to produce a paragraph, to be included in the Baxter's Farm Development Brief, in relation to securing an appropriate level of affordable housing taking into account current housing demand and need in Musbury;
2. that a six week consultation on the Baxter's Farm Development Brief be undertaken.

**\*13 Brownfield Land Register Review 2018**

The report presented to the committee outlined the East Devon Brownfield Land Register review to 31 March 2018, information on proposed changes to the National Planning Policy Framework in relation to Brownfield Land and proposed changes to the EDDC website to invite submissions of suitable Brownfield sites for the register.

Members will recall that Local Authorities are required to produce a Brownfield Land Register and consider issuing "Permission in Principle" for previously developed sites which are considered suitable for housing. The Brownfield Land Register is reviewed annually.

A review of the register has been completed to bring data up-to-date and correspond with other monitoring reports which are prepared on an annual basis to 31 March annually. The reviewed register contains details of 31 sites. No sites have been added since November 2017, however three sites have been taken off the register as housing is complete. These sites are Gerway Nurseries in Ottery St Mary, the ex-Carpentry shop in Seaton and the ex-British Legion site in Honiton. There are 31 sites remaining on the register. Of these sites, 25 have planning permission with the estimated capacity to build 783 dwellings. Of these, five sites are older 'stalled' sites with no clear evidence of housing completions beginning within 5 years.

The register is kept in two parts:

- Part 1 - includes all sites suitable for housing irrespective of planning status, but only sites with a realistic prospect of coming forward are included. The inclusion of sites on the register does not give them any formal status or permission in principle.
- Part 2 - includes sites, if any, that are granted permission in principle (PiP). This is a new status that Local Authorities can give to land and buildings that establishes in principle that a site would be suitable for new dwellings. It places responsibility (and by implication has cost impacts) on the Council for extra work and it was recommended in the last report that this Council does not for the time being grant PiP for sites. There are no entries in P2.

Discussion covered:

- That development on many of the sites included in the Brownfield Land Register are close to completion.
- Clarification was sought as to the definition of Brownfield Land. In response, it was advised that the definition of Brownfield Land is included in the National Planning Policy Framework. Agricultural land and buildings are not categorised as brownfield land.
- Clarification was sought as to whether there is a target for the number of brownfield sites on the register. In response, it was advised that the register is not target driven but simply to identify which sites are available and suitable and to encourage the use of brownfield sites regardless of how many there are.
- Clarification was sought as to the use of the Brownfield Land Register. It was advised that there are two parts to the register; part one is the register of identified sites and part two is to grant permission in principle which helps to bring sites forward.
- Clarification was sought as to whether brownfield sites outside of built-up area boundaries can be developed. In response, it was advised that sites included in the register have to be suitable and deliverable. If the site were outside of the built-up area boundary then it wouldn't be included in the register as it would not be suitable.
- That sites should include employment and leisure space as part of a balanced development.
- That towns with a Neighbourhood Plan should view brownfield sites holistically as part of their Neighbourhood Plan.

**RESOLVED:**

1. that the invitation of submissions of suitable sites for Part 1 of the Brownfield Land Register be undertaken.

2. That the Brownfield Land Register Review 2018 report, which includes a review of the register to 31 March 2018 and implications of proposed changes to the NPPF currently under review, be noted.

**\*14 Community Infrastructure Levy Working Party minutes**

The Committee was asked to consider the recommendations of the Community Infrastructure Levy Working Party meeting held on 29 June 2018.

The Chairman of the Working Party, Councillor Mike Howe, briefly outlined their recommendations.

The recommendations of the Working Party were:

1. Defer the bidding process for spending CIL until 2019 at the earliest;
2. To focus CIL spending on infrastructure projects identified in the Infrastructure Delivery Plan (IDP) that are:
  - a. Known to be required to deliver development, and;
  - b. Identified as meeting the highest priority status;
3. The CIL Member Working Party to meet again in September to consider the key infrastructure projects from the IDP to be prioritised.
4. That no further CIL spend is undertaken until the identified projects have been delivered.

Points raised during the discussion included:

- Clarification was sought as to whether a memo would be sent round to members and Town and Parish Clerks regarding the Community Infrastructure Levy (CIL) and Section 106 agreements. In response, it was advised that the current system for CIL and Section 106 agreements is undergoing an update which will speed up the processing of information. However, this will not be completed for another three to four weeks. An e-mail will be sent to all members and clerks outlining this.
- Clarification was sought as to why the bids from last year did not secure any CIL funding. In response, it was advised that the bids received lacked sufficient supporting evidence to meet the set criteria for awarding funds.
- Specifically highlighted that CIL spending on infrastructure projects identified in the Infrastructure Delivery Plan (IDP) must be known to be required to deliver development **and** identified as meeting the highest priority status.

**RESOLVED:**

1. Defer the bidding process for spending CIL until 2019 at the earliest;
2. To focus CIL spending on infrastructure projects identified in the Infrastructure Delivery Plan (IDP) that are:
  - a. Known to be required to deliver development, and;
  - b. Identified as meeting the highest priority status;
3. The CIL Member Working Party to meet again in September to consider the key infrastructure projects from the IDP to be prioritised.
4. That no further CIL spend is undertaken until the identified projects have been delivered.

**Attendance list**

**Committee Members:**

Councillors:

Paul Diviani - Chairman

Mike Allen – Vice Chairman  
Susie Bond  
Colin Brown  
Jill Elson  
Graham Godbeer  
Mike Howe  
Geoff Jung  
Rob Longhurst  
Geoff Pook  
Philip Skinner

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

Councillors:  
Alan Dent  
Peter Faithfull  
Tom Wright

**Officers present (present for all or part of the meeting):**

Mark Williams, Chief Executive  
Henry Gordon-Lennox, Strategic Lead – Governance and Licensing  
Ed Freeman, Service Lead – Planning Strategy and Development Management  
Claire Rodway, Senior Planning Policy Officer  
Jacqui Best – Planning Policy Officer  
James Coles – Technical Support and Monitoring Officer  
Tabitha Whitcombe, Democratic Services Officer

**Apologies:**

Councillors  
Ian Hall  
Eleanor Rylance  
Brenda Taylor  
Ian Thomas  
Mark Williamson

Chairman ..... Date.....



**Report to:** **Strategic Planning Committee**

**Date of Meeting:** Tuesday 4 September 2018

**Public Document:** Yes

**Exemption:** None

**Review date for release** None

**Agenda item:** 7

**Subject:** **Principles For Accommodating The Future Growth Needs Of East Devon**

**Purpose of report:** This report is intended to detail the government requirements for levels of future housing delivery in the district and the likely implications for jobs growth that will be needed. The report then considers the constraints and issues across the district which will influence where growth can be accommodated and considers some principles that can be established to guide future decision making on where the growth needs of the district should be accommodated and how this should be done.

**Recommendation:** **That Members:**

- 1. Consider the issues raised in the report**
- 2. Endorse the proposed principles for growth as the basis for future discussion and consultation on accommodating growth in the district.**

**Reason for recommendation:** Reasons are contained within the report.

**Officer:** Ed Freeman, Service Lead – Strategic Planning and Development Management

**Financial implications:** In facilitating and encouraging housing and business growth in the district the council has benefitted financially both through the growth itself in council tax receipts as well as through government incentive schemes such as New Homes Bonus (£4.6m in 2017, £4.2m in 2018) and business rates retention above our baseline (£2.4bn in 2017). New development in 2017 also contributed £3.2mn in income through the community infrastructure levy and continued growth is required to finance the councils Habitat Mitigation Strategy as well as other local infrastructure investment. The continued growth of the district and the future incentives form a vital element in the mitigation of the future financial pressures anticipated from 2020/21 as detailed in the financial plan.

Additionally, as a council with a housing revenue account it is also important that growth plans with regards to the numbers of affordable houses consider the increasing pressures that right to buy sales versus



replenishing stock through acquisitions in a high value district are having on managing the HRA.

**Legal implications:** The report refers to a baseline of 844 homes per year to be accommodated and while this may fluctuate to a degree due to the way it is calculated, it is unlikely to vary significantly. This figure reflects only the growth required of East Devon and does not account for any additional need that the Council may agree to accommodate arising from discussions with neighbouring authorities established under the duty to co-operate (for example from Exeter to the West or Lyme Regis to the East) which may lead to an increase in the overall number required. Even though the detail of the report is at a high level, and while it is acknowledged that it does not seek to prejudge the process going forward, it is clear that constraints within the district do lead to some principles being established – such as the large proportion of the growth being to the West end of the district. In light of the principles enshrined within the NPPF and our adopted local plan in terms of growth (both housing and employment) Members will no doubt appreciate that there is a very clear need to look proactively and positively at seeking to accommodate future growth within the district in pure planning policy terms. Notwithstanding the planning policy approach to growth, there will also be wider financial benefits to the district and the Council from accommodating future growth and this will be relevant for Members to have in their minds as consideration of this issue goes forward.

**Equalities impact:** Low Impact

**Risk:** Low Risk

**Links to background information:** N/A

**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. Purpose**

1.1 The purpose of this report is to consider the future growth needs of East Devon and how they could be accommodated. The report has been informed by work undertaken for the now adopted Local Plan and some early work on the Greater Exeter Strategic Plan (GESP). It is not however intended to pre-judge the detailed assessment and evidence gathering that is being undertaken to support GESP and a future Local Plan Review but simply to start the debate based on what is already known.

1.2 The report has been written to specifically focus on the growth needs of East Devon alone so that Members can understand the levels of growth that the government will be requiring and the issues and options associated with accommodating this level of growth. The intention is to debate

these issues in isolation of considering the growth of the wider Greater Exeter area (Exeter, East Devon, Teignbridge and Mid Devon Council areas) to understand as a baseline what is to be accommodated and the implications of this. It is hoped that the debate will help to inform work on the GESP as well as work on the Local Plan Review.

## **2. Background**

2.1 In November 2017 the government consulted on a white paper called “Planning for the right homes in the right places: consultation proposals”. One of the key proposals in the paper was a standard method for calculating local authorities housing need. This was as a response to concerns that the existing approach to assessing housing need was too complex with the NPPF requiring each authority to define a housing market area and identify the objectively assessed housing need for the area and then break that down by market and affordable housing needs. This approach has led to a lot of time and money being spent by local authorities on consultants to come up with a housing need figure often using different, inconsistent and complex methodologies. This then leads to disagreements with developers and communities who struggle to understand how the figures were calculated and then time at local plan examinations investigating these concerns.

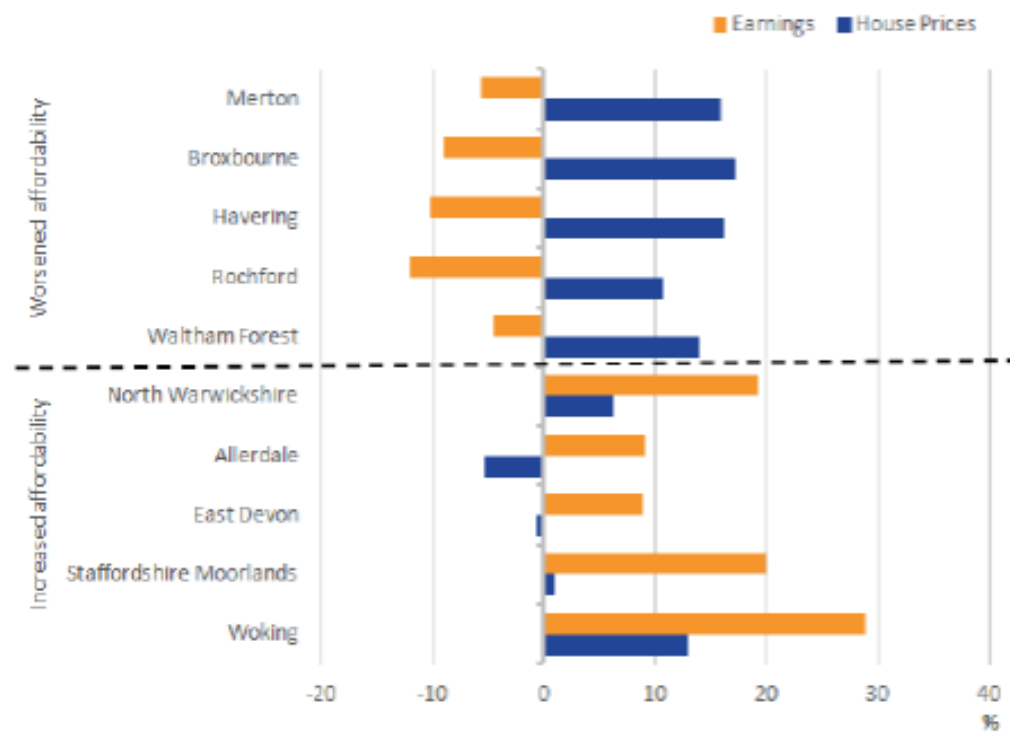
2.2 The government therefore proposed a standard method that is simple, based on publically available data and realistic in reflecting the actual needs for each area. The calculator therefore uses a baseline of projections of household growth in the area using published demographic data. It then adjusts this according to the affordability of new homes in the area using the ratio of median house prices to median earnings. The intention of this apparently being to increase supply in areas where housing is less affordable.

2.3 The need for consistency and clarity over housing needs calculations is clear when looked at on a national scale as some authorities have been better at meeting the needs of their growing population and addressing the growing ratio between house prices and earnings than others. The maps on the next page show planned housing growth compared to annual population growth across the country and housing affordability ratios nationally. The first map indicates that in much of the country housing growth has not or has only just kept pace with population growth. East Devon is one of the few places in the south west where housing delivery has exceeded population growth by more than 0.5%. There is quite a clear correlation between the two maps indicating that in those areas where housing growth has not kept pace with population growth affordability is a significant issue.

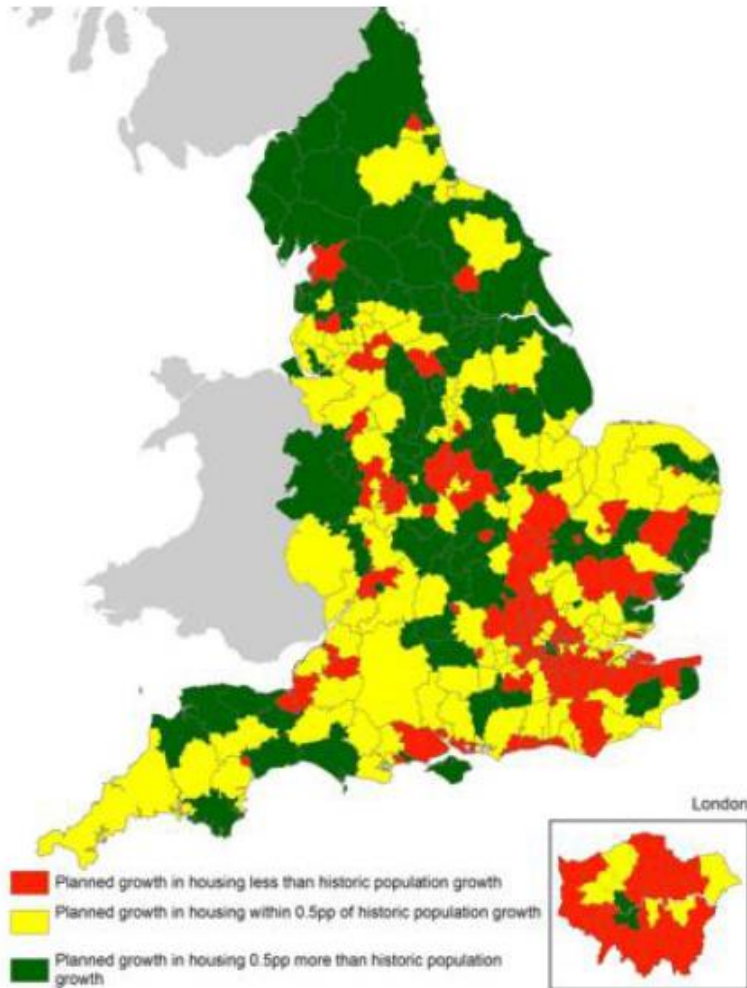
2.4 In East Devon as a result of maintaining a high rate of housing delivery combined with a strategy that promotes economic growth the affordability ratio has improved such that East Devon is one of the 5 local authorities to see the biggest increase in affordability of housing according to government figures for 2015-16. See graph below:

**Figure 6: Percentage change in median house prices and earnings in the 5 local authorities with the largest increase and decrease in affordability ratio**

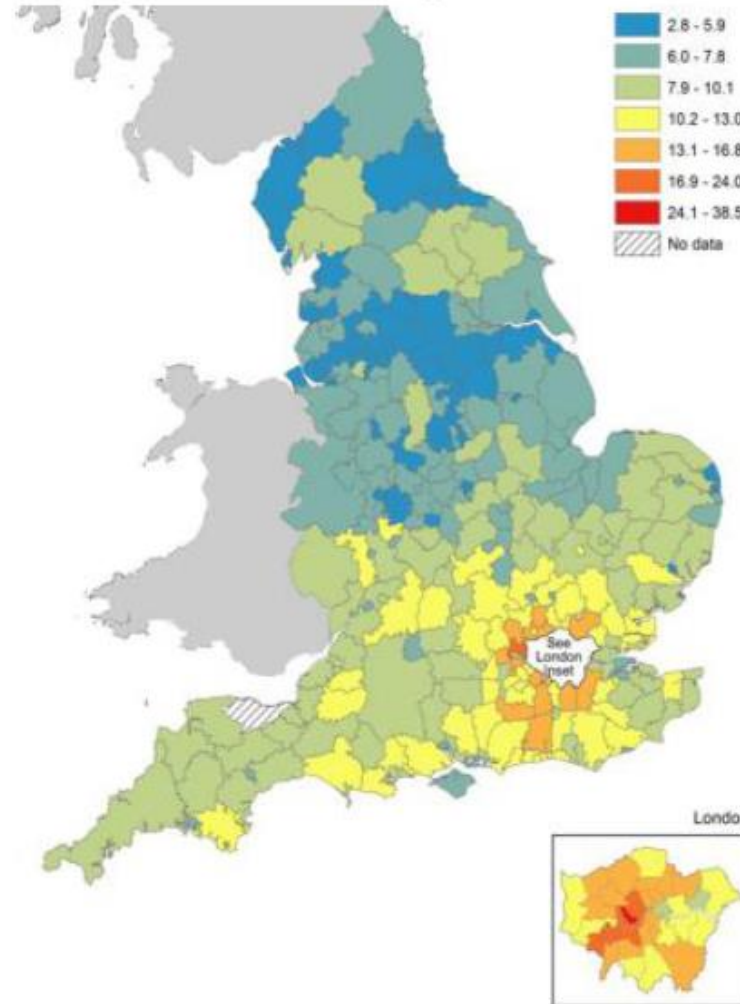
England and Wales, 2015 to 2016



Planned housing growth compared to historic annual population growth (2010 to 2015)



Ratio of average house price to average earnings



Source: Ministry of Housing, Communities and Local Government

2.3 Alongside the consultation the government published a table of housing needs for each district based on the calculator. In the case of East Devon this shows a housing need of 844 homes per year. The national calculator does not take account of variations that may be appropriate to take account of factors such as significant jobs growth in a locality as was the case with the now adopted Local Plan. It also does not take account the ability of each authority to accommodate the stated levels of growth which can lead to discussions about neighbouring authorities accommodating each other's growth under the duty to co-operate. Local level adjustments are still appropriate in such circumstances and further work is needed to determine if a local level adjustment will be needed again. It is therefore important to consider the 844 as an indicator of a minimum level of growth that will need to be accommodated as it is by no means a definitive figure.

2.4 In November 2017 Strategic Planning Committee agreed a response to the consultation which welcomed the principle of the national methodology and the transparency that this enables but questioned some of the thinking behind the methodology. In March 2018 the government published a response to the consultation responses received which indicates that the methodology as consulted upon will be incorporated into a revised NPPF and associated guidance in the near future. It is therefore appropriate to take 844 homes per year as the minimum number of new homes that the government will be requiring us to deliver in East Devon in future. This figure may however change over time as the factors that affect the calculation change. There is also scope to propose higher levels of growth due to other policy objectives such as bringing about a change in the local economy or in support of a growth deal with government that would bring in investment in infrastructure. In theory it could be argued that growth levels should be reduced due to factors such as environmental constraints, however it is considered unlikely that government would accept such arguments given the capacity of the less constrained parts of the district as discussed later in this report.

2.5 Clearly if we are to deliver at least 844 homes per year and also achieve Members aspiration to deliver one job per home we will also need to deliver enough employment space to accommodate at least 844 jobs per year. In the Local Plan it was estimated that based on this ratio for each 250 new homes we would need to deliver around 1 hectare of employment land, however jobs are increasingly less reliant on traditional employment spaces such as workshops, warehouses and offices and with a trend for working from home, work hubs and other premises it is likely that this figure will reduce. It should however be noted that when this report refers to growth it is a reference to both housing and employment growth as well as community and other facilities that would be needed to support housing and jobs growth.

### **3. How could this level of growth be accommodated sustainably?**

3.1 The starting point to answering this question is to consider the factors that would make a strategy for growth sustainable. Sustainability remains the golden thread running through the NPPF and so achieving sustainable growth will be key to presenting a sound strategy. For this it is worth referring to the sustainability appraisal (SA) that was carried out at each stage of the development of the now adopted Local Plan. This is because the themes that were considered as part of the SA remain a good bench mark to consider the factors that will be important for planning growth into the future. The themes used were as follows with the key issues in each area listed beneath:

- Healthy and Prosperous Communities
  - Housing

- Social Inclusiveness
- Population and Health
- Settlement 'Liveability'
  
- Environmental Protection and Enhancement
  - Built Heritage and Landscape
  - Biodiversity
  - Air, Soil and Water Quality
  - Transport
  
- Resource Consumption and Climate Change
  - Energy Consumption
  - Waste
  - Climate Change
  
- Economic Growth, Education and Employment
  - Economic Growth

3.2 Delivering good outcomes against each of these themes and key issues will be vital to a successful strategy for accommodating future growth in the district. It is therefore logical to consider these themes when considering principles for future growth in the district. In doing so key changes in the new NPPF 2018 have been considered as well as these may require a change in approach in some areas. The following section will look at each of these themes in turn and consider the issues under each and how they could inform how and where future growth should be accommodated. At the end of each theme a series of principles for addressing the identified issues are proposed to guide future work and plan preparation.

## **4. Healthy and Prosperous Communities**

### **4.1 Key Issues**

- House prices in the district are high with the average price currently standing at £297,675 according to Zoopla and prices continue to rise. According to the Office of National Statistics the average weekly wage for those living in the district in 2015 was £394.40. The ratio between average earnings and average house prices is in the region of 11.42 making addressing this disparity a clear principle for future growth.
- The district has an ageing population with an average age of over 50 and over 29% over 65. The population also has increasing mobility issues and so there is a significant and growing need for adapted and adaptable homes to meet the needs of the population.
- The range of housing being delivered in the district is limited and supply is dominated by a small number of major house builders delivering family homes. There is therefore a need to encourage a wider range of house building including self and custom build, off-site manufactured homes, homes for different groups and needs etc. The new NPPF requires 10% of housing need to be met on small sites of less than 1 ha to encourage small and medium sized builders which would also assist in addressing this issue.
- Smaller towns and villages are losing services and facilities due to austerity measures and economic change and residents are becoming increasingly dependent on travelling to larger service centres and are often doing this by car due to poor access to public transport, convenience etc.

## 4.2 Principles for growth

- Deliver housing to meet the needs of all parts of the community including affordable housing, adaptable homes, self and custom build homes and accommodate new forms of construction.
- Promote self-contained communities where jobs, services and facilities are within easy reach of homes using sustainable means of transport.
- Encourage more small housing sites and diversification of agents delivering housing in the district to broaden the range of housing being delivered and support supply.
- Ensure that sites are genuinely viable and deliverable at allocation stage.

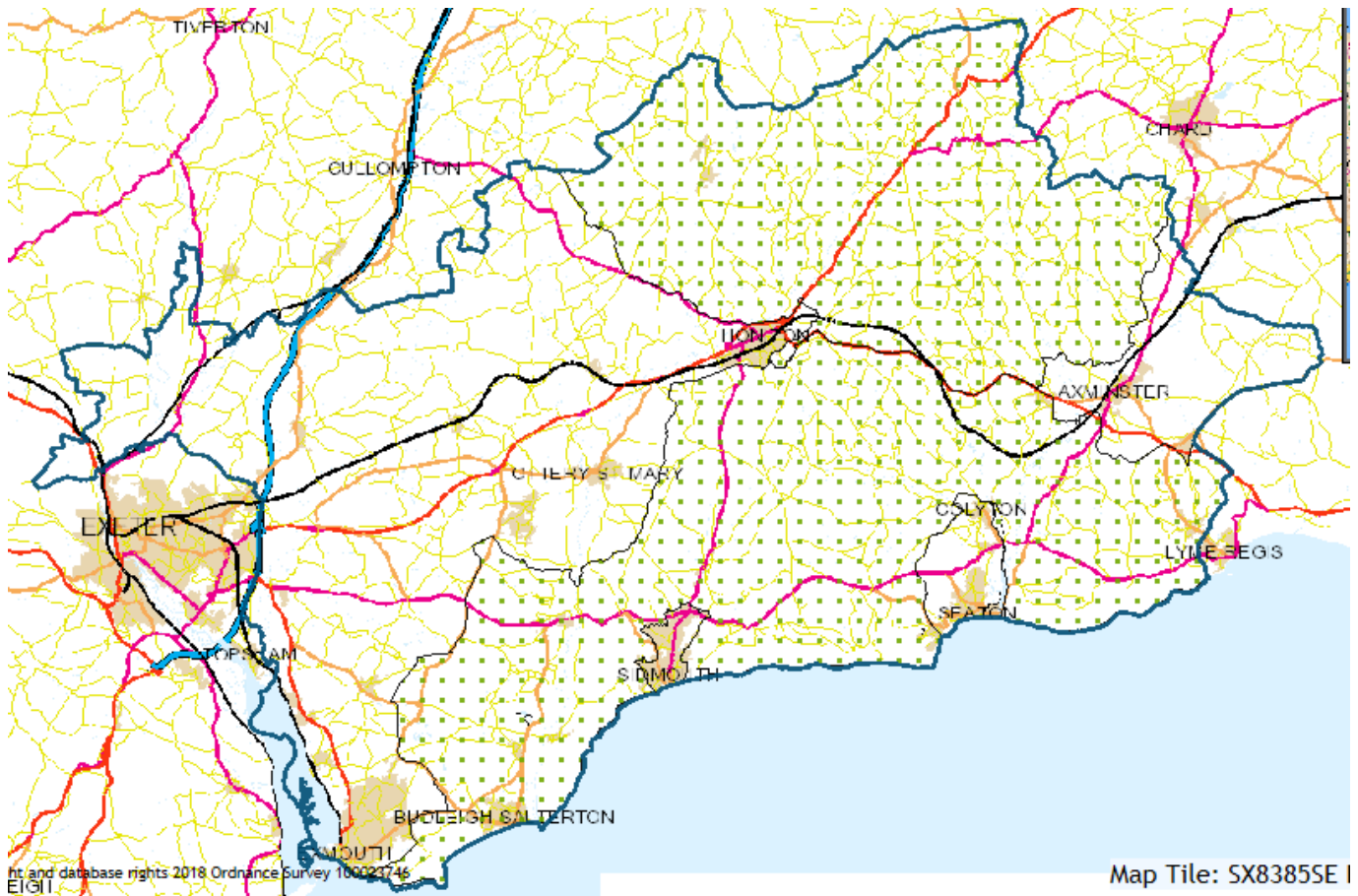
## **5. Environmental Protection and Enhancement**

### 5.1 Key Issues

- Areas of Outstanding Natural Beauty – Members will appreciate that two thirds of the district falls within either the Blackdown Hills or East Devon AONB. These areas alongside the national parks enjoy the highest level of landscape protection and are national assets. As custodians of these areas it is considered inappropriate to put significant growth in these areas although some authorities are doing this due to a lack of alternatives. That is not to say that there should be a moratorium on growth in the AONB's. Any growth in AONB's under our own policies and government policies must conserve or enhance the landscape character of the area and major development should only be accommodated where it cannot be accommodated elsewhere.

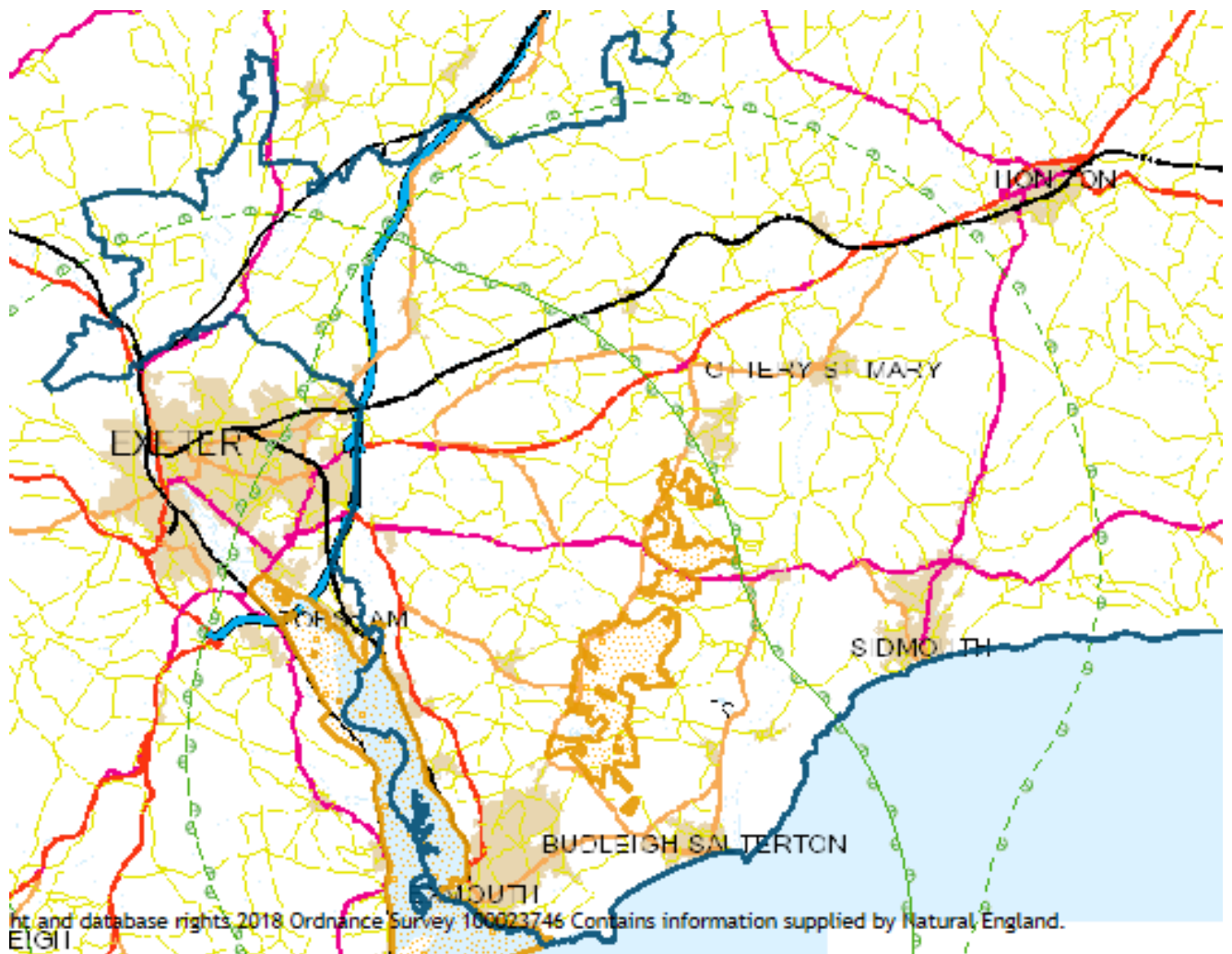
*The map below shows the extent of the two AONB's:*



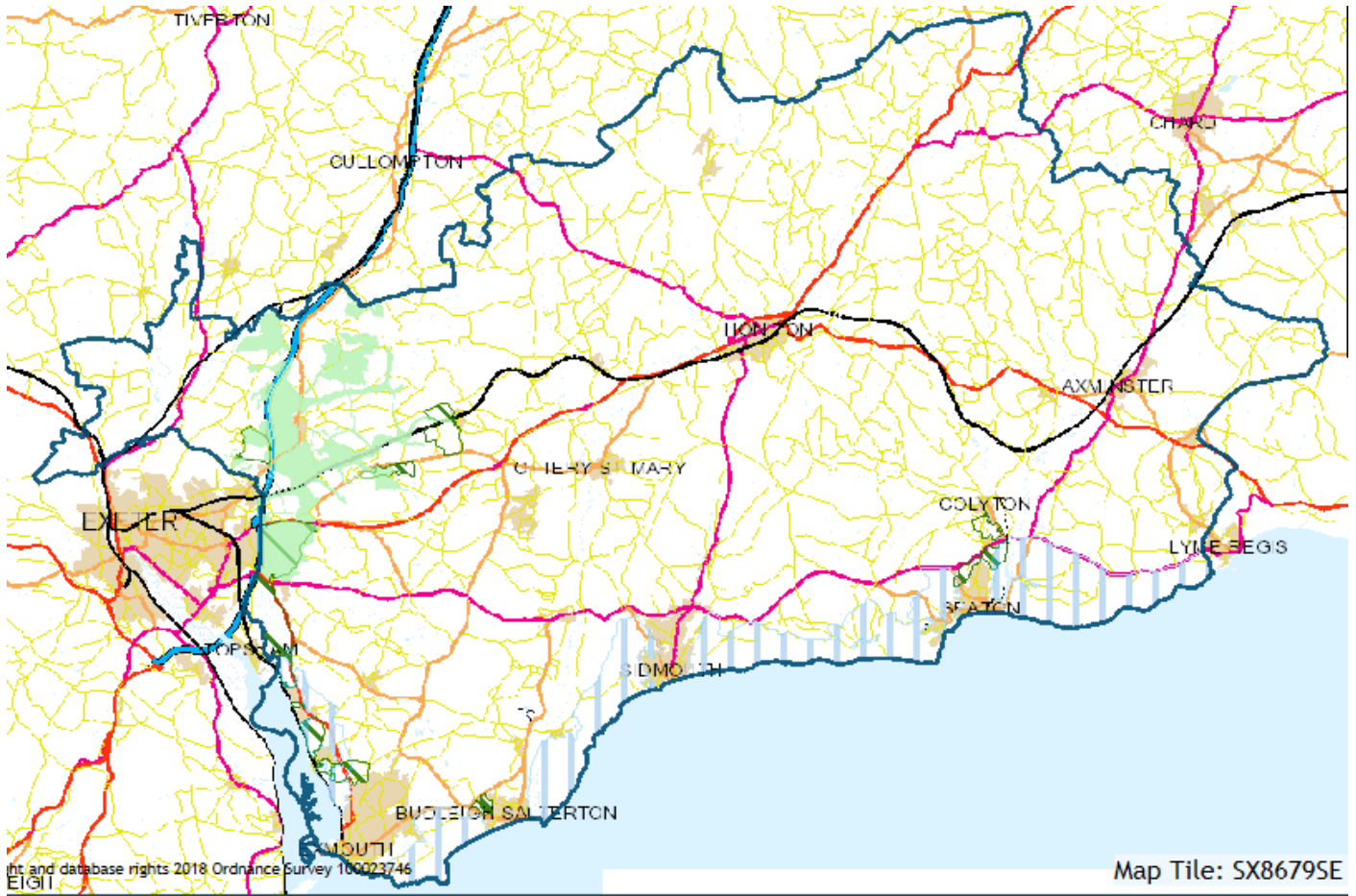


- Protected Habitats – The Exe Estuary and Pebbledbed Heaths are both European protected habitats. In the case of the Pebbledbed Heaths there is essentially a moratorium on residential development within 400m of the heaths due to bird predation from domestic cats. In the case of both sites a habitat mitigation zone has been established within 10km within which mitigation will have to be provided for any residential development or tourist accommodation. This is not an absolute constraint on development but it does mean that proposals would have to provide Suitable Alternative Natural Green Space (SANGS) and a portion of CIL would have to be used to pay for the infrastructure costs of on-site mitigation and a separate contribution for the non-infrastructure costs of mitigation. These factors increase the land required for accommodating growth in these areas as well as the costs.

*The map below shows the extent of the two protected habitats and the habitat mitigations zones with the habitats shown speckled and the mitigation zones by dotted lines.*



- Topography – The ground levels and steepness of slopes in the district is another significant barrier to where growth could be accommodated. While there is often an engineering solution to these issues the costs associated with these would often mean that development would not be viable and either would not proceed or could only proceed where a significant reduction in affordable housing were accepted. In any event the engineering works themselves can often be harmful to the landscape and character of an area.
- Coastal Preservation Areas – These areas are protected in order to retain its openness and views to and from the sea. Clearly the Jurassic coast world heritage site also falls within the coastal preservation area but is not land that could be developed in any event.
- Green Infrastructure – It is important that we retain and provide green infrastructure such as the Clyst Valley Regional Park which is an important recreational resource for our communities fulfilling a leisure resource as well as providing important routes that can enable commuting by foot or cycle.
- Green wedges – Although not allocated for their landscape importance they are currently identified as areas that require some protection to prevent settlement coalescence and protect the identity of the adjoining settlements. The green wedges would benefit from a review but the principle of avoiding settlement coalescence is considered important.



*Plan above shows the coastal preservation areas (blue hatch), the Clyst Valley Regional Park (green block) and the green wedges (green outline).*

## 5.2 Principles for growth

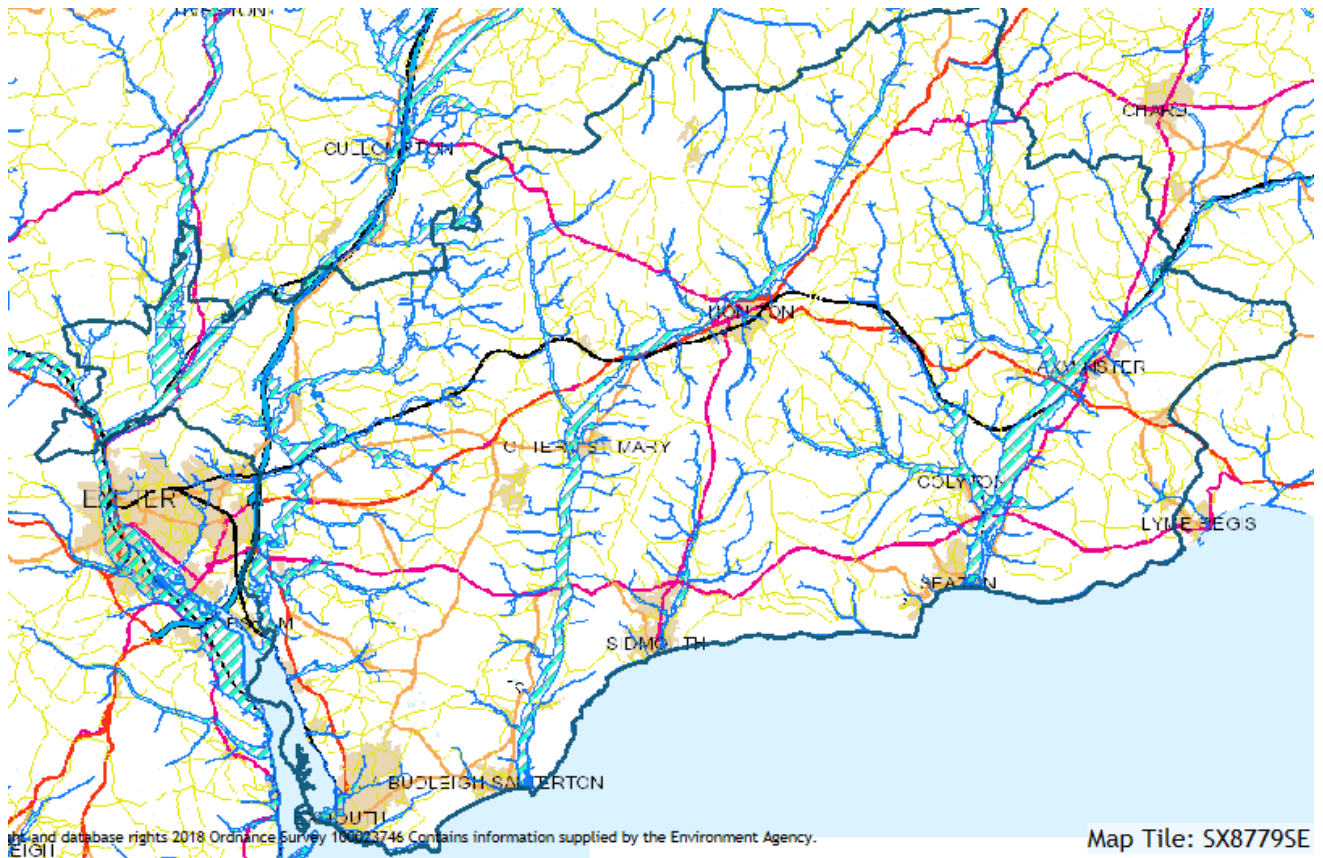
- Limit growth within the AONB's to only that required to meet local needs that cannot be met elsewhere.
- Ensure that growth in the habitat mitigation zones provides appropriate mitigation in the form of SANGS on site and a contribution towards mitigation works on the protected sites.
- Focus growth on sites where abnormal costs associated with topography are kept to a minimum to ensure that development is viable.
- Avoid growth in coastal preservation areas where this would harm openness and public views of the sea.
- Avoid accommodating growth in green wedges where this would undermine their purpose.
- Ensure new developments provide high quality green infrastructure and protect existing and proposed areas of GI.

## 6. Resource Consumption and Climate Change

### 6.1 Key Issues

- Flood zones – Clearly we should not be planning for new homes in areas at high risk of flooding and so areas within flood zones 2 and 3 should be excluded from any search for locations to accommodate growth.

*The map below shows the extent of flood zones 2 and 3 in the district:*



- Waste and recycling – There is a need for growth to minimise waste both during the construction phase and once occupied for development to encourage recycling.
- Carbon reduction – The country is committed to reducing carbon emission by at least 80% by 2050 when measured against base line levels set in 1990. It is widely recorded that the country is behind in achieving this target with only around 17% likely to have been achieved by 2020 compared to a target of 34%. Linked to these targets is the ban on the sale of diesel and petrol cars by 2040 and therefore the need for infrastructure to enable the widespread use of electric vehicles. It is important that East Devon plays its part in trying to achieve these targets and for the sake of the environment that we plan for growth in a way that reduces carbon emissions.

## 6.2 Principles for growth

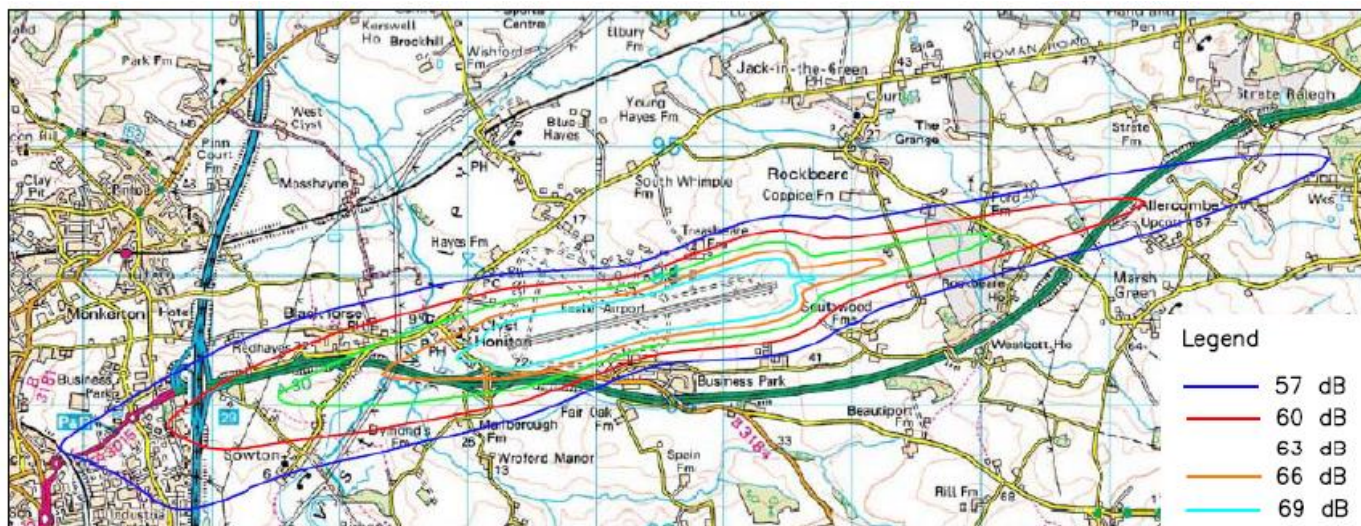
- Accommodate growth outside of areas within flood zones 2 and 3 and ensure that sustainable drainage systems are incorporated to ensure that surface water is wherever possible dealt with on site.
- Locate growth in locations well served by jobs and services to minimise the need to travel and encourage the use of walking, cycling and public transport to promote sustainable travel.
- Encourage growth that maximises the use of renewable energy and energy conservation.
- Promote the delivery of infrastructure for electric vehicles.

## 7. Economic Growth, Education and Employment

### 7.1 Key Issues

- Exeter Airport - Clearly it is important to safeguard safety at the airport, however a wider area of land is affected by noise from the airport. It is considered that any new growth

should not be significantly impacted by noise from the airport nor should development be placed so close to the airport that it potentially prevents future growth and expansion of the airport due to its vital role to the local economy and meeting the travel needs of those living in and visiting the area. The plan below shows the predicted noise contours at summer 2030 to give an idea of the area of land affected by this issue. World Health Organisation standards would suggest that residential development should not be accommodated in areas affected by airport noise in excess of 55dB. The safeguarding areas also fall within these areas.



**Exeter Airport - Daytime Air Noise Contours,  $L_{Aeq,16h}$ , Summer 2030**

- The adopted Local Plan promoted a strategy that encouraged high technology industries to the district (specifically the west end) which is leading to an upskilling of the local labour force and raising average incomes. It is important that moving forward this approach is continued.
- Evidence suggests that the area has a high number entrepreneurs and small businesses and encouraging these businesses and provide suitable accommodation for them to expand and grow will be an important factor for accommodating growth.
- Supporting traditional business sectors such as agriculture, tourism, service industries etc is also an important part of a sustainable strategy for growth.
- Internet speeds across the district vary greatly and are known to be slow in many rural areas. A strategy for growth that supports business and enterprise needs to ensure that connectivity across the district is improved to make it more attractive to businesses as well as a well-connected area for residents.

## 7.2 Principles for growth

- Accommodate growth in locations that will not prejudice the future growth and operation of Exeter Airport or where development would be significantly impacted by airport and related activities.
- Ensure adequate employment space is provided to meet the needs of all types of businesses in sustainable and accessible locations.
- Promote new and emerging high technology industries such as data analytics and environmental futures.

- Encourage greater connectivity across the district ensuring high quality broadband infrastructure is incorporated into new developments and existing infrastructure is improved.

## **8. Where can growth go?**

8.1 Based on the principles outlined above it is possible to start assessing suitable locations for accommodating growth. Many of these same issues led to a strategy in the adopted Local Plan of accommodating much of the required growth in the west end of the district on the basis that it is less constrained. The high level analysis in this report would suggest that a similar approach will be required moving forward.

8.2 Members will be aware of the need to accommodate growth in sustainable locations where services and facilities are readily available and to protect the districts environmental assets such as the AONB's and protected habitats. With this in mind it is worth considering the scope for growth in each of the main towns in the district. It should be noted that the following assessment has been informed by the existing constraints and a high level assessment of capacity based on sites put forward in the HELAA. As a result it looks at general areas where growth could potentially be accommodated rather than specific sites. The reason for this is that there are numerous site specific constraints and issues that would need to be considered before specific sites could be considered as well as a need for wider consultation and engagement to assess such sites. This work will all be done in due course but the purpose of this report is to establish broad principles and locations for growth that can inform this work and in order to do this it is important to understand the constraints and issues associated with each town.

**8.3 Axminster** – The town is heavily constrained by flood plain to its west and by AONB to its north, south and east. There is however some scope for growth to the west of the town albeit the topography is challenging. Similarly there is some scope to the south of the town albeit care would be needed to prevent a harmful impact on the setting of the AONB to the south. It is also worth noting that the land around Axminster that is not within the AONB is still of very high landscape quality.

8.4 There is already substantial growth planned in the town with the Cloakham Lawns development only partially constructed and the allocated land to the east of the town currently the subject of a master planning exercise. Early signs from the masterplan are that in order to fund the delivery of the relief road and other infrastructure on the site the development is likely to need to expand from the 650 homes envisaged in the local plan. This is despite £10million from the HIF fund. With all of this growth already taking place or planned in the town there is concern as to whether the housing market can sustain further growth in this area particularly as delivery of the consented schemes has been relatively slow compared to those seen in the growth point area.

8.5 Overall it is clear that Axminster is already a focus for growth but the timing of future growth needs to be carefully considered and planned to ensure appropriate and timely delivery and avoid stalled sites that do not deliver in good time.

**8.6 Budleigh Salterton** – The town is washed over by the East Devon AONB and therefore development here would be likely to harm the landscape character of the AONB. Any development here would therefore have to be to meet local needs in the town as wider needs should be met outside of the AONB. The scope for strategic growth in the town is therefore limited.

**8.7 Cranbrook** – The Cranbrook Plan is already exploring opportunities for further growth at Cranbrook and the delivery of the allocations at Cranbrook will take many years. There are

significant constraints to further growth at Cranbrook such as the location of the railway line to the north and national trust land to the north of that. There may be some scope for further growth at Cranbrook but it is not likely to be close to the scale of growth accommodated in the last two local plans in this area.

**8.8 Exmouth** – Clearly the town is heavily constrained by water on two sides and an AONB to the east. There is however considered to be some options for growth at Exmouth. The sites that exist are however locally sensitive and would potentially involve incursions into the Maer Valley or expansion of the town out into the Lypstone ward. Expansion to the north-east of the town would also be likely to raise concerns with highway access.

**8.9 Honiton** – The town is largely surrounding by AONB and growth to the north is also limited by the A30. There is however some scope for growth to the east of the town where sites were put forward for inclusion in the now adopted Local Plan but were set aside in favour of sites to the west. There is also some limited scope for growth to the west of the town.

**8.10 Ottery St Mary** – The town has fewer constraints than many of the other towns being situated outside of protected landscapes and with less challenging topography than some areas albeit by no means flat. The flood zone for the river otter runs through the existing town essentially splitting the town but land to the west of the otter has seen some significant development in recent years with some further potential. There is more limited scope to the south and east of the town. Due to viability issues some of the recent developments in the town have not contributed fully to infrastructure in the town and so it is understood that there are infrastructure requirements that would need to be met.

**8.11 Seaton** – The town is constrained by topography particularly to the east and west but there is some limited scope for growth to the north of the town. The capacity to the north of the town would depend on the extent to which developing in the existing green wedge separating the town from Colyford would be accepted. The local plan had included a reserve site which still has potential while the allocated site for employment and community purposes has not come forward and may need looking at again. Clearly there are sensitivities to the north of the town in terms of the landscape given that it is rising land but also with the green wedge designation between Seaton and Colyford.

**8.12 Sidmouth** – The town is abutted by AONB on 3 sides and the sea on the other side and so there is very limited scope for growth to be accommodated without incurring into the AONB which is likely to be harmful to its character and appearance. It is likely that any growth at Sidmouth would need to be limited to that required to meet the local needs of the town rather than any wider growth needs in order to limit the landscape impact of growth.

**8.13 Overall** the towns have some scope to accommodate growth. The extent to which they could accommodate growth will depend on how willing Members are to extend into the surrounding countryside (including AONB in some cases) and potentially intrude into areas that are currently designated as green wedge or are locally valued areas of open land. It is likely to represent little more than the proportion of growth that it was possible to accommodate in the towns in the now adopted Local Plan with the majority of growth being accommodated within the north-west part of the district. It is therefore worth considering opportunities within this area.

**8.14 North west quadrant of the district** – The western most quadrant of the district to the north of Exmouth and west of Ottery St Mary is the least constrained part of the district for accommodating growth. The land is relatively flat with no landscape designations. It is well served by main roads with good vehicle access via the M5, A30, A3052 and A376 and has good existing public transport links with the railway line and existing bus routes. The main constraints in this area of the district are the airport safeguarding and noise zones but these cover a relatively small part of the area and development could readily be accommodated outside of these zones. The other main constraint is the habitat mitigation zones, however with appropriate mitigation development can still be accommodated in this area.

8.15 Evidence suggests that demand is high in this part of the district with delivery and sales of new homes across this part of the district remaining consistently good and accounting for a large proportion of total housing delivery. This suggests that market conditions are attractive in this part of the district for developers. With these factors in mind it is therefore a logical place to accommodate further growth.

8.16 Other than Cranbrook which has already been discussed there are no existing towns within this part of the district where growth would logically be centred. There are therefore potentially 3 options for accommodating growth in this part of the district as outlined briefly below:

## **9. Options for growth in the north west quadrant of the district**

**9.1 Centre growth around one or more existing villages** – This scenario would identify a number of key villages with scope for significant expansion based on factors such as access to public transport, road infrastructure and the services and facilities available within the village. This option has the benefits of helping to support existing businesses and services potentially helping to secure the future of existing village shops, schools, pubs, churches etc. It could also encourage new services and facilities to be provided which are then beneficial to existing residents as well as new residents. This is something that the new NPPF encourages, however these issues would require further consideration on a village by village basis as in most cases growth would have to be quite substantial (in the region of 400 – 500 homes) to make it viable to deliver the required services and facilities to make the settlement suitably sustainable for growth and in the process could harm the character of the village and the existing community.

9.2 In landscape terms this approach could help to minimise the landscape impact of growth by accommodating it around existing settlements which are already features in the landscape thereby leading to a more modest change to the landscape than could potentially be created by a new settlement in open countryside. Equally it could be argued that smaller changes on the edge of existing settlements where they are most visible to residents and from public view points is more harmful overall.

**9.3 Establish a further new town** – This scenario would involve the creation of a new community similar to Cranbrook within the western part of the district. Cranbrook has been successful in delivering a high number of new homes in a relatively short space of time and has delivered some significant infrastructure alongside such as schools, a community centre and the railway station. There is however still much to be delivered at Cranbrook and the creation of a similar new town in the district could harm delivery at Cranbrook.



9.4 Cranbrook benefited from substantial government investment to get development started and there is no guarantee that such resources would be made available again. It has also been a private sector led development and there is some uncertainty whether the private sector would commit to a further new town delivered on a similar basis in the district. Cranbrook has also been criticised for delivering one type of housing which has successfully met the needs of young families but it has not to date provided a wide range of choice to meet the broad range of housing needs that exist in the district. The delivery of a town centre and some other key facilities at Cranbrook is still pending with the town needing to reach a critical mass to support these things. This in itself illustrates the scale a new community needs to achieve before such facilities can economically be provided.

**9.5 Establish a number of new villages** – This scenario would involve the creation of a series of modern Devon villages that could reflect to some degree the form of existing villages within the district. This option would potentially be the most sensitive option in landscape terms. If the villages were designed so that they had different characters and form then there would be the greatest potential to broaden the choice of housing in the district and maximise delivery rates by having several developers delivering different types of housing simultaneously across the area. and is favoured in terms of delivery as there would be scope to have several builders delivering simultaneously with each village providing opportunities to develop their own form and character.

9.6 A significant concern with this option is the ability of new villages to deliver the required service and facilities as well as jobs alongside the housing. As has already mentioned the existing villages are struggling to maintain such facilities and providing new within a new village is likely to be even more difficult unless the villages are quite large and facilities are somehow shared with neighbouring settlements and good transport links provided between them.

9.7 Each of these options raises issues but the new NPPF acknowledges that “The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way.”

9.8 The assessment of each of the options is at an early stage but Members views are sought on these options and any clear preferences that Members may have. The following locational principles are however recommended to help inform future plan making work.

## **10. Locational Principles for Growth**

- A significant proportion of growth to be accommodated within the western part of the district.
- Accommodate growth in the existing towns focusing strategic growth around Axminster, Exmouth, Honiton and Ottery St Mary with the remaining towns taking more modest growth to meet the needs of those settlements.
- Villages to bring forward modest levels of growth to meet their own needs through neighbourhood plans.
- Focus development around main transport corridors where possible.

## **11. Conclusion**

11.1 As outlined at the start of this report it is early days in terms of understanding how growth could be accommodated in the district and this report is not intended to pre-empt this work which will establish an evidence base to inform detailed consultation and discussion in the future. However the issues and constraints that were considered as part of the production of the now adopted Local Plan remain and therefore it is possible to draw some early conclusions about what a strategy for growth may look like. The principles included in this report are proposed as a baseline position to inform strategy development and work only but hopefully help to aid understanding of the issues and start the debate on an appropriate response.

**Report to:** **Strategic Planning Committee**

**Date of Meeting:** Tuesday 4 September 2018

**Public Document:** Yes

**Exemption:** None

**Review date for release** None



**Agenda item:** 8

**Subject:** **Greater Exeter Strategic Plan – Update and Vision**

**Purpose of report:** This report seeks authority to consult on a Greater Exeter Strategic Plan consultation document.

**Recommendation:** **Members are asked to:**

- 1 Consider whether the proposed Greater Exeter Strategic Plan consultation document “Our New Vision and How We Make It Real” attached as Appendix A meets their vision for the Greater Exeter Strategic Plan and adequately addresses the associated infrastructure needs including previously indicated aspirations for a sports hub and concert venue.**
- 2a In the event that modifications are recommended that delegated authority be given to the Chairman of Strategic Planning Committee to agree amendments jointly with the equivalent Chairman or Portfolio Holders in the other GESP local planning authorities and the revised document be agreed for public consultation. Or**
- 2b In the event that no modifications are recommended that the document be agreed for public consultation.**

**Reason for recommendation:** To ensure Greater Exeter Strategic Plan work can proceed in a logical manner and that the next phase of consultation can be undertaken.

**Officer:** Ed Freeman, Service Lead – Strategic Planning and Development Management

**Financial implications:** There are no additional financial implications at this stage.

**Legal implications:** There are no legal implications from this report.

**Equalities impact:** Low Impact

If choosing High or Medium level outline the equality considerations here, which should include any particular adverse impact on people with protected characteristics and actions to mitigate these. Link to an equalities impact assessment form using the [equalities form template](#).

**Risk:** Low Risk

As endorsement is sought for consultation only there is a low identified risk associated with this report.

**Links to background information:**

- Click here to enter links to background information; appendices online; and previous reports. These must link to an electronic document. Do not include any confidential or exempt information.

**Link to Council Plan:**

The Greater Exeter Strategic Plan, overall, will covers a full spectrum of planning matters and therefore can be seen to have links all corporate priorities.

**1. PURPOSE**

- 1.1 To provide an update on the progress of preparing the Greater Exeter Strategic Plan (GESP) and to recommend that a public consultation on a new vision for the plan, together with engagement on homes and infrastructure matters is held in October and November 2018.

**2. BACKGROUND**

- 2.1 The four Local Planning Authorities of East Devon, Exeter City, Mid Devon and Teignbridge confirmed that they will prepare a joint plan to cover strategic matters for their area, known as the Greater Exeter Strategic Plan (GESP). Devon County Council has supported the progress, and joint funding and staffing arrangements have been set up. An “Issues” consultation was undertaken in 2017, which included an earlier draft vision. Responses to that consultation can be read on the website [www.gesp.org.uk](http://www.gesp.org.uk) together with other GESP information.
- 2.2 The joint GESP team has been preparing evidence (including procuring it from consultants) and considering the responses received. The aim is to prepare a draft plan for consultation in the summer of 2019, in line with the most recently agreed Local Development Scheme. A number of the completed studies can be found on the GESP website and more will be published between now and the draft plan consultation.
- 2.3 During the issues consultation, comments were sought on the vision, and in relation to housing and infrastructure policy. Given this interest, and the further work now undertaken on these matters, an additional consultation event is now proposed to engage further on these matters in advance of consulting on a draft plan.

**3. MAIN IMPLICATIONS**

**“Consultation: Our Vision and how we make it real”**

- 3.1 The work undertaken, and the issues raised during previous consultations have resulted in the recommendation for a further consultation on the specific issues covered in this consultation.
- 3.2 The consultation will be held between 5 October and 30 November 2018. The draft consultation leaflet attached as Appendix A to this report will provide the basis of the consultation. This contains some explanatory text and diagrams to prompt people to respond. It will be accompanied by a more detailed infrastructure evidence document, to which people will be signposted during the consultation.
- 3.3 As a joint consultation document, the four GESP local planning authorities will need to sign it off before it is formally published. This should happen during meetings in September,

allowing the October consultation date. The recommendation includes a mechanism to allow further modifications to the document before it is finally published. This allows for minor changes such as typos, etc. It also ensures that a recommended change to the document by one authority does not hold up the consultation by requiring a further round of committee meetings to agree the change.

### Vision

- 3.4 The previous consultation included a draft vision and responses provided views on whether it was appropriate for guiding the future of the Greater Exeter area up to 2040. The responses have been analysed and published on the GESP website as part of the 'summary of responses'. Comments were varied but feedback suggested that the vision should be more locally specific and include more specific targets. In this context, the vision has been reviewed and is now separated into three sections covering 'the plan, 'the place' and 'the priorities'. This explains the role of the plan, what kind of place we are trying to create and the key priorities to make this happen.

### Transport

- 3.5 Transport investment generates significant interest and debate, and is an important element of delivery the GESP vision of an "accessible and networked city region". The consultation will set out the main concepts and elements of a potential transport strategy for Greater Exeter. Like other forms of infrastructure, this will need continued work alongside the spatial development strategy leading to the draft plan. The transport approach concentrates on an avowedly sustainable approach to movement, and seeks to harness the swift technology changes affecting the transport sector, tying in with the digital theme of the vision.

### Infrastructure

- 3.6 The consultation provides information regarding recently provided and currently planned infrastructure to provide a context for GESP strategy. The financial considerations are highly relevant given the cost of infrastructure and the continued importance of viability in plan making. The document sets out the kind and broad scale of new infrastructure needed, although clearly any site specific information will need to await the draft local plan consultation next year, when the spatial strategy is being considered. During the consultation, people will be provided with the opportunity to set out their key issues and infrastructure projects to give us more opportunity to take those concerns on board. A key message concerns the benefits for infrastructure (including transport) of a more certain long term funding regime.
- 3.7 In previous discussions regarding the GESP the Deputy Leader of the Council has put forward the idea of developing a regionally or nationally significant sports arena and concert venue within the GESP area. The consultation does not specifically refer to this concept as work in understanding the need for such a facility and how it could be delivered are at an early stage. The consultation is also focused at high level issues and does not talk in any detail about specific proposals. It is however considered that the consultation asks about public aspirations for the delivery of infrastructure thus enabling respondents to raise the opportunity for such a facility and make suggestions for what it would be. Members are however asked to consider whether this is sufficient.

### Homes

- 3.8 The Government has changed the way in which housing targets for Local Planning Authority areas are set, instead now providing a formulaic methodology using Office of National

Statistics demographic projections and relative housing affordability. This forms the basis of the housing targets which should be included in plans. Previously it was for Local Planning Authorities to set housing targets based on a recommended assessment methodology. As a result of this change, and because the four Local Planning Authorities are jointly planning to meet the development needs of the area, the current housing needs figure for the area has been identified in the engagement document. The total provision (as currently published) is about 2,600 new homes per year, although this will change in the future with new data. For example most recent affordability data suggests a further increase in the target is likely. The document reflects this, and refers to the need for additional flexibility in housing supply.

### Working with government to deliver high quality development

- 3.9 It has already been noted that additional housing development will be required in the period up to 2040 and that one of the principal roles of the GESP will be to identify overall housing requirements and the locations of development. Furthermore, it also anticipated that significant investment will be needed to deliver the infrastructure required to support this development and overcome existing issues. These challenges are not new although they are being faced in changing circumstances in which the Government is providing renewed focus on the need for accelerated delivery of additional housing of a high quality supported by key infrastructure. This change in Government emphasis gives the opportunity for councils or (more commonly) groups of councils to negotiate deals with the government to fund additional infrastructure. Even more importantly, long term security of transport and infrastructure funding will be very helpful going forward in the context of long term development proposals. The consultation seeks views on how this could work, particularly focusing on 'asks' of Government and 'offers' from the GESP authorities. Such a deal would enable the councils to improve the long term planning for infrastructure in association with growth.

### **Future work**

- 3.10 Responses will be analysed and used to inform further work on the GESP. This will take place in late 2018 and early 2019 and will result in the preparation of a draft GESP document. As per the adopted Local Development Scheme, a further public consultation on the draft plan will be held in June 2019.

## **4. GROUPS CONSULTED**

- 4.1 The report has been agreed jointly with officers of the five participating authorities and is being presented (with appropriate variations to reflect local matters) to each.

## **5. TIME-SCALE**

- 5.1 The consultation is proposed to run for eight weeks between 5 October 2018 and 30 November 2018.

## **6. JUSTIFICATION**

- 6.1 Approval is required to enable the Authorities to hold a joint consultation. The consultation will build on the information provided during the 'issues consultation' in 2017 and enable debate on key issues which the GESP will address in advance of a draft plan consultation being held in 2019.

# Greater Exeter Strategic Plan



Consultation:  
Our new vision and  
how we make it real

October 2018



Agenda Page 32





The local authorities of Devon, East Devon, Exeter, Mid Devon and Teignbridge are working together to prepare a Greater Exeter Strategic Plan (GESP).

### What is the Greater Exeter Strategic Plan trying to achieve?

- Have a joined-up vision and hopes for our area
- Meet the area’s housing needs in the right places
- Support job creation and greater prosperity
- Improve transport and other infrastructure
- Protect and enhance the environment
- Give us the basis for talking to Government about how they can support us more

### What is the latest progress on the GESP?

Last spring a consultation was held to launch the GESP, explain its role and identify issues. We also held a ‘call for sites’ which allowed people to suggest areas for development. Since that consultation the GESP team has been busy analysing the consultation responses and the sites suggested. We have also been doing studies which have covered various topics:

- Housing and employment
- Environment
- Transport
- Infrastructure
- Broadband and mobile connectivity
- Climate change and low carbon

### What is this consultation for?

Housing, infrastructure and transport were three key topics identified during the previous consultation. As a result, we are holding this additional consultation to provide further information and explore the issues in more detail before we prepare a draft plan for consultation next year. The consultation includes our new vision for the area, explains what the Government has said our housing need is, asks people what the most important infrastructure projects we need to invest in are and includes the main points for a transport strategy for the area.



## How to get involved

You can make comments on this document between 5th October 2018 and 30th November 2018. Please fill in the online consultation form at:

[www.gesp.org.uk/XXXXX](http://www.gesp.org.uk/XXXXX)

When you comment on this consultation we don't automatically keep your details. Instead if you want to be kept up to date with our progress and sign up to our email alerts please visit:

[www.gesp.org.uk/stay-informed](http://www.gesp.org.uk/stay-informed)

## Vision

**What drives us? What are we trying to achieve?**

**How will Greater Exeter be different and better?**

The Greater Exeter vision responds to these questions. In spring 2017, the 'issues' consultation asked for your views on an early version of our vision and we received many replies. We have published a summary on our website. Some of the key points are:

- Needs to be more 'locally distinctive'
- Should recognise the key role of Exeter and other places
- Should be optimistic but also realistic
- Should include the need for new homes, jobs and infrastructure
- Should deal with quality of life and the need for quality development

We have used these suggestions to write a new vision which we hope the communities in the area can get behind. It contains some key priorities for the plan looking to the future.

**The vision is in three parts:**

**PLAN**

What the Greater Exeter Strategic Plan does and why we need it.

**PLACE**

The type of area we are aiming for, looking at strengths and weaknesses.

**PRIORITIES**

Bringing the vision to life with a small number of key, clear targets.

The new vision is included here and we'd like to hear what you think.

## The Greater Exeter Strategic Plan vision

### The plan

The Greater Exeter Strategic Plan makes the big, cross-boundary decisions about growth and infrastructure in the Greater Exeter area looking many years ahead. The innovative planning and ambitious investment decisions taken together by the local authority partners aim to realise our potential by creating great places to live full lives.

### The place

In 2040 we are an accessible and networked city region of linked but distinct communities. Our economy is low carbon and productive. We invest in our citizens, celebrate the area's beauty and continue to work together for mutual long term benefit. We fully utilise our unique south western city-town-country-coast environment and our growing academic and skills base for smart growth. We enable prosperous and healthy lives in high quality homes and communities with access to great greenspaces and high quality jobs linked by a reliable, sophisticated and sustainable transport system.

### The priorities

**Greater ambition** – hardwiring delivery in from the start

**Greater innovation** – fast growth in cutting edge businesses including becoming the UK centre for data analytics, environmental futures, knowledge-based industries and smart logistics

**Greater connectivity** –gigabit ready communities with majority sustainable travel

**Greater prosperity** – local wages rise to above the national average

**Greater places for people** – providing the homes we need in high quality, healthy neighbourhoods in the right places

**Greater places for nature** – rebuilding biodiversity and peoples' access to it

**Greater education** – nurturing, attracting and retaining a world class workforce

**Greater efficiency** – a 60% reduction in carbon emissions



## Question 1

**Do you have any comments to make on the vision?**

## “an accessible and networked city region”

The transport strategy will support travel needs of a growing population and economy whilst also contributing to better places and quality of life in the Greater Exeter Strategic Plan area.

It draws on existing travel patterns, current transport issues and the Greater Exeter vision to start thinking about the key principles of managing transport in the area. It will grasp the opportunities of new technology to make travel more integrated and efficient.

The impact of more travel will be most greatly felt in Exeter and the larger towns and we will have to pay special attention to those places. Our urban areas benefit from a variety of travel choices and there is scope to boost this further, whilst in our rural areas the choices are more limited. For example, the diagram below shows an overview of commuting trips into Exeter. 90% of rural commuters into Exeter use the car, compared with 70% of town residents and just 40% of those living in the city.



In the last decade the population of the Greater Exeter area has increased by 34,000 people. However, in that time traffic volumes on the local road network have not increased. Travel patterns are changing and there has been big growth in the use of sustainable modes such as cycling, bus, park and ride and a doubling of rail usage. Advancements in technology will further change how and when people travel.

The Greater Exeter transport strategy will take advantage of this shift by continuing and accelerating further improvements to the transport system.

The GESp vision will be achieved by:

- **Greater Connectivity**, improving sustainable transport networks to create a connected City Region.
- **Greater Places for People** with an emphasis on the role of transport in improving places, health and quality of life in our urban areas.
- **Greater Innovation** by utilising the opportunities arising from technological advancements to integrate travel information, improve network operation and enhance peoples travel choices.

We are seeking your views on the following key principles which together will underpin the emerging transport strategy.

## Transport strategy: The key points:

### Greater connectivity

- **Connected city region**  
Provide a consistent standard of sustainable transport between Exeter and key towns, including trains every 30 minutes, buses every 15 minutes and high-quality cycle routes.
- **Protect and improve our strategic road and rail**  
Focus on M5 gateway, A30, A38, A303, A380 & junctions on A35/A361 and mainline rail links to enhance connectivity and reduce journey times to the rest of the Country.
- **Park and Ride sites on all main corridors into Exeter**  
Double the number of car parking spaces serving the city and improve bus journey time reliability on key corridors into the city.

### Greater places for people

- **Healthy active city**  
A comprehensive network of walking and cycling routes to achieve significantly more short distance trips being made on foot or by bike.
- **People Based Places**  
Reduce the dominance of cars in urban centres and corridor enhancements to reduce pollution, support sustainable travel and contribute to improved health and well-being.
- **Attractive Urban Bus Networks**  
Work with operators to achieve a modern, reliable and low carbon network of urban bus routes.

### Greater innovation

- **Develop and Launch New Transport Interventions**  
Utilise technological enhancements and work with innovators to test new ideas, improve the operation of the network and increased shared mobility options.
- **Single Ticketing Travel**  
Develop a new integrated product which combines sustainable travel modes into a single subscription travel service. (e.g. car club, bike hire and public transport).



## Question 2

**Do you have any comments to make on the key parts of the transport strategy**

We know that new development and transport need to be thought about together and more detail on those transport measures needed to directly support future development areas will be identified and consulted on in the draft GESP in Summer 2019.

## "great places to live full lives"

Our vision and the need for housing and jobs means that we need to think hard about what infrastructure is required and how we provide it. From transport to open space, utilities to schools, infrastructure is vital to make places work and support people in their lives. We need to make sure we get it right when we plan new development and so infrastructure is at the front of our thoughts in preparing the GESP. The whole range of facilities and services need to be coordinated, funded and delivered alongside the new homes and jobs the area needs.



The Councils understand the importance of key infrastructure and so there has been major investment across the area in recent years. Since 2013, more than £320m has been spent on a range of large scale infrastructure projects in the area which bring benefits to local communities and businesses. Some examples are:

- The South Devon Highway: £110m
- Exeter Flood Defence Scheme: £32m
- Cranbrook education campus: £16m
- Crediton relief road: £8.5m
- Pavilions Teignmouth: £4.75m
- A361 junction phase 1, Tiverton: £3.9m
- Dawlish Countryside Park: £2.9m
- Sidmouth recycling centre: £2.3m
- Newcourt station: £2.2m

We also have a pipeline of future schemes which will bring major benefits to our area and support the housing we have already identified in plans. Amongst others these projects include:

- Leisure centre and bus station complex, Exeter: £40m
- A382 to A38 improvements, Newton Abbot: £28.5m
- South West Exeter all-through school: £22m
- Marsh Barton Station, Exeter: £13m
- Cullompton Relief Road: £10-15m
- Dinan Way extension, Exmouth: £10m
- A361 junction phase 2, Tiverton: £9m
- Clyst Valley Regional Park: £7m



But of course we know there is more to do. Our existing plans already identify more infrastructure and this is likely to cost around £700m. These projects are funded in part but there is still a large 'funding gap'.

We are now looking as far as 2040 with the Greater Exeter Strategic Plan. We think that expensive additional infrastructure will be needed beyond that already listed. Up to 2040 this extra large-scale infrastructure is likely to cost more than £1 Billion. This will be determined to a large extent by future development sites in the plan. These sites are not yet determined, however we can take a steer from the vision, the fact that Exeter will continue to be the travel focal point of the area, our knowledge of existing infrastructure issues and the views of the public. Examples of infrastructure we may need to provide up to 2040 in the GESP area are:

- New primary and secondary schools
- Relief to major junctions on the M5
- Improvements to the A30/A303
- A number of new Park and Ride sites on the main roads into Exeter
- Walking and cycling routes in and between towns and Exeter
- Improvements to rail and bus routes and buses
- Low carbon energy generation and a smart grid
- New, accessible green space
- Healthcare facilities
- Community facilities e.g. local halls
- Internet connectivity and mobile communications



There will be a funding gap here too. Building on our previous successes, we are optimistic that we can fill the funding gap, but there is no certainty. We are therefore keen to explore new ways of providing so we can make more informed long-term planning decisions.

### Public aspirations

We also recognise that communities have specific views about infrastructure. We are therefore asking people to tell us what problems people wish to solve or infrastructure they think is needed in the area. We will take account of people’s answers when writing the GESP, however we need to bear in mind how much finance may be available.



### Question 3

**What is the most important issue you would like to see tackled or infrastructure project you would like to see happen in Greater Exeter and why?**

The already planned infrastructure projects are shown on an interactive map and in the infrastructure delivery plan available at [www.gesp.org.uk](http://www.gesp.org.uk)

## "Providing the homes we need"

The Greater Exeter area is a great place to live, with amazing scenery, stunning coastlines, thriving market towns and a vibrant city at its heart. But zero change isn't an option. People are increasingly locked out of our 'broken housing market' as house prices outstrip local wages. House purchase is beyond the reach of many first time buyers, renting is expensive and the need for affordable housing exceeds supply. Providing more, better and a wider variety of new homes is the main way to improve this unbalanced situation.

### Greater Exeter houses built



**2,200**  
in 2016/17

The Government recognises these issues and aims to provide 300,000 homes per year across England. To achieve this, they now provide housing figures which Councils need to meet so that we have enough homes locally. For the GESP area this is 2,600 per year. These targets take account of population growth, changing individual and family situations and how overheated the local housing market is.

Changing the housing market in this way will take a long time. In the meantime we also want to improve things by providing affordable housing, ensuring homes are of a good quality supported by the right infrastructure and making sure the homes are in the right places. Joint planning between councils will help achieve these aims because we can look at the area as a whole.

The government housing target may change over the next year or two. Our current plans look forward to between 2026 and 2033. Beyond this, the GESP will cover up to 2040. This table explains our housing needs in a bit more detail. We have included a +10% flexibility allowance to deal with future changes and uncertainties.

Minimum need for new homes per year in Greater Exeter	Approximately 2,600
+10% flexibility	Approximately 260
Minimum 20 year need for Greater Exeter (2020-2040)	Approximately 57,200
Homes already committed: Permissions and housing in local plans	28,700
Minimum extra homes in GESP and local plans	28,500

Housing is not the only type of growth which we are looking at. The Councils in the South West have agreed that they will try to double the size of the local economy by 2036 and increase local prosperity. This will mean that we need more well-paid jobs in different industries and more space to attract businesses and allow them to grow. The GESP will help meet these aims.

Meeting the need for homes and jobs is challenging and we will need to put more detailed thought into the infrastructure implications. However, we know that there are going to be some key areas and projects where investment is needed, irrespective of where the new homes and jobs are going.



## "ambitious investment decisions"

The Councils agree that homes and infrastructure are key issues which the GESP can deal with. As far as is possible, Councils would like to ensure both homes and infrastructure are planned together to provide high quality development. A lot of infrastructure funding comes from development, central government grants and the Councils themselves. However, there are always uncertainties about where funding will come from. If we could overcome this, more infrastructure could be provided with more certainty, and it could be provided earlier.



We think working more closely with the Government could help. Other Councils have worked with the Government to agree ‘infrastructure deals’ to provide more and higher quality homes in return for infrastructure investment. For example, Councils in Oxfordshire have agreed a deal where the Government provides up to £215 million towards infrastructure and housing in return for a commitment to a specific number of homes being built.

If the Councils in Greater Exeter worked with the Government, the Councils would need to make ‘offers’ of what they can do locally to provide more homes and in return, ‘ask’ the Government for support. Some examples are included here.

Example Council ‘offers’ to the Government	Example Council ‘asks’ to the Government
Councils provide more housing than Government figures (more than 2,600 per year)	Government provides more infrastructure funding
Councils provide some of the housing more quickly	Government provides more funding for affordable housing
Councils directly provide some housing themselves	Government provides public sector land or buys land for development to make building easier



### Question 4

**Do you have any comments to make on the idea of an infrastructure deal with the Government?**

What could the Councils offer? What could the Councils ask for?

## Next steps

We have already carried out an 'issues' consultation. This current consultation is an additional stage in the plan's preparation as a result of the interest in the vision, infrastructure and housing issues. After considering the additional views received we will be moving to a consultation on a draft GESP in the summer of next year.

<b>Stage one</b> (complete)	<b>Issues Consultation and Call for Sites</b>	You can comment on the content of the plan and provide local knowledge.
<b>Stage two</b> (current)	<b>Consultation: Our new vision and how we make it real</b>	
<b>Stage three</b>	<b>Draft Greater Exeter Strategic Plan</b>	You are invited to comment on draft policies, potential development locations and supporting information, based on the previous stage and evidence gathering.
<b>Stage four</b>	<b>Publication version of Greater Exeter Strategic Plan</b>	You can comment on the revised plan, changed in light of the previous stage and further evidence gathering. Plan and comments go to the Planning Inspector.
<b>Stage five</b>	<b>Planning Inspector's hearings</b>	An independent Planning Inspector examines the plan, evidence and comments made. He/she holds hearings to discuss the 'soundness' of the plan.
<b>Stage six</b>	<b>Adopted Greater Exeter Strategic Plan</b>	The plan is adopted and is used to inform local planning policy and decisions on planning applications.

Thank you very much for taking the time to look at this document.  
Your views are valuable and your answers will help shape the  
future of the Greater Exeter area.

More information is available at [www.gesp.org.uk](http://www.gesp.org.uk)

To request this information in an alternative format or  
language please call the Greater Exeter Strategic Plan  
team on [01392 265177](tel:01392265177) or [gesp@devon.gov.uk](mailto:gesp@devon.gov.uk)

We consider requests on an individual basis.

**Report to:** Strategic Planning Committee

**Date of Meeting:** Tuesday 4 September 2018

**Public Document:** No

**Exemption:** None

**Review date for release** None



**Agenda item:** 9

**Subject:** **Publication of the new revised National Planning Policy Framework (July 2018)**

**Purpose of report:** This report provides summary information and commentary on the newly published (July 2018) revised National Planning Policy Framework.

**Recommendation:** **That members note the content of this report.**

**Reason for recommendation:** To ensure members are aware on new national planning policy.

**Officer:** Ed Freeman, Service Lead – Planning Strategy and Development Management

**Financial implications:** No specific financial implications.

**Legal implications:** The NPPF forms a material consideration when determining applications for planning permission. There are no legal implications other than as set out in the report.

**Equalities impact:** Low Impact  
No specific impacts issues are identified in respect of reporting on Government policy.

**Risk:** Low Risk  
No specific risk issues are identified in respect of reporting on Government policy.

**Links to background information:**

- a) The revised National Planning Policy Framework (July 2018) can be viewed at:  
<https://www.gov.uk/government/publications/national-planning-policy-framework--2>
- b) The draft NPPF that was consulted on (March 2018) can be viewed at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/685289/Draft\\_revised\\_National\\_Planning\\_Policy\\_Framework.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/685289/Draft_revised_National_Planning_Policy_Framework.pdf)
- c) The Committee report (of the 24 April 2018) that contained the Council response to the draft NPPF consultation can be viewed at:

<http://eastdevon.gov.uk/media/2445987/240418strategicplanningcombinedagenda.pdf>

- d) The Government response to consultation comments received on the consultation draft can be viewed at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/728498/180724\\_NPPF\\_Gov\\_response.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/728498/180724_NPPF_Gov_response.pdf)
- e) The National Planning Policy Framework is complemented by Planning Practice Guidance, also published by the Government. This guidance is subject to regular updates and can be viewed at:  
<https://www.gov.uk/government/collections/planning-practice-guidance>
- f) For reference purposes, and to allow for comparison with the revised National Planning Policy Framework, the former framework (dated 2012) can be viewed at:  
<http://webarchive.nationalarchives.gov.uk/20180608095821/https://www.gov.uk/government/publications/national-planning-policy-framework--2>
- g) Historic England have published a briefing on the NPPF that provides further useful background information, it can be viewed at:  
<http://content.historicengland.org.uk/content/docs/planning/he-nppf-briefing-jul18.pdf>

**Link to Council Plan:**

The National Planning Policy Framework covers a full range of planning matters and as such can be seen to have a planning and wider relevance to all council priorities.

## 1 Introduction

- 1.1 On the 24 July 2018 the Government published the revised National Planning Policy Framework (NPPF). Members of committee will recall that early this year there was a consultation draft of the NPPF and on the 24 April 2018 Strategic Planning Committee received and endorsed a report setting out feedback from this Council to the consultation.
- 1.2 The revised NPPF sets out the government's planning policies for England and how these are expected to be applied. This revised Framework replaces the previous NPPF published in March 2012. In **Section 1 of the NPPF – Introduction**, at Paragraph 2, the importance of Government policy and legislation is clearly defined:

*“2. Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise. The National Planning Policy Framework must be taken into account in preparing the development plan, and is a material consideration in planning decisions. Planning policies and decisions must also reflect relevant international obligations and statutory requirements.”*

- 1.3 The revised NPPF does not introduce any fundamental changes to the planning system or processes but it does bring about some more detailed changes, particularly with regard to plan making. This report provides a summary overview of some of key issues covered in the guidance and highlights and comments on specific matters that may have particular relevance in East Devon.

## 2 Section 2 of the NPPF – Achieving sustainable development

- 2.1 The revised NPPF, in its very early paragraphs, in section 2, reiterates and stresses the message that sustainable development remains at the core of planning with three overarching objectives (previously expressed as roles) – economic, social and environmental. The revised NPPF explicitly sets out, at paragraph 11, that

*“11. Plans and decisions should apply a presumption in favour of sustainable development.*

*For **plan-making** this means that:*

- a) plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change;*
- b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:
  - i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
  - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.**

*For **decision-taking** this means:*

- c) approving development proposals that accord with an up-to-date development plan without delay; or*
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
  - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
  - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”**

- 2.2 Section 2 of the NPPF also emphasises the importance of Neighbourhood Plans and highlights that they should support the delivery of strategic policies. In an East Devon context strategic policies will, in due course, include policies in the Greater Exeter Strategic

Plan (GESP), as well as strategic policies in the adopted East Devon local plan and strategic policies that may be set out in any future local plan.

- 2.3 The presumption in favour of sustainable development can be significant in cases where a Council has a less than five year housing land supply. In cases where housing land supply falls below five years planning permissions may be granted even if contrary to adopted council local plan policies, in such cases council policies may be deemed to be out-of-date. However the revised NPPF, in paragraph 14, sets out specific tests that afford qualified weight to neighbourhood plans that lowers the land supply requirements to three years (amongst other considerations) in neighbourhood plan areas before policies are deemed out-of-date.
- 2.4 Further on in this report more detailed reference is also made to the Housing Delivery Test (an assessment that compares past completions against targets). The revised NPPF sets out (Footnote 7) that where housing delivery has been substantially below targets then the presumption in favour of sustainable development applies.

### **3 Section 3 of the NPPF – Plan Making**

- 3.1 Section 3 of the revised NPPF highlights the importance of up to date plans, highlighting in its opening paragraph (paragraph 15) that the *“planning system should be genuinely planned”*.
- 3.2 Plans should contain strategic policies and also policies to address non-strategic matters. GESP will include strategic policies and the expectation is that there will be a new East Devon local plan that will contain strategic policies and non-strategic policies and the forthcoming Cranbrook Plan should contain strategic policies and non-strategic policies. Non-strategic policies can be contained in neighbourhood plans, but such plans should not contain strategic policies. Strategic policies set out an overall strategy and priorities for an area, including cross-boundary issues, and look forward over a minimum 15 year period, though no doubt there is much room for debate and disagreement over what may be and what may not be a strategic policy. At Paragraph 23 the revised NPPF, in so far as it helps, advises:

*“23... Strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area (except insofar as these needs can be demonstrated to be met more appropriately through other mechanisms, such as brownfield registers or non-strategic policies).”*

- 3.3 With respect to non-strategic policies the revised NPPF, at paragraph 28 advises:

*“28. Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design*

*principles, conserving and enhancing the natural and historic environment and setting out other development management policies.”*

- 3.4 The importance of meeting the Duty to Co-operate is reiterated in the revised NPPF and for East Devon the GESP work will be particularly relevant. As a Council, and specifically for future local plan work, we will however also need to look eastward in respect of joint working with Somerset and Dorset authorities, southward to the sea in respect of the Marine Management Organisation policies and more generally work with other agencies and bodies that have an interest and a role in planning matters. Cross boundary statements of common ground (paragraph 27 of the revised NPPF) will be required.
- 3.5 Planning policy, it is emphasised, should be underpinned by relevant up to date evidence and should be reviewed at least every five years. The key tests of soundness are retained in the NPPF; local plans should be:
- a) Positively prepared;
  - b) Justified;
  - c) Effective; and
  - d) Consistent with national policy.

#### **4 Section 4 of the NPPF – Decision-making**

- 4.1 The revised NPPF advises that planning authorities should take a positive and creative approach to decision making and early engagement by applicants is actively encouraged. The revised document encourages other consenting bodies to also be involved at an early stage in considering proposals.
- 4.2 The NPPF reiterates that decisions should be made in accordance with the development plan and highlights when weight can be attached to policies in an emerging plan. However, clear limitations are set out in respect of seeking to justify a refusal of planning permission on grounds of prematurity in respect of policy in an emerging plan.
- 4.3 In paragraph 51 of the revised NPPF it is advised that “*Local planning authorities are encouraged to use Local Development Orders to set the planning framework for particular areas or categories of development....*” and it is also noted that local communities can use Neighbourhood Development Orders and Community Right to Build Orders to grant planning permission. This scope for permission to be established outside of normal planning permissions highlight Government aspirations to speed up planning and delivery of development.
- 4.4 Whilst the revised NPPF reiterates a number of existing considerations in respect of planning conditions and obligations it does, in paragraph 52, emphasise the importance of viability assessments, establishing that approaches to assessment should reflect national guidance and place a clear onus on applicants justifying circumstances to warrant need.
- 4.5 Paragraph 55 references upcoming changes by which conditions that require the agreement of details before commencement of development should be avoided. There will need to be a clear justification for pre-commencement conditions and agreement with applicants.



- 4.6 Paragraph 57 confirms that planning applications which offer full planning obligations should be assumed to be viable. In addition, it confirms that all viability assessments should be made publically available. It is proposed that from the date of this Committee, that viability appraisals submitted with new planning applications be made publically available. This will accordance with the guidance in Council adopted SPD.

## 5 Section 5 of the NPPF – Delivering a sufficient supply of homes

- 5.1 The opening paragraph, 59, of section 5 of the revised guidance emphasises the importance the Government attaches to the building of new homes and the Government’s objective of significantly boosting housing supply. Members will be aware of the importance and emphasis that the Government attach to higher housebuilding levels. Paragraph 60 of the revised NPPF establishes the need to use the national planning guidance standard methodology for determining housing need. In this context it should be noted that the adopted East Devon local plan identifies a need for 950 new homes per year in the District and this is a figure that exceeds the current national methodology defined figures which at September 2017 stood at 844 new homes per year. Housing figures, the revised NPPF advises at paragraph 60, should take into account potential for accommodating needs from adjoining local planning authority areas. Assessment work should also look at the needs of differing groups in the community with these including need for rental and self/custom build.
- 5.2 Under the revised NPPF, Paragraph 62, it is advised that where a need for affordable housing is identified planning policies should specify the type of affordable housing required with an expectation that it is met on-site unless off-site provision or a contribution “*can be robustly justified*” an such provision contributes to the “**objective of creating mixed and balanced communities**”. Paragraph 62 cross references to Annex 2 of the NPPF which defines affordable housing:

*“Affordable housing: housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions:*

*a) Affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the Government’s rent policy for Social Rent or Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); (b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).*

*b) Starter homes: is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and*

*any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used.*

*c) Discounted market sales housing: is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households.*

*d) Other affordable routes to home ownership: is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale (at a price equivalent to at least 20% below local market value) and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision, or refunded to Government or the relevant authority specified in the funding agreement.”*

5.3 Paragraph 63 states that affordable housing should not be sought for residential developments that are not major developments i.e comprising 10 dwellings or more, other than in rural areas where policies may set a lower threshold of 5 units or fewer. Clearly this has implications in terms of the scale of development from which affordable housing can be sought and will reduce the supply of affordable housing. In rural areas we have previously only been able to seek a financial contribution from sites of between 5 and 10 dwellings under a previous ministerial statement. The revised NPPF now opens the opportunity for on-site provision in such circumstances and officers are currently considering how we can implement this lower threshold.

5.4 Paragraph 63 also moves the application of Vacant Building Credit from the NPPG to the NPPF stating that:

*“To support re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount.”*

5.5 The footnote confirms that the amount of reduction should be equivalent to the existing gross floorspace of the existing buildings. This will result in a slight reduction in affordable housing units, and/or financial contributions towards off-site affordable housing, that can be negotiated.

5.6 The revised guidance sets out information on measuring affordable housing needs and at paragraph 64 advises of provision of at least 10% of homes on major developments being affordable home ownership (with specific exemptions noted). At paragraph 65 it is advised that strategic policies:

*“...should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations”.*

- 5.7 In an East Devon context, therefore, we may expect that a future local plan would need to be more explicit in establishing housing numbers for neighbourhood plan areas (this for the most part, its assumed in East Devon, will mean Parishes) and for the local plan to set out how and where these houses will be built or to pass this role onto neighbourhood plan making groups.
- 5.8 The new guidance emphasises the important role that small and medium sized sites can play in contributing to meeting housing needs, noting such issues as speed of delivery on such sites. There is a need to identify land to accommodate at least 10% of housing on sites no larger than one hectare (the equivalent of 2.471 acres). With GESP allocating large scale strategic sites there may be an expectation that a future local plan will need to place considerable attention on allocating small sites, though Neighbourhood Plans can also allocate smaller sites as well.
- 5.9 Paragraph 71 of the new guidance highlights what are termed “*entry-level exception sites*” suitable for first time buyers (or those looking to rent their first home) – they are specifically for affordable housing. These should **not** be allocated sites and should adjoin settlements (hence why they are “exceptions” and in an East Devon context such sites could be expected, assuming we follow policy approaches used in the past, to be outside of but well related to Built-up Area Boundaries).
- 5.10 At paragraph 72 of the revised NPPF highlights scope for significant numbers of new homes at new settlements or extensions to existing villages and towns. There is the potential for GESP to make new settlement provision as the Cranbrook Plan will include policy for new town expansion.
- 5.11 From paragraph 73 onward the revised NPPF includes new wording under the heading of – Maintaining supply and delivery. Strategic policies should set out a trajectory showing expected housing delivery and this could extend to delivery for individual sites (it should be noted that this is already work undertaken by the Council). Five year housing land supply figures should also continue to be provided though where strategic policies are over five years old the assessment should be against local housing needs test, rather than plan policy targets. There is now also scope to establish local position statements on housing delivery that can be used in respect of five year land supply assessment.
- 5.12 What will be new, going forward, is a Housing Delivery Test. Paragraph 75 of the revised NPPF advises:
- “75. To maintain the supply of housing, local planning authorities should monitor progress in building out sites which have permission. Where the Housing Delivery Test indicates that delivery has fallen below 95% of the local planning authority’s housing requirement over the previous three years, the authority should prepare an action plan in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future years.”*
- 5.13 Housing Delivery Test results will be published by the Ministry of Housing Communities and Local Government and it is assumed they will be undertaking the formal assessment. The first Housing Delivery Test test results will be published in November 2018. The Council will need to undertake delivery assessment each year and if delivery falls short,

below defined levels, will need to prepare an action plan. There may be a case for preparing an action plan to promote delivery in East Devon regardless of delivery levels. There are a number of major housing sites concentrated in the western part of East Devon, largely under the control of a limited number of major housebuilders, and the comparative dominance of these limited players in a geographical close knit area could be seen to warrant a particular focus of attention.

- 5.14 Paragraph 79 replaces the old paragraph 55 in identifying circumstances where isolated homes in the countryside will be permitted. The new NPPF has the same circumstances as before but with an additional one where “*d) the development would involve the subdivision of an existing residential dwelling...*”.

## **6 Section 6 of the NPPF – Building a strong, competitive economy**

- 6.1 The revised NPPF highlights the importance of creating conditions for businesses to invest, expand and adapt, it highlights the importance of creating policies tailored to local circumstances including identifying sites for investment and development. Reference is made to supporting a prosperous rural economy.
- 6.2 Paragraph 84 states that planning policies and decisions should recognise that local business and community needs may need to be met through locations not well served by public transport and that development of previously developed land in rural areas should be encouraged.

## **7 Section 7 of the NPPF – Ensuring the vitality of town centres**

- 7.1 Section 7 of the revised NPPF provides policy on the vitality of town centres; it does so, however, within the context of a national picture of many town centres and particularly shops and retail premises struggling, though the town centres of East Devon appear more prosperous and buoyant than those in some parts of England.
- 7.2 The revised NPPF sets out guidance on policy making to support and enhance town centre role and function and also on consideration of retail planning applications.

## **8 Section 8 of the NPPF – Promoting healthy and safe communities**

- 8.1 The revised NPPF highlights the importance of healthy, inclusive and safe places including through provision of mixed-use developments, neighbourhood centres, street layouts that promote pedestrian and cycle connections and active frontages. Measures to avoid crime and promoting healthy lifestyles also feature as headline messages.
- 8.2 Access to high quality open and recreation space and need assessments are afforded their own sub-section in the NPPF with specific reference to avoidance of loss of facilities. Reference is also made to long term designation of Local Green Space, though with tests of proximity to communities, specialness and being local in character highlighted.

8.3 In Paragraph 94 the revised NPPF highlights the importance of choice of school places to meet community needs. Proactive approaches that will widen choice are encouraged and planning authorities, the NPPF sets out, should:

*“a) give great weight to the need to create, expand or alter schools through the preparation of plans and decisions on applications; and*

*b) work with schools promoters, delivery partners and statutory bodies to identify and resolve key planning issues before applications are submitted.”*

## **9 Section 9 of the NPPF – Promoting sustainable transport**

9.1 Section 9 of the revised NPPF addresses the issue of promoting sustainable transport, highlighting opportunities to promote walking, cycling and public transport. Significant development is to be focussed on locations that minimise the need to travel and offering a choice of travel modes.

9.2 Paragraph 109 states the following and clarifies that there no longer needs to be a severe impact on highway safety for planning applications to be refused:

*“109. Development should only be prevented or refused on highway grounds if there would be an unacceptable impact upon highway safety, or the residual cumulative impacts on the road network would be severe.”*

## **10 Section 10 of the NPPF – Supporting high quality communications**

10.1 Section 10 of the revised NPPF stresses the importance of having advanced, high quality and reliable communications infrastructure. Next generation mobile technology (such as 5G) and full fibre broadband connections are promoted. Paragraph 116 of the NPPF, in respect of electronic communication considerations advises:

*“116. Local planning authorities must determine applications on planning grounds only. They should not seek to prevent competition between different operators, question the need for an electronic communications system, or set health safeguards different from the International Commission guidelines for public exposure.”*

## **11 Section 11 of the NPPF – Making effective use of land**

11.1 Section 11 of the revised NPPF addresses the importance of making effective use of land and amongst other matters reiterates the importance of making use of previously-developed or ‘brownfield’ land. In support of initiatives and proactive actions in using land the revised NPPF advises at paragraph 119:

*“119. Local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs, including suitable sites on brownfield registers or held in public ownership, using the full range of powers available to*

*them. This should include identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers .....*”

- 11.2 Paragraph highlights density considerations and at 123 c) re-introduces reference to the need to make an efficient use of land stating the following:

*“123. Where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:*

*a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. This will be tested robustly at examination, and should include the use of minimum density standards for city and town centres and other locations that are well served by public transport. These standards should seek a significant uplift in the average density of residential development within these areas, unless it can be shown that there are strong reasons why this would be inappropriate;*

*b) the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range; and*

*c) local planning authorities should refuse application which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).”*

## **12 Section 12 of the NPPF – Achieving well-designed places**

- 12.1 An increasing importance attached to design considerations has been one area that has been widely commented on in the revised NPPF. The opening text of Section 12, at paragraph 124, advises:

*“124. The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.”*

- 12.2 Securing high quality design is seen as one means by Government to gain greater public support for new development, especially new house building. Neighbourhood plans are

seen as having a key role to play and use of visual tools such as design guides and codes are promoted as is early and ongoing consultation with local communities.

- 12.3 How far the new emphasis upon design can be used to justify the refusal of planning applications will not be determined until it has been tested a number of times on appeal.

### **13 Section 13 of the NPPF – Protecting Green Belt land**

- 13.1 As there is no Green Belt land in East Devon or in close proximity and very minimal chance of establishment of one no comments are made on this section of the revised NPPF. The nearest designated Green Belts are at/around the conurbations centred on Bristol/Bath and Bournemouth/Poole.

### **14 Section 14 of the NPPF – Meeting the challenge of climate change, flooding and coastal change**

- 14.1 Section 14 of the revised NPPF commences by identifying the need for transition to a low carbon future taking full account of flood risk and coastal change with relevant provision for mitigation and adaption. At Paragraph 152 the NPPF places weight on neighbourhood plans, in renewables planning, by setting out that:

*“152. Local planning authorities should support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning.”*

- 14.2 Decision making in relation to flood risk remains unchanged. *However, paragraph 166 advises of taking account of the UK Marine Policy Statement and marine plans. The South Marine Plan, includes the inshore and offshore waters between Folkestone in Kent and the river Dart in Devon and therefore all of sea East Devon, was produced by the Marine Management Organisation and was formally adopted by Government on the 17th of July 2018.*

- 14.3 At Paragraph 167 the revised NPPF advises:

*“167. Plans should reduce risk from coastal change by avoiding inappropriate development in vulnerable areas and not exacerbating the impacts of physical changes to the coast. They should identify as a Coastal Change Management Area any area likely to be affected by physical changes to the coast, and:*

*a) be clear as to what development will be appropriate in such areas and in what circumstances; and*

*b) make provision for development and infrastructure that needs to be relocated away from Coastal Change Management Areas.”*

## **15 Section 15 of the NPPF – Conserving and enhancing the natural environment**

- 15.1 In section 15 the revised NPPF highlights that planning policies and decisions should contribute to and enhance the natural and local environment. Key assets that should be protected and enhanced are identified including landscapes, countryside and coast; these areas, of the highest quality, are all present in East Devon.
- 15.2 Decision making in relation to the natural environment remains unchanged with the same, if not greater emphasis, on the need to give great weight to conserving and enhancing landscape and scenic beauty of Areas of Outstanding Natural Beauty.

## **16 Section 16 of the NPPF – Conserving and enhancing the historic environment**

- 16.1 In section 16 of the revised NPPF the importance of heritage considerations are stressed with the need to set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. There is a heritage strategy for East Devon in production that is proposed to be presented to Strategic Planning Committee.
- 16.2 Decision making in relation to heritage assets remains unchanged.

## **17 Section 17 of the NPPF – Facilitating the sustainable use of minerals**

- 17.1 Section 17 of the revised NPPF stressed the importance of the supply of minerals and highlights a number of considerations that are applicable in respect of minerals planning. However as Devon County Council are the mineral planning authority covering East Devon further comment is not made.

## **18 Annex 1: Implementation and Annex 2: Glossary**

- 18.1 The revised NPPF concludes by way of two annexes, the first on implementation advises that the NPPF should be taken into account in considering applications from the day of publication (24 July 2018), i.e. it is already in use. The revised NPPF advises of early planning policy review but in paragraph 23 also sets out that:

*“213. .... existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them, according to their degree of consistency with this Framework (the closer the policies in the plan to the policies in the Framework, the greater the weight that may be given).”*

- 18.2 Of relevance is that the revised NPPF at paragraph 214, in Annex 1, advises that:

*“214. The policies in the previous Framework will apply for the purpose of examining plans, where those plans are submitted on or before 24 January 2019.”*

With a footnote that states:



*“For neighbourhood plans, ‘submission’ in this context means where a qualifying body submits a plan proposal to the local planning authority in accordance with regulation 15 of the Neighbourhood Planning (General) Regulations 2012.”*

18.3 The Cranbrook Plan is likely to be submitted for examination after the 24 January 2019. However, there may be Neighbourhood Plans where the timing is such that they will still be examined under the previous (2012) NPPF.

18.4 The most notable change to the Glossary at Annex 2 is the change to the definition of Affordable Housing, as commented on earlier in this report. There is, as well, a notable change in respect of housing delivery. Under the “*Deliverable*” definition it is advised that

*“Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.”*

18.5 Whilst we have previously looked at site delivery timing for all sites, and noted that some may not see completions in a five year time timeframe, there will be a greater onus on more formally setting out justification for house building delivery timescales in the future.

## **19. Planning Practice Guidance**

19.1 In addition to the changes to the NPPF the government has also updated the Planning Practice Guidance which is a more detailed on-line document that provides detail about the implementation of the NPPF. The guidance is regularly updated and will continue to be updated over time in response to the above mentioned changes to the NPPF. The guidance has however been significantly updated already in terms of issues of viability and so it is worth considering those changes in more detail.

19.2 The government intend that viability assessment work is primarily undertaken at the plan making stage. The onus is on local authorities to undertake robust viability assessments to ensure that policies are realistic and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan. Similar individual allocations should be assessed to ensure that they are viable and deliverable taking into account expected levels of affordable housing and infrastructure needs. Site promoters are similarly expected to engage in the plan making process and to take into account the costs of delivery in their own profit expectations and risk assessments ensuring that their proposals are policy compliant. The implications of all of this mean a significant amount of more detailed assessment of sites at the plan making stage than would previously have been undertaken. If however this ensures that sites are viable and deliverable then clearly this would be beneficial, however there is a significant risk that things will have moved on by the time a planning application for the site is submitted and viability work undertaken at the plan making stage may by that stage be redundant.

19.3 Having undertaken the detailed viability work at the plan making stage it will be assumed that planning applications that comply with the policies of the plan will be viable. It will therefore be for the applicant to demonstrate whether particular circumstances justify the need for a re-assessment of viability and where this is proven it will be based on the work that informed the plan with the applicant providing evidence of what has changed in the

meantime. This change appears to strengthen the local authority's ability to resist viability challenges other than where clear unforeseen issues arise.

- 19.4 The guidance now gives clearer guidance on land values with these to be based on the existing use value of the land plus a premium for the land owner. It is however difficult to understand what an appropriate premium will be and this is likely to continue to vary on a case by case basis taking into account factors such as abnormal costs, sales values and policy. We also need to be mindful that most sites in East Devon will be greenfield sites where the established use is agricultural and the existing use value is very low compared to residential value. Therefore what constitutes an appropriate premium will remain a significant issue.
- 19.5 Openness and transparency on viability issues is also clearly part of the guidance now with the expectation being that appraisals are publicly available other than in exceptional circumstances. This aligns with the approach taken in our now adopted SPD on Planning Obligations.

**Report to:** Strategic Planning Committee  
**Date of Meeting:** 4 September 2018  
**Public Document:** Yes  
**Exemption:** None  
**Review date for release**



**Agenda item:** 10

**Subject:** Statement of Community Involvement (SCI)

**Purpose of report:**

To advise Members of the outcome of consultation on the updated Statement of Community Involvement and propose that it be adopted.

**Recommendation:** That Members agree that

1. The Statement of Community Involvement be adopted subject to minor amendments as set out in the table at paragraph 3.1 and as updated arising from the consultation

**Reason for recommendation:** To ensure that this Council meets its legislative requirements and the community and other interested parties are able to fully participate in the planning process.

**Officer:** Claire Rodway, Senior Planning Officer, Planning Policy

**Financial implications:** No financial implications.

**Legal implications:** The requirement to review and maintain an up to date Statement of Community Involvement to reflect legislative and other changes is met by adoption of the revised Statement. Other legal implications are covered in the report.

**Equalities impact:** Medium Impact

The SCI establishes how, when and where the local community and other interested parties are able to become involved in the planning system. Certain groups with particular needs or constraints, for instance disabled, elderly, low income, rural, may find it difficult to participate unless the process is flexible and takes account of these issues. To be inclusive it is proposed that material is made

available in a range of formats and responses are accepted in a variety of ways.

**Risk:** Low Risk

The risk considerations associated with this report are low.

**Links to background information:**

- The previous SCI can be accessed here <http://eastdevon.gov.uk/media/344008/statement-of-community-involvement-2013.pdf>
- The revised SCI can be accessed here [S:\Planning\\_Countryside\Planning Policy\A Local Devt Framework\06 Statement of Community Involvement\06 2018 revised SCI\2018 SCI v4.pdf](S:\Planning_Countryside\Planning Policy\A Local Devt Framework\06 Statement of Community Involvement\06 2018 revised SCI\2018 SCI v4.pdf)
- The NPPG advice is here <https://www.gov.uk/guidance/local-plans--2>
- The Planning and Compulsory Purchase Act (2004) is here <http://www.legislation.gov.uk/ukpga/2004>

**Link to Council Plan:** Living and Working in this outstanding place.

## 1 Introduction

1.1 Members will recall that they agreed to consult on a new Statement of Community Involvement (SCI) at the meeting on 26 June 2018. This is a document that Local Planning Authorities are required to produce, setting out how the Council will consult the local community and other interested parties on

- Planning Policy documents (including Local Plans, Supplementary Planning Documents and other guidance),
- Neighbourhood Plans and
- Planning Applications.

An SCI states who the council will consult with, when and how. It provides an opportunity to ensure that the particular needs of 'hard to reach' groups are taken into account, making the planning system more inclusive.

1.2 The National Planning Practice Guidance states that:

*“Section 18 of the Planning and compulsory Purchase Act 2004 requires local planning authorities to produce a Statement of Community Involvement, which should explain how they will engage local communities and other interested parties in producing their Local Plan and determining planning applications. The Statement of Community Involvement should be published on the local planning authority’s website”*

## 2 Outcome of Consultation

- 2.1 The timescale for the consultation to be undertaken and reported to Members is tight due to the need to progress the SCI ahead of consultation progressing on various policy documents including Baxter’s Farm Development Brief, the Heritage Strategy, the Areas of Special Control of Advertisements and Coastal Change Management Areas. The SCI consultation ran from Tuesday 3<sup>rd</sup> July to Wednesday 15<sup>th</sup> August 2018.
- 2.2 To comply with the Data Protection Act, private individuals were contacted only if they had specifically requested notification but a wide range of statutory consultees, voluntary bodies, representative organisations, Parish Councils, adjoining authorities, agents and businesses who expressed an interest were contacted directly. To bring the consultation to the attention of the public and other interested parties, a press release was issued, the document was advertised on the EDDC website and local libraries were notified.

## 3 Responses to the consultation

- 3.1 In order to protect anonymity, individual respondents are not identified in the following table of comments received. Full text (with personal details redacted) is available on the EDDC website:

<b>Respondent</b>	<b>Summary of comments</b>	<b>Changes to the SCI proposed in response to representation</b>
Devon Countryside Access Forum	Support approach suggested	None
Equality and Human Rights Commission	Due to lack of resources, only able to respond to matters of strategic importance	None
Greater Exeter Strategic Plan	It might be useful to specifically state that the East Devon SCI doesn’t apply to GESP, which will have its own bespoke SCI, jointly adopted by the four GESP councils	<b>Agreed- Add “The Greater Exeter Strategic Plan is subject to its own SCI, jointly adopted by the four GESP authorities” to the first para.</b>
Marine Management Organisation	General comments relating to MMO, no changes to SCI required	None
Natural England	Support the SCI principles, no changes required	None
Paul Weston (consultant)	Concerned that some sections of the Council do not respond to Neighbourhood Plan consultations at the right stage so can’t be taken into account. They also give the Examiner an unfair negative	Internal consultation is already undertaken in accordance with the SCI and the NP protocol. It is not appropriate to amend these documents but Officers will stress the importance

	impression without the NP group being able to resolve issues.	of timely responses when consulting internally.
South West Water	Content noted	None
Blue Cedar Homes	<p>Pre-application section- (summarised)</p> <p>Applicants should have more flexibility as to how pre-submission consultation is carried out. Rather than requiring a manned exhibition there should also be alternative options for a dedicated consultation website and the local community advised by public notice. Those without web access could view paper copies held by the Parish Council. Static exhibitions limit attendance due to their opening hours and accessibility, most people now have 24 hour web access.</p>	<p>Development Management procedures, based on best-practice which has been followed for a number of years, require pre-application consultation on major schemes to be undertaken in several ways (online, manned exhibition and through the Parish Council) to ensure that all affected parties have an opportunity to view and discuss proposals face-to-face. As the District Council is not responsible for the content of this consultation, the quality and availability varies between applicants and a range of methods increases participation rates. A manned exhibition provides the community with the opportunity to discuss and clarify the proposals directly with the Developer who is then able to discuss and understand their concerns. Written and electronic material are very useful consultation tools but feedback from previous consultation has been that face-to-face discussion is beneficial to those who are directly affected by major proposals, particularly if they can't access the internet or would like the proposals explained to them.</p> <p>Consultation should apply to all major sites as, even if they are allocated, it provides an opportunity to influence the design and detail.</p> <p><b>Agree that 'major' should be clarified- add "Major sites are defined in the Local Plan as 10 or more dwellings or, for other uses, 1000 square metres or 1 ha or more".</b></p>
Waddeton Park Ltd	<p>Pre-application section- (summarised)</p> <p>The SCI should define 'major site'</p> <p>If a site has been allocated within either the Local Plan, Villages Plan, Neighborhood Plan or other planning policy document further community consultation should not be required. The consultation process in the SCI for planning policy documents is comprehensive and will have given all parties ample opportunity for comment on proposals that become allocations. A requirement that would require a staffed public exhibition seems excessive, a duplication and places unnecessary financial burdens on the applicant. A blanket policy covering every "major" application seems excessive and goes well beyond what is required by national guidance and is not justified.</p>	<p>Consultation should apply to all major sites as, even if they are allocated, it provides an opportunity to influence the design and detail.</p> <p><b>Agree that 'major' should be clarified- add "Major sites are defined in the Local Plan as 10 or more dwellings or, for other uses, 1000 square metres or 1 ha or more".</b></p>
Blackdown Hills AONB	(Summarised)- as a significant part of the District is covered by the Blackdown Hills and East Devon AONBs, could the AONB Partnerships be included as a specific example under the 'General Consultation Bodies' (page 17/18)	<b>Agreed. Include the AONB Partnerships as a specific example.</b>
All Saints Parish Council	<p>Planning application section states that</p> <p>" Parish Council's will usually be notified of planning applications...".</p>	<b>Agreed. Delete 'usually' from the text.</b>

	Request that 'usually' be deleted as PC's should always be consulted.	
West Hill Parish Council	<p>(Summarised)- Development Management</p> <p>Advertisement-</p> <ul style="list-style-type: none"> <li>Residents often unaware of planning applications so don't comment.</li> <li>A site notice is most effective way of advertising, please use them more often. If resources prevent this, ask/require the applicants to post a notice themselves</li> <li>Write to less immediate neighbours more frequently</li> </ul> <p>Pre-submission consultation-</p> <ul style="list-style-type: none"> <li>Support the requirement for pre-submission consultation for major applications. We ask that particular attention is given to requiring the applicants to demonstrate how the issues raised through the consultation have been addressed.</li> <li>Some minor applications, have a large impact on residents eg change of use of local shop. The development management team should (and have) use their discretion to recommend pre-submission consultation in such cases, and that a statement to this effect be added to the SCI.</li> </ul>	<p>These are matters for Development Management to consider in their service operation. It is not appropriate to amend the SCI but Officers will stress the importance of the issues raised internally.</p> <p>The PC's concerns are appreciated, but, whereas 'Major' applications have a standard definition, the Local Plan does not define minor development which has a significant local impact. This is subjective and is application-specific so a general statement is considered sufficient.</p> <p><b>Add- "Where other applications are likely to result in a significant local impact, pre-application consultation may be required"</b></p>
Whimble Parish Council	Content noted	None
Colyford Village Residents Association	<p>(Summarised)</p> <ul style="list-style-type: none"> <li>Neighbourhood Plans- Should emphasise need for community involvement in making NP's. Greater need for transparency within the local community and ensuring full local community involvement and consultation should be written into the SCI</li> <li>Development Management- The official starting point for the consultation period should begin only when all the plans and documents are publicly available on the Planning Portal.</li> <li>To address the problem of poor quality/illegible documents and plans the application should not be accepted by EDDC unless all the</li> </ul>	<p>The SCI sets out the District Councils responsibility with regard to NP's- although we voluntarily offer help and guidance our role fundamentally is to check, once the NP is submitted to us, that the consultation undertaken meets the 'basic conditions'. A separate protocol sets out exactly what EDDC is required to do at each stage and this is linked from the SCI.</p> <p>The issue of legibility is a matter for internal discussion and improvement rather than the SCI as the Plans/documents submitted comply with the legislation, it is the quality of their reproduction which is at issue.</p>

	<p>supporting documents can be made digitally available on the Portal with acceptable legibility.</p> <ul style="list-style-type: none"> <li>• The SCI should address the issue of illegible documents being provided at PC meetings</li> </ul>	
Newton Poppleford with Harford Parish Council	<p>(Summarised)</p> <ul style="list-style-type: none"> <li>• No consultations during holiday periods / summer break as this unfairly discriminates against those on holiday</li> <li>• That consultation period for significant planning policy changes be set at a minimum 6 weeks, and preferably 12 weeks</li> <li>• The consultation period should be 21 working days, as opposed to 21 days</li> <li>• Clarification of the EIA definition (Equalities Impact Assessment)</li> <li>• EDDC website is not user friendly. Data is hard to find</li> <li>• The word 'usually' should be removed from DMC section in relation to parish council planning application consultations</li> </ul>	<p>Consultation periods are established by legislation and this also sets out the time limits within which planning applications should be determined. It is not possible to routinely delay planning application consultation to accommodate holiday periods, although they may be extended depending on individual application circumstances. Consultation on policy documents is usually timed to avoid holiday periods, or extended to allow extra response time.</p> <p><b>Agreed- an extra line defining EIA should be added.</b></p> <p><b>Agreed. Delete 'usually' from the text.</b></p>
Janvrin Edbrooke (consultant)	<p>(Summarised)-</p> <p>The Neighbourhood Planning section should be updated to refer to Neighbourhood Development Orders. A list of detailed points is then provided.</p>	<p><b>Agreed. Update the Neighbourhood Planning section to include NDO's, although this will be a brief overview</b></p>
Member of Public	<p>(Summarised from very detailed comments)-</p> <p>The representor raises concerns at the way current and proposed consultation and decision making are undertaken and suggests appropriate processes to address their concerns. This includes matters such as ensuring summaries include all relevant points, fully taking statutory consultees (and others) comments into account, independent scrutiny to ensure accuracy of information, waiting for all consultation feedback before determining applications and better training for Members. The full text is available to view on the EDDC website.</p>	<p>It is agreed that consultation needs to be transparent, inclusive and accurately interpreted and reported. The SCI sets out the minimum requirements and is written with the expectation that these will be exceeded and that data will be handled and reported appropriately. The detailed comments made in the response will be discussed internally as they are matters of good practice rather than issues to be addressed specifically through the SCI.</p>
Otter Valley Association	<p>(Summarised)- Development Management</p> <ul style="list-style-type: none"> <li>• The SCI doesn't define MAJOR applications. What would be</li> </ul>	<p><b>Agree that 'major' should be clarified- add "Major sites are</b></p>



	<p>“major” in one of the East Devon villages is very different to that which is “major” in one of the towns. Eg. the impact of 5 houses in a village can have a major impact but can easily be assimilated into a town.</p> <ul style="list-style-type: none"> <li>• It is essential that no pre-application advice is hidden and should be fully disclosed. Lack of transparency flouts the general principles of the Nolan Principles which apply to all those in public office. These documents should always be made available with the validated planning application.</li> <li>• The SCI does not address retrospective planning applications. There is no consultation put forward of how to deal with this problem.</li> </ul>	<p><b>defined in the Local Plan as 10 or more dwellings or, for other uses, 1000 square metres or 1 ha or more”.</b></p> <p>It is not always appropriate to disclose information, for example where it is exempt under the Freedom of Information Act (FOI) or Environmental Information Regulations (EIR) or is commercially sensitive.</p> <p>Where retrospective applications are received they are treated in the same way as other applications so it is not necessary to amend the SCI. Enforcement procedures are not addressed in the SCI as they are not subject to public consultation.</p>
<p>Transition Exmouth</p>	<p>(Summarised)-</p> <p>Consultation should avoid public holidays as this dilutes public participation and awareness. There should be a Policy applicable to EDDC and applicants.</p> <p>P13- Applications should be advertised by all three of the stated methods in every case.</p> <p>P13- 'Depending on the circumstances' is too vague a criteria. Suggest instead 'Where the development would have an impact beyond the immediate locality or might be of concern to a wider section of the public'. On-line alerts option should be more widely publicized.</p> <p>P13- add a section: 'Major Planning Applications', under which:</p> <p>'To the extent that the law permits, the Planning authority will urge applicants for major developments to set aside 10% of the public relations budget to fund those objecting to the application'.</p>	<p>Policy consultations avoid public holidays where possible, where it is unavoidable then the consultation period is usually extended. Legislation does not require all 3 consultation methods on every application and, whilst EDDC usually apply all 3, it is not always possible/practical.</p> <p><b>Agree – replace text with 'Where the development would have an impact beyond the immediate locality or might be of concern to a wider section of the public'</b></p> <p>There is no power to require applicants to fund objections to the application.</p>

## 4 Conclusion

- 4.1 Adoption of the SCI will ensure that the requirements to keep the SCI up-to-date, and include reference to Neighbourhood Plans and the Local Development Scheme, are met.

**Report to:** **Strategic Planning Committee**

**Date of Meeting:** Tuesday 4 September 2018

**Public Document:** Yes

**Exemption:** None

**Review date for release** None

**Agenda item:** 11

**Subject:** **Interim Masterplan to support planning applications at the Exeter Science Park and the adjacent Redhayes development to facilitate a potential land use exchange.**

**Purpose of report:** To seek Members endorsement of the interim Masterplan to be used to guide and inform two planning applications to ensure that, in the event of a land exchange, the new development coming forward is compatible and complementary to the Science Park and the adjacent mixed use development at Redhayes.

**Recommendation:** **1. That Members consider the Interim Masterplan and endorse it for the purposes of informing decision making at Science Park until a final updated Masterplan is adopted.**

**Reason for recommendation:** To give corporate weight to the interim Masterplan to allow it to guide and inform two planning applications to ensure that, in the event of a land exchange, the new development coming forward is compatible and complementary to the Science Park and the adjacent mixed use development at Redhayes

**Officer:** Andy Carmichael, Major Projects Team Leader

Email: [acarmichael@eastdevon.gov.uk](mailto:acarmichael@eastdevon.gov.uk)

Tel: 01395 571681

**Financial implications:** No financial implications at this stage.

**Legal implications:** There are no legal implications arising from this report.

**Equalities impact:** Low Impact

The endorsement of the interim Masterplan will not have specific equalities impacts

**Risk:** Medium Risk

There is a risk that without a clear masterplan that considers and controls the impact of additional residential and science park development on these respective developments could result in a poorly integrated development that lacks cohesiveness.

**Links to background information:** [Interim Masterplan Report](#)

**Link to Council Plan:** Encouraging communities to be outstanding.  
Developing an outstanding local economy



## Report in full

### 1. Background

- 1.1 Outline planning permission was approved in 2010 for the development of a science park of about 76,000 sqm, including a hotel and ancillary uses. The approved uses were essentially Research and Development under the Gateway policy applied to the park. The science park has developed since then with a number of buildings erected and being constructed, including infrastructure such as roads, parking and landscaping.
- 1.2 On land immediately to the east of the science park, planning permission was granted in 2013 for a mixed use development of up to 580 houses, offices, park and ride, local centre, health and fitness centre, open space, parking and associated landscaping and servicing (the site known as Redhayes). The development included the Tithebarn Link Road which has now been constructed and recently residential development has started to the north end of the site.
- 1.3 The science park planning permission was granted on the basis of providing a cluster of buildings set in a parkland setting to have a campus feel to the development with the main centre being around Babbage Way where the Science Park Centre is located. There is an approved masterplan and a series of cluster design codes to secure the parkland setting.
- 1.4 The Redhayes site has a series of parameter plans to control the development with predominantly the residential to the north and the more commercial uses to the south.
- 1.5 The north east section of the consented science park has not been developed to date and the land is owned by Eagle-One, except for the Sunny Mead Kennels. This land is marked by the Redhayes development to the east, Langaton Lane to the west, Blackhorse Lane to the south and the Tithebarn Link Road to the north. In addition the land to the east of the Science Park Centre is also owned by Eagle-One and is marked by Blackhorse Lane to the north, the old A30 London Road to the south, the Science Park to the west and Tithebarn Link Road to the east. The site is bisected by Anning Road. See attached plan.
- 1.6 The land in question to the north of Blackhorse Lane is shown as forming part but not all, of two approved science park clusters: to the north end the Langaton Lane cluster and to the southern end, the Science Park Centre cluster which has recently been amended to the Anning Drive Cluster.
- 1.7 The land to the south of Blackhorse Lane has outline planning permission for up to 8,850 sqm of office development as part of and to help serve the mixed use Redhayes development and includes a Park and Ride site. There is currently a reserved matters application for the Park and Change.
- 1.8 Eagle-One and the Science Park Company propose to move the science park development on the land to the north of Blackhorse Lane and relocate this use onto the land to the south of Blackhorse Lane and exchange the approved science park use for a residential use as an extension to the Redhayes development on the land to the north of Blackhorse Lane.

1.9 The proposed land swap will require the benefit of planning permission and it is likely that two outline planning applications will be submitted for residential to the north of Blackhorse Lane and for science park use on the land to the south of Blackhorse Lane.

## 2. The purpose of the Interim Masterplan

2.1 Both proposals would result in an extension and/or change to the respective science park and Redhayes developments and cannot be considered in isolation.

2.2 The Science Park gained planning permission in 2010 and this was accompanied by an Environmental Statement. Since then a number of both full and reserved matters applications have been approved, often requiring changes to be made to the original planning permission to accommodate the particular development. The Environmental Statement is now old and can't be fully relied on to accurately assess the current environmental effects. Over time, the Science Park has evolved to reflect changing circumstances and consequently, the original planning permission is increasing out-of-date and struggling to perform for the delivery of the science park in today's market.

2.3 Both sites are intimately related to the Science Park and the Redhayes developments and should therefore be considered as part of the wider development and consider the changing context of work place environments.

2.4 Therefore the purpose of this interim masterplan is to provide a high level conceptual framework to consider how the main aspects of the proposed land swap should perform to allow the planning applications to be prepared and determined.

2.5 In terms of the tight timescales for the land swap, the interim masterplan will help facilitate this through the planning applications coming forward shortly. However, in the longer term, the original outline planning permission and Environmental Statement are becoming increasing out-of-date and it is envisaged that a more comprehensive review of the overall masterplan will be needed.

## 3. The interim Masterplan

3.1 The interim masterplan considers the original masterplan on the outline planning permission and relates this to the strategic changes happening to employment/workplace and technology since the original masterplan together with the local context changes to the area in terms of the development coming forward. This informs the update of the vision to create an urban village with the surrounding new development, developing key attributes of good connectivity, a hub of knowledge and a gateway to greenness through Green Infrastructure and supporting healthy living. There are a number of key drivers identified to shape the future of the science park which present a complex range of issues for the revised conceptual framework to establish an overall placemaking idea to organise, prioritise and guide design development decisions later in the process.

3.2 The aim is to overcome the barriers to good placemaking when considering two large developments merging separately in an unrelated way whilst creating recognisable different uses but defined by innovation.

3.3 The interim masterplan therefore comprises a series of diagrams referring to high level performance relating to strategic and local connectivity, principal land uses and development character and edges. The interim masterplan does, however, need to ensure there is sufficient flexibility to respond to site constraints and market demand. It is

not the purpose of this report to outline in detail the interim masterplan as this is linked to this report.

#### 4. Consultation and engagement.

4.1 As part of the process, two workshops have been held and consultation has taken place with the key stakeholders. A draft of the interim masterplan was produced and key stakeholders consulted. Some concerns were raised and fed back to the consultants and a further meeting was held to discuss the outstanding concerns of the stakeholders. Following this, amendments and clarification were made to the draft interim document to accommodate where possible the views of the stakeholders. The revised draft interim masterplan is appended to this report. Stakeholders have responded with some proposed minor tweaks and typos which will need to be addressed prior to formal endorsement of the document.

#### 5. Conclusion

5.1 The process of producing this interim masterplan has gone through two workshops with the relevant parties and has evolved to this stage. The relevant parties have been consulted on the various drafts and comments received were considered.

5.2 An endorsement of the interim masterplan is being sought which will provide a high level conceptual framework to guide the specific planning applications for the proposed land swap in the context of the wider issues for the future way forward and relationship between the two major developments.

Proposed Land swap areas

